

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Charges	Fiscal Years 2022-2023
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**PHILADELPHIA WATER DEPARTMENT'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
SET V (Haver)**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Water Department ("Department" or "PWD") requests that Lance Haver provide full and complete answers to the following interrogatories and request for production of documents upon the undersigned with seven calendar days of the service hereof.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely by those officers, employees or agents of the Public Advocate who may be cognizant of the requested information and who are authorized to answer on behalf of Public Advocate. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.

2. Each answer shall restate the question and identify the name and affiliation of the person or persons who prepared the answer or who is responsible for the information contained therein.

3. Please attach written or electronic material and documents to any answer for which written or electric material and documents are requested and/or available. If such written or electronic materials and documents are not available, state where it may be obtained. Label the material and documents with the number of the interrogatory to which it pertains. Copies of all answers shall be provided in PDF and/or Excel (.xlsx or .xls) format via email. Excel spreadsheets shall be provided with data and formulae intact.

4. Answers to these interrogatories and requests for production of documents shall be made in accordance with the Hearing Officer's Procedural Rules applicable to this rate proceeding.

5. These interrogatories and requests for documents are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. PWD reserves the right to propound additional interrogatories and to request additional documents as and if additional information is required.

6. For purposes of the following requests, (a) you" or "your" means and includes Lance Haver and any person, agency or corporation whom Lance Haver has retained to provide the relevant customer service function; and, (b) the "Haver Statement" refers to your direct testimony dated March 21, 2021 in this proceeding.

Interrogatories and Requests for Production

1. Reference Paragraph 4 of the Haver Statement: Please provide the following regarding all matters in which you “have been qualified as an expert on how utility rates affect consumers”: (a) the forum of the proceeding where your testimony was given (e.g., Pennsylvania Public Utility Commission); (b) the date and docket number of the proceeding; and (c) a summary of the subject of your testimony.

2. Reference Paragraph 5 of the Haver Statement: Please provide the following regarding all matters in which you have previously filed testimony, testified, or provided any reports in any proceeding, other than this case, for the last five years: (a) the forum of the proceeding where your testimony or report was given (e.g., Pennsylvania Public Utility Commission); (b) the date and docket number of the proceeding; and (c) a summary of the subject of your testimony.

3. Reference Paragraph 6 of the Haver Statement: Please provide a copy of any testimony that you prepared or submitted in any proceeding before the “Philadelphia Gas Commission and before the various incarnations of the Philadelphia Water Rate Board” for the last five years.

4. Reference Paragraph 8 of the Haver Statement: Please provide the following for all matters in which you have been a party “before the Pennsylvania Public Utility Commission and in Pennsylvania and Federal Courts”: (a) identify the forum of the

proceeding where you participated as a “party” (e.g., Pennsylvania Public Utility Commission); (b) state the date and docket number of the proceeding or matter; (c) provide a summary of your participation the matter.

5. Reference Paragraph 12 of the Haver Statement: Please define the area of your expertise on which you are offering your expert opinion.

Respectfully submitted,

/s/ Andre C. Dasent

Andre C. Dasent, Esquire
Centre Square – East Tower
1500 Market Street, 12th Floor
Philadelphia, Pennsylvania 19102

Carl R. Shultz, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

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