

To Mayor Jim Paine and Custodian of Records,

This is a request under the Wisconsin Public Records Law for documents sufficient to verify or refute a series of public statements made by Mayor Jim Paine regarding the City of Superior's water utility, its costs, and the proposed acquisition of that system.

Mayor Paine has presented a clear and compelling narrative to the public: that Superior residents pay the highest water bills in Wisconsin, that municipal ownership universally results in lower rates, and that the City can purchase the utility in a way that lowers bills without raising taxes. These claims, taken together, justify a significant public financial decision. This request seeks the factual record underlying those claims.

I respectfully request the following:

1. Independent Analysis Referenced by Mayor Paine

Provide the complete, unredacted "independent analysis" referenced by Mayor Paine regarding the cost of purchasing the water utility, including:

The identity of the author(s) and commissioning party

Scope, assumptions, and limitations

All appendices, datasets, and supporting documentation

2. Documentation Supporting "Highest Water Bills in the State" Claim

Provide all records supporting the assertion that Superior has the highest water bills in Wisconsin, including:

The metric used (average household bill, rate per unit, etc.)

The municipalities included in the comparison

Dates, sources, and methodologies used to compile the data

3. Documentation Supporting Municipal Ownership Claims

Provide records supporting the statements that:

"Every other city in the state already owns their own water"

Municipally owned systems "all pay lower rates than Superior"

Include any studies, rate surveys, or analyses relied upon. If no comprehensive statewide

analysis exists, provide any partial or anecdotal data used to support these conclusions.

4. Financial Claims: Lower Bills Without Increased Taxes

Provide all documents demonstrating how acquisition of the water utility would result in lower utility bills without increasing taxes, including:

Financing plans, including bonding assumptions and repayment schedules

Projected operating and maintenance costs post-acquisition

Revenue projections and rate modeling

Sensitivity or risk analyses addressing cost overruns, interest rate changes, or revenue shortfalls

5. "Water Sold for Profit" Assertion

Provide records supporting the claim that Superior is uniquely subject to water being "sold for profit," including:

Current ownership structure and contractual arrangements

Regulatory filings and rate-setting authority

Any analysis of profit margins or return structures

Comparisons to other Wisconsin utilities with similar or differing ownership models

6. Communications and Internal Review

Provide all communications, including emails, memoranda, and reports, involving Mayor Jim Paine, City staff, consultants, or third parties that discuss:

Development of these public statements

Any internal review of their accuracy

Identification of risks, uncertainties, or contradictory findings

7. Regional and Peer Comparisons

Provide records comparing Superior's water rates, ownership model, and cost structure with:

Other Wisconsin municipalities

Neighboring Lake Superior communities, including Duluth

This request is made in the public interest. The statements made by Mayor Paine present a simplified conclusion to a complex financial and policy question. The requested records will allow the public to determine whether these conclusions are supported by complete and accurate analysis or rely on selective comparisons.

If any portion of this request is denied, please provide a written explanation citing the specific statutory exemption and release all segregable material.

I request that records be provided in electronic format where available. Please notify me of any fees prior to fulfilling this request.