



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Leva, Paralegal  
Legal Department  
Direct Dial: 215-684-6862  
FAX: 215-684-6798  
E-mail: [danielle.leva@pgworks.com](mailto:danielle.leva@pgworks.com)

December 23, 2013

Francine Thornton-Boone Esq.  
SBG Management Services, Inc.  
702 Marshall Street  
Philadelphia, PA 19123

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

Dear Ms. Thornton-Boone:

Enclosed please find Philadelphia Gas Works' Responses to the Complainant's Interrogatories and Requests for Production of Documents, Set II, in the above captioned matter, numbers 1 and 26.

If you would like to discuss this matter further, please contact me at my direct-dial number above. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Danielle Leva". The signature is written in a cursive, flowing style.

Danielle Leva

Enclosures

CC: Francine Thornton Boone, Esq. (email)  
Mr. Philip Pulley (email)  
Ms. Kathy Treadwell (email)  
Anne Marie Cromley (PGW Mail)  
Linda Pereira (PGW Mail)



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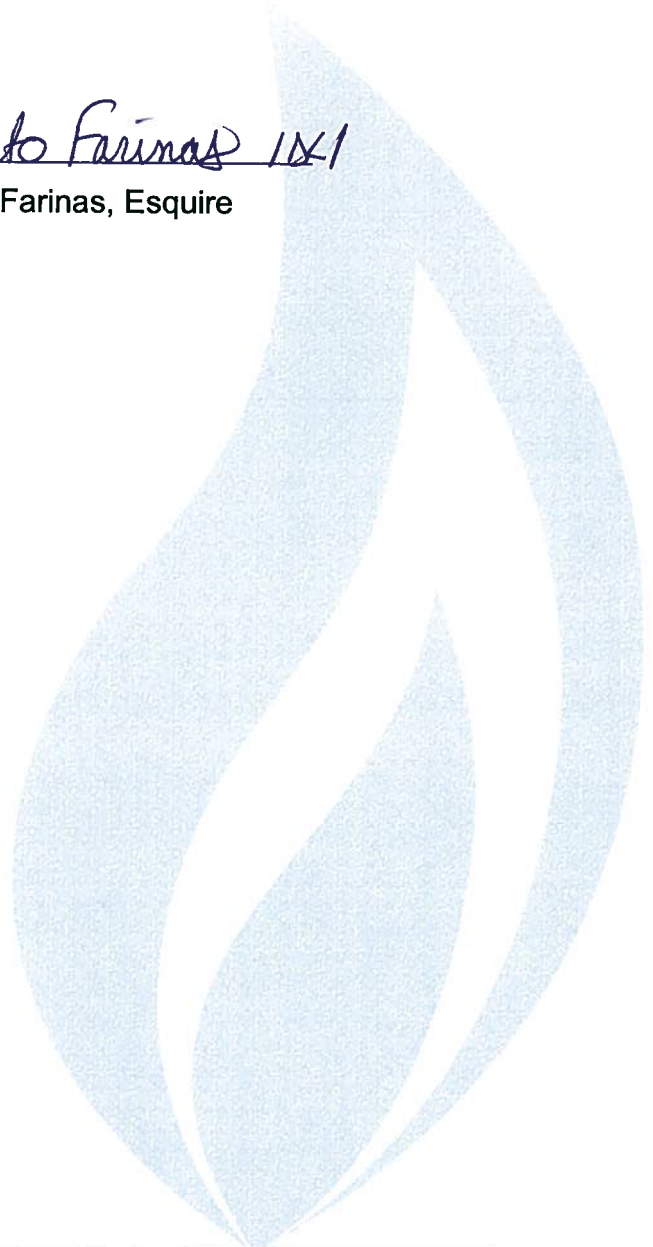
**VERIFICATION**

I, Laureto Farinas, hereby declare that I am counsel for the Philadelphia Gas Works. I am authorized to make this verification on its behalf. The response to the Interrogatories and Requests for Production of Documents are true and correct. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

December 23, 2013

*Laureto Farinas* 1X1

Laureto Farinas, Esquire





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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF PHILADELPHIA GAS WORKS' RESPONSE TO THE INTERROGATIRES AND REQUESTS FOR PRODUCTION OF DOCUMENTS, NO. 41 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:

Francine Thornton Boone, Esq.  
SBG Management Services, Inc.  
702 N. Marshall Street  
Philadelphia, PA 19123

& by e-mail: [fboone@sbgmanagement.com](mailto:fboone@sbgmanagement.com)

Mr. Philip Pulley  
Ms. Kathy Treadwell  
SBG Management Services, Inc.  
P.O. Box 459  
Abington, PA 19001

& by e-mail: [phil@sbgmanagement.com](mailto:phil@sbgmanagement.com)  
[ktreadwell@sbgmanagement.com](mailto:ktreadwell@sbgmanagement.com)

December 23, 2013

*Laureto Farinas* 1544  
Laureto Farinas, Esquire  
Attorney I.D. 50415  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982

**SBG Management Services, Inc. v. Philadelphia Gas Works**  
**Docket Nos. C-2012-2304215, C-2012-2304167,**  
**C-2012-2304303, C-2012-2304183, C-2012-2304324,**  
**C-2012-2334253, C-2012-2308454, C-2012-2308462, C-2012-2308465**

**Requests for Production of Documents And Interrogatories of**  
**SBG Management Services, Inc. and Related Entities (together, "SBG")**  
**Set II**

As modified by the Orders on Motion to Compel of Nov. 14 and Dec. 11, 2013 ("Discovery Order")

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1. For each individual person, officer, employee, agent or other entity answering or providing any information used by Respondent to answer any Interrogatory, state the following:
  - a. First, last and middle legal name;
  - b. All DBA, fake or alias name(s) used by this person;
  - c. Job title or capacity;
  - d. Business address and telephone number;
  - e. ~~Home address and telephone number; and~~
  - f. ~~Age~~

**RESPONSE:**

According to the Discovery Order PGW is not obligated to provide the age or home address of any PGW employee preparing responses to the discovery requests or a listing of employees.

The business address of all PGW employees preparing responses to these discovery requests is:

Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

To arrange any contact with the individuals preparing responses to these discovery requests, please contact PGW counsel:

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

For each person preparing the responses to these discovery requests, the job title, the legal name (first, middle and last), with any DBA, fake or alias names will appear on each response to the request.

THIS RESPONSE WAS PREPARED BY Laureto Farinas, Counsel for PGW.

**SBG Management Services, Inc. v. Philadelphia Gas Works  
Docket Nos. C-2012-2304215, C-2012-2304167,  
C-2012-2304303, C-2012-2304183, C-2012-2304324,  
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26. Identify and describe any writings, utility reports, correspondence, letters, memorandums, email communications, "MELITA" notes, or any other documentations Respondents sent, mailed, faxed to Complainants or the Commission related to the resolutions of or pertaining to Complainant's customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8", and including but not limited to the same as located in the books and records of Respondents' Dispute Resolution Group, Customer Service Center and/or the Commercial Resource Center.

**RESPONSE:**

Attached are the Customer Contact Screens for all of the SBG and related entity accounts. Although the information has been extracted from PGW's Billing Credit and Customer Service System (BCCS), it is the same information that is contained in "Contacts for Account" screens that were provided during the hearings of this matter but for the additional employee identification. These contain information relating to writings reports correspondence with respect to any actions taken on the accounts. As the information has been specifically requested, we provide it as an initial response to this and other requests in Set II.

A legend explaining the columns is attached to the last page of the document.

THIS RESPONSE WAS PREPARED BY Linda Pereira, Senior Customer Review Officer – PGW, with the assistance of the PGW IT department in the extraction of the information for the BCCS.

### Contact Screen Legend:

Column 1 – Account No.	Account Number that was the subject of the Contact entry.
Column 2 – Address	The Service Address that was the subject of the Contact entry.
Column 3 – Contact Date	Date of the Contact entry.
Column 4 – Contact Time	Time of the Contact entry in military time.
Column 5 – CCClass	Customer Contact Class is the major description for the Contact entry that is automatically populated when the Customer Contact Type is chosen.
Column 6 – CCType	Customer Contact Type is the minor description for the Contact entry that is chosen by the Customer representative making the entry into BCCS.
Column 7 – Comments	Comments made by the PGW representative
Column 8 – Comments	Comments made by the PGW representative that exceeded the limit of the first comment space
Column 9 – User Name	Name of the Customer representative making the entry into the BCCS Contact screen. The first letter in the column is the first initial of the employee's name the letters that follow are the last name of the employee. Example: WGIES is W. Gies