

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

HAVER 2<sup>ND</sup> SET OF DISCOVERY REQUESTS  
&  
REQUESTS FOR PRODUCTION OF DOCUMENTS

Haver seeks the following from the Philadelphia Water and Sewer Rate Board

LH-2-1      Please provide any and all written requests for evaluations of the entity appointed by the Philadelphia Water Sewer Rate Board (Board) sent to any elected official, civic group, union, community group, advocacy group, religious group or any group or individual

LH-2-2      Please provide the name of the person or consultant who created and/or drafted and/or wrote the request for the evaluation(s) sent to the groups listed above

LH-2-3      Please provide redacted, with the any identifying names removed, all of the evaluations collected by the Board

LH-2-4      Please provide the summation of the survey shared with all Board Members and the entity it hired and named the 'public advocate'

LH-2-5      Please provide the name of any and all consultants retained to evaluate the results of the survey(s)

LH-2-6      Please provide the name of any and all consultants retained to evaluate the work of the entity the Board hired and named "the public advocate"

LH-2-7 Please list the names and positions of the Board Committee established to evaluate the work of the entity hired by the Board and named the “public advocate”

LH-2-8 Please provide the dates and times of those committee meetings and any and all notes from the committee meetings where the evaluation (s) of the entity hired by the rate board and called the public advocate were discussed

LH-2-9 Please provide and all correspondence pertaining the hiring of the entity the Board named the “public advocate” from elected officials, civic groups, individuals or anyone contacting the Board.

LH-2-10 Please provide the Board’s written evaluation (s) of the work of the entity it hired and named the “public advocate” and the date upon which the evaluation (s) were written

LH-2-11 Please list how the Board knows if the entity it hired and calls the public advocate is representing the public other than the Board members own personal opinions

LH-2-12 If the only information the Board sought and/or has on how poorly or well the entity it hired and calls the “public advocate” represents the interest of the public is the Board’s personal opinion, please explain how the 80% of the board placed to represent interests other than the rate payers are qualified to know how well the public is being represented by the entity hired by the board