

RESPONSE TO
LANCE HAVER'S INTERROGATORIES (SET II)
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-32

Dated: April 2023

1 **LH-II-1.** PLEASE LIST ALL PWD EMPLOYEES WORKING AT 1101 MARKET ST.
2 PHILADELPHIA, PA
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4 **RESPONSE:**

5 PWD communicated with Mr. Haver that it would object to providing the names of the
6 employees. That objection was resolved by agreement. In response to LH-II-1, PWD will
7 provide a list of positions and the number of employees at 1101 Market Street.
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9 The list of positions at 1101 Market Street is attached as LH-II-1.
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11 As of March 27, there were 2114 employees at PWD of which 859 positions work from
12 1101 market excluding about 38 Office of Innovation and Technology (OIT) staff.
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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-2.** PLEASE CONFIRM OR DENY THAT PWD MANAGEMENT OFFICES HAVE
2 BEEN IN THE LAST 5 YEARS OR ARE CURRENTLY BEING RENOVATED
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4 **RESPONSE:**

5 Confirm. The Department is updating its headquarters at 1101 Market Street.
6 Periodically, when necessary, limited modifications are made to accommodate current
7 needs, particularly relating to providing appropriate seating for staff.
8

9 Currently, there is a modest modernization project taking place on the 4th and 5th floors.
10 This project is to ensure the health and safety of the PWD staff and to comply with
11 current code requirements. Among the modifications taking place are the creation of an
12 accessible restroom on the 5th floor; replacement of 40-year-old light fixtures with energy
13 efficient LEDs; enlargement of the reception area to provide for social distancing when
14 guests are waiting; replacement of worn carpet that is a trip hazard; and installation of
15 cubicles that provide better social distancing for staff. The total cost of this project is
16 \$830,000 with a 5% contingency fee. See also, response to LH-3.
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18 In FY 2022, PWD updated 4 restrooms on the 5th and 6th floors and improved reception
19 areas (lobby) using primarily improvement funds made available in connection with lease
20 renewal. The cost was approximately \$100-200,000.
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22 In FY 2021, PWD renovated and added capacity to its restrooms on the 4th floor at a cost of
23 approximately \$600,000.**RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-3.** IF THE OFFICES ARE BEING RENOVATED, PLEASE SUPPLY THE
2 CONTRACT FOR THE RENOVATIONS, THE TOTAL COST OF THE
3 RENOVATIONS AND WHO APPROVED THE RENOVATIONS
4

5 **RESPONSE:**

6 The document referenced in this discovery question has been requested and will be
7 provided when available. See also, response to LH-II-2.
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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-4.** PLEASE STATE HOW MANY SQ FT OF OFFICE SPACE PWD LEASES IN
2 CENTER CITY, THE LOCATIONS OF ITS RENTAL SPACE, THE SQUARE
3 FOOT COST OF THE RENTALS AND THE TERMS OF THE RENTALS.
4

5 **RESPONSE:**

6 The leased square footage is approximately 110,000 at 1101 Market Street. The Department
7 occupies the 2nd through 6th floors at the above address pursuant to a long term lease. See
8 also, response to LH-II-5.
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10 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-5.** PLEASE PRODUCE ALL REVIEWS OF LESS EXPENSIVE OFFICE SPACE
2 CONDUCTED BY PWD AND/OR ITS CONSULTANTS; AND WRITTEN
3 CORRESPONDENCE WITH RELATORS SEEKING LOWER RENTS,
4 WRITTEN BEFORE THIS CURRENT RATE INCREASE WAS FILED
5

6 **RESPONSE:**

7 The documents referenced in the discovery question have been requested and will be provided
8 when available. Please be aware that the Department has entered into a long-term lease for the
9 premises at 1101 Market Street that pre-dates the instant rate proceeding.
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11 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-6.** PLEASE PRODUCE ALL STUDIES AND/OR REVIEWS THAT PWD
2 AND/OR ITS CONSULTANTS RELIED UPON, BEFORE THE RATE
3 INCREASE WAS FILED, THAT LED TO PWD REJECTING LOWER COST
4 OFFICE SPACE LEASING.

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6 **RESPONSE:**

7 See LH-II-5.

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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department

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1 **LH-II-7.** PLEASE SUPPLY ANY AND ALL COST SAVING STRATEGIES DEVELOP
2 BY PWD AND/OR ITS CONSULTANTS BEFORE THE RATE INCREASE
3 WAS FILED.
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5 **RESPONSE:**

6 Cost control at PWD starts with budgeting. PWD has a vigorous budget process through
7 which all program managers submit and justify their budget to senior management. During
8 the year, PWD Finance produces monthly budget monitoring reports that evaluate budget
9 performance. See PWD discovery response to PA-III-4.
10

11 As noted in PWD Statement 4, the Department has also implemented operational changes
12 with the goal of achieving efficiencies and cost savings for customers. See, PWD Statement
13 4 at 20-21. Other examples of ongoing initiatives designed to achieve operational savings
14 and efficiencies include our Northeast Water Pollution Control Plant cogeneration facility,
15 bio-solids recycling center and ongoing implementation of Advanced Meter Reading
16 Infrastructure.
17

18 As noted in PWD Statement 7, the Department request reflects the following adjustments
19 during the rate period to help manage customer bill impacts and meet the financial
20 obligations and metrics:

- 21 • Temporarily reduce the SMIP/GARP budget by \$5 million
- 22 • Setting rates to meet the interim senior debt service coverage requirement of 1.25x,
23 instead of the target 1.30 set forth under the 2018 Rate Determination.
- 24 • Leaving the Rate Stabilization Fund slightly below the \$135 Million target under the
25 2018 Rate Determination; and
- 26 • Deferring the 20% cash funding target for capital projects.
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1 As noted in Schedule FP-3 of Statement 2A, a recent reassessment of PWD's share of
2 allocable pension costs reduced PWD expenditures by approximately \$20 million annually
3 (beginning in FY 2022).

4
5 In addition, the Department has taken numerous steps to lower the cost of borrowing
6 associated with its capital program since the last general rate case, including issuing its
7 Series 2020 forward refunding bonds, Series 2020A&B refunding bonds, Series 2021B
8 refunding bonds generating \$89.4 million in present value savings and securing \$500
9 million in low-interest loans from federal/state sources.

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11 **RESPONSE PROVIDED BY:** Philadelphia Water Department

1 **LH-II-8.** PLEASE SUPPLY ANY AND ALL ANALYSES OF THE COST SAVINGS
2 STRATEGIES DEVELOPED BY PWD AND OR ITS CONSULTANTS
3 CONDUCTED BY PWD AND/OR ITS CONSULTANTS.
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5 **RESPONSE:**

6 See response to LH-II-7.
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8 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-9.** PLEASE LIST ALL COST SAVINGS PROGRAMS THAT WERE
2 DEVELOPED BEFORE THE FILING OF THIS RATE INCREASE, THE
3 PROJECTED SAVINGS AND THE FISCAL YEAR IN WHICH THE SAVINGS
4 WILL BE REALIZED.

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6 **RESPONSE:**

7 See response to LH-II-7. Examples of operational savings include those associated with the
8 bio-solids recycling center which exceed \$100 million over the life of the project. Present
9 value savings associated with the Series 2020 forward refunding bonds, Series 2020A&B
10 refunding bonds, Series 2021B refunding bonds are approximately \$89.4 million over the
11 life of the bonds. Similarly, savings associated with AMI are anticipated over the life of the
12 project.

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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-10*** PLEASE PROVIDE ANY AND ALL LETTERS TO PGW SEEKING TO
2 DISCOVER IF PGW'S HEADQUARTERS HAS SURPLUS SPACE THAT CAN
3 HOUSE PWD'S MANAGEMENT OFFICE.
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5 **RESPONSE:**

6 After reasonable investigation, no letters have been identified that are responsive to this
7 discovery request.
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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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* The questions with an asterisk have been renumbered to account for duplicate numbers in the original set of questions received.

1 **LH-II-11*** PLEASE PROVIDE ANY AND ALL LETTERS TO PGW SEEKING TO
2 COMBINE SERVICES, SUCH AS BILLING AND COLLECTIONS, AS A
3 COST CUTTING STRATEGY.
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5 **RESPONSE:**

6 After reasonable investigation, no letters have been identified that are responsive to this
7 discovery request.
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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-12***. PLEASE PROVIDE ANY AND ALL STRATEGIES REVIEWED BY PWD
2 AND/OR ITS CONSULTANTS BEFORE THIS RATE INCREASE WAS FILED
3 TO LOWER THE COST OF PURCHASING SUPPLIES.
4

5 **RESPONSE:**

6 The Department does not control procurement of goods and services. The City's
7 Procurement Department has oversight over the cost of purchasing supplies and
8 services.^[1] The Procurement Department manages and acquires goods and services for the
9 City, including the Department, using a fair, open, and cost-effective process.^[2]
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11 ^[1] Procurement is governed by the Home Rule Charter, Section 8-2000, and requires the
12 participation of the Procurement Commissioner and Director of Finance; also, local
13 bidding is governed by Section 17-109 of the Philadelphia Code and requires the
14 participation of the Procurement Commissioner.

15 ^[2] <https://www.phila.gov/departments/procurement-department/>
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17 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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LH-II-13* 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.

RESPONSE:

See response to LH-II-12.

RESPONSE PROVIDED BY: Philadelphia Water Department

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LH-II-14* PLEASE PROVIDE IN WHAT FISCAL YEAR THE COST SAVINGS PLAN
FOR PURCHASING PROCEDURES WILL BEGIN AND THE TOTAL
AMOUNT OF SAVINGS.

RESPONSE:

See response to LH-II-12.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **LH-II-15***. PLEASE PROVIDE ANY AND ALL REQUESTS FOR PROPOSALS SEEKING
2 COST SAVINGS INNOVATIONS FOR PWD OPERATIONS.
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4 **RESPONSE:**

5 Examples of recent RFPs designed to achieve operational savings and efficiencies are
6 described below:
7

- 8 • In FY23, the Planning and Research Unit issued an RFP for applied research services. One
9 of the goals of this contract is to “investigate emerging and non-standard technologies to
10 meet the ever-changing needs of the department.” Some of the tasks currently being
11 conducted under the contract include an evaluation of the collection system that could
12 allow for potential chemical savings, research into emerging technologies for ammonia
13 removal at PWD’s wastewater treatment plants (up to 60% capital cost savings over
14 conventional treatment methods), and to evaluate data management systems that could
15 help to optimize chemical usage.
- 16 • In FY23, the Planning and Research Unit also issued an RFP for energy consulting
17 services. This contract explicitly requests support for “the development and
18 implementation of energy efficiency projects that reduce... utility costs” and to “support
19 the promotion of energy conservation and efficiency within Department facilities.”
- 20 • In FY23, the Planning and Research Unit issued an RFI for Renewable Natural Gas
21 Development at Wastewater Pollution Control Plants. The purpose of this RFI was to
22 canvass the industry for “information from manufacturers, research institutions, utilities,
23 and other relevant organizations regarding their technology solutions, business models,
24 and implementation best practices” for renewable natural gas projects, which could save
25 the department money in the long run.
- 26 • Just recently, PWD issued an RFP for the purchase of a Drinking Water Treatment Pilot
27 Plant. This pilot system will allow PWD to evaluate and research different treatment
28 strategies, with one goal being a reduction in chemical usage at the water treatment plants.

- PWD also just submitted a DOE grant with only a 20% match to pilot a new form of biosolids treatment that would save well over 50% of the current process energy usage.

Please refer to the City website to find RFPs described in this response.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **LH-II-16***. PLEASE LIST ANY AND ALL PROPOSALS FOR COST SAVING
2 INNOVATIONS THAT WERE ACCEPTED BY PWD.
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4 **RESPONSE:**

5 See responses to LH-II-9 and LH-II-15 for available information.
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7 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-17*** PLEASE STATE IN WHICH FISCAL YEAR THOSE SAVINGS WILL BE
2 ACHIEVED AND THE AMOUNT OF THE SAVINGS
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4 **RESPONSE:**

5 Savings associated with projects identified in the response to LH-II-9 are ongoing and are
6 reflected in the rate filing.
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8 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-18***. PLEASE LIST ALL REQUEST FOR PROPOSALS ISSUED BY PWD
2 SEEKING PROPOSAL(S) TO USE PWD'S INFRASTRUCTURE TO
3 GENERATE ELECTRICITY
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5 **RESPONSE:**

6 The Department produces about 25% of its energy needs.^[1] The Southeast Water Pollution
7 Control Plant's solar array began operation in May 2011. Biogas created from anaerobic
8 digestion of waste sludge at two of the Department's wastewater treatment facilities is
9 used for energy needs at those treatment plants, including heating and electricity
10 generation at PWD's cogeneration facility.
11

12 These programs have been underway for a number of years. Please refer to City website
13 for any available RFPs.
14

15 [1] 50 percent of the Department's energy needs are provided by purchased electricity.
16 Natural gas accounts for another quarter of the energy used by the Department. *See*,
17 <https://water.phila.gov/sustainability/energy/>
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21 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-19*** PLEASE LIST ALL REQUEST FOR PROPOSALS ISSUED BY PWD
2 SEEKING PROPOSAL(S) TO USE PWD'S INFRASTRUCTURE TO
3 GENERATE RENEWABLE ENERGY
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5 **RESPONSE:**

6 See response to LH-II-18 for available information.
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8 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-20*** PLEASE PROVIDE THE ANALYSIS OF THE PROPOSALS SUBMITTED
2 FOR GENERATING BOTH ELECTRICITY AND RENEWABLE ENERGY
3 FROM PWD'S INFRASTRUCTURE.
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5 **RESPONSE:**

6 See response to LH-II-18 for available information.
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8 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-21*** PLEASE STATE THE FISCAL YEAR IN WHICH THE ENERGY PROJECTS
2 WILL BE USABLE BY PWD.

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4 **RESPONSE:**

5 See response to LH-II-18 for available information.

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7 **RESPONSE PROVIDED BY:** Philadelphia Water Department

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1 **LH-II-22***. PLEASE LIST THE NUMBER OF AND NAMES OF PWD EMPLOYEES
2 RESPONSIBLE FOR RECRUITING WATER INTENSIVE INDUSTRY TO
3 THE CITY OF PHILADELPHIA. PLEASE HAVE THOSE EMPLOYEES
4 AVAILABLE FOR CROSS EXAMINATION.

5
6 **RESPONSE:**

7 There are no names of PWD employees to disclose in response to this discovery request.
8 Philadelphia's Department of Commerce works to (among other things) attract businesses
9 to the City.^[1] In addition, the Philadelphia Industrial Development Corporation ("PIDC")
10 is Philadelphia's public-private economic development corporation. PIDC works to
11 attract, manage, and invest public and private resources in the clients, communities, and
12 markets that energize Philadelphia's economy.^[2]

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14 ^[1] <https://www.phila.gov/departments/department-of-commerce/>

15 ^[2] <https://www.pidcphila.com/who-we-are>

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17 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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LH-II-23*. PLEASE LIST THE NUMBER OF BUSINESSES RECRUITED INTO THE CITY OF PHILADELPHIA, THE NAMES OF THE BUSINESSES AND THE NUMBER OF JOBS CREATED.

RESPONSE:

After reasonable investigation, no information has been identified that is responsive to this discovery request.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **LH-II-24*** PLEASE LIST THE NAME OF ANY AND ALL NON PWD EMPLOYEES
2 WHO HAVE CONSULTED WITH PWD IN PREPARING THIS RATE FILING
3 AND/OR ARE TESTIFYING IN SUPPORT OF THE RATE INCREASE
4

5 **RESPONSE:**

6 Philadelphia Water Department. See, PWD Exhibit 1 at PDF pages 7-9 and 10 for a list of
7 non-PWD employees who assisted in preparing the rate filing and/or are testifying in
8 support of the rate case. Resumes of experience are provided for non-PWD witnesses as
9 attachments to PWD Statements 2A (Ballard Spahr), 2B (Public Financial Management,
10 Acacia Financial Group), 5 (WRB), 6 (Raftelis Financial, Consultants) and 7 (Black &
11 Veatch).
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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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LH-II-25*. 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.

RESPONSE:

Preparation of this response is in progress and will be provided in the future.

RESPONSE PROVIDED BY: Philadelphia Water Department

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LH-II-26*. 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 ANY ENTITY THAT DOES BUSINESS WITH PWD.

RESPONSE:

After reasonable investigation, no document has been identified that captures the requested information.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **LH-II-27*** PLEASE LIST THE NUMBER OF PHILADELPHIA RESIDENTS EACH OF
2 THE CONSULTANTS AND/OR THEIR FIRMS RETAIN OR RETAINED
3 UNDER THE CONTRACT WITH PWD
4

5 **RESPONSE:**

6 After reasonable investigation, a complete of the number of residents employed by
7 consultants is not available. Mr. Dasent's firm is completely comprised of Philadelphia
8 residents. Staff for Raftelis Financial Consultants is not locally based. Some staff for
9 Black & Veatch are locally based. PFM and Ballard Spahr have offices and staff in the
10 City.
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12 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-28***. PLEASE LIST THE CORPORATE HEADQUARTERS FOR EACH AND
2 EVERY FIRM PWD CONTRACTED WITH TO HELP WITH THIS RATE
3 FILING.
4

5 **RESPONSE:**

6 Mr. Dasent's office is at 2001 Market Street, 25th Floor, Philadelphia, PA 19103. Black &
7 Veatch offices are located at 1101 Lamar Boulevard, Overland Park, KS; Raftelis
8 Financial Consultants offices are located at 227 West Trade Street, Charlotte, NC; PFM is
9 located at 1735 Market Street, 42nd Floor, Philadelphia, PA; Acacia is located at 6000
10 Midlantic Drive, Mt. Laurel, NJ 08054; Ballard Spahr is located at 1735 Market Street,
11 51st Floor, Philadelphia, PA 19103.
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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department.
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1 **LH-II-29***. PLEASE SUPPLY ALL OF THE PWD AUDITS CONDUCTED BY THE
2 PHILADELPHIA CITY CONTROLLER OVER THE LAST SIX YEARS.
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4 **RESPONSE:**

5 After reasonable investigation, no audits were identified other than the audited
6 Consolidated Annual Financial Reports of the City (audited by the City Controller's
7 Office) which are posted at [https://www.phila.gov/office-of-the-director-of-](https://www.phila.gov/office-of-the-director-of-finance/financial-reports/#/)
8 [finance/financial-reports/#/](https://www.phila.gov/office-of-the-director-of-finance/financial-reports/#/).
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10 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-30***. PLEASE SUPPLY ALL PWD'S WRITTEN RESPONSES TO THE CITY
2 CONTROLLER'S AUDIT.
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4 **RESPONSE:**

5 See response to LH-II-29.
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7 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-31***. PLEASE SUPPLY ANY AND ALL AUDITS CONDUCTED BY ANY NON
2 EMPLOYEE OF PWD'S OPERATIONS CONDUCTED IN THE LAST SIX
3 YEARS.
4

5 **RESPONSE:**

6 Annual Auditor's Reports on Philadelphia City Departments, including PWD are available
7 at:

8 <https://controller.phila.gov/audits/>

9
10 Annual Financial Reports (AFRs) and Annual Comprehensive Financial Reports are
11 available from the City Treasurer at:

12 <https://www.phila.gov/departments/office-of-the-director-of-finance/financial-reports/#/>

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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **LH-II-32***. PLEASE SUPPLY ANY AND ALL RESPONSES TO THE AUDITS
2 CONDUCTED BY NON PWD EMPLOYEES.
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4 **RESPONSE:**

5 See response to LH-II-31.
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7 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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