

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water Department's 2022 Special Rate Proceeding	Fiscal Year 2023
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**PHILADELPHIA WATER DEPARTMENT'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO LANCE HAVER, SET I**

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 ten calendar days of the service hereof.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely by you. All information is to be divulged that is within your knowledge, possession and control or within the custody of your 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. 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.

5. For purposes of the following requests, (a) “you,” “your” or “yourself” means and includes Lance Haver who is a *pro se* participant in this proceeding; and, (b) the term “Rate Board” means the Philadelphia Water, Sewer, and Storm Water Rate Board.

Interrogatories and Requests for Production

1. Are you an attorney admitted to practice before the Supreme Court of Pennsylvania?

Response:

2. Are you an attorney admitted to practice in jurisdiction other than Pennsylvania?
If you are, please (a) state if have you sought permission from the Rate Board to appear before the Board and (b) provide a copy of document seeking permission from the Rate Board.

Response:

3. Did you, **on or before April 5, 2022**, submit written testimony to explain your concerns, issues, proposals and opinions for this proceeding? If you did not, please (a) state how you intend to inform the Rate Board of your concerns, issues, and proposals regarding this proceeding, (b) provide an explanation of your concerns, issues, and proposals regarding this proceeding, and (c) provide copies of any documents supporting your concerns, issues, and proposals regarding this proceeding.

Response:

4. To the extent that you are alleging a violation (or non-compliance) with any provision of the Philadelphia Home Rule Charter or with relevant ordinances and regulations, please provide (a) a citation to each provision in the Charter,

ordinance or regulations that you allege is being violated, and (b) a description of the time, place and manner of each violation.

Response:

5. Please identify all persons, **including yourself (if appropriate)**, that you intend to rely on as a witness to support your concerns, issues, and proposals in this proceeding, and provide the following with respect to each:
- (a) name;
 - (b) Curriculum Vitae;
 - (c) business address and personal or business affiliation;
 - (d) briefly state the subject matter of their expected testimony;
 - (e) whether or not the witness has testified or prepared direct testimony related to any proceeding before the Rate Board for the last five years:

Response:

6. Will you be offering your **expert opinion** in this proceeding? If so, please (a) describe your qualifications, and (b) define the area(s) of your expertise within which you will be offering your expert opinion.

Response:

7. For each persons identified in Interrogatory No. 5 **other than yourself**, please describe the time, place and manner of their consent to provide testimony and opinions supporting your concerns, issues, and proposals in this proceeding.

Response:

8. For all persons identified in Interrogatory No. 5, please provide the following regarding for all matters in which the witness has previously filed testimony, testified, or provided any reports in any proceeding, other than this proceeding, for the last five years:

- (a) the forum of the proceeding where the testimony was given (e.g., the Rate Board or the Pennsylvania Public Utility Commission);
- (b) the date and docket number of the proceeding; and
- (c) a summary of the subject of the testimony.

Response:

9. For all persons identified in Interrogatory No. 5 please provide a copy of any testimony or report prepared or submitted with any proceeding identified in Interrogatory No. 8, other than proceedings before the Rate Board.

Response:

10. (a) For all persons identified in Interrogatory No. 5, briefly describe the subject matter of the testimony that you anticipate being provided in this proceeding.
- (b) Please provide a list of material (e.g., speeches, legislative testimony, articles, blog posts, social media posts, podcasts, etc.) published by the person(s) identified in Interrogatory No. 5 which relates to the subject matter of their anticipated testimony as described in part (a) of this Interrogatory.

Response:

11. For all persons identified in Interrogatory No. 5, please provide copies of the complete workpapers, support documentation, electronic files (including all calculation and formulae intact), and electronic versions of any documents that

the witness(es) prepared or relied upon in connection with their evaluation of the proposals set forth in the Department's Formal Notice in this proceeding.

Response:

Respectfully submitted,

/s/ Andre C. Dasent

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Dated: April 8, 2022

Counsel to Philadelphia Water Department