

Gregory Berry
P.O. Box 13291
Philadelphia, PA 19101
(415) 321-9683
gregoryberry@gmail.com

October 4, 2010

Laureto Farinas
800 West Montgomery Avenue
Philadelphia, PA 19122

RE: Gregory Berry v. PGW, Docket No. F-2010-2163390

Dear Mr. Farinas:

Pursuant to 52 Pa. Code §§ 5.341 & .349, Gregory Berry, pro se, hereby propounds the following Interrogatories and Requests for Production of Documents (generally, “Interrogatories”) to Philadelphia Gas Works (PGW), Defendant in the above-captioned matter, to which you are to answer or produce copies of documents. The due date for responses to these Interrogatories is twenty (20) days from the date of service.

If you need additional information about this matter, please contact me at my direct-dial number above. Thank you.

Sincerely,

Gregory Berry

cc: Service List
Angela T. Jones, ALJ
James McNulty, PUC Secretary

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GREGORY BERRY,)	
Complainant)	Docket No.: F-2010-2163390
)	
v.)	
)	
PHILADELPHIA GAS WORKS,)	
Defendant)	Date: October 4, 2010
_____)	

**COMPLAINANT’S INTERROGATORIES
AND REQUESTS FOR PRODUCTION
OF DOCUMENTS, SET I**

Pursuant to 52 Pa. Code §§ 5.341 & .349, Gregory Berry hereby propounds the following Interrogatories and Requests for Productions of Documents (generally, “Interrogatories”) to Philadelphia Gas Works (“PGW”), Defendant in the above-captioned matter, to which you are to answer or produce copies of documents. The due date for responses to these Interrogatories is twenty (20) days from the date of service.

Each of the Interrogatories shall be answered fully and completely. All information is to be divulged that is within PGW’s knowledge, possession, control, or custody, or may be reasonably ascertained by PGW.

1. Please provide all information and documents concerning the Service Address at 2326 Reed Street, Philadelphia, PA, 19146, from July 1, 2007, through July 31, 2008, including but not limited to information and

documents relating to accounts, meter readings, billing, balances, and gas usage at that address.

2. Please list the name, address, and title of a person who can/will serve as witness to lay the foundation for each of the documents produced in response to Interrogatory No. 1. Complainant will subpoena each such witness to lay the foundation for each document produced under Interrogatory No. 1. Alternatively, Defendant may wish to stipulate to the information contained in each such document, or waive any possible objection to its introduction in court.

3. State whether PGW destroyed, discarded, or otherwise disposed of any documents concerning any matters relating to this action, and the facts and claims alleged herein. If so, identify each document, and state when it was destroyed, discarded, or otherwise disposed of, the method by which it was destroyed, discarded, or otherwise disposed of, and the identity of the person(s) who destroyed, discarded, or otherwise disposed of such document.

4. Please list the name, address, and title of each person PGW intends to call as a witness at the hearing of the complaint. Please summarize the purpose and general content of the testimony of each person who will appear as a witness in the presentation of your case.

Respectfully submitted,

Gregory Berry, pro se
P.O. Box 13291
Philadelphia, PA 19101
(415) 321-9683
gregoryberry@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Service List:

For Defendant:

Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982

Date: October 4, 2010