

SBG Management Services, Inc.

P.O. Box 549 Abington, PA 19001
Phone 215.938.6665 Fax 215.938.7613

February 10, 2014

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

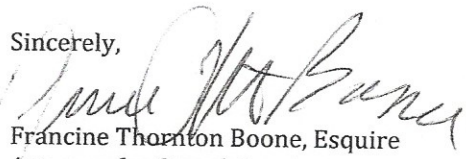
RE: SBG Management Services, Inc. (and related entities) v. PGW, Docket Nos. C-2012-2304167; C-2012-2304183; C-2012-2304215; C-2012-2304303; C-2012-2304324; C-2012-2308454; C-2012-2308462; C-2012-2308465; and C-2012-2334253

Dear Secretary Chiavetta:

On behalf of the Complainants in the above-referenced matters, enclosed for filing is the original **Amended Second Motion to Compel** and original **"Notice to Plead" for the Second Motion to Compel**. Copies to be served in accordance with the attached Certificate of Service. This Motion is also being filed by First-Class, overnight mail, with the Commission today.

If you have questions or require additional information, please do not hesitate to contact me at 215-260-4562 or as described in the contact information, below. Your assistance in this matter is appreciated.

Sincerely,


Francine Thornton Boone, Esquire
Attorney for Complainants
General Counsel, SBG Management Services, Inc.
P.O. Box 549, Abington, PA 19001
c: 215-260-4562
e: fboone@sbgmanagement.com or Booneft@aol.com

Enclosure

cc: ALJ Eranda Vero (by overnight, First Class mail)
Laureto Farinas, Esquire, Philadelphia Gas Works (by overnight, First Class mail)
Phil Pulley, SBG Management Services, Inc. (by hand-delivery)
Kathy Treadwell, SBG Management Services, Inc. (by hand-delivery)

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of:

Docket No. C-2012-2304167--SBG Management Services, Inc. (Etrae) v. Philadelphia Gas Works
Docket No. C-2012-2304183--SBG Management Services, Inc. v. Philadelphia Gas Works
Docket No. C-2012-2304215--SBG Management Services, Inc. v. Philadelphia Gas Works
Docket No. C-2012-2304303--SBG Management Services, Inc. (v. Philadelphia Gas Works
Docket No. C-2012-2304324--SBG Management Services, Inc. v. Philadelphia Gas Works
Docket No. C-2012-2308454--SBG Management Services, Inc. v. Philadelphia Gas Works
Docket No. C-2012-2308462--SBG Management Services, Inc. v. Philadelphia Gas Works
Docket No. C-2012-2308465--SBG Management Services, Inc. v. Philadelphia Gas Works
Docket No. C-2012-2334253--SBG Management Services, Inc./Colonial Garden Realty Co., L.P. v. Philadelphia Gas Works

CERTIFICATE OF SERVICE

I hereby certify that on the date below, I have served the foregoing Complainants' **Amended Second Motion to Compel with Exhibits "A" and "B" and the original "Notice to Plead" for the Second Motion to Compel**, upon the Secretary for the Pennsylvania Public Utility by mailing, via First Class, overnight mail, as a hard-copy, and served a copy of the same upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54:

VIA First Class Mail, Overnight Mail only:

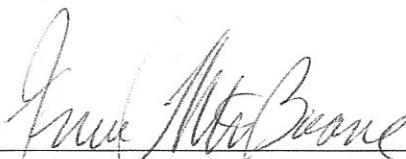
For the PA Public Utility Commission:
Administrative Law Judge Eranda Vero
PA Public Utility Commission
Suite 4063--801 Market Street
Philadelphia, PA 19107

For Respondent:
Laureto Farinas, Esquire, Philadelphia Gas Works
Attorney for PGW and Respondents
800 W. Montgomery Avenue, 4th Floor, Philadelphia, PA 19122

VIA Personal Service (by Hand Delivery):

Phil Pulley and Kathy Treadwell, SBG Management Services, Inc.:
P.O. Box 549, Abington, PA 19001 or
1095 Rydal Road, Abington, PA 19001

Date: February 10, 2014

BY: 
FRANCINE THORNTON BOONE, ESQUIRE
P.O. BOX 549
ABINGTON, PA 19001
Phone: 215-260-4562; Office: 215-938-6665
Electronic Mail Address: Booneft@aol.com
Facsimile Number: 215-938-7613
Pennsylvania Attorney I.D. No.—45118
ATTORNEY FOR COMPLAINANTS

Shipment Receipt: Page #1 of 1

THIS IS NOT A SHIPPING LABEL. PLEASE SAVE FOR YOUR RECORDS.

SHIP DATE:
MON, FEB 10, 2014

EXPECTED DELIVERY DATE:
TUES, FEB 11, 2014 EOD

SHIP FROM:
SBG MANAGEMENT SERVICES
P.O. BOX 549
ABINGTON PA 19001
(215) 260-4562

SHIPMENT INFORMATION:
UPS GROUND COMMERCIAL
8.05 LBS ACTUAL WT
9.00 LBS BILLABLE WT
DIMS: 14.00X14.00X8.00 STORE PACKED
PACK AND SHIP GUARANTEE

TRACKING NUMBER: 1ZR54HG30382471797
SHIPMENT ID: MNPJQR76GUPFN
SHIP REF 1: - -
SHIP REF 2: - -

SHIP TO:
PA PUBLIC UTILITY COMMISSION
ROSEMARY CHIAVETTA, SECRETARY
400 NORTH ST
2ND FLOOR
COMMERCIAL TR Keystone BUILDING
HARTSBURG PA 17120
BUSINESS

SHIPMENT CHARGES:
GROUND COMMERCIAL \$11.48
SERVICE OPTIONS \$0.00
FUEL SURCHARGE \$0.80
CMS PROCESSING FEE \$0.20

COMPLETE ONLINE TRACKING: ENTER THIS ADDRESS IN YOUR WEB BROWSER TO TRACK:
[HTTP://THEUPSTORE.COM](http://theupsstore.com) (SELECT TRACKING, ENTER SHIPMENT ID #) SHIPMENT
QUESTIONS? CONTACT SHIPPED THROUGH ABOVE.

1D: MNPJQR76GUPFN
SHIP TO:
PA PUBLIC UTILITY COMMISSION
ROSEMARY CHIAVETTA, SECRETARY
400 NORTH ST
2ND FLOOR
COMMERCIAL TR Keystone BUILDING
HARTSBURG PA 17120
BUSINESS



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TRACKING NUMBER: 1ZR54HG30382471797
SHIPMENT ID: MNPJQR76GUPFN
SHIP REF 1: - -
SHIP REF 2: - -

SHIP TO:
PA PUBLIC UTILITY COMMISSION
801 MARKET ST
STE 4063
JUDGE ERANDA VERO
PHILADELPHIA PA 19107-3168
BUSINESS

DESCRIPTION OF GOODS:
--

SHIPMENT CHARGES:
GROUND COMMERCIAL \$11.48
SERVICE OPTIONS \$0.00
FUEL SURCHARGE \$0.80
CMS PROCESSING FEE \$0.20

SHIPPED THROUGH:
THE UPS STORE #4744
PHILADELPHIA, PA 19118
(215) 242-2800

TOTAL \$12.48

COMPLETE ONLINE TRACKING: ENTER THIS ADDRESS IN YOUR WEB BROWSER TO TRACK:
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ABINGTON PA 19001
(215) 260-4562

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UPS GROUND COMMERCIAL
8.05 LBS ACTUAL WT
9.00 LBS BILLABLE WT
DIMS: 14.00X14.00X8.00 STORE PACKED
PACK AND SHIP GUARANTEE

TRACKING NUMBER: 1ZR54HG30382470823
SHIPMENT ID: MNPJQR7PJYKKN
SHIP REF 1: - -
SHIP REF 2: - -

SHIP TO:
LAURETO FARINAS, ESQUIRE, PGW
PHILADELPHIA GAS WORKS
800 N MONTGOMERY AVE
FL 4
ATTORNEY FOR PGW AND RESPONDENTS
PHILADELPHIA PA 19122-2806
BUSINESS

DESCRIPTION OF GOODS:
--

SHIPMENT CHARGES:
GROUND COMMERCIAL \$11.48
SERVICE OPTIONS \$0.00
FUEL SURCHARGE \$0.80
CMS PROCESSING FEE \$0.20

SHIPPED THROUGH:
THE UPS STORE #4744
PHILADELPHIA, PA 19118
(215) 242-2800

TOTAL \$12.48

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[HTTP://THEUPSTORE.COM](http://theupsstore.com) (SELECT TRACKING, ENTER SHIPMENT ID #) SHIPMENT
QUESTIONS? CONTACT SHIPPED THROUGH ABOVE.

SHIPMENT ID: MNPJQR76GUPFN

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02/10/2014 02:32 PM Pacific Time N

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SHIPMENT ID: MNPJQR7PJYKKN

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