

**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 2024 – 2025
Rates and Charges to Become Effective
: September 1, 2023 and September 1, 2024**

**LANCE HAVER, PRO SE, DISCOVERY REQUESTS
&
REQUESTS FOR PRODUCTION OF DOCUMENTS
FROM THE PHILADELPHIA WATER**

- LH-II-1 Please list all PWD employees working at 1101 Market St. Philadelphia, PA
- LH-II-2 Please confirm or deny that PWD management offices have been in the last 5 years or are currently being renovated
- LH-II-3 If the offices are being renovated, please supply the contract for the renovations, the total cost of the renovations and who approved the renovations
- LH-II-4 Please state how many sq ft of office space PWD leases in Center City, the locations of its rental space, the square foot cost of the rentals and the terms of the rentals.
- LH-II-5 Please produce all reviews of less expensive office space conducted by PWD and/or its consultants; and written correspondence with relators seeking lower rents, written before this current rate increase was filed
- LH-II-6 Please produce all studies and/or reviews that PWD and/or its consultants relied upon, before the rate increase was filed, that led to PWD rejecting lower cost office space leasing.
- LH-II-7 Please supply any and all cost saving strategies develop by PWD and/or its consultants before the rate increase was filed.
- LH-II- 8 Please supply any and all analyses of the cost savings strategies developed by PWD and or its consultants conducted by PWD and/or its consultants.
- LH-II-9 Please list all cost savings programs that were developed before the filing of this rate increase, the projected savings and the fiscal year in which the savings will be realized.
- LH-II-9 Please provide any and all letters to PGW seeking to discover if PGW's Headquarters has surplus space that can house PWD's management office.
- LH-II-10 Please provide any and all letters to PGW seeking to combine services, such as billing and collections, as a cost cutting strategy.

- LH-II-11 Please provide any and all strategies reviewed by PWD and/or its consultants before this rate increase was filed to lower the cost of purchasing supplies.
- LH-II-12 Please provide any and all written determination(s), created before this rate increase was filed, which reviewed proposals to save money by implementing cost saving purchasing strategies.
- LH-II-13 Please provide in what fiscal year the cost savings plan for purchasing procedures will begin and the total amount of savings.
- LH-II-13 Please provide any and all requests for proposals seeking cost savings innovations for PWD operations.
- LH-II-14 Please list any and all proposals for cost saving innovations that were accepted by PWD.
- LH-11-15 Please state in which fiscal year those savings will be achieved and the amount of the savings
- LH-11-16 Please list all request for proposals issued by PWD seeking proposal(s) to use PWD's infrastructure to generate electricity
- LH-11-17 Please list all request for proposals issued by PWD seeking proposal(s) to use PWD's infrastructure to generate renewable energy
- LH-II-18 Please provide the analysis of the proposals submitted for generating both electricity and renewable energy from PWD's infrastructure.
- LH-II-19 Please state the fiscal year in which the energy projects will be usable by PWD.
- LH-II-20 Please list the number of and names of PWD employees responsible for recruiting water intensive industry to the City of Philadelphia. Please have those employees available for cross examination.
- LH-II-21 Please list the number of businesses recruited into the City of Philadelphia, the names of the businesses and the number of jobs created.
- LH-II-22 Please list the name of any and all non PWD employees who have consulted with PWD in preparing this rate filing and/or are testifying in support of the rate increase
- LH-II-23 Please list the amount the hourly rate each consultant bills for, the total amount for each contract and if there is, a maximum amount of the contract. Please include all outside legal firms, legal firms hourly billing and any maximum amount set in the contract.
- LH-II-24 Please list any and all non PWD employees who have or are serving as consultants who either work for or whose company, firm and/or partners work or worked for for any entity that does business with PWD.
- LH-II-25 Please list the number of Philadelphia residents each of the consultants and/or their firms retain or retained under the contract with PWD

- LH-II-26 Please list the corporate headquarters for each and every firm PWD contracted with to help with this rate filing.
- LH-II-27 Please supply all of the PWD audits conducted by the Philadelphia City Controller over the last six years.
- LH-II-28 Please supply all PWD's written responses to the City Controller's audit.
- LH-II-29 Please supply any and all audits conducted by any non employee of PWD's operations conducted in the last six years.
- LH-II- 30 Please supply any and all responses to the audits conducted by non PWD employees.