**BEFORE THE**

**PHILADELPHIA WATER, SEWER AND STORMWATER RATE BOARD**

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| **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 COMMUNITY LEGAL SERVCIES**

**A PARTY TO THESE PROCEEDINGS**

LH-I-1 Please provide the process by which Community Legal Services decides what position(s) to take in any and all proceedings before the Philadelphia Water and Sewer Rate Board .

LH-I-2. Please provide the written document that outlines, describes, memorializes or in any other way informs the public of how Community Legal Services decides what position to take regarding any and all proceedings before the Rate Board.

LH-I-3 Please provide the name of any and all supervisors of the people Community Legal Services appoints to work on the contract Community Legal Services has with the Rate Board. Please identify how often the supervisor meets with the attorneys assigned to the contract with the rate board and any and all written documents describing what role and/or powers the supervisor has regarding decisions made by those assigned to the contract Community Legal Services has with the Rate Board

LH-I-4 Please provide the number of, and the names of any and all elected officials Community Legal Services has met with in person or via zoom, to brief on the proposed water rate increase

LH-I-5 Please provide the number of and names of any and all community, civic, religious or advocacy groups Community Legal Services has met with in person or via zoom to brief on the proposed water rate increase

LH-1-6 Please provide any and all contracts with consultants, of any type, with a description of the work which is to be performed that Community Legal Services has retained in this rate case

LH-I-6 Please provide a list of all the advertisements Community Legal Services has paid for to announce the public hearings on the proposed water rate increase.

LH-I-6 Please provide the number of people who have “visited” Community Legal Services Web page regarding the proposed water rate increase.

LH-I-7 Please provide the number of community groups who have contacted Community Legal Services

LH-I-8 Please provide a list of any and all Board Members of Community Legal Services who have any business relationship, defined broadly as representing the company in any capacity, owning any shares in any capacity doing business in any capacity, with any business that does business with the Philadelphia Water Department

LH-I-9 Please provide a list of any and all contracts and the amounts Community Legal Services has with the City of Philadelphia

LH-I-10 Please provide any and all written correspondences between Community Legal Services and/or its employees and any and all members of the Rate Board

LH-I-11 Please provide and all written correspondences with the Rate Board’s attorney or attorneys.

LH-I -12 Please provide the names of any and all people Community Legal Services will consult with prior to accepting any and all settlement offers from the Philadelphia Water Department

LH-1-13 Please provide any and all written correspondence between Community Legal Services and the attorneys representing the Philadelphia Water Department that did not pertain to a settlement discussion over the last 3 fiscal years.