

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORMWATER RATE BOARD

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater, and Stormwater Rates and Related Charges : Fiscal Years 2026 – 2027 Rates and Charges to Become Effective September 1, 2025 and September 1, 2026

Lance Haver Discovery Requests
&
Requests for Production of Documents

Set I to the Philadelphia Water Department

- LH-1-1 Please list the names and positions of all PWD employees in the cost containment Committee and/or Group.
- LH-1-2 Please list the names and positions of all PWD employees in the lowering procurement costs Committee and/or Group
- LH-1-3 Please list all successful programs implemented by the Cost Containment Group; the amount of money saved and how it was saved
- LH-1-4 Please list all the successful programs implemented by the lowering procurement costs group, how much was saved and how it was saved.
- LH-1-5 Please provide a list of all PWD vendors with employees living in Philadelphia; the amount of the money spent with each of those vendors and the percentage of all expenditures spent on those Philadelphia Vendors
- LH-1-6 Please provide how much excess capacity PWD has in its infrastructure and agreements, with excess capacity defined as the difference between what is being currently used and what could be used if there was additional demand, in both water and sewer capacity
- LH-1-6 Please list the employee (s) and their official title (s) tasked with identifying businesses with the need for water in their processing and all the reports the employee (s) provided to the City's Commerce Director
- LH-1-6 Please provide the incentive rates offered new businesses to locate in the City of Philadelphia, how long the incentive rates are in effect, how the incentive rates compare with other water utilities' incentive rates, and the basis for setting the incentive rates

- LH-1-7 Please provide the title(s) of the person (s) tasked with developing the incentive rates
- LH-1-8 Please provide the amount, in total, PWD is billed for the operations of the Water Rate Board, including, but not limited to any and all lawyers it contracts with, consultants it contracts with and operating expenses
- LH-1-9 Please explain who at PWD reviews the invoices or requests for payments made by the Water Rate Board
- LH 1-10 Please explain who at PWD evaluates the requests and how she/he decides which request should be paid and which should be rejected
- LH-1-10 Please list all the outside legal counsels PWD contracts with, by name and for how many years PWD has contracted with those lawyers
- LH-1-11 Please explain who at PWD decides which lawyers to contract with and what criteria she/he uses to decide which lawyers
- LH-1-12 Please list all of the lawyers PWD is using who have represented clients opposing rate increases
- LH-1-13 Please list the amounts paid to each law firm and/or lawyer for legal fees budgeted for this rate increase; and the amount budgeted and spent in the last rate case.
- LH-1-14 Please list the name of and the amount of the contributions given to Federal and/or State/and or political action committees given by any of the lawyers, law firms, or consultants
- LH-1-15 Please provide the name of the company and/or person who last preformed a management and/or operations audit for PWD.
- LH-1-16 Please provide a copy of the audit
- LH-1-17 Please provide the industry standard time between management/operations audit
- LH-1-18 Please provide the name of the consultant who reviewed operation and recommended savings for this rate case
- LH-1-19 Please provide the name of the consultant who reviews PWD procurements and recommended savings for this rate case
- LH-1-20 Please provide a list of all rate cases PWD's consultants participated in where the consultant recommended against a rate increase, the case and the year in which the consultant found ways to make a rate increase unneeded and unwarranted.
- LH-1-21 Please list all the recommendations for cost savings provided by the consultants and adopted by PWD
- LH-1-22 Please list all the recommendations for cost savings provided by the consultants and not adopted by PWD
- LH-1-23 Please provide a copy of the program that offers rewards to PWD's workforce for establishing cost savings programs
- LH-1-24 Please provide the last program developed from the employee program awarding workers for developing cost savings