

**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**

PUBLIC ADVOCATE RESPONSES

TO DISCOVERY REQUESTS OF LANCE HAVER

LH-IV-1 Mr. Ballenger were you serving in your capacity as the “Public Advocate” when you called Hall Monitor’s managing partner?

RESPONSE:

No. Mr. Ballenger did not “call Hall Monitor’s managing partner.”

A reporter named Larry McGlynn contacted CLS to request to speak with Mr. Ballenger on June 22, 2022 regarding reporting that aired on “Philadelphia Hall Monitor” during the preceding week. Mr. Ballenger met with Mr. McGlynn via Zoom on June 27, 2022.

LH-IV-2 Mr. Ballenger, if you did not make call in your capacity of Public Advocate, did you make the call on behalf of Community Legal Services?

RESPONSE:

No. As described in LH-IV-1, Mr. Ballenger met with Mr. McGlynn at Mr. McGlynn’s request.

LH-IV-3 Mr. Ballenger to which client or entity did you bill the time you spent making the phone call, under the cover of “background” so they cannot be repeated, to Hall Monitor’s managing partner?

RESPONSE:

Not applicable. The time spent meeting with Mr. McGlynn was not a billable activity. Community Legal Services attorneys are routinely requested to provide information of public interest to the media, doing so on background allows for sharing of information that a journalist can utilize without specific attribution.