



PHILADELPHIA GAS WORKS

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November 4, 2013

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

Re: SBG Management Services, Inc v. PGW, Docket No. C – 2012 – 2304183, C – 2012 – 2304215, C – 2012 – 2304324, C – 2012 – 2304167, C – 2012 – 2304303, C – 2012 – 2308454, C – 2012 – 2308462, C – 2012 – 2308465, and C – 2012 – 2334253

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.371, the Philadelphia Gas Works ("PGW") hereby files its answer to the Complainants' Motion to Compel Responses to Requests for Production of Documents and Interrogatories, Set II.

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

Sincerely,


Danielle Leva

Enclosure

cc: Francine Thornton Boone, Esq. (FedEx and Email)
Mr. Philip Pulley (Email)
Ms. Kathy Treadwell (Email)
Administrative Law Judge Eranda Vero (Email)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

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NOV 4 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SBG Management Services, Inc. / :
Colonial Garden Realty, LP, :
Complainant :

v. :

Philadelphia Gas Works, :
Respondent :

Docket No. C – 2012 – 2304183

SBG Management Services, Inc. / :
Fairmount Realty, :
Complainant :

v. :

Philadelphia Gas Works, :
Respondent :

Docket No. C – 2012 – 2304215

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SBG Management Services, Inc. / :
Simon Gardens Realty, LP, :
Complainant :

v. :

Philadelphia Gas Works, :
Respondent :

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket No. C – 2012 – 2304324

SBG Management Services, Inc. / :
EIRae Garden Realty, LP, :
Complainant :

v. :

Philadelphia Gas Works, :
Respondent :

Docket No. C – 2012 – 2304167

SBG Management Services, Inc. / :
Marshall Square Realty, LP, :
Complainant :

v. :

Philadelphia Gas Works, :
Respondent :

Docket No. C – 2012 – 2304303

SBG Management Services, Inc. / :
Marchwood Realty, :
Complainant :
v. : **Docket No. C – 2012 – 2308454**
: :
Philadelphia Gas Works, :
Respondent :

SBG Management Services, Inc. / :
Oak Lane Realty Co., LP, :
Complainant :
v. : **Docket No. C – 2012 – 2308462**
: :
Philadelphia Gas Works, :
Respondent :

SBG Management Services, Inc. / :
Fern Rock Realty, :
Complainant :
v. : **Docket No. C – 2012 – 2308465**
: :
Philadelphia Gas Works, :
Respondent :

SBG Management Services, Inc. / :
Colonial Garden Realty, LP, :
Complainant :
v. : **Docket No. C – 2012 – 2334253**
: :
Philadelphia Gas Works, :
Respondent :

**Answer of Philadelphia Gas Works to
Complainants' Motion to Compel Responses to
Requests for Production of Documents and Interrogatories, Set II**

Pursuant to 52 Pa. Code §5.342(g)(1), the Philadelphia Gas Works ("PGW") hereby answers the Complainants' motions to dismiss PGW objections to the Complainants discovery, Set II and compel responses to the Complainants' Requests for Production of Documents and Interrogatories, Set II.

Summary

The disputes that comprise the three sets of consolidated Complaints include legal issues with respect the correct "interest rate" to be applied when the customer fails to make payment, generally, and after the City of Philadelphia files a Municipal Lien.¹ The consolidated complaints also list several bills which the Complainants believe are too high as they are alleged to be out of line with other billing periods and several transactions listed in the Complainant's account records that the Complainants do not agree with or understand the reason for the transaction. In the context of the billing disputes a threshold matter remains that much of what is complained about, may be beyond the Commission's statute of limitations on bringing timely disputes before the Commission. Although individually disputed transactions seem numerous, these are finite, the disposition and can be

The Complaints' Discovery Set II, as propounded on October 9, 2013, comes at a time after 5 days of hearings have been devoted to the presentation of the Complainant's case in chief in two of the three sets of the consolidated matters. In anticipation of the presentation of its evidence, PGW is preparing documents and witnesses to provide testimony addressing each of the billing dispute issues as set forth in the Complainants' filings. Throughout the Complainants' presentation of evidence, however, it appears that the Complainants have made an effort to expand the scope of inquiry of these matters from the several billing disputes and a legal issues to be briefed regarding the applicable interest rate to that of a review of PGW operations at every level including training material where the nature of the dispute (billing/meter error, application of interest to an account) is automated. To the extent that any of the discovery requests require PGW to make an unreasonable investigation, causes oppression, unreasonable burden or expense, PGW reasserts its objection.

Set II, No. 1

PGW reasserts its objection to Set II discovery request No. 1, which seeks a listing of all persons providing information responding to Set II and seeks specific information including, "alias names", "home addresses", "home telephone numbers" and

¹ Municipal Liens are filed by the City of Philadelphia pursuant to the Municipal Claim and Tax Lien Law, Act 153 of 1923, P.L. 207 53 P.S. §7101, et seq. (Municipal Lien Act).

“age” of those preparing the answers to Set II. The Complainant’s motion to compel asserts the example of the witness, John Dunn who appeared at the request of the Complainant. The Complainant failed to obtain Mr. Dunn’s information when he attended the hearing and thus failed to do what it could to obtain the information the Complainant’s are seeking. PGW employees will prepare the responses to discovery and will not require the assistance of non-employees. PGW’s responses will comply with the requirements of 52 Pa. Code §5.342(2) and will identify the name and position (PGW title) of the person preparing the answer to the request on the answer to each request. More information about the home address is beyond the scope of these proceedings. Further to the extent request No. 1 seeks to have a list recreated that contains all who prepared answer to Set II, this request is also burdensome. As the Complainants may make a list from the information contained on each of the answers, it is unnecessarily burdensome for PGW to create such a list for the Complainants.

Set II, No. 2

PGW objects to this discovery request on the grounds that it is overbroad in that it is beyond the scope of these proceedings. To the extent request No. 2 seeks to have a list recreated that contains all documents contained in the answers to Set II, this request is also burdensome. PGW responses in the form of documents will be attached to the discovery request. As the Complainants may make a list from the information contained on each of the answers, it is unnecessarily burdensome for PGW to create such a list for the Complainants.

Set II, No. 3

PGW reasserts its objection to Set II, No. 3 requests that each document “identified and in Respondent’s possession...” that are contained in answers to Set II, PGW is requested to produce the document or make available inspection. PGW objects to this Interrogatory, as it is overbroad, as written. The production of each document relied upon creates an unreasonable burden. The making available of documents in discovery for inspection is governed by 52 Pa. Code §5.349.

Set II, No. 4

PGW reasserts its objection to Set II, No. 1, PGW objects to Set II discovery request No. 4, which seeks a listing of all persons “known to Respondent to have personal knowledge of any facts or issues involved in this law suit,...” and seeks specific information including, “alias names”, “home addresses”, “home telephone numbers” and “age” of those who have knowledge about these matters. (See Appendix “A”)

As in its objection to Set II, No. 1. PGW objects to this discovery request on the grounds that it is overbroad in that it is beyond the scope of these proceedings. It seeks the home address, telephone number age of the persons whether PGW employees or not, that have personal knowledge of these matter. Further to the extent request No. 4 seeks to have a list recreated that contains all who prepared answer to Set II, and have knowledge about these matters creates an unreasonable burden. As the Complainants may make a list from the information contained on each of the answers, it is unnecessarily burdensome for PGW to create such a list for the Complainants. PGW is not trying to obstruct the Complainant’s rights to investigate its Complaints, PGW points out that the Complainants have an obligation to work in organizing the information provided to them and cannot unreasonably burden PGW.

Set II, No. 5

PGW objects to this discovery request on the grounds that PGW has provided some of the information previously. A review and the voluminous discovery provided 11 months ago shows that PGW provided documents “which are utilized to manage the Complainant’s Customer Accounts, SA accounts, former and current meters located...” at the Complainant’s properties generally and those referred to in the Set II, Exhibits A-1 through – 8. To the extent at PGW has provided information that is contained in its Billing Credit and Collection System (BCCS) and its other database containing metering information, PGW reasserts its objection. PGW has provided extensive account (including “SA” information) and meter records to the Complainants. The last of this information was provided in response to discovery requests under cover letters dated

January 31 and February 21, 2013 to counsel of record Scott H. Debroff, Esq. of Rhoads & Simon LLP. To the extent that the Complainants seek to duplicate this information is unnecessarily burdensome for PGW.

Set II, Nos. 6, 7, 8, 9 and 10

PGW reasserts its objection to these discovery requests on the grounds that it is overbroad requests information that is beyond the scope of these proceedings. Request Nos. 6, 7, 8, 9 and 10 seek information concerning the documents and persons involved in training for credit and collection matters at PGW. These requests rise to the level of a management/training audit and not that of the customer dispute issues raised by the Complainant. The issues that have been raised in these matters involve some billing disputes dating back several years, the management of commercial account by a particular unit for that purpose and the legally applicable late payment charges/interest rate. Even the testimony provided the Complainants thus far have been confined to specific identified disputes with bills and the Complainants relationship with a particular unit designed for the Complainants commercial accounts. These requests for training information (materials, content, time and duration) on all debt collection activities are beyond the scope of these proceedings and place an unreasonable burden upon PGW.

Set II, No. 11, 12 and 13

PGW reasserts its objection to Set II discovery request No. 11, which requests description of "...forms of communication or attempted communication with person or other third parties in connection with the collections of accounts..." PGW objects to this discovery request on the grounds that it is overbroad and seems to request information that has been previously provided in discovery months ago and during the course of the hearings of these proceedings. Request Nos. 11, 12 and 13 seek information pertaining to the Complainant's properties generally and those referred to in the Set II, Exhibits A-1 through – 8. As the Complainants conducted discovery previously, PGW has provided information that is contained in its Billing Credit and Collection System (BCCS) and its other database containing metering information. PGW has provided extensive account and meter records to the Complainants. The last of this information was provided in

response to discovery requests under cover letters of January and February, 2013 to counsel of record Scott H. Debroff, Esq. of Rhoads & Simon LLP. To the extent that the Complainants seek to duplicate this information is unnecessarily burdensome for PGW.

Set II, No. 14, 15 and 16

PGW reasserts its objections to Set II discovery request Nos. 14, 15 and 16 which seeks, among other things, to identify any or all of the Respondent's notes or telephone calls "...with any person from whom they collection debt, and what steps are taken to preserve these recordings." ... PGW objects to this discovery request on the grounds that it is overbroad and seems to request information that has been previously provided in discovery months ago and during the course of the hearings of these proceedings. PGW has provided to the Complainants "Contacts" information for each of their accounts in discovery and during the course of testimony. To the extent it can, PGW will provide an explanation of the policies for recording telephone calls made to the Customer Service Representatives and the time for which they kept and any information on PGW's notes on telephone calls that have not been provided. PGW is not trying to obstruct the Complainant's rights to investigate its Complaints, PGW points out that the Complainants' discovery requests must be within the scope of the proceeding and must not place an unreasonable burden upon PGW.

Set II, No. 17, 18 and 19

PGW has objected to Set II discovery request Nos. 17, 18 and 19 which seek a chronological description of "...the process, the origins, the events , and the circumstances under which the Complainants incurred the arrearages, if any allege due by Respondent, sufficient to warrant the imposition of municipal liens..." and other account information.

PGW reasserts its objection to these discovery requests on the grounds that it is overbroad, and requests an explanation of a resulting situation with the Complainants' accounts that is beyond the Commission's jurisdiction (municipal liens) and seems to request information that has been previously provided in discovery months ago and during the course of the hearings of these proceedings. Request Nos. 17, 18 and 19

seek information pertaining to the Complainant's properties generally and those referred to in the Set II, Exhibits A-1 through – 8. As the Complainants conducted discovery previously, PGW has provided information that is contained in its Billing Credit and Collection System (BCCS) and its other database containing metering information. PGW has provided extensive statement of account (including "SA") information. These show that the Complainants' accounts went unpaid which eventually results in the imposition of liens.

Set II, No. 20

PGW reasserts its objection to Set II discovery request No. 20, which seeks to describe "each instance of a mistake, error or event requiring a correction by Respondent for which Respondent was responsible..." PGW objects to this discovery request on the grounds that it is overbroad and burdensome, as it requests an explanation of every mistake on the Complainants' accounts including the accounts appearing on Set II, Exhibit "A-1" through "A-8". To the extent it has provided testimony in these proceedings, PGW has pointed out where there was an error made. Further, PGW's pre-filed testimony in the remaining consolidated proceedings will include an explanation of the account to include whether PGW found any errors.

Set II, No. 21

PGW reasserts its objection to Set II discovery request No. 21, which seeks to describe in detail "each mathematical method, algebraic mean, algorithm and method of calculation used by Respondent to calculate or confirm the accuracy of Complainant's utility bills..." PGW objects to this discovery request on the grounds that it is overbroad and seems to request information that has been previously provided in discovery 11 months ago. Request No. 21 seeks information that is available to the Complainants' the rates at which the Complainant is charged and the volumes of gas that the Complainants have been billed are readily available on the Complainants' bills and on the documents previously provided in discovery. The Complainants have access to the PGW Tariff as it is contained for public consumption in the PGW website. As the Complainants conducted discovery previously, PGW has provided extensive billing

information that is contained in its Billing Credit and Collection System (BCCS). All account information provided to the Complainants' in these matters contains the information sought, which may be derived by the Complainant through a review of this bills and the PGW Tariff.

Set II, No. 22, 23, 24

PGW reasserts its objection to Set II discovery request Nos. 22, 23 and 24 which request that PGW describe each communication, or attempted communication, between the Respondents and Complainants, made in connection with the collection, billing and disputes involving the Complainants' Customer Accounts. PGW objects to this discovery request on the grounds that it is overbroad and seems to request information that has been previously provided in discovery months ago and during the course of the hearings of these proceedings. PGW has provided to the Complainants "Contacts" information for each of their accounts in discovery and during the course of testimony.

Set II, No. 25

PGW objects to Set II discovery request No. 25, which seeks to identify and describe "... the manner and frequency in which Respondent maintains, repairs, inspects, tests, and ensures accuracy or utility meters.."

Request No. 25 seek information pertaining to the Complainant's properties generally and those referred to in the Set II, Exhibits A-1 through – 8. As the Complainants conducted discovery previously, PGW has provided information that is contained in its Billing Credit and Collection System (BCCS) and its other database containing metering information. PGW has provided extensive statement of account (including "SA") information and meter records to the Complainants. The last of this information was provided in response to discovery requests under cover letters dated January 31, 2013 to counsel of record Scott H. Debroff, Esq. of Rhoads & Simon LLP.

The issues that have been raised in these matters involve some billing disputes dating back several years, the management of commercial account by a particular unit for that purpose and the legally applicable late payment charges/interest rate. Even the testimony provided the Complainants thus far have been confined to specific identified

disputes with bills and the Complainants relationship with a particular unit designed for the Complainants commercial accounts. Request No. 25 seeks to expand inquiry of these beyond the scope of these proceedings by introducing new issues on metering practices.

Set II, Nos. 26 and 27

PGW reasserts objects to Set II discovery request Nos. 26, and 27, which seeks to describe "any writings, utility reports, correspondence, letters, memorandums, emails communications, or any other documents Respondents sent, mailed, faxed to Complainants' or the Commission related to the ..." resolution of or filing of an Informal Complaint "including but not limited to the same as located in the books and records of Respondents Dispute Resolution Group...". PGW objects to this discovery request on the grounds that it is overbroad and seems to require an unreasonable investigation upon PGW as such correspondence would also be in the Complainants' possession.

Set II, No. 28, 29, 30 and 31

PGW reasserts its objection to Set II discovery request No. 28, which seeks to describe "Respondent's system of accounts, its policies and practices pertaining to maintaining and ensuring accuracy of customer financial accounts...", No. 29 that seeks a description of PGW's "...automated collection policies and practices." Request Nos. 28, 29, 30 and 31 rise to the level of a management audit and not that of the customer dispute issues raised by the Complainant. The issues that have been raised in these matters involve some billing disputes dating back several years, the management of commercial account by a particular unit for that purpose and the legally applicable late payment charges/interest rate. Even the testimony provided the Complainants thus far have been confined to specific identified disputes with bills and the Complainants relationship with a particular unit designed for the Complainants commercial accounts. As stated in its objections, these requests for explanations of the billing system of accounting activities are beyond the scope of these proceedings.

Set II, No. 32

PGW reasserts its objection to Set II discovery request No. 32, which seeks a list of all Respondent employees responsible for applying Complainants' payments to the Customer Accounts. As PGW's billing payment and mail receipt is automated, this request for the identity of all PGW employees who are responsible for applying payments is burdensome beyond the scope of these proceedings.

Set II, No. 33 and No. 34

PGW reasserts its objections to Set II discovery request No. 33 and No. 34, which seek to describe "methodology used in by Respondent, to calculate and apply charges for "makeup" bills for or relations to all or any Customer Accounts." PGW objects to this discovery request on the grounds that it is overbroad and seems to request information that has been previously provided in discovery 11 months ago. Request Nos. 33 and 34 seek information that is available to the Complainants'. The rates at which the Complainant is charged and the volumes of gas that the Complainants have been billed are readily available on the Complainants' bills and on the documents previously provided in discovery. The Complainants have access to the PGW Tariff as it is contained for public consumption in the PGW website. As the Complainants conducted discovery previously, PGW has provided extensive billing information that is contained in its Billing Credit and Collection System (BCCS). Such information may be derived by the Complainant. The Complainant's fail to grasp the nature of the "re-bill."

Set II, No. 35, 36 and 37

PGW reasserts its objections to Set II discovery request Nos. 35 and 36 which seek to describe "methodology used in by Respondent, to calculate and apply interest charges to Complainants' Customer Accounts where liens were filed..." PGW objects to this discovery request on the grounds that it is overbroad and seems to request information that has been previously provided in discovery 11 months ago. Request Nos. 33 and 34 seek information that is available to the Complainants'. The rates at

which the Complainant is charged and the volumes of gas that the Complainants have been billed are readily available on the Complainants' bills and on the documents previously provided in discovery. The Complainants have access to the PGW Tariff as it is contained for public consumption in the PGW website. As the Complainants conducted discovery previously, PGW has provided extensive billing information that is contained in its Billing Credit and Collection System (BCCS) including the assessment of late payment charges. The Complainant has made its own attempt to derive such information and is included on the record of these proceedings.

Set II, No. 38

PGW reasserts its objection to Set II discovery request No. 38, which seeks to describe "the billing period and gas usage period covered by each lien filed or imposed on any and all of Complainants' Customer Accounts..."

PGW objects to this discovery request on the grounds that it is overbroad and seems to request information that has been previously provided in discovery 11 months ago. Request No. 38 seeks information that is available to the Complainants'. The billing period at which the Complainant is charged and the volumes of gas that the Complainants have been billed are readily available on the Complainants' bills and on the documents previously provided in discovery. As the Complainants conducted discovery previously, PGW has provided extensive billing information that is contained in its Billing Credit and Collection System (BCCS). Such information may be derived by the Complainant. Further, PGW objects to this discovery request on the grounds that it is beyond the scope of these proceedings in that it requests an explanation of a resulting situation with the Complainants' accounts that is beyond the Commission's jurisdiction (municipal liens).

Set II, No. 39

PGW objects to Set II discovery request No. 39, which seeks to produce all documents the Respondent sent to the Commission and to Complainants indicate that any municipal lines on file have been marked satisfied.

PGW reasserts its objection to this discovery request on the grounds that it is beyond the scope of these proceedings in that it requests an explanation of a resulting situation with the Complainants' accounts that is beyond the Commission's jurisdiction (municipal liens).

Set II, No. 40

PGW reasserts its objection to Set II discovery request No. 40, which seeks to identify all persons known to Respondent to have knowledge of any facts or issues involved in the accounting practices with respect to Respondent PGW's system of accounts.

PGW objects to this discovery request on the grounds that it is overbroad in that it is beyond the scope of these proceedings. It seeks the home address, telephone number age of the persons whether PGW employees or not, that have personal knowledge of these matter. More information is beyond the scope of these proceedings. Further to the extent request No. 40 seeks to have a list recreated that contains all who prepared answer to Set II, and have knowledge about these matters is also burdensome. As the Complainants may make a list from the information contained on each of the answers, it is unnecessarily burdensome for PGW to create such a list for the Complainants.

Set II, No. 42 and No. 43

PGW reasserts its objection to Set II discovery request No. 42 and No. 43, which seeks to list all persons the Respondent, intends to call as an expert witness at a trial of this case. Such information has been provided previously to the Complainant or will be provided in connection with PGW's pre-filed testimony, the dead line for which has been set forth by Prehearing Order dated October 2, 2013. The listing of PGW witnesses and related information has not been finalized.

Set II, No. 44

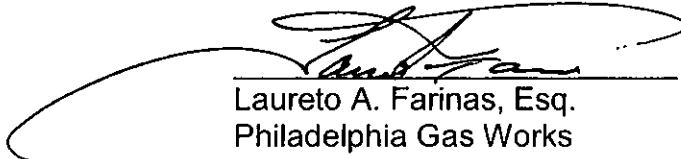
PGW reasserts its objection to Set II discovery request No. 44, which seeks to describe "and provide copies of all exhibits Respondent may introduce at the hearing or

trial of this matter." Such information has been provided previously to the Complainant or will be provided in connection with PGW's pre-filed testimony, the dead line for which has been set forth by Prehearing Order dated October 2, 2013. The listing of PGW exhibits has not been finalized.

WHEREFORE, for the reasons stated above, PGW respectfully requests that the Commission issue an order sustaining PGW's objections to the Complainants' discovery Set II.

Respectfully submitted,

November 4, 2013



Laureto A. Farinas, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

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 and 5.342(c) (RELATING TO SERVICE BY A PARTICIPANT).

Service List

For Complainants:

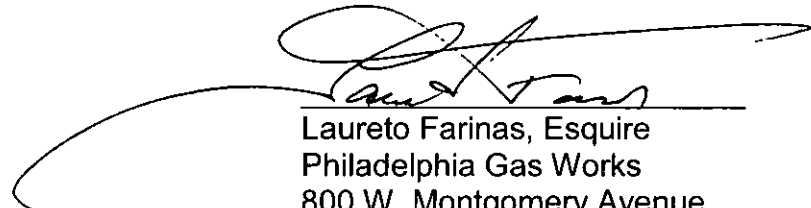
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November 4, 2013



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