



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Ross, Paralegal  
Legal Department  
Direct Dial: 215-684-6862  
FAX: 215-684-6798  
E-mail: danielle.ross@pgworks.com

July 5, 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Warren Jones v. PGW, Docket No. C- 2012 - 2308240**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.342(g), the Philadelphia Gas Works ("PGW") hereby files the Objection to Complainant's interrogatories and Requests for Production of Documents to the above captioned matter.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,

A handwritten signature in blue ink that reads "Danielle Ross/dc". The signature is written in a cursive style.

Danielle Ross

Enclosure

cc: Service List (Regular Mail)  
Anne Marie Cromley (PGW Mail)  
Linda Pereira (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Warren Jones**

**v.**

**Philadelphia Gas Works**

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**Docket No. C – 2012 – 2308240**

**Philadelphia Gas Works Objection to  
Complainant's Interrogatories and Requests for Production of Documents**

Pursuant to 52 Pa. Code §5.342(g), the Philadelphia Gas Works ("PGW") hereby files its objections to the Complainant's discovery propounded on or about June 25, 2012 in the above captioned matter, which is attached hereto as Exhibit "A." PGW objects to the requests enumerated below. For ease of review, PGW has reproduced the objectionable discovery below.

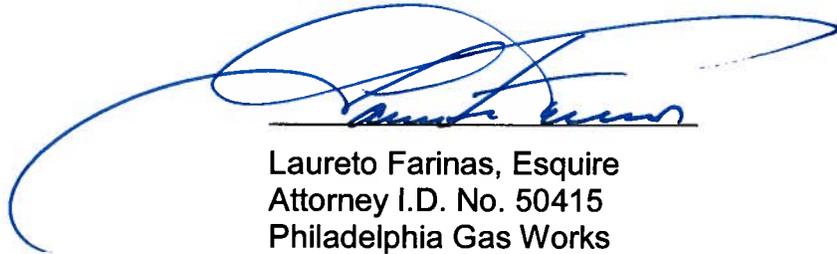
4. Please provide the billing and payment history for all gas meters installed at the Property, including the identity of all persons contacted and paying bills from January 2004 to the present.
5. Please provide all Records regarding any application for gas service, payment agreement, or other customer service at the Property by anyone, other than the Complainant from January 2004 to the present.
6. Please provide all Records regarding any investigation performed by PGW of gas usage, meter functioning and gas service issues at the Property for all gas meters installed at the Property from January 2004 to the present.
20. Please provide a complete copy of all Records in the Meter Investigation Unity relating to the Property since January 1, 2004 including, but not limited to, handwritten notes and phone logs.

PGW objects to the four (4) discovery requests above to the extent that the Complainant's discovery seeks the production of documents or demands any information that is subject to applicable privileges including the right of privacy to customer information, where the Complainant is not the customer of record for the account from which the information is sought.

**Whereas**, PGW, therefore respectfully requests that its objections to discovery requests numbers 4, 5, 6, and 20 be sustained.

Respectfully submitted,

July 5, 2012



Laureto Farinas, Esquire  
Attorney I.D. No. 50415  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982

# EXHIBIT A



COMMUNITY LEGAL SERVICES  
OF PHILADELPHIA

June 25, 2012

By eFiling

Secretary Rosemary L. Chiavetta  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Warren Jones v. Philadelphia Gas Works, Docket No. C-2012-2308240**

Dear Secretary Chiavetta:

On behalf of Complainant/Petitioner Warren Jones, enclosed for eFiling is the Certificate of Service pertaining to Warren Jones's Interrogatories and Requests for Production of Documents – Set I, which were served upon the parties today.

Respectfully Submitted,

Benjamin D. Salvina, Esq.  
Thu B. Tran, Esq.  
Attorneys for Warren Jones

Enclosures

cc: Laureto Farinas, Esq., Philadelphia Gas Works  
Warren Jones

BSalvina@CLSPHila.org ▪ Direct Dial: 215.981.3726 ▪ Fax: 267.765.6481

WWW.CLSPHILA.ORG

1424 CHESTNUT STREET PHILADELPHIA, PENNSYLVANIA 19102 P 215.981.3700 F 215.981.0434



COMMUNITY LEGAL SERVICES  
OF PHILADELPHIA

June 25, 2012

Laureto A. Farinas, Esquire  
Philadelphia Gas Works  
Legal Department  
800 West Montgomery Avenue  
Philadelphia, PA 19122

**Re: Warren Jones v. Philadelphia Gas Works, Docket No. C-2012-2308240**

Dear Mr. Farinas:

Enclosed please find Interrogatories and Requests for Production of Documents – Set I in the above captioned matter. Please forward the responses to me as they become available instead of waiting to forward all responses at the same time. Please provide all responses in writing within twenty (20) days from the date of service, pursuant to 52 Pa. Code § 5.342. The Certificate of Service has been filed with the Secretary, pursuant to 52 Pa. Code § 5.341(b), by eFiling as indicated on the attached confirmation printout.

If you have any questions, please call me at (215) 981-3726.

Sincerely,

Benjamin D. Salvina, Esq.  
Staff Attorney  
Energy Unit

Enclosures  
cc: Warren Jones

BSalvina@CLSPHila.org ▪ Direct Dial: 215.981.3726 ▪ Fax: 267.765.6481

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COMMUNITY LEGAL SERVICES  
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Pennsylvania Public Utility Commission  
P.O. Box 3265  
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**Re: Warren Jones v. Philadelphia Gas Works, Docket No. C-2012-2308240**

Dear Secretary Chiavetta:

On behalf of Complainant/Petitioner Warren Jones, enclosed for eFiling is the Certificate of Service pertaining to Warren Jones's Interrogatories and Requests for Production of Documents – Set I, which were served upon the parties today.

Respectfully Submitted,

Benjamin D. Salvina, Esq.  
Thu B. Tran, Esq.  
Attorneys for Warren Jones

Enclosures

cc: Laureto Farinas, Esq., Philadelphia Gas Works  
Warren Jones

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WARREN JONES	:
Complainant	:
v.	: Docket No. C-2012-2308240
	:
PHILADELPHIA GAS WORKS	:
Respondent	:

Warren Jones's Interrogatories and Requests for Production of Documents  
SET I

Pursuant to 52 Pa. Code §§5.341, 5.349, Complainant Warren Jones, through counsel Community Legal Services, Inc., hereby propounds the following Interrogatories and Requests for Production of Documents to Philadelphia Gas Works (hereinafter "PGW") to be answered by those officers, employees or agents as may be cognizant of the requested facts and/or documents and who are authorized to answer on behalf of the Company. The due date for response to the Interrogatories is twenty (20) days from the date of service.

The following instructions apply to these interrogatories:

1. These interrogatories shall be deemed to be continuing. PGW is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to PGW after the answers hereto are served.
2. The answer should first restate the question asked and also identify the name and position of the individual who provided the answer.
3. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession,

control, or custody of PGW or may be reasonably ascertained thereby. The term "PGW" or "Company" as used herein includes PGW, its attorneys, agents, employees, or other representatives.

4. As used in these discovery requests, the following terms shall have the meanings provided below, unless the context clearly requires otherwise:

- a. "Account" means the PGW gas account of Warren Jones, and all charges attributed to such Account, at the Property.
- b. "Commission" means the Pennsylvania Public Utility Commission, including, without limitation, the Commission's Bureau of Consumer Services and the natural persons providing services as investigators thereto.
- c. "Complainant" means Warren Jones.
- d. "Document" or "workpaper" means and includes, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires, surveys, drawings, graphs, charts and photographs and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written

comments concerning the foregoing, in whatever form stored or contained in or on whatever medium including computerized memory or magnetic media.

- e. "Property" means that certain dwelling located at 1621 S. 53<sup>rd</sup> Street, Philadelphia.
- f. "Record" means any and all documents or workpapers in the possession, custody or control of, or which may be reasonably ascertained or acquired by, the Company.

**Warren Jones v. Philadelphia Gas Works**

Docket No. C-2012-2308240

**Warren Jones's Interrogatories and Request for Production of Documents  
Set I**

1. Please provide records of all contacts between PGW and Complainant, including but not limited to, a printout of contacts and credit and collections events for the Account from January 2004 to the present.
2. Please provide the gas meter identification numbers for all gas meters installed at the Property from January 2004 to the present.
3. For all gas meters installed at the Property from January 2004 to the present, please provide all Records regarding the installation, service, inspection, repair, certification and removal of such device, including the dates on which each such installation, service, inspection, repair, certification and removal was performed and the identity and position title of each PGW worker performing such installation, service, inspection, repair, certification or removal.
4. Please provide the billing and payment history for all gas meters installed at the Property, including the identity of all persons contacted and paying bills, from January 2004 to the present.
5. Please provide all Records regarding any application for gas service, payment agreement, or other customer service at the Property by anyone, other than Complainant, from January 2004 to the present.

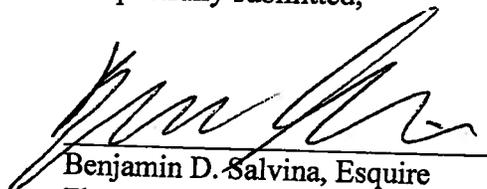
6. Please provide all Records regarding any investigation performed by PGW of gas usage, meter functioning and gas service issues at the Property for all gas meters installed at the Property from January 2004 to the present.
7. Please provide a description of the bypass allegedly found at the Property, including any pictures, images, or drawings available or which could be made available, to explain how the bypass was installed.
8. Please verify that PGW still possesses the alleged bypass and removed meter, and identify their location.
9. Reference PGW Tariff § 8.3.C. Please describe the Company policy and procedure for:
  - a. Determining who is “responsible” for any alleged damage or unauthorized use, pursuant to PGW Tariff § 8.3.C; and,
  - b. Addressing claims by Customers or Applicants who deny they are “responsible” for any alleged damage or unauthorized use, pursuant to PGW Tariff § 8.3.C.
10. Please provide all information, documents and records pertaining to any alleged unauthorized usage or gas theft on the Account, including but not limited to, documents and records which contain the following information:
  - a. The date the alleged unauthorized usage or gas theft at the Property was discovered;
  - b. How the alleged unauthorized usage or gas theft at the Property was discovered;

- c. Any notices concerning alleged unauthorized usage or gas theft provided to Complainant or any other person at the Property;
  - d. How it was determined that there had been unauthorized usage or theft of gas at the Property;
  - e. The names and position titles of all employees connected with determining that there had been unauthorized usage or gas theft at the Property; and
  - f. The method by which the alleged unauthorized usage or gas theft at the Property was accomplished.
11. Please describe the Company policy and procedure for investigating unauthorized usage or gas theft.
12. With respect to unauthorized usage, gas theft and/or meter tampering, please provide all current PGW manuals, training materials and other Records pertaining to, but not limited to, the following:
- a. What triggers PGW to conduct an investigation;
  - b. What notices are provided to the customer concerning the investigation;
  - c. What PGW personnel and departments are involved in the investigation;
  - d. How long the process takes;
  - e. What steps are taken to determine the reason for and the nature of the alleged unauthorized usage or gas theft; and
  - f. What procedures are used for terminating service to these customers.
13. Please state the Company procedure for handling customers when PGW asserts that they have been using gas without authorization.
14. Please state any health or safety issues involved with the type of illegal usage alleged with respect to the Property, and provide all supporting Records.

15. Please provide the name(s) of the PGW employee(s) who removed the meter from Complainant's home on or about October 2011 and any Records generated by this individual(s) about the meter in question.
16. Please state if a bonus was paid to the employee(s) who removed the meter from the Complainant's home. If yes, please provide the following:
- a. The name(s) of the employee(s) who were authorized to receive the bonus;
  - b. The amount of this bonus and any documentation relating to payment of this bonus;
  - c. All documents, manuals and memos that relate to such type of bonus, including but not limited to, information about when and under what conditions such a bonus would be paid;
  - d. The dates that the bonus payments were issued to the employee(s); and
  - e. The total amount of all bonuses (related to discovery of unauthorized usage) that were issued in calendar year 2011 and 2012-to-date to each of the employees involved in this case.
17. Please provide the amount of gas that PGW alleges to have been used illegally at the Property and how this number was determined.
18. Please state the payment amount PGW is requesting for restoration of gas service to Complainant and explain how such amount was calculated.
19. Please state the total amount that the Company claims Complainant currently owes to the Company. Please itemize the different segments of this amount, by indicating, without limitation:
- a. That portion of the total amount representing gas service for which Complainant has not paid, and
  - b. That portion of the total amount representing other fees charged by PGW, such as late fees, reconnection fees and deposits.

20. Please provide a complete copy of all Records in the Meter Investigation Unit relating to the Property since January 1, 2004 including, but not limited to, handwritten notes and phone logs.

Respectfully submitted,



Benjamin D. Salvina, Esquire  
Thu B. Tran, Esquire  
Attorney for Complainant  
COMMUNITY LEGAL SERVICES, INC.  
1424 Chestnut Street  
215-981-3726

June 25, 2012

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WARREN JONES  
Complainant

v.

PHILADELPHIA GAS WORKS  
Respondent

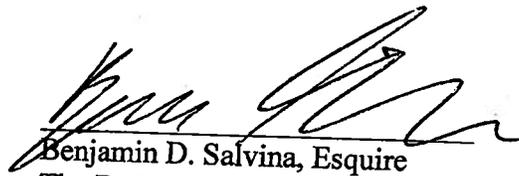
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: Docket No. C-2012-2308240  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day, served a copy of Warren Jones's Interrogatories and Requests for Production of Documents, Set I, upon the participant, listed below, in accordance with the requirements of 52 Pa.Code §1.54 (relating to service by a participant).

By e-mail and first class mail:  
Laureto A. Farinas, Esquire  
Philadelphia Gas Works  
Legal Department  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
Laureto.Farinas@pgworks.com

Dated this 25<sup>th</sup> day of June, 2012.



Benjamin D. Salvina, Esquire  
Thu B. Tran, Esquire  
Attorney for Complainant  
COMMUNITY LEGAL SERVICES, INC.  
1424 Chestnut Street  
215-981-3726

**BEFORE THE  
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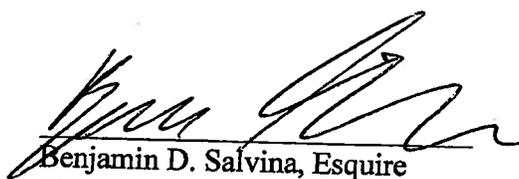
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Philadelphia Gas Works  
Legal Department  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
Laureto.Farinas@pgworks.com

Dated this 25<sup>th</sup> day of June, 2012.

  
Benjamin D. Salvina, Esquire  
Thu B. Tran, Esquire  
Attorney for Complainant  
COMMUNITY LEGAL SERVICES, INC.  
1424 Chestnut Street  
215-981-3726

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

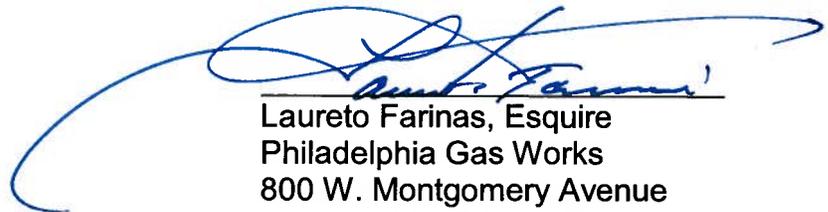
Service List:

For Complainant:

Bengamin D. Salvina, Esq.  
Thu B. Tran, Esq.  
Community Legal Services  
1424 Chestnut Street  
Philadelphia, PA 19102

Warren Jones  
1621 S. 53<sup>rd</sup> Street  
Philadelphia, PA 19143

July 5, 2012



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