



PHILADELPHIA GAS WORKS

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October 15, 2014

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 the Requests for Production of Documents and Interrogatories, Set II filed by letter dated October 6, 2014.

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: Donna Ross, Esq. (Email)
Francine Thornton Boone, Esq. (Email)
Mr. Philip Pulley (Email)
Ms. Kathy Treadwell (Email)
Administrative Law Judge Eranda Vero (Email)
Linda Pereira (PGW Mail)
Wendy Vacca (PGW Mail)

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OCT 15 2014
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

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

v. :

Philadelphia Gas Works, :
Respondent :

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**SBG Management Services, Inc. /
Marchwood Realty,**
Complainant

v.

Philadelphia Gas Works,
Respondent

Docket No. C – 2012 – 2308454

**SBG Management Services, Inc. /
Oak Lane Realty Co., LP,**
Complainant

v.

Philadelphia Gas Works,
Respondent

Docket No. C – 2012 – 2308462

**SBG Management Services, Inc. /
Fern Rock Realty,**
Complainant

v.

Philadelphia Gas Works,
Respondent

Docket No. C – 2012 – 2308465

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

v.

Philadelphia Gas Works,
Respondent

Docket No. C – 2012 – 2334253

**Answer of Philadelphia Gas Works to
Complainants' Second 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' motion to compel a response to the Complainants' Requests for Production of Documents and Interrogatories, Set II filed by letter dated October 6, 2014, which is attached hereto as Appendix "A." For the reasons stated herein the Complainant's motion should be denied.

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SECRETARY'S BUREAU

PGW's Answer to the Motion to Compel

1. After a discussion with the Complainant's counsel on October 15, 2014, concerning what is meant by Paragraphs 7 through 12 of the motion to compel of October 6, 2014 PGW learned that the Complainants believe that not all information and "screens" concerning the PGW "F AIMS" system has been provided. The Complainants' counsel had previously agreed to an extension in the filing of a response to the motion.

2. By letter dated May 27, 2014 (re-transmitted by e-mail on May 30, 2014) PGW sent supplemental responses to Set II Nos. 11, 12, and 13, which is attached hereto as Appendix "B." These were the training materials that included examples for accessing PGW information in various screen formats in the F AIMS data base. This database interfaces with PGW's BCCS to share customer and company operation information. The screens presented in the training materials have counterparts that have been presented in discovery. As such, PGW thought the information to be duplicative. The customer/address information, meter reading, customer contact and billing information contained on these F AIMS screens have been provided in a different format in PGW's responses to discovery primarily in the BCCS format. The PGW BCCS system shares the same data stored information. Even the F AIMS information contained on the Field Service Screens (Service Orders) is found in the Customer Contacts screens.

3. The F AIMS screen concerning "Surveys" concerns work of the PGW Distribution Department. These may be only tangentially applicable to the Complainants, as the screens may cover work done on the block of the Complainants buildings. The F AIMS screen concerning BRT interfaces with the City of Philadelphia public information concerning property taxes.

4. On September 11, 2014 PGW sent supplemental response to Set II, Nos. 5, 22, 23, 24, 25 and 27. That supplemental response included a guide to finding and reading information previously provided. It contained samples of the meter number, testing and account information already provided for each of the SBG properties. Most of these would duplicate information found in the F AIMS screens. The guide showed

the location of the separate metering and account information by page number in discovery responses already provided by property in PGW's response to Set II No. 25. It is attached as Appendix "C."

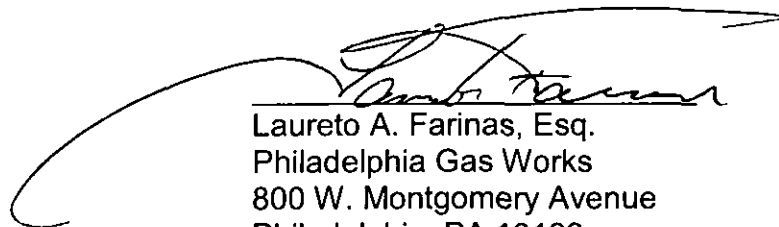
5. The printing and copying of all of the F AIMS screens concerning all of properties and accounts related to the Complainants' properties would be burdensome.

6. PGW proposes that a Complainants' representative visit PGW at a *mutually agreed upon time and date, under supervision of a PGW employee who could assist in review of the information, to review the F AIMS materials to see how much the F AIMS screens differ from the information already provided and to review any information concerning the Complainants' properties.*

WHEREFORE, for the reasons stated above, PGW respectfully requests that the Commission issue an order denying the Complainants' the Complainants' motion to compel discovery of October 6, 2014.

Respectfully submitted,

October 15, 2014



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

APPENDIX A

RECEIVED
OCT 15 2014
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SBG Management Services, Inc.

P.O. Box 549 Abington, PA 19001

Phone 215.938.6665

Fax 215.938.7613

October 6, 2014

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

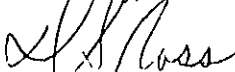
RE: SBG Management Services, Inc. (and related entities) v. PGW, Docket Nos. C-2012-2304167; C-2012-2304183; C-2012-2304215; C-2012-2304303; C-2012-2304324; C-2012-2308454; C-2012-2308462; C-2012-2308465; and C-2012-2334253

Dear Secretary Chiavetta:

On behalf of the Complainants in the above-referenced matters, enclosed for filing is the original **Motion To Compel Responses to Set II Discovery Requests** and original **"Notice to Plead" for the Motion for 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 215-938-6665 or 484-888-9578 or as described in the contact information, below. Your assistance in this matter is greatly appreciated.

Sincerely,



Donna S. Ross, Esquire
Attorney for Complainants
General Counsel, SBG Management Services, Inc.
P.O. Box 549, Abington, PA 19001
c: 484-888-9578
e: dsross@sbgmanagment.com; dsross90@gmail.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)

Donna S. Ross
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Attorney ID. No. 59747

Attorney for Complainants

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SBG MANAGEMENT SERVICES, INC./ COLONIAL GARDEN REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304183
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./ FAIRMOUNT REALTY <i>Complainant</i>	: DOCKET NO. C-2012-2304215
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./ SIMON GARDENS REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304324
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./ ELRAE GARDEN REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304167
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./ MARSHALL SQUARE REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304303
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./ MARCHWOOD REALTY <i>Complainant</i>	: DOCKET NO. C-2012-2308454
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./ OAK LANE REALTY CO., LP	: DOCKET NO. C-2012-2308462

<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	:
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	:
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:

DOCKET NO. C-2012-2308465

DOCKET NO. C-2012-2334253

--- NOTICE TO PLEAD ---

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.371, you are hereby notified to file a written response to this Motion to Compel Respondent's Responses to Complainants' Set II Discovery Requests, which was served on this date, of the above-captioned matters, within five (5) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted, the Pennsylvania Public Utility Commission ("Commission") may rule on this Motion without further input, and a judgment may be entered against you. All pleadings, such as an Answer to the enclosed Motion, must be filed with the Secretary of the Commission, with a copy served on the undersigned counsel for Complainants.

Date: October 6, 2014

Respectfully Submitted By,



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Attorney ID. No. 59747

Attorney for Complainants

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SBG MANAGEMENT SERVICES, INC./ COLONIAL GARDEN REALTY, LP <i>Complainant</i>	:	DOCKET NO. C-2012-2304183
V.	:	
PHILADELPHIA GAS WORKS <i>Respondent</i>	:	
SBG MANAGEMENT SERVICES, INC./ FAIRMOUNT REALTY <i>Complainant</i>	:	DOCKET NO. C-2012-2304215
V.	:	
PHILADELPHIA GAS WORKS <i>Respondent</i>	:	
SBG MANAGEMENT SERVICES, INC./ SIMON GARDENS REALTY, LP <i>Complainant</i>	:	DOCKET NO. C-2012-2304324
V.	:	
PHILADELPHIA GAS WORKS <i>Respondent</i>	:	
SBG MANAGEMENT SERVICES, INC./ ELRAE GARDEN REALTY, LP <i>Complainant</i>	:	DOCKET NO. C-2012-2304167
V.	:	
PHILADELPHIA GAS WORKS <i>Respondent</i>	:	
SBG MANAGEMENT SERVICES, INC./ MARSHALL SQUARE REALTY, LP <i>Complainant</i>	:	DOCKET NO. C-2012-2304303
V.	:	
PHILADELPHIA GAS WORKS <i>Respondent</i>	:	
SBG MANAGEMENT SERVICES, INC./ MARCHWOOD REALTY <i>Complainant</i>	:	DOCKET NO. C-2012-2308454
V.	:	
PHILADELPHIA GAS WORKS <i>Respondent</i>	:	
SBG MANAGEMENT SERVICES, INC./ OAK LANE REALTY CO., LP	:	DOCKET NO. C-2012-2308462

<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	:
<i>Complainant</i>	: DOCKET NO. C-2012-2308465
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	:
<i>Complainant</i>	: DOCKET NO. C-2012-2334253
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:

**COMPLAINANTS', SBG MANAGEMENT SERVICES, INC., COLONIAL GARDEN REALTY CO. (I and II), FAIRMOUNT REALTY CO., SIMON GARDENS, ELRAE GARDEN REALTY, MARCHWOOD REALTY, FERNROCK REALTY, OAK LANE REALTY CO., L.P., AND MARSHALL SQUARE REALTY ("COMPLAINANTS"),
MOTION TO COMPEL PGW'S RESPONSES TO COMPLAINANTS' REQUESTS FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES ADDRESSED TO RESPONDENT PHILADELPHIA GAS WORKS, SET II, INTERROGATORIES NOS. 5, AND REQUEST FOR SANCTIONS ("MOTION")**

Pursuant to 52 Pa. Code Sections 5.342 and 5.321(c), Complainants, by their undersigned counsel, hereby respectfully request the Pennsylvania Public Utility Commission ("Commission") to compel Philadelphia Gas Works ("PGW" or "Respondent") to fully respond and to file complete answers to Complainants' Requests for Production of Documents and Interrogatories Addressed to Respondent PGW, Set II, Interrogatory No. 5 in accordance with the presiding officer's Orders dated April 9, 2014 and August 21, 2014.

I. SUMMARY

Respondent's response to the Subject Interrogatories are incomplete and non-responsive and violate applicable statutory law, including 52 Pa. Code Sections 5.342, as Respondent: (1) submitted incomplete supplemental responses that failed to supply all the requested information, including data regularly maintained in the course of doing business and easily accessible and

retrievable by PGW that would respond to the stated Interrogatory that included electronically held documents, calculations, memoranda, and other information as discussed below; (2) PGW submitted responses that claim to provide information on all the accounts but then failed to provide the *all such* information; and (3) submitted responses that refers to “previously provided” information [to Complainants from Respondent] without specifically identifying where and in what particular documents the discoverable information is set forth or by referring to responses previously answered to Set II, Interrogatories, which was also an incomplete response. On August 21, 2014, ALJ discussed at length in her order of the same that Complainants’ question:

5. Identify and describe with particularity any and all documents, of any kind, that are in the possession, control or custody of Respondent, or of which Respondent has knowledge, whether originals, copies or facsimiles, regardless of their location, which are utilized to manage Complainants’ Customer Accounts, SA accounts, former and current meters located at the Subject Properties limited to Disputed Transactions attached hereto as Exhibits “A-1” through “A-8”.

was unduly burdensome to produce and somewhat vague. In that order, the presiding officer denied Complainants’ Motion for Sanctions, however, in accordance with her previous order of April 9, 2014, Respondent, PGW was ordered and under a continuing duty to supply *supplemental information related to Set II, No. 5, 11, 12, and 13 pertaining to discovery.*

Respondent was not forthright in its response as to indicate that it had the means and access to provide the information requested. Instead they argued that it would be unduly burdensome and Complainants requests were vague.

On September 30, 2014, fifteen (15) days after the close of discovery, Respondent sent discovery verifications for supplemental responses in the form of documents, which showed examples of data collections screens, whereby information could be gleaned and retrieved

regarding premised based and customer based data , as part of their ongoing duty to supplement their responses to Set II, Nos. 11, 12, and 13. PGW provided information that shows that it may electronically retrieve account information related to a premise that receives PGW gas usage with information contained on data screens that provide pertinent customer information providing a specific location's complete history of gas accounts, including but not limited to, the Premise Based Tabs which provides information of all of the bills from the "Subject Properties" premises for all customers, including previous customers and Customer Based Tabs, which provides similar data and information for customer accounts. Despite having easily retrievable information at its' disposal, Respondent failed to provide Complainants' with such information in response to the discovery propounded. And furthermore, PGW did not disclose its' ability to provide such information until fifteen days (15) after discovery closed on September 15, 2014.

II. SPECIFIC GROUNDS TO COMPEL RESPONSES TO THE SUBJECT INTERROGATORIES

In support of this Motion, Complainants by and through their undersigned counsel, hereby move the Commission to enter an appropriate Order and Sanctions against Respondent, pursuant to 52 Pa. Code Section 5.342 and 5.371-5.372. In support of this Motion, Complainants aver as follows:

1. The above-referenced consolidated Complaints were commenced by filing Complaints and Amended Complaints. Respondents subsequently filed Answers and Amended Answers to the Amended Complaints.
2. Complainants, by its former counsel, Scott DeBroff, Esquire, served discovery requests upon counsel for Respondent.
3. On October 9, 2013, Complainants, by their current counsel, served a second set of discovery requests, Complainants' Requests for Production of Documents and Interrogatories

Addressed to Respondent PGW, Set II (collectively, "Interrogatories" or "Interrogatories Set II"), a copy of these Interrogatories, are attached as Exhibit "A", and incorporated herein by reference.

4. On December 9, 2013, ALJ Eranda Vero issued an "Order on the Joint Motion to Extend the Time to Conduct Discovery and to Continue the Scheduled Hearings" ("12/9/2013 Order") on page 4 (second full paragraph), that cited ALJ Vero's November 14, 2013 Order ("11/14/2013 Order") as follows:

"On November 14, 2013, I issued an Order granting, in part, and denying, in part, the Complainants' Motion to Compel.... Noting that the objections did not state with any degree of specificity where such information was provided to the Complainants, I instructed the Respondent to do so 'within fifteen (15) days of the date of this Order unless the parties agree upon a different due date.' See Order of Motion to Compel, Ordering Paragraphs 5, and 11. Based on the Respondent's claim that it had already provided to Complainants the information requested by the majority of their Set II-Discovery Requests, I deemed this amount of time sufficient **for the Respondent to direct the Complainants to the information it had provided during previous discovery, to supplement that information, and to answer the remainder of discovery requests propounded by the Complainants.**" (Emphasis added.)

5. Pennsylvania statutes define the manner and form of Answers to Interrogatories. Specifically, 52 Pa. Code Section 5.342 (a) (3) and (4) require:

"(a) Form. Answers to Interrogatories must:

3. Be submitted as an answer and may not be submitted as an exhibit or in another form.

4. Answer each interrogatory fully and completely unless an objection is made.
(See 52 Pa. Code Section 5.342)

6. On 4/9/2014 ALJ Vero, issued an order granting and denying, in whole or in part, Complainants' Second Amended Motion to Compel for Interrogatory Nos. 2,3, 5-31, 33-39, that granted on 4/9/2014: 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16, 22, 23, 24, 27, 29, 30, and 36; and denied on 4/9/2014: 14, 17, 18, 19, 20, 21, 26, 28, 31, 33, 34, 35, 37, 38, and 39.

7. Upon Motion for Reconsideration by Complainants, ALJ Vero issued an Order amending the 4/9/2014 Order to require supplemental responses from Respondent, including responses for Interrogatories 5, 11, 12, and 13 within forty-five (45) days from the day of the Order, April 9, 2014.

8. On August 21, 2014, ALJ Vero denied Complainants' Motion for Sanctions regarding Respondent's incomplete responses to interrogatories and requests for production to Set II Nos. 5, 11, 12, and 13.

9. Complainants file this Motion due to Respondent's failure to comply with applicable case and statutory law and Respondent's failure to provide the requisite full, complete and specific responses to the following Interrogatories Set II, Nos. 5, 11, 12, and 13 ("Subject Interrogatories").

10. Respondent knew it had the ability to easily access information in its possession, long before these proceedings started and the ability to forthrightly provide such information and share it with Complainants. Had they done so, PGW may have answered Complainants' questions regarding these matters and prevented this voluminous discovery process and litigation.

11. Respondent waited until discovery closed (September 15, 2014) before it provided verified responses to the interrogatories as stated (September 30, 2014), which indicated that such embedded information exists and is accessible.

12. Respondent still has not provided specific premise/customer based information as found in the Viewing and Navigating AIMS Data system and they have the easy ability to do so. Or if PGW has provided such information, they have only turned over select data and not all that is available, relevant and pertinent to these proceedings.

13. Respondent is deliberately being evasive and showing bad faith in these proceedings as it relates to veracity and conformity to discovery and these proceedings.

14. As stated below in this Motion, for the remainder of the Responses, Respondent failed to identify all such documents and/or failed to provide for inspection or to attach all documents as required by Set II, Interrogatories 5, 11, 12, and 13.

15. The Supplemental Responses provided and verified on September 30, 2014, show that PGW maintains information that is specific to the "Subject Properties" and Customer accounts, is easily retrievable and available, but does not provide the specific information as requested for these subject properties/premises or customer based accounts.

16. This Motion incorporates the contents and statements set forth in the Prehearing Conference Memorandum dated 7/10/2014 ("7/10/2014 Memo"), by reference as though set forth herein and thereto, in its entirety.

* * * * *

SUMMARY OF MOTION TO COMPEL:

In summary, based on a review of the applicable case and statutory law, Respondent must be compelled to fully, completely, and specifically answer the Subject Interrogatories.

Essentially, the Interrogatories are governed by 52 Pa. Code Section 5.321(c), which provides:

(c) Scope. Subject to this subchapter, a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not ground for objection that the information sought will be inadmissible at hearing if the information sought is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code Section 5.321 (c).

52 Pa. Code Section 5.342 states the form and manner of Answers to Interrogatories:

- (a) **Form. Answers to Interrogatories must:**
- (1) Be in writing.
 - (2) Identify the name and position of the individual who provided the answer.
 - (3) Be submitted as an answer and may not be submitted as an exhibit or in another form.**
 - (4) Answer each interrogatory fully and completely unless an objection is made.**
 - (5) Restate the interrogatory which is being answered or be inserted in the spaces provided in the interrogatories.
 - (6) Be verified in accordance with Section 1.36 (relating to verification).

Here, Complainants served Interrogatories on Respondent. Respondent failed to fully comply with Section 5.342, and Respondent provided partial or no responsive information to Complainants, as discussed in detail in Paragraphs 1 through 16, above. Neither Section 5.342, nor any other section of the statute, supports these incomplete and inadequate discovery responses. As noted in prior pleadings, discovery is encouraged so that the parties may dispose of any or as many issues as possible, prior to trial or hearing. Through discovery, the parties may discover that certain issues are “resolvable” or not in dispute and avoid wasting precious judicial time and resources. Here, Respondent is acting in contradiction to the rules governing discovery.

Respondent must provide its discovery documents and responses in a proper manner. Here, Respondent refers to policies, procedures, practices, calculations of basic charges, outstanding balances, interest and penalties, the imposition of liens, applications of payments and even issues conclusions that Respondent satisfied the applicable laws and tariffs, while *responding with exhibits or other forms of or statements documents that contain incomplete information and that fail to organize or state account information in a manner that fully and specifically answers or responds to the Interrogatories as required by Section 5.342.* Respondent needs to answer the Interrogatories, specifically, fully and completely as required by law and we respectfully request that the Commission compel PGW to do so.

Pursuant to 52 Pa. Code Section 5.321(c):

“...a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter.”

Here, the Interrogatories seek information, including “books, documents, and other tangible things and the identity and location of persons having knowledge of a discoverable matter”, that are relevant to this proceeding and that are further defined as discoverable at Section 5.321(c), above. Respondent failed to fully provide and identify those letters, correspondence, records, emails, and other documents explaining the bills, charges, application of payments on the Customer Accounts, SAs, and Disputed Transactions, and documents containing or referring to the internal memoranda/documentation on Respondent’s practices, policies, and procedures underlying the calculation of the debt, imposition of liens (including gas usage period covered by the lien and date of filing/satisfying all liens, if applicable), application of payments, charges, LPC’s, and interest charges—and to provide this information on each Customer Account, SA, and Disputed Transaction that are part of this litigation. Without this detailed information, Respondent is withholding critical data that permits all parties and the Commission to confirm or defeat its claim of billing Complainants in accordance with the applicable statutes, tariffs, and laws. (In an effort to amicably resolve this matter, the need for this information was also discussed with counsel for PGW, who refused to provide it.)

Respondent also failed to show where and how the information was previously provided “during the hearings”; as previously done, Respondent simply refers to its Exhibits and its Statement of Accounts (the original and “updated” SOAs). The Exhibits are not organized in a manner to specifically correlate to each discovery request as required by 52 Pa. Code Sections 5.342 and 5.321. The Statement of Account, as stated repeatedly by PGW, does not provide

details on calculation of the debt and the application of the payments as discussed in greater detail above.

The importance of receiving this detailed, complete, specific, and full discovery response is best shown in the case of Campos v. PGW, where the Administrative Law Judge for the Commission stated that Linda Pereira, a senior customer review officer for PGW testified and noted:

“...the credit that the Complainant had established on his account was absorbed through the make-up bill and that the current undisputed charges after the issuance of the make-up bill have not been paid....PGW also assess a late payment fee...because Complainant had not paid undisputed charges for gas services rendered.” (See Campos, p. 28)”

Thereafter, the Commission, by its ALJ, held at page 28:

“I disagree with the account of billed charges by PGW toward Complainant’s account. The amount of \$2,028.80 is under dispute. PGW does not dispute that \$781.01 is credit accrued by the Complainant for early payments made. PGW cannot place the credit established by the Complainant toward the disputed amount owed. Rather, PGW must continue to place the credit toward undisputed amounts owed. (See Campos, at p. 30)...”

As shown in the Campos case, one can not assume that because PGW claims it is calculating the bills and payments in accordance with the statutes, rules, and tariffs, that a full examination of the critical underlying pieces of the bills and charges is a waste of time or unnecessarily burdensome. To the contrary, this Motion to Compel is needed to force a clear and readily understandable explanation for the bills, charges, and payments underlying this litigation and the related Customer Accounts, SAs, and Disputed Transaction.

The statutes governing billing by a utility in this Commonwealth are clear and provide substantial guidance to the parties, as set forth below:

52 Pa. Code Section 56.15 provides:

“§ 56.15. Billing information.

A bill rendered by a public utility for metered residential public utility service must state clearly the following information:

(4) The amount due for service rendered during the current billing period, specifying the charge for basic service, the energy or fuel adjustment charge, State tax adjustment surcharge if other than zero, State sales tax if applicable and other similar charges. The bills should also indicate that a State gross receipts tax is being charged and a reasonable estimate of the charge. A Class A utility shall include a statement of the dollar amount of total State taxes included in the current billing period charge. For the purpose of this paragraph, a Class A utility shall also include a Class A telephone utility as defined under § 63.31 (relating to classification of public utilities).

(7) The total amount of payments and other credits made to the account during the current billing period.

(8) The amount of late payment charges, designated as such, which have accrued to the account of the customer for failure to pay bills by the due date of the bill and which are authorized under §56.22 (relating to accrual of late payment charges).

(9) The total amount due.

(11) A statement directing the customer to “register any question or complaint about the bill prior to the due date,” with the address and telephone number where the customer may initiate the inquiry or complaint with the public utility.

(12) A statement that a rate schedule, an explanation of how to verify the accuracy of a bill and an explanation, in plain language of the various charges, if applicable, is available for inspection in the local business office of the public utility and on the public utility’s web site.”

(14) Electric distribution utilities and natural gas distribution utilities shall incorporate the requirements in § § 54.4 and 62.74 (relating to bill format for residential and small business customers). (Emphasis added.)

Accordingly, the applicable laws and tariffs require that the utility provide specific information on its bills and billing statements. Arguably, despite the discovery requests and the above statutory provisions, PGW continues to refuse to provide details on the bills and payments, including a separate statement of the “accrued late payment charges” and an explanation on how to verify the accuracy of the bills, i.e., provide the details and accounting for the application of payments, including those involving disputed vs. undisputed debt, lien information, payment information, and LPC detailed information.

52 Pa. Code Section 56.21 provides:

“§ 56.21. Payment.

(2) *Date of payment by mail.* For a remittance by mail, one or more of the following applies:

(i) Payment shall be deemed to have been made on the date of the postmark.
(ii) The public utility may not impose a late payment charge unless payment is received more than 5 days after the due date.

(4) *Electronic transmission.* The effective date of a payment electronically transmitted to a public utility is the date of actual receipt of payment.

(6) *Multiple notifications.* When a public utility advises a customer of a balance owed by multiple notices or contacts which contain different due dates, the date on or before which payment is due shall be the latest due date contained in any of the notices.”

52 Pa. Code Section 56.22, provides:

“§ 56.22. Accrual of late payment charges.

a) Every public utility subject to this chapter is prohibited from levying or assessing a late charge or penalty on any overdue public utility bill, as defined in § 56.21 (relating to payment), in an amount which exceeds 1.5% interest per month on the overdue balance of the bill. These charges are to be calculated on the overdue portions of the bill only. The interest rate, when annualized, may not exceed 18% simple interest per annum.

(b) An additional charge or fixed fee designed to recover the cost of a subsequent rebilling may not be charged by a regulated public utility.

(c) Late payment charges may not be imposed on disputed estimated bills, unless the estimated bill was required because public utility personnel were willfully denied access to the affected premises to obtain an actual meter reading.”

In addition to the above, the Courts of this Commonwealth have limited how and when the 1.5% financing charge/rate may be imposed in the face of a judgment or lien. Despite PGW’s claims, if the rate of the finance charge must change to 6% from 18%, upon post-judgment, then the filing date of the judgment or lien is needed to calculate the post-judgment interest on the lien debt? Further, only PGW files the liens and knows the details of the debts and charges underlying these debts and charges. Some of the liens have no account numbers or information on the gas usage periods covered by the liens—all of this information is part of verifying the underlying debt. Since 42 Pa.C.S. § 8101 (relating to interest on judgments) limits post-judgment interest to 6% per year unless otherwise provided by another statute, it supersedes the regulation that provides for 18% financing charge or LPCs, per year on amounts owed to a public utility. Equitable Gas Co. v. Wade, 812 A.2d 715 (Pa. Super. 2002). We cannot assume, as PGW might, that it does not matter when the lien was filed on each and every Subject Property; this

information creates a 12% difference in the particular financing charged assessed and deemed due on the debt.

Further, statutes and the Commission have set requirements on providing information to customers on bills and charges. The Complainants seek information that will easily and readily explain how PGW created its bills and claims against Complainants. By providing the requested detailed information on the bills and payments for the Customer Accounts, as described herein and in Paragraphs 1 through 16 above, PGW will be complying with the discovery requests, as well as with the spirit and goals of the "plain language" guidelines set forth in 52 Pa. Code §69.251, that permit a customer to obtain billing information in a clear and easily and readily understood manner.

52 Pa. Code Sections 56.23 and 56.24 provide as follows:

“§ 56.23. Application of partial payments between public utility and other service.

Payments received by a public utility without written instructions that they be applied to merchandise, appliances, special services, meter testing fees or other nonbasic charges and which are insufficient to pay the balance due for the items plus amounts billed for basic utility service shall first be applied to the basic charges for residential public utility service.

And

§ 56.24. Application of partial payments among several bills for public utility service.

In the absence of written instructions, a disputed bill or a payment agreement, payments received by a public utility which are insufficient to pay a balance due both for prior service and for service billed during the current billing period shall first be applied to the balance due for prior service.”

The Statement of Accounts clearly show partial payments or payments that do not pay the full balance on bills that include basic and non-basic charges and bills that are for prior service and service billed during the current period. Yet, the Statement of Accounts, do not designate how these partial payments are applied. Without this detailed information, the parties and the Commission cannot verify whether PGW has fully, completely, specifically, and properly

complied with the tariffs, statutes, rules, and laws governing good service and billing by a utility in this Commonwealth.

52 Pa. Code Section 56.151 provides:

"§ 56.151. General rule.

Upon initiation of a dispute covered by this section, the public utility shall:...

(2) Investigate the matter using methods reasonable under the circumstances, which may include telephone or personal conferences, or both, with the customer or occupant.

(3) Make a diligent attempt to negotiate a reasonable payment agreement if the customer or occupant is eligible for a payment agreement and claims a temporary inability to pay an undisputed bill. Factors which shall be considered in the negotiation of a payment agreement include, but are not limited to:

- (i) The size of the unpaid balance.**
- (ii) The ability of the customer to pay.**
- (iii) The payment history of the customer.**
- (iv) The length of time over which the bill accumulated.**

(4) Provide the customer or occupant with the information necessary for an informed judgment, including, but not limited to, relevant portions of tariffs, statements of account and results of meter tests.

(5) Within 30 days of the initiation of the dispute, issue its report to the complaining party. The public utility shall inform the complaining party that the report is available upon request.

(i) If the complainant is not satisfied with the dispute resolution, the utility company report must be in writing and conform to § 56.152 (relating to contents of the public utility company report). Further, in these instances, the written report shall be sent to the complaining party if requested or if the public utility deems it necessary.

(ii) If the complaining party is satisfied with the orally conveyed dispute resolution, the written utility company report may be limited to the information in § 56.152(1), (2) and, when applicable, § 56.152(7)(ii) or (8)(ii).

(iii) The information and documents required under this subsection may be electronically provided to the complaining party as long as the complaining party has the ability to accept electronic documents and consents to receiving them electronically."

Clearly, the above shows that Section 56.151 provides the criteria for actions required by the utility in the face of a dispute with a customer. The information requested in the Interrogatories seek details on the training, practices, policies, and procedures used to resolve the disputes in the underlying litigation. The Interrogatories seek specific and detailed information which would permit an understanding and a determination of whether PGW satisfied the dictates of Section 56.151 and other statutes with respect to the disputes at the heart of this litigation.

PGW's refusal to specifically, fully, and completely provide this information is an attempt to frustrate the discovery process and to prevent a full and thorough hearing on the bills and PGW's actions in providing "good service" in these consolidated cases. Accordingly, Complainants respectfully request that the Commission compel Respondent to fully, completely, and specifically answer the Interrogatories.

III. CONCLUSION

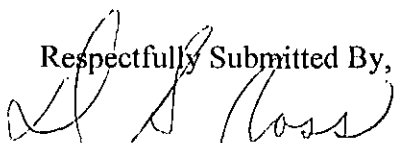
WHEREFORE, Complainants respectfully request Your Honor and the Commission:

- (1) Grant this Motion to Compel;
- (2) Compel PGW to answer Set II, Interrogatories Nos. 5, 11, 12 and 13 by providing all the Premised Based and Customer Based data/information for the "Subject Properties" named herein and Customer accounts for said "Subject Properties" as embedded in the Viewing and Navigating AIMS Data collection system used by PGW for historical electronic data on Complainants premises and accounts which are the subject of this litigation and produce full and complete answers and documents pertaining thereto within five (5) days of the date of the Commission's Order on the same; and
- (3) Grant any other relief deemed appropriate, including, but not limited to:
 - a. Striking all PGW bills, demands for payments, charges, late payment charges, interest charges, and other costs and charges for those Customer Accounts from PGW to Complainants (except for basic gas usage charges that are not in dispute) for those Customer Accounts, where PGW failed to fully, completely, and specifically provide and respond to any or all of the discovery requests, which are the subject of this Motion; and

- b. Barring the introduction, by PGW, of any evidence in the form of testimony, exhibits, examples or documentation, at the remaining hearings and in the pre-filed testimony presented by PGW, in contradiction of Complainants' case in chief or in PGW's defense, that requires the use of, relates to or refers to the documents, materials, and/or responses sought, but not provided by PGW in response to, Interrogatories Set II /Subject Interrogatories and
- c. Imposing, any and all other appropriate sanctions for failing to fully and completely answer the Subject Interrogatories.

Date: October 6, 2014

Respectfully Submitted By,



Donna S. Ross
General Counsel
SBG Management Services, Inc.
P.O. Box 549
Abington, PA 19001
E: dsross@sbgmanagement.com; dsross90@gmail.com
T: 215-938-6665; M: 484-888-9578
Attorney ID. No. 59747

COMMONWEALTH OF PENNSYLVANIA
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:

Docket No. C-2012-2304167--SBG Management Services, Inc. (Elrae) 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' **Motion To Compel Responses to Set II Discovery Requests** and original "**Notice to Plead**" for the **Motion for 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

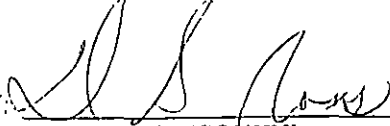
For Respondent:

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: October 6, 2014

BY: 
DONNA S. ROSS, ESQUIRE
P.O. BOX 549
ABINGTON, PA 19001
Phone: 484-888-9578; Office: 215-938-6665
Electronic Mail Address: dsross@sbgmanagement.com; dsross90@gmail.com
Attorney I.D. No. 59747
ATTORNEY FOR COMPLAINANTS

COMMONWEALTH OF PENNSYLVANIA BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:

Docket No. C-2012-2304167--SBG Management Services, Inc. (Elrae) v. Philadelphia Gas Works
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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

**CERTIFICATION OF COUNSEL OF DISCOVERY UNDERTAKEN AND EFFORTS TO RESOLVE THE
DISCOVERY DISPUTES**

In accordance with the applicable regulations and statutes, I, Donna S. Ross, Esq., counsel for Complainants, hereby certify that in good faith, on an informal basis, and without the intervention of and prior to contacting the Commission or ALJ Vero for this Motion to Compel, as well as on a formal basis through written memoranda and a hearing before ALJ Vero, I attempted to resolve these discovery disputes amicably with counsel for Respondent, Laureto Farinas, Esq., in accordance with the applicable sections of Title 52 of the Pennsylvania Code.

Date: October 6, 2014

BY: 

DONNA S. ROSS, ESQUIRE

P.O. BOX 549

ABINGTON, PA 19001

Phone: 484-888-9578; Office: 215-938-6665

Electronic Mail Address: dsross@sbgmanagement.com; dsross90@gmail.com

Attorney I.D. No. 59747

ATTORNEY FOR COMPLAINANTS

From Please print and press hard. Date 10/6/2011 Sender's FedEx Account Number 2393-0508-3 Sender's Name Donna S Ross Company SBG MANAGEMENT Address 1095 RYDAL RD City RYDAL State PA ZIP 19046-1711

Your Internal Billing Reference To Recipient's Name Mr. Laureto Encinas Esq. Company DGW Address 800 W. Montgomery Ave. City Philadelphia State PA ZIP 19122 0115759565



4 Express Package Service Packages up to 150 lbs. FedEx First Overnight, FedEx Priority Overnight, FedEx Standard Overnight, FedEx 2Day AM, FedEx 2Day, FedEx Express Saver

5 Packaging FedEx Envelope, FedEx Pak, FedEx Box, FedEx Tube, Other. 6 Special Handling and Delivery Signature Options SATURDAY Delivery, No Signature Required, Direct Signature, Indirect Signature. 7 Payment Bill to Sender, Recipient, Third Party, Credit Card, Cash/Check. Total Packages 1, Total Weight 1.42, Total Declared Value \$6.11

YOU MUST RETAIN THIS COPY BEFORE AFFIXING TO THE PACKAGE. NO POUCH NEEDED.

From Please print and press hard. Date 10/6/2011 Sender's FedEx Account Number 2393-0508-3 Sender's Name Donna S Ross Company SBG MANAGEMENT Address 1095 RYDAL RD City RYDAL State PA ZIP 19046-1711

Your Internal Billing Reference To Recipient's Name A.J. Franko Vice Esq. Company AA-PUC Address 801 Market St Suite 1063 City Philadelphia State PA ZIP 19107 0115759565



4 Express Package Service Packages up to 150 lbs. FedEx First Overnight, FedEx Priority Overnight, FedEx Standard Overnight, FedEx 2Day AM, FedEx 2Day, FedEx Express Saver

5 Packaging FedEx Envelope, FedEx Pak, FedEx Box, FedEx Tube, Other. 6 Special Handling and Delivery Signature Options SATURDAY Delivery, No Signature Required, Direct Signature, Indirect Signature. 7 Payment Bill to Sender, Recipient, Third Party, Credit Card, Cash/Check. Total Packages 1, Total Weight 1.42, Total Declared Value \$6.11

YOU MUST RETAIN THIS COPY BEFORE AFFIXING TO THE PACKAGE. NO POUCH NEEDED.

From Please print and press hard. Date 10/6/2011 Sender's FedEx Account Number 2393-0508-3 Sender's Name Donna S. Ross Esq. Company SBG MANAGEMENT Address 1095 RYDAL RD City RYDAL State PA ZIP 19046-1711

Your Internal Billing Reference To Recipient's Name Ms. Mary Chiavetta Esq. Company PA-PUC Commonwealth Keystone Bldg Address 400 North Street City Harrisburg State PA ZIP 17120 0115759565



4 Express Package Service Packages up to 150 lbs. FedEx First Overnight, FedEx Priority Overnight, FedEx Standard Overnight, FedEx 2Day AM, FedEx 2Day, FedEx Express Saver

5 Packaging FedEx Envelope, FedEx Pak, FedEx Box, FedEx Tube, Other. 6 Special Handling and Delivery Signature Options SATURDAY Delivery, No Signature Required, Direct Signature, Indirect Signature. 7 Payment Bill to Sender, Recipient, Third Party, Credit Card, Cash/Check. Total Packages 1, Total Weight 1.42, Total Declared Value \$6.11

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APPENDIX B

RECEIVED

OCT 15 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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

September 11, 2014

Donna Ross, Esq.
SBG Management Services, Inc.
702 N. Marshall Street
Philadelphia, PA 19123

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 Ms. Ross :

Enclosed please find Philadelphia Gas Works' Supplemental Responses to Set II Nos., 5, 22, 23, 24, 25, and 27.

If you would like assistance in navigating the chart in response to Set II Nos. 5 and 25, please do not hesitate to contact me.

Thank you for your assistance in the matter.

Sincerely,

Danielle Leva
Danielle Leva

Enclosure

cc: Francine Thornton Boone, Esq.
Donna Ross, Esq.
Mr. Philip Pulley
Ms. Kathy Treadwell
Linda Pereira (PGW Mail)

RECEIVED

OCT 15 2014
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**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")

Supplemental Response to Set II Nos. 5 and 25

RESPONSE:

Pursuant to the Discovery Order of August 21, 2014 ("Discovery Order") p.8, in these matters, PGW has been requested to identify provide specifically where Meter Reading information screens associated with accounts and SBG related buildings. The attached is a guide to finding the meter information sought.

On the Sample pages provided the location of the information indicated as highlighted on the screen. The listing shows the page numbers of PGW's Response to Set II, No. 25 with the corresponding information.

- The SA Number is located on the page number indicated on the top left corner next to "USA" and is highlighted in yellow on the sample page.
- The Meter Number is located in the middle of the left side of the page number indicated and is highlighted in green on the sample page.
- The Meter Maintenance is located on the page number indicated. The title is on the top center of the page and is highlighted in orange on the sample page.
- The Meter Test is located on the page number indicated. The title is located on the top center of the page and is highlighted in pink on the sample page.

This response was prepared by Linda Pereira, Senior Customer Review Officer – PGW

Name	Account	SA	Meter #	SA#	Meter Maintenance	Meter Test
			Set II, No. 25 Page #	Set II, No. 25 Page #	Set II, No. 25 Page #	Set II, No. 25 Page #
Colonial Gardens	6128000245	1375369694	25011	25010	25012	25013
Elrae	227745786	1453977841	25021		25022	25023
	608367105	9709627993	25026		25027	
	608367105	3022438905	25026			
	405781694	5794296888	25036		25037	25038
	294731407		25041		25042	25043
704 Marshall	156030558	9834719279	25046		25047	25049
627 Marshall	89533358	7366786439	25053		25054	25056
628 Marshall	75710860	6155784270	25061		25062	
615 N 7 th	25088422	4797733461	25068			
606 Marshall	0736586029	91056958	25073		25074	
620 Marshall	677180766	7054389359	25110	25109	25111	
	664719425	6785497900	25080	25079	25081	
625 N 7 th	612167092	1346070888	25087	25086	25088	25089
640 N Marshall	355139832	2103898906	25095	25094	25096	
634 N 6 th	333870431	6792935701	25103	25101		
	333870431	4304754753	25103	25102	25104	
700 N Marshall	215659749	8938394971	25117	25116		
702 N Marshall	215659749	1882249424	25120	25119	25122	25123
Fern Rock	719354604	5597548861	25134	25136	25139	25140
	253720512	9935030987	25143		25144	25145

Name	Account	SA	Meter #	SA#	Meter Maintenance	Meter Test
			Set II, No. 25 Page #	Set II, No. 25 Page #	Set II, No. 25 Page #	Set II, No. 25 Page #
Marchwood	9125007651	9961788347	25161		25162	25163
	5128000237	6676751050		25153	25156	25157
	5128000237	6430067215		25153	25154	25155
Marshall Square	373007503	3068796324	25166		25167	25168
	323900622	6654332208	25171		25172	25173
Oaklane	981038702	8606551072	25181		25182	25183
	101551535	3338317341	25176		25177	25178
Simon Garden	539547187	1162325601	25195	25194	25196	25197
	539547187	4395848077	25187	25186	25189	25196
	539547187	8569221065	25191		25192	25193

USA: 1375369694

G6-GS, Active, GSC

SA Sub: 2

Account: 0061 2800 0245 Colonial Garden Realty Co
Effective Period: 04/19/2003 -
Rate: GSC General Service Commercial
Tauf Map:
CCDB Account:
Customer Class: 6 - Commercial Non-Heat
Rate Class: GS - General Service
Revenue Code:
Collection Path: T/L PATH - Tenant Landlord Path

Areas	
0 - 30	1,206.64
31 - 60	1,093.45
61 - 90	708.18
91 Up	19,485.79
Total:	21,287.42

Financial Summary	
Total Amount Due:	22,494.06
Regular Balance:	22,494.06
Late Payment Charges:	0.00
Current Amount Due:	22,494.06
Budget Enrollment Date:	
Monthly Budget:	0.00

Premise: 5425-7 Wayne Ave, M1/Philadelphia, Pa

- Main
- Misc 1
- Misc 2
- Tax Exemption
- Service Points
- Contract Riders
- Interruptions
- P&L Plan
- Suppliers

Meter Read Query: MTR 1987516 (Int: 87024963) Active ROOTS/1M MEBE 11/2/14

Action: [Icons]

Premise: 5425-7 Wayne Ave, M1/Philadelphia, Pa

Service Points:

SP Id: 2025 SP Type: G-GS Status: Conn Meter: MTR 1987516 Int: 87024963 ROOTS/1M

SP Id	SP Type	Status
2025	G-GS	Conn

Measuring Components:

MC Id	UOM	HTU	TOD	Register Code
92652856	CCF	+		

Meter Read History For SP: Conn On G-GS, GSC, MTR 1987516, BSE, 01/02/14 96173.0000 CCF R N

MTR	Read Date/Time	Reading	Low Limit	High Limit	Tp/RC	UOM	TOD	Source
MTR 1987516	01/02/2014 05:23	96173.0000	95279.0000	11549.0000	N / R	CCF		Amr Read
MTR 1987516	12/02/2013 06:40	95279.0000	94480.0000	9357.0000	N / R	CCF		Amr Read
MTR 1987516	11/05/2013 09:03	94588.0000	93963.0000	96539.0000	N / R	CCF		Sio
MTR 1987516	10/31/2013 05:37	94480.0000	93508.0000	4686.0000	N / R	CCF		Amr Read
MTR 1987516	10/02/2013 06:00	93963.0000	93042.0000	4991.0000	N / R	CCF		Amr Read
MTR 1987516	09/03/2013 05:35	93508.0000	93042.0000	96370.0000	N / R	CCF		Amr Read
MTR 1987516	08/01/2013 05:59	93042.0000	92692.0000	95496.0000	N / R	CCF		Amr Read
MTR 1987516	07/02/2013 02:49	92692.0000	91593.0000	97294.0000	N / R	CCF		Amr Read
MTR 1987516	06/03/2013 05:16	92259.0000	91593.0000	94584.0000	N / R	CCF		Amr Read

Meter Read Maintenance

Record displayed
 METR METER MANAGEMENT SUBSYSTEM 01/29/13 Gas >
 CMMTRF METER MAINTENANCE 08:47:08

*Action : (I,L,N,R)
 *Meter : MTR 1987516 *Util: G *INTERNAL METER: 87024963
 *Stock Location: MONT_ Mont
 *Status : A Active *Stock Status : _
 *Manufac/Model : ROOTS_ / 1M_ *Read Device : _
 Serial Nbr : 1987501_ *Stock Item Nbr: _
 *Periodic Test : RESAGE Resid age Last Test Date: _
 Package : *CPR Code : _
 Location : 5425-7 WAYNE AVE, M1/PHILA, PA
 Measuring Comp: 92652856 CCF +, ODOM 5.0 digits, 1.0

*Equipment	Qty	Comment
A3_ 00019469269	1_	ATT 03/28/03 INDEX-06910_ +
Electronic Id :		*Owner : Real Time : N
Date Received : 09 06 2000		Batch Add Id : 9260138 Batch Up1 ID:
Date Retired :		Purchase Cost: Tamper Cnt: 1 0
*Reason Retired:		Labour Cost : Transl Name: _
Comments :		+

*Tran: Act: Key:
 Enter-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10--PF11--PF12---
 help quit retrn main MTST MLOCH MTSTH MCOM SP left right

Meter information displayed

MTST
QMMTSTF

METER MANAGEMENT SUBSYSTEM
(METER TEST MAINTENANCE)

01/29/13
10:50:52

*Action : (I,N,R)
*Meter : MTR 1987516 *Util: G *METER TEST ID :
Internal Meter : 87024963 Mtr MTR 1987516 G, RESAGE, ROOTS/1M, MCs=1, CCF

Record Type : (as Found,Left,Both)
*Test Status : Meter Stat/Stk : Active
Periodic Test : RESAGE Resid age Last Test Date :
Manufac / Model : ROOTS/1M Serial Nbr : 1987501
Measuring Comps : 92652856 CCF +, ODOM 5.0 digits, 1.0
Location : 5425-7 WAYNE AVE,M1/PHILA,PA
Test Date / Time : / Need Repairs : (Y,N)
Field/Bench Test : (Field,Bench) *Repair Codes : +
*Reason For Test : Mtr Seals Found: (Y,N)
Perform Calcs : (Y,N) Mtr Seals Left : (Y,N)
*Tested By : Batch Add Id :
Outside Facility: Coil Tests : (A,B,blank)
Passed / Failed : Message:
Comments : + P/F SRC:

*Tran: Act: Key:
Enter-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10---PF11---PF12---
help quit retrn main MLOCH MTSTH - + METR left right MCOM

**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")

Supplemental Response to Set II Nos. 22, 23, 24 and 27

Re: PGW's Responses to Set II, Nos. 13 and 26

RESPONSE:

Pursuant to the Discovery Order of August 21, 2014 ("Discovery Order") p.18, in these matters, PGW has been requested to identify from the Contact screens provided in its Response to Set II, No. 26, which contacts are associated with collection, billing and dispute resolution negotiation.

Set II, No. 26 is an enhanced version of PGW's Contacts for Account screens. In developing that response for the Complainant, PGW provided additional information including the identification of the PGW employee making the entry into the Contact record. The identification of the specific contacts according to collection, billing and dispute resolution negotiation is not automated. The specific contents of each comment might address the purpose of the entry relative to collection, billing and dispute resolution negotiation. *The sorting of the contacts along those categories would be as burdensome for the PGW as for the Complainants.*

Pursuant to the discussion in the Discovery Order, PGW cannot further sort the contacts of its Response to Set II, No. 26 for purposes of identifying collection, billing and dispute resolution negotiation contract entry.

As to other correspondence that has been provided in discovery, in particular, the binder of e-mails the first of which is dated November 13, 2008, the nature of the e-mails can be gleaned from the content of each piece of correspondence. Whether sent in the context of a dispute which should have halted the assessment of late payment charges in a question of fact at issue in these proceedings.

This response was prepared by Linda Pereira, Senior Customer Review Officer – PGW



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

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 INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS, 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.
Donna Ross, Esq.
Mr. Philip Pulley
Ms. Kathy Treadwell
SBG Management Services, Inc.
702 N. Marshall Street
Philadelphia, PA 19123

September 11, 2014

RECEIVED

OCT 15 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

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

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 Set III, in the above captioned matter, numbers 1, and 2 are true and correct. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

September 11, 2014



Laureto Farinas, Esquire

APPENDIX C

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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

Supplemental Responses Pursuant the Orders on the 2nd Motion to Compel of April 9, 2014 and May 12, 2014
("Discovery Orders")

PGW's Supplemental Response to Interrogatories, Set II, Nos. 11, 12, and 13

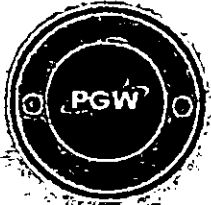
Additional policies and practices are in place for the BCCS operating system and are contained in the training materials associated with the procedures contained in PGW's Supplemental Responses to Interrogatories, Set II, Nos. 6, 7, 8, and 9.

See the attached documents which are the training materials and policies associated with the AIMS System.

This document was prepared by Linda Pereira, Senior Customer Review Officer – PGW.



Philadelphia Gas Works
Customer Service Representative
New Hire Training
AIMS Introduction



AIMS Basics

Learning Objectives

Trainees will be able to:

1. Describe the acronym and primary uses by customer service reps (CSRs)
2. Start AIMS
3. Search for a customer or premise



AIMS

Advanced Intelligent Mobile Solutions

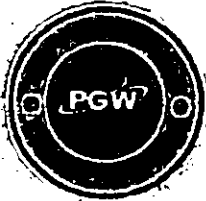
- Includes the following applications:
 1. Resource Management
 2. Order Generator
 3. Dispatching
 4. Field
 5. Meter Inventory
 6. Reports



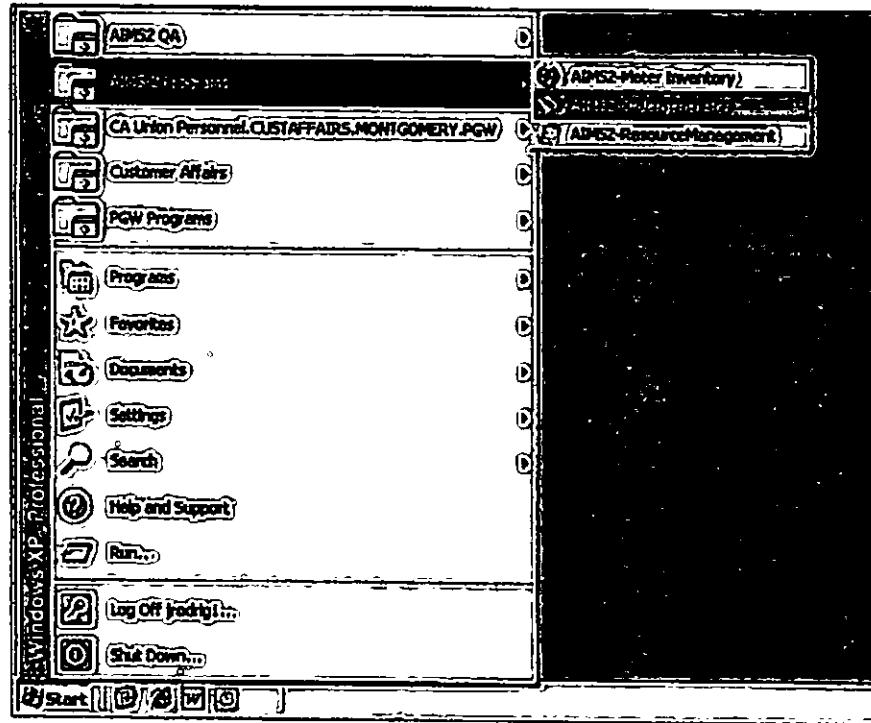
AIMS Usage by CSRs

Advanced Intelligent Mobile Solutions

- Used by CSRs to:
 1. Generate emergency / trouble orders
 2. Generate service orders & schedule appointments to:
 - Turn gas service on or off,
 - Service meters, or
 - Repair appliances
 3. Enter customer provided meter readings



How to Log into AIMS



**AIMS
Order
Generator**

1. Click on the Start Menu,
2. Click on the AIMS-2 Programs folder,
3. Click on AIMS2 – Ordergenerator



AIMS Search Capabilities

Search by Customer Name, Address, Bldg Name, Phone No., SSN, or Block

Select Customer or Block Tab

Customer: [Block]

Search By Name
Person Business
Business Name: center city [Search]

Search By Address
St. # [] St. Name [] Apt# [] [Search]

Search By Building Name
Building [] [Search]

Search By Phone Number
Phone Number: 715 [] [Search]

Search By Meter Number
Meter Number: [] [Search]

Search By Account Number
Account Number: [] [Search]

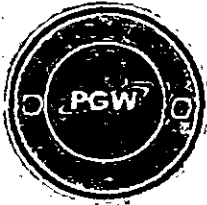
Search By SSN
SSN [] [Search]

Building (Bldg) Name

Name: [] Address: [] Phone ID: [] Account ID: [] Personal ID: [] Gas On Account: []

Account Holder Info hidden for privacy.

[View Details] [Close]



AIMS Search Capabilities

Search by Street Name / Block

Street Names
at
Intersections

The screenshot shows the AIMS software interface. At the top, there is a search bar with the text "Search By Block". Below it, the "Street Name" field contains "Hurley" and the "Hundred Block" field is empty. A "Search" button is visible. Below the search bar, there is a table with columns: "Block", "Cross1", "Cross2", "DMH", and "Pave Zone". The table contains the following data:

Block	Cross1	Cross2	DMH	Pave Zone
02900 HURLEY ST	INDIANA	INDIANA	KS-43	2
03000 HURLEY ST	INDIANA	CLEARFIELD	KS-33	2
03100 HURLEY ST	CLEARFIELD	ALLEGHENY	KS-33	2
03200 HURLEY ST	ALLEGHENY	WESTMORELAND	KS-23	2
03300 HURLEY ST	WESTMORELAND	ONTARIO	KS-14	2

Below the table, there is a section for "Customer Details" which contains the text "Account Holder Info hidden for privacy." At the bottom of the interface, there is a table with columns: "Order Number", "Order Type", "Order Sub Type", "Completion Date", "Call Date", "Primary Crew", and "Status". The table contains the following data:

Order Number	Order Type	Order Sub Type	Completion Date	Call Date	Primary Crew	Status
1619625	New Business / BI	Service & Special Job Instruction	01/15/2009 9:57 A		03200 HURLEY S	Finalred
1722448	Damage Prevention	New - Excavation - Routine	03/28/2010 8:19 P	03/28/2010 8:19 P	03200 HURLEY S	Cancelled



AIMS Customer/Premise Info

Customer Information Window

Service Orders

Emergency Orders

Address: [Field] SSM Home Phone: [Field]
Zip Code: 15145-2015 Account: [Field] Work: [Field]
Customer Name: [Field] St. Clk. Discount: [Field] Mobile: [Field]
USA Rate: General Service Residential Customer's Age: [Field] Car: [Field]
Mailing Address: [Field] Meter Status: [Field] SP Status: Connected
Alarm: [Field] Service Status: ACTIVE Curb Box? No Valve
T-Inst Indicators: [Field] Expedite: [Field] Update: [Field]
Last Contact (Premise): [Field] Last Contact (Person): [Field] Last Contact for person not found: [Field]

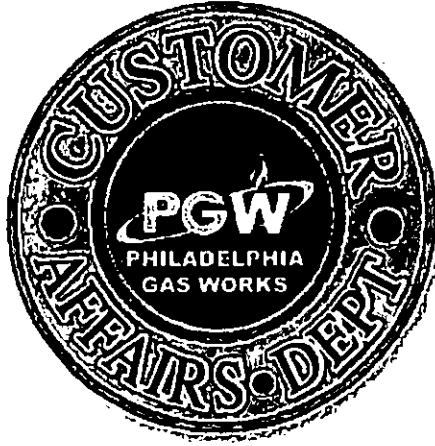
Customer Billing | Precision Billing | Precision Alarm | Add Meter Read | Exchange Meter

Date	Meter Number	Reads	Type	Code	Source	Error	Temp Count	Name
07/13/2008	1417580	7778	Normal	System Estimate	Billing			SMITH, STE
08/11/2008	1417580	7641	Normal	System Estimate	Billing			SMITH, STE
05/12/2008	1417580	7513	Normal	System Estimate	Billing			SMITH, STE
02/11/2008	1417580	7128	Normal	Regular	AMR Read		12	SMITH, STE
01/12/2008	1417580	6951	Normal	Regular	AMR Read		12	SMITH, STE
12/11/2008	1417580	6865	Normal	Regular	AMR Read		12	SMITH, STE
11/07/2008	1417580	6782	Normal	Regular	AMR Read		12	SMITH, STE
10/03/2008	1417580	6759	Normal	Regular	AMR Read		12	SMITH, STE
09/10/2008	1417580	6738	Normal	Regular	AMR Read		12	SMITH, STE
08/11/2008	1417580	6718	Normal	Regular	AMR Read		12	SMITH, STE
07/11/2008	1417580	6696	Normal	Regular	AMR Read		12	SMITH, STE
06/11/2008	1417580	6676	Normal	Regular	AMR Read		12	SMITH, STE
05/12/2008	1417580	6651	Normal	Regular	AMR Read		12	SMITH, STE
04/11/2008	1417580	6621	Normal	Regular	AMR Read		12	SMITH, STE



AIMS Search Procedures

We'll next review step by step procedures for
how to search for a customer or premise
in AIMS



PGW Customer Affairs
CSR Training

How to View and Navigate AIMS Data

Revised: January 10, 2014

How to View and Navigate AIMS Data

Please see the **Software User's Manual for the Advanced Intelligent Mobile Solutions – Order Generator Application** (hereafter referred to as the AIMS User's Manual) located in the AIMS Section of the LMS Library.

Introduction

When working as a PGW customer service representative (CSR) you will use the *Advanced Intelligent Mobile Solutions (AIMS) - Order Generator application* whenever you handle emergencies, trouble orders, or service requests calls. Therefore it is very important that you understand how the information is organized and how to navigate to pertinent information needed for call situations.

The instructor will briefly review how to search for a customer or premise; and then describe the organization and levels of detail of the AIMS customer or premise information. See the training module *"How to Search for a Customer or Premise in AIMS"* for a more complete description of the search capabilities.

Demonstration of account numbers _____ , _____ , & _____
(Once the data set is available account numbers will be inserted into this entry.)

Learner should practice on the account numbers provided by the instructor. Feel free to review the following sections in the AIMS User's Manual:

- *Data from Other Applications*
- *Searching for a Customer*
- *Viewing Customer Details*

Viewing and Navigating AIMS Data

STEP 1. Start AIMS by clicking on the **START MENU**, then click on the **AIMS-2 PROGRAMS** folder, and finally click on **AIMS2- ORDERGENERATOR**.

STEP 2. Enter information obtained from the customer in the appropriate search fields in the AIMS Order Generator Customer Search window.

Do one of the following:

- a) **Search by Name:** Select the **PERSON** or **BUSINESS** option.
- b) **Search by Address:** Type the customer's street number (ST. #) and ST. NAME. If applicable, type the customer's apartment number in the APT# field.
- c) **Search by Phone Number:** Type the customer's entire ten-digit PHONE NUMBER; a hyphen is automatically inserted between the last seven digits. The default area code is 215, but you can modify it as necessary.
- d) **Search by Account Number:** Type the customer's entire ACCOUNT NUMBER excluding any leading zeros. For instance if the account number is 0012121212, enter it as 12121212.

STEP 3. Click the **Search** button. A list of customers matching your search criteria appears in the search results table. Search results for customer *Jose Rodriguez* is illustrated in Figure 1.

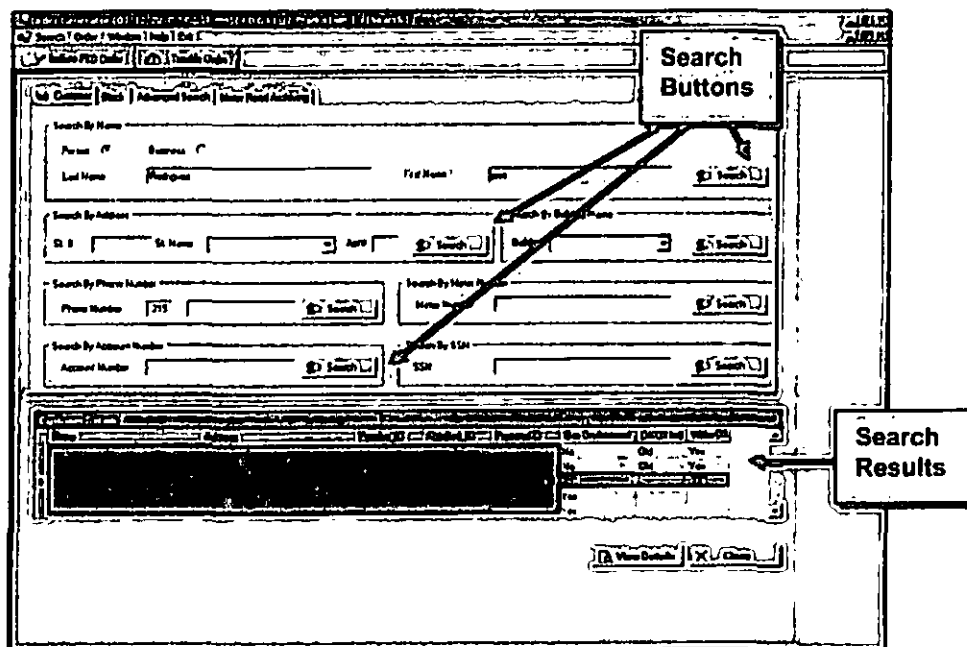


Figure 1

Viewing and Navigating AIMS Data

STEP 4. Select the customer in the search results table and click the **VIEW DETAILS** button to view a customer's account information. The *CIS Information* window opens (see Figure 2).

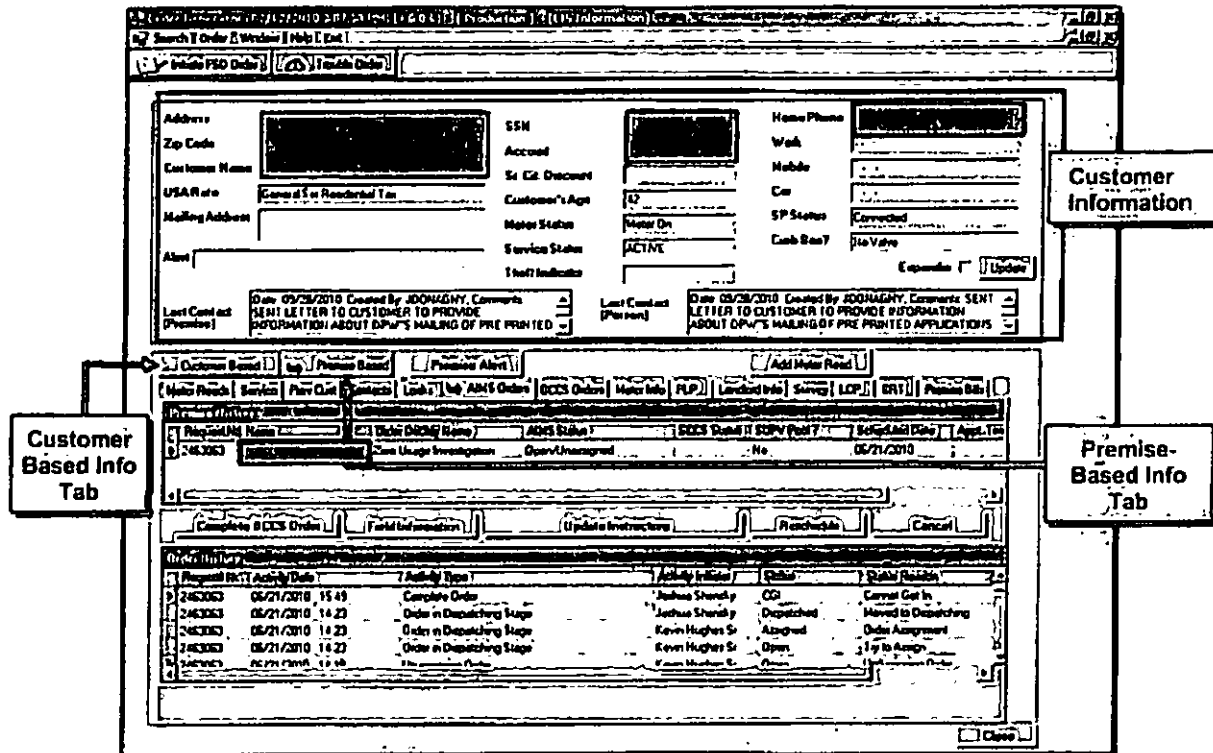


Figure 2

The *CIS Information* window provides the customer's account details. This information is imported from BCCS and cannot be updated in the AIMS Order Generator application.

The *CIS Information* window is divided into two sections. The top portion of the window gives the customer's current premise and mailing addresses, rate, Social Security and account numbers, age, and all possible contact phone numbers. It also notes any alerts placed on the account and the most recent contact information for the premise and person.

The bottom portion of the window contains customer and premise based tab views that provide more detailed information about the customer's account activity. The **CUSTOMER BASED** tabs provide information about the customer's account as a whole, not just for the premise you are viewing. In contrast, the **PREMISE BASED** tabs provide information based on the premise regardless of the current customer.

Tabs allow you to view different sets of data within the same window. The tab currently selected is indicated with a green arrow on the tab. Figure 2 above illustrates that the **PREMISE BASED** tab is selected.

Tabs below the **CUSTOMER** or **PREMISE BASED** tabs represent types of information providing sets of data with further details relative to the customer or premise.

Navigating through AIMS Data

To view sets of customer or premise based information, do the following:

Step 1: Click on the **CUSTOMER BASED** or **PREMISE BASED** tab.

Step 2: Click on the tab below with the desired information group.

A customer may exist in AIMS and not be associated with a premise. This may occur if a customer who previously had service with PGW moved outside of Philadelphia, or the customer may have moved to a residence where someone else is the customer of record on the PGW account.



If there is no premise associated with the customer, the **PREMISE BASED** tab will be a light gray and the premise based data groups will be unavailable.

A premise may exist in AIMS and not have any customers linked. This may be the case if a building or residence is abandoned; or, the previous customer moved out and no one currently occupies the premise; or, a building may be newly constructed or renovated with no current occupants.



If there are no customers associated with the premise, the **CUSTOMER BASED** tab will be a light gray and the customer based data groups will be unavailable.

Table View and Form Layout View

Most of the tabs representing a type of Customer-based or premise-based information display the information in a table format. You may display the same information in a form layout view. The form layout view contains the same data fields as the table view but displays them in a different format.

To display details in form layout view instead of the table view, do the following:

Step 1: Click on the **CUSTOMER BASED** or **PREMISE BASED** tab.

Step 2: Click on the tab below with the desired information group.

Step 3: If the data is displayed in a table format, click on the desired table row to select it and then double-click on it.

A new window opens with the information shown in a forms layout view.

Data from Other Applications

Some of the data viewable in the AIMS applications is entered and maintained in other PGW applications, and therefore, cannot be updated in AIMS. Data imported from other applications, such as the Human Resources ADP application, can only be updated in the application from which it was imported. For instance, if you find a Field Service Department (FSD) employee's name spelled incorrectly in AIMS, you must contact Human Resources to get the name corrected in ADP. Once corrected in ADP, the information is automatically updated in the AIMS.

The table below describes the PGW applications from which AIMS imports data.

Application	Department Responsible for Maintaining the Application	Type of Imported Data
ADP	Human Resources	Employee personal information related to benefits allocation and payroll deductions. For example, first and last name, address, employee ID, birth date, and so on.
BCCS ⁽¹⁾	Customer Affairs	Customer contact and billing information.
M4	Operations	Vehicle data such as the vehicle number, status, and location.
UFS ⁽²⁾	Operations	Customer and premise location data/validation.

Table 1: Imported Data

Notes:

- (1) Billing, Collections, and Customer Service (BCCS) System
- (2) Underground Facilities System (UFS)

Customer and Premised Based Data Groups Defined

The remaining sections of this training module illustrate and describe each data group under the **CUSTOMER BASED** and **PREMISE BASED** tabs.

Customer Based Tabs - Defined

The following tabs are available when the Customer Based tab group is selected. Some tabs are not applicable to all customers and therefore may be blank.

Bill Information Tab

The screenshot shows a web-based form for customer bill information. It is divided into several sections:

- Personal Information:** Address, Zip Code, Customer Name, USA Rate (General Service Residential), Mailing Address, Alert (NONE), SSN, Account, St. Cr. Discount, Customer's Age (38), Meter Status (Miles On), Service Status (ACTIVE), Health Indicator, Home Phone, Work, Mobile, Car, SP Status (Corrected), Cash Due? (18 6m SHH IN WWC).
- Account Information:** Account, SA Type (G-2-GS), USA # (4128002967), Occupancy (1 Year), Customer Since (05-07-2007), Customer Class (Residential Non and Domestic).
- Account Indicators:** Write Off, Easy Pay, Cut Non Pay, Pay Avg, Backup, Cash Only, Collector Sent.
- Summary Table:**

Total Am Due	\$1,451.60
Utility Am Due	\$263.06
Am 0 to 30	\$263.06
Am 31 to 60	\$0.00
Am 61 to 90	\$0.00
Am 91 And Up	\$0.00
- Other Fields:**
 - ① Total Am Due: \$1,451.60
 - ② Last Grant: Type (NONE), Date (03/09/2007), Amount (\$181)
 - ③ CRP Status (Detailed), Last Changed Date (00/11/2010), Type (10 00% OF INCOME), Monthly Amount Due (\$263.06)
 - ④ Blocker: Block Code (P.U.C HOLD), Start Date (10/14/2004), End Date (05-03-2005)
 - ⑤ SA Total Due: \$263.06, SA Cur Am Due: \$263.06

Two callout boxes on the right side of the form are labeled "Cut Non Pay Indicator" and "Cash Only Indicator".

Numbers on the screen image above refer to the data groups described below.

1. The Account group boxes indicate how much the customer currently owes on the entire account, the utility amount owed, and, if overdue, the money owed for the current and previous months. These fields also indicate which of the 23 day billing cycles the customer is on and the number of Utility Service Agreements (USAs) on the account.
2. If applicable, the Last Grant fields list the most recent type of grant applied to the account, the date it was applied, and the total grant amount.
3. If the customer is a current or previous participant in the Customer Responsibility Program (CRP), the CRP fields give the customer's current status, when it was last modified, the type of CRP agreement, and the monthly amount due.
4. The Blocker fields indicate if a type of Hold has been placed on the account and the start and end dates for that Hold.

Viewing and Navigating AIMS Data

Customer Based: Bill Information Tab - *continued*

5. The SA fields list the Service Agreement (SA) type, the USA number, if the customer is the current owner or tenant, the date they became a customer, and their customer class. The group of SA fields in the bottom right corner list the money owed by the customer at this premise only.
6. The Account Indicators alert you if the customer has write-offs on the account, is an EasyWay program participant, is on a payment arrangement, or has a bankruptcy on the account.
 - The Cut Non Pay field indicates if the customer's gas has been shut off for non-payment (also called NPSO).
 - The Cash Only field indicates if the customer has passed bad checks or credit cards and can only pay by cash.

Customer Based: Credit Collection Events Tab

The screenshot displays the 'Credit Collection Events' tab in the AIMS software. The top portion shows a form for customer details, including fields for Address, SSN, Account, Meter Phone, Work, Mobile, Cell, SPS Status, and Cash Ben? Below the form is a table of credit collection events. The table has the following columns: Event ID, Address, Status, Created, Completed, Due, Cancel, and Description. The events are listed in descending order of their creation date.

Event ID	Address	Status	Created	Completed	Due	Cancel	Description
43922678	3206 HURLEY ST	Pending	05/03/2010		05/21/2010		30 day CRP notice - Phone Day
345226285	3206 HURLEY ST	Authorized	05/12/2010	05/03/2010	05/03/2010		100 day CRP notice
618004179	3206 HURLEY ST	Cancelled	05/25/2010		07/14/2010	07/01/2010	30 day CRP notice - Phone Day
375004981	3206 HURLEY ST	Authorized	05/02/2010	05/25/2010	05/25/2010		100 day CRP notice
08480377	3206 HURLEY ST	Cancelled	04/01/2010		04/26/2010	04/05/2010	100 day CRP notice
84378276	3206 HURLEY ST	Cancelled	01/26/2010		02/05/2010	02/01/2010	Moderate Risk 30D Mail Notice
433128256	3206 HURLEY ST	Authorized	01/14/2010	01/26/2010	01/27/2010		Moderate Risk 151 Mail Notice
275624441	3206 HURLEY ST	Authorized	01/12/2010	01/14/2010	01/25/2010		Moderate Risk Phone Day Event
829158620	3206 HURLEY ST	Authorized	01/05/2010	01/11/2010	01/11/2010		Low Risk - Last Event
24108982	3206 HURLEY ST	Authorized	12/21/2009	01/05/2010	01/12/2010		Low Risk - Phone Day Message
26249110	3206 HURLEY ST	Authorized	12/10/2009	12/21/2009	12/21/2009		Low Risk - Mail Reminder Notice
613033720	3206 HURLEY ST	Authorized	12/09/2009	12/10/2009	12/16/2009		Low Risk - Phone Day Event
63244410	3206 HURLEY ST	Cancelled	11/05/2009		12/03/2009	11/14/2009	Low Risk - Last Event
877278495	3206 HURLEY ST	Authorized	11/05/2009	11/05/2009	11/05/2009		Low Risk - Mail Reminder Notice
216786758	3206 HURLEY ST	Authorized	10/29/2009	10/30/2009	10/30/2009		CRP Conversion

All BCCS events are listed on this tab, including each collection event and field visit. The events are listed in descending order of the dates created. Data shown for each event includes: the status, completed date, due date, cancel date, description, trigger date, and the collection path the customer is on.

Select a collection event in the table and double-click on it to display the information in form layout view.

Viewing and Navigating AIMS Data

Customer Based: Payments Tab

The screenshot displays the AIMS Customer-Based Payments Tab. The top section contains customer information fields:

- Address: [Redacted]
- Zip Code: [Redacted]
- Customer Name: [Redacted]
- USA Role: [Redacted]
- Mailing Address: [Redacted]
- Alias: JUDG
- SSN: [Redacted]
- Account: [Redacted]
- St. Ct. Discount: [Redacted]
- Customer's Age: 35
- Marital Status: [Redacted]
- Service Status: ACTIVE
- Health Indicator: [Redacted]
- Name: [Redacted]
- Phone: [Redacted]
- Work: [Redacted]
- Mobile: [Redacted]
- Car: [Redacted]
- SP Status: Connected
- Cost Base? 18 on SAN 18 W/C

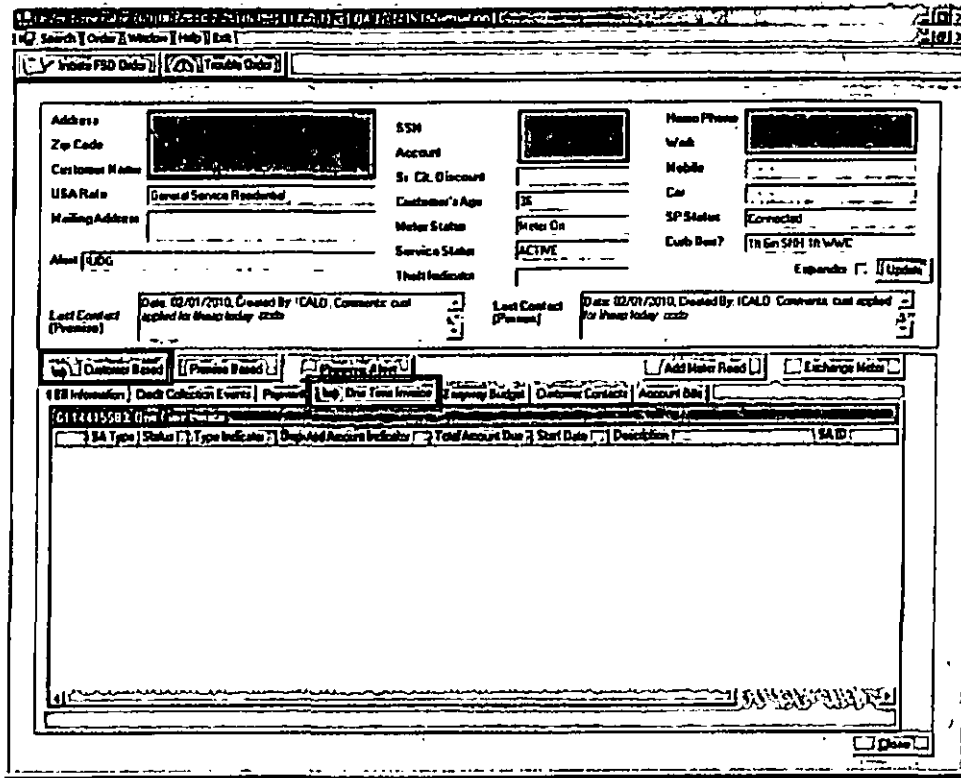
Below the customer information is a table of payments:

Date	Amount	Exp?	Used Applied?	Paid Method	Status
07/01/2010	\$536.12			Credit Card	Frozen
04/30/2010	\$368.06			Credit Card	Frozen
04/01/2010	\$158.06			Credit Card	Frozen
02/27/2010	\$293.06			Credit Card	Frozen
12/01/2009	\$300.00			Credit Card	Frozen
11/13/2009	\$230.10			Credit Card	Frozen
10/14/2009	\$221.00			Credit Card	Frozen
09/01/2009	\$230.10			Credit Card	Frozen
08/10/2009	\$230.10			Credit Card	Frozen
07/04/2009	\$230.10			Credit Card	Frozen
06/01/2009	\$230.10			Credit Card	Frozen
05/01/2009	\$230.10			Credit Card	Frozen
04/01/2009	\$230.10			Credit Card	Frozen
02/27/2009	\$230.10			Credit Card	Frozen
01/30/2009	\$230.10			Credit Card	Frozen

The Customer-Based **Payments** Tab lists all payments applied to the customer's account in reverse chronological sequence (i.e., the most recent payment is listed first). The data displayed includes: the amount paid, whether the payment is pending because of an error, whether the payment came from a grant, and the method of payment.

Select a payment in the table and double-click on it to display the information in form layout view.

Customer Based: One Time Invoice Tab

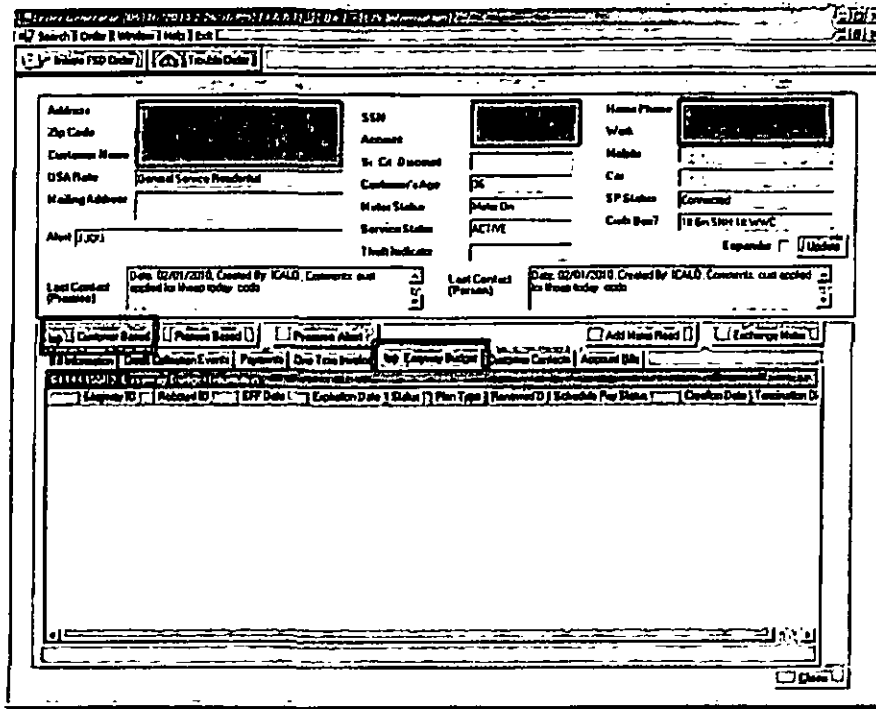


Most one-time invoices fall into two categories. The first are high bill dispute invoices where the customer has an active dispute and the disputed amount is separated from the service agreement (SA) to prevent collection events until the matter is resolved.

Most other one-time invoices result from chargeable services, or labor and part charges for installation of non-covered parts performed by the Field Services Department (FSD) at the customer's premise.

Select an invoice in the table and double-click on it to display the information in form layout view.

Customer Based: Easy Way Budget Tab



For customers participating in the Easyway Budget program, this tab provides details such as when they started participating, when they renewed, the status, and so on.

Select an Easy way event in the table and double-click on it to display the information in form layout view

Viewing and Navigating AIMS Data

Customer Based: Customer Contacts Tab

The screenshot displays the AIMS Customer Contacts Tab. At the top, there are navigation buttons for 'Home', 'Search', 'Order', 'Web', and 'Exit'. Below this is a search bar and a 'Simulate PDD Order' button. The main area is divided into two sections: a form for customer details and a table of contact history.

Customer Information Form:

- Address:** Zip Code, Customer Name, USA Note (General Service Residential), Mailing Address, Alt (A/C).
- SSN:** Account, Ss. Cit. Document, Customer's Age, Meter Status, Service Status, Theft Indicator.
- Home Phone:** Work, Mobile, Car, SP Status, Cash Box? (TR En STR IR WVC).
- Last Contact (Previous):** Date: 02/01/2010, Created By: TCAUD, Comment: out called for these today code.
- Last Contact (Present):** Date: 02/01/2010, Created By: TCAUD, Comment: out called for these today code.

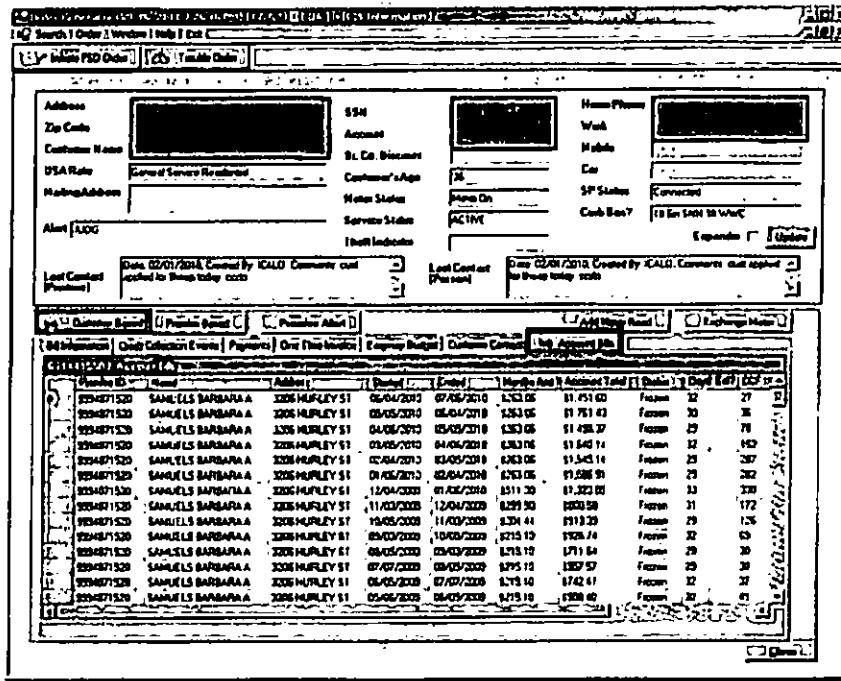
Contact History Table:

Date	Type	Comments
02/01/2010 5:21 PM	Lead Gen	call applied for these today code
02/01/2010 3:33 PM	Reconciliation	no Remarks of code to get back on cap - visited gas of 6636 40 sq ft = 1352.80 also the bus
11/10/2009 9:36 AM	Customer Responsibility Progm	CDR called for CRP. Evt it has been suspended. Referred to CSC with past due payment of 21
03/25/2009 7:40 PM	Service	Michael Lynn was here on a Gas Leak Inside order with Order # 1717723, with a result of Call
03/25/2009 6:45 PM	Inside Order Contact	entered gas code work
03/06/2009 11:10 PM	Service	Sharon Jones was here on a Gas Leak Outside order with Order # 1632493, with a result of Call
03/06/2009 10:19 PM	Inside Order Contact	called in by email of record status order outside on the
03/18/2009 12:49 PM	Service	CDR called to check if needs gas line for new gas meter would PDW do work - referred to com
03/04/2009 11:13 AM	Miscellaneous	on at code for cap expense is 7951.00.3 with cap is 20.10 advised
03/01/2009 10:49 AM	Payment	Gas made a payment over the phone. 150.10 was paid via credit card. The card is 183134. She
04/29/2008 11:19 PM	Collection	owner of property (owner: Smith) calling meter calling property and that abstract on rec - fire
04/29/2008 12:44 PM	Loan and/or Adjudment	can still regarding said information given to land by his title Co. land in the process of sale
04/29/2008 11:41 AM	Billing	LANDLORD CAME TO SPND BECAUSE HE IS SELLING PROPERTY AND ABSTRACT CDMS
04/18/2008 3:11 AM	Scheduled Payoff Request	Completed statement from Northwest Escrow # 24 01 Phone 213 322 8280

This tab lists all contacts associated with the Personal ID(??). There may be multiple contacts for the same account. The date and time, type of activity, and the comments entered by the PGW representative are shown.

Select a contact in the table and double-click on it to display the information in form layout view

Customer Based: Account Bills Tab



The ACCOUNT BILLS tab lists all bills generated for the premise under the customer's account in reverse chronological sequence (i.e., most recent to the oldest). All bills for the account at any premise will be listed regardless of whether the Universal Service Agreement (USA) is active or not.

Data presented for each bill includes: the start and end date, month's amount, account's entire amount, status (frozen or canceled), number of days included in the bill, estimated usage indicator, amount of gas consumed during the month, and the bill and header IDs are given for each bill.

Select a premise bill in the table and double-click on it to display the information in form layout view.

Premise Based Tabs, Defined

The following tabs are available when the PREMISE BASED tab group is selected. Some tabs are not applicable to all premises and are therefore blank.

Meter Reads Tab

T-Account Alert

Date	Meter Number	Reads	Type	Code	Source	Error?	Temporal Chart	Name
09/24/2009 10:53 PM	1785722	8252	Normal	System Estimate	Billing			ZHENG BAO
09/24/2009 10:50 PM	1785722	8252	Normal	System Estimate	Billing			ZHENG BAO
09/24/2009 12:21 AM	1785722	8252	Normal	System Estimate	Billing			ZHENG BAO
03/29/2009 10:42 PM	1785722		No Read	Normal	System			ZHENG BAO
07/27/2009 9:51 AM	1785722	82014	Normal	Regular	AMR Read		10	ZHENG BAO
06/25/2009 11:57 AM	1785722	82523	Normal	Regular	AMR Read		10	ZHENG BAO
06/27/2009 10:53 AM	1785722	82535	Normal	Regular	AMR Read		10	ZHENG BAO
04/17/2009 1:25 PM	1785722	87877	Normal	Regular	AMR Read		10	ZHENG BAO
03/26/2009 10:20 AM	1785722	87421	Normal	Regular	AMR Read		10	ZHENG BAO
02/26/2009 10:16 AM	1785722	87004	Normal	Regular	AMR Read		10	ZHENG BAO
01/18/2009 13:41 AM	1785722	85587	Normal	Regular	AMR Read		10	ZHENG BAO
12/29/2008 12:50 PM	1785722	82802	Normal	Regular	Turn On		1	CHEN JING
12/29/2008 12:50 PM	1785722	82802	Normal	Regular	Turn On		1	ZHENG BAO
12/29/2008 9:49 AM	1785722	82862	Normal	Regular	AMR Read		110	CHEN JING

The PREMISE BASED METER READS tab lists the date of each meter read for the premise and whether it was an actual or estimated read. Select a reading in the table and double-click on it to display the information in form layout view.

T-Account Alert:

Premises which are considered T Accounts (multiple metered premises with same street number, street direction, street name and suffix) will display a yellow box with red text noting the number of linked premises (currently linked customers) and the number of Pending Turn-On orders against all the premises under that blanket address. These counts are only updated once nightly and are not real time checks.

Indication AMR Device Not Working:

If the NO READ is displayed in the CODE data field (column of table) and AMR READ is displayed in the SOURCE data field, this indicates the Automatic Meter Reading (AMR) device did not read that month and may not be working properly.

Premise Based: Service Tab

The screenshot shows the AIMS software interface for the Service Tab. At the top, there is a navigation bar with options like 'Search', 'Order', 'Window', 'Help', and 'Exit'. Below this is a main form area with various input fields and buttons. The form is divided into several sections: Address, SSN, Home Phone, Work, Meters, Customer Name, Account, Sr. Cit. Discount, Customer's Age, Meter Status, Meter On, SP Status, USA Rate, Meter Status, Service Status, and Curb Box?. There are also buttons for 'Expand' and 'Update'. Below the form, there are two tables. The first table is titled 'Service Order Information Table' and has columns for Service Number, Service Address, Service Location, Service Condition, Service Location Reference, and Valve Location. The second table is titled 'Service Listing History Table' and has columns for Date, Reason, and Reason Due To. There are callout boxes on the left side of the screenshot pointing to these two tables.

The Premise Based **SERVICE** tab details all work related to underground service performed by the Distribution Department. The **SERVICE ORDER INFORMATION** table gives all the specific location and service order information and the **SERVICE LISTING HISTORY** table gives the date, reason, and cause of the work performed.

Select a service order in the **SERVICE ORDER INFORMATION** table and double-click on it to display the information in form layout view.

Viewing and Navigating AIMS Data

Premise Based: Previous Customers Tab

The screenshot displays the 'Previous Customers' tab in the AIMS web application. The top section is a form with the following fields:

- Address: [Redacted]
- Zip Code: [Redacted]
- Customer Name: [Redacted]
- USA Rate: General Service Residential
- Mailing Address: [Redacted]
- Alert: [X] [Y] [Z]
- SSN: [Redacted]
- Account: [Redacted]
- St. Cat. Discount: [Redacted]
- Customer's Age: 35
- Meter Status: Meter On
- Service Status: ACTIVE
- Thresh Indicators: [Redacted]
- Name Phone: [Redacted]
- Work: [Redacted]
- Mobile: [Redacted]
- Cell: [Redacted]
- SP Status: Connected
- Coast Box?: IN On SIBI IR WWC

Below the form, there are two 'Last Contact' fields:

- Last Contact (Person): Date: 02/01/2010, Created By: ICALD, Comments: cust accepted for cheap today costs
- Last Contact (Person): Date: 02/01/2010, Created By: ICALD, Comments: cust applied for the so today costs

The table below the form lists previous customers:

Account Number	Customer Name	Service Type	Description	SA Status	Link Date	Unlink Date
[Redacted]	[Redacted]	General Service Residential	Residential Heat and Domestic	C	12/04/2000	05/
[Redacted]	[Redacted]	General Service Residential	Residential Heat and Domestic	C	04/10/1998	12/
[Redacted]	[Redacted]	General Service Residential	Residential Heat and Domestic	C	02/05/1998	04/

The **PREVIOUS CUSTOMERS** tab lists the name, phone number, service type, the effective start date of the Universal Service Agreement (USA) (LINK DATE), the effective end date of the USA (UNLINK DATE), and so on for all previous customers at the premise.

Select a customer in the table and double-click on it to display the information in form layout view.

Viewing and Navigating AIMS Data

Premise Based: Contacts Tab

Order generated on 10/06/2010 02:52:07 PM (400.77)(CA) - [CIS Information] | [Customer Service] | [Premise] | [Order] | [Search] | [Order] | [Window] | [Help] | [Exit]

Initial FTD Order | Trouble Order

Address: [Redacted] SSN: [Redacted] Home Phone: [Redacted]
Zip Code: [Redacted] Account: [Redacted] Mobile: [Redacted]
Customer Name: [Redacted] Sr. Cit. Discount: [Redacted] Mobile: [Redacted]
USA Rate: [Redacted] Customer's Age: [Redacted] Car: [Redacted]
Marketing Address: [Redacted] Mktg Status: [Redacted] Mktg On: [Redacted] SP Status: [Connected] Cash Bus?: [18 for SHH 18 W/C]
Alert: [X] T-Soft Indicator: [Redacted] Expanded: [X] Update: [X]

Last Contact (Premise): Date: 02/01/2010, Created By: ICALO, Comments: cust called for thrap today code
Last Contact (Person): Date: 02/01/2010, Created By: ICALO, Comments: cust called for thrap today code

Customer Based | **Premise Based** | Premise Alert | Add Make Prod | Exchange Make

Major Search | Service | Prev Call | **Contacts** | Links | ADMS Orders | BCCS Orders | Status Info | PUP | Landlord Info | Survey | LEP | BRT | Planned OH

Date	Type	Comments
02/01/2010 9:21 PM	License Query	cust called for thrap today code
02/01/2010 2:33 PM	Reconciliation	int Semuels at code to get back on cap visited gas of 1436.40 cu ft x 2 = 1332.00 also the int CDR called for CRP. Exp it has been suspended. Referred to LSC with past due payment of 21. Michael Lynn was here on a Gas Leak trouble order with Order # 1717723, with a result of Corrected gas order made.
11/10/2009 9:36 AM	Customer Responsibility Program	
03/25/2009 7:40 PM	Service	
03/25/2009 6:45 PM	Trouble Orders Contact	
03/05/2009 11:10 PM	Service	Steven Agnes was here on a Gas Leak, Outside order with Order # 1632430, with a result of Called in by cust. of record status order outside in the as
03/06/2009 10:19 PM	Trouble Orders Contact	CDR called to check if results gas line for new gas dryer would PGW do work -referred to cust. as at code for cap income is 2151.00 x 144 cap is 220.10 needed
05/16/2008 12:43 PM	Service	Car made a payment over the phone, 150.10 was paid via credit card. The cost is 1821.36. She
06/01/2008 11:13 AM	MacIntosh	owner of property (accc. handle) calling states selling property, and that abstract on rec. she
07/01/2008 10:43 AM	Payment	car, call regarding acct information given to landlord by his wife co. landlord in the presence of self.
04/28/2008 12:44 PM	Collection	LANDLORD CAME TO SPD0 BECAUSE HE IS SELLING PROPERTY AND ABSTRACT COME.
04/28/2008 11:49 AM	Billing	Completed settlement from Northeast Landlord 074.01 phone 215 332 3030
04/18/2008 9:11 AM	Settlement Parcel Request	

The **CONTACTS** tab lists all contacts stored in BCCS associated with this premise and the Customer Service Representative who made the contact.

Select a contact in the table and double-click on it to display the information in form layout view.

Viewing and Navigating AIMS Data

Premise Based: Leaks Tab

The screenshot displays the 'Leaks Tab' in the AIMS software. The top portion of the window shows a form with the following fields:

- Address:** [Redacted]
- Zip Code:** [Redacted]
- Customer Name:** [Redacted]
- USA Rate:** General Service Residential
- Alert:** JUDG
- SSN:** 2435
- Account:** 511419583
- Sr. Ctl. Discount:** [Redacted]
- Customer's Age:** 35
- Meter Status:** Meter On
- Service Status:** ACTIVE
- Time Indicators:** [Redacted]
- Home Phone:** 257 630-6005
- Work:** 257 639-4495
- Mobile:** [Redacted]
- Car:** [Redacted]
- SP Status:** Connected
- Cash Box?** 1R 6m 5101 1R WWC

Below the form, there are two 'Last Contact' entries:

- Date: 02/01/2010, Created By: ICALO, Comments: cust called for cheap today ccdo
- Date: 02/01/2010, Created By: ICALO, Comments: cust called for cheap today ccdo

The bottom section of the window features a navigation bar with tabs: Meter Reads, Service, Prev Cust, Contacts, **Leak**, BMS Orders, BCCS Orders, Meter Info, P.L.P., Landlord Info, Survey, LCP, BRIT, and Prepaid Bill. Below the navigation bar is a table of trouble orders:

Entry Date	To ID	Trouble Order/Reason	Comments	Complete Comments
10/17/2001	7800069	Gas leak at appliance	states odor at house heard 1 instructed cust of safety precautions	1st service call no he
11/24/2000	36302295	Gas leak inside	511	no leak no odor
11/11/2000	73025511	Gas leak inside	odor in bus	FOUND H PLEDT OLI
10/10/2000	49136564	Emergency Inside	Smoking heater	leaking into charge
11/03/1999	51470011	Gas leak inside	BASEMENT AREA NO P.L.P.	NO LEAKS FOUND
11/03/1999	4348911	2nd call emergency	INSIDE/BASEMENT	NO LEAKS FOUND
04/02/1999	51077457	Gas leak inside		
11/14/1999	51077458	Gas leak at appliance		

The Premise Based LEAKS tab lists all trouble orders generated for the premise. Select a trouble order in the table and double-click on it to display the information in form layout view

Viewing and Navigating AIMS Data

Premise Based: AIMS Orders Tab

The screenshot displays the AIMS Orders Tab interface. At the top, there are navigation tabs: 'Premise Based', 'Premise Alerts', 'Add Meter Read', and 'Exchange Meter'. Below these are various buttons like 'Customer # Info', 'Premise Based', 'Premise Alerts', 'Add Meter Read', and 'Exchange Meter'. The main area is divided into several sections:

- Customer Information:** Fields for Address, Zip Code, Customer Name, USA Rate, Mailing Address, and Account. It also shows 'Customer's Age' (18), 'Meter Status' (None On), and 'Service Status' (ACTIVE).
- Order History Table:** A table listing orders with columns: Request #, Activity Date, Activity Type, Activity Initiated, Status, and Order Result.

Request #	Activity Date	Activity Type	Activity Initiated	Status	Order Result
1632490	03/06/2008 22:10	Complete Order	Steven Jones	Completed	Completed By FSD
1632490	03/06/2008 22:21	Order in Dispatching Stage	Steven Jones	Dispatched	Moved to Dispatching
1632490	03/06/2008 22:19	Order Creation	Parole McGilbra	Open	Trouble Order
- Field Information Button:** A callout box points to the 'Field Information' button located below the Order History table.

If a service order is pending for the premise, this is the default tab view when the *C/S Information* window opens. The **PREMISE HISTORY** table lists all service orders generated in AIMS and the status of each order. The **ORDER HISTORY** table details all activities associated with the order currently selected in the **PREMISE HISTORY** table. You can update order information, reschedule, or cancel orders from this tab. Select an order and click the **FIELD INFORMATION** button to see details about the field visit as illustrated below.

The screenshot shows the 'Field Information' window for a specific order. It includes the following sections:

- Order Information:** Order Num: 1632490, Order Type: Repair Appliance, Customer Name: [Redacted].
- Field Activity Summary Table:**

Request #	Activity Date	Activity Type	Activity Initiated	Status	Order Result		
1632490	03-06-08	Complete By FSD	Primary	1625-2000	03-06-2008 5:30 PM	OFF	Off
1632490	03-06-08	Call	Primary	1625-2000	03-06-2008 4:51 PM		
- Field Activity Details:** A section with various buttons like 'Call Status', 'Reference Data', 'Print Data', 'New-Pol Change', 'Safety Survey', 'Show Order', 'Print Summary', 'Access', 'Completion Time', 'Survey Check', 'Acc. Codes', and 'Comment'.
- Order Details:** A section with buttons like 'Call Status', 'Reference Data', 'Print Data', 'New-Pol Change', 'Safety Survey', 'Show Order', 'Print Summary', 'Access', 'Completion Time', 'Survey Check', 'Acc. Codes', and 'Comment'.

Viewing and Navigating AIMS Data

Premise Based: BCCS Orders Tab

The screenshot displays the 'Premise Based BCCS Orders' tab in the AIMS software. The top portion of the window is a form for customer details, including fields for Address, SSN, Home Phone, Zip Code, Account, Work, Customer Name (SAMUELS BARBARA A), St. Ct. Discount, Mobile, USA Rate (General Service Restricted), Customer's Age (36), Car, Meter Status (Alert On), Service Status (ACTIVE), and Cash Rec? (TR Gen SDCI TR WVC). There are also 'Last Contact' fields for both the premise and the person, both dated 02/01/2010. Below the form is a navigation bar with tabs for Customer Based, Premise Based, and Premise Alert. The 'Premise Based' tab is active, showing a table of service orders.

Order ID	Date	Type	Description	Reason	Applicable	Status	Class
287183003	11/02/2000	SIXC	Meter Exchange			Completed	MOB
226170087	05/01/2001	DH R	Turn On (Pre-act)			Completed	AMR
670061116	05/01/2001	OFFR	Turn Off (Pre-act)			Completed	AMR
738371643	12/20/2000	OFFD	Turn Off (DR At Meter)			Incompleted Or Voided	MOB
7444070480	12/22/2000	OFFR	Turn Off (Pre-act)			Incompleted Or Voided	MOB
249295113	12/14/2000	OFFD	Turn Off (DR At Meter)			Incompleted Or Voided	MOB
670116204	12/05/2000	OFFD	Turn Off (DR At Meter)			Incompleted Or Voided	MOB
192574635	12/04/2000	DH R	Turn On (Pre-act)			Completed	HBR
190120617	12/04/2000	OFFR	Turn Off (Pre-act)			Completed	HBR
781622929	10/18/2000	SIXC	Meter Exchange	Meter exchange		Completed	PVAI

The Premise Based BCCS ORDERS tab lists service order details for all orders generated against the premise and entered into the Billing Collections & Customer Service (BCCS) system prior to the conversion to AIMS. You cannot modify these orders.

Select a service order in the table and double-click on it to display the information in form layout view.

Premise Based: Meter Info Tab

The screenshot shows a web application interface with a top navigation bar and a main content area. The main content area is divided into several sections:

- Customer Information:** Includes fields for Address, Zip Code, Customer Name, USA Rate (General Service Residential), Mailing Address, and Alert (RUDG).
- Account Information:** Includes SSN, Account, Sr. Cit. Discount, Customer's Age (36), Meter Status (Photo On), Service Status (ACTIVE), and Theft Indicator.
- Contact Information:** Includes Home Phone, Work, Mobile, Cell, SP Status (Connected), and Curb Cam? (TR 6m SIM TR W/C).
- Contract Information:** Two sections for 'Last Contact (Previous)' with dates of 02/01/2010 and notes about ICALD comments.
- Navigation and Tabs:** A row of tabs includes 'Customer Based', 'Premise Based', and 'Premise Alarm'. Below this is a row of sub-tabs: 'Meter Patch', 'Services', 'New Out', 'Contacts', 'Links', 'ADMS Orders', 'BCE3 Orders', 'Meter Info', 'Landed Info', 'Survey', 'LCP', 'SR', and 'Premise Etc'. The 'Meter Info' tab is currently selected.
- Meter Details Table:** A table with two columns and eight rows of data:

Er ID	00030003533	New Stock Date	10/31/2004
Meter #	1800790	ERT Stock Date	04/13/2005
Make	AMERICAN	Temp Completed	NA
Model	1250	Any Message Date	06/04/2005
Meter Cycle	04	Gas Pressure Factor	1
Read Out Type	DDDM	Meter Constant	1
Number of Dials	4		

The **Premise Based METER INFO** tab provides the premise's meter details including the Encoder Receiver Transmitter (ERT) ID, meter number, make, model, cycle, read out type, and so on.

Viewing and Navigating AIMS Data

Premise Based: PLP Tab

The screenshot displays the AIMS software interface for a 'Premise Based' view. The top navigation bar includes 'Home', 'Search', 'Order', 'Window', and 'Help'. Below this, there are tabs for 'Include PSD Order' and 'Exclude Order'. The main content area is divided into several sections:

- Customer Information:** Fields for Address, Zip Code, Customer Name, USA Flag, and Mailing Address.
- Account Information:** Fields for SSN, Account, St. Cr. Discount, Customer's Age, Meter Status, Service Status (set to ACTIVE), and Teeth Indicate.
- Phone Numbers:** Fields for Home Phone, Work, and Mobile.
- Other Details:** Fields for Car, SP Status (set to Disconnected (Plan P), Shut Off), and Cash Base (set to 18.60 NEM 18.000).
- Alerts and Status:** An 'Alert' field and a 'Loan Found' section with a date of 12/17/2008 and a comment: 'Created By SYS. Comments: ABMS Debit 2162655 Cancelled. George Blass J412/17/2008 12:38 PM! (log treat here 12 17 08, \$18.007 outside, CCI - Recycled)'. A 'Last Contact (Person)' field is also present.

Below the main form, there are tabs for 'Customer Based', 'Premise Based' (selected), and 'Premises All'. A toolbar contains buttons for 'Add to Plan', 'Exchange Meter', 'Main Profile', 'Service', 'Plan Detail', 'Contact', 'Link', 'AIMS Orders', 'DCS Orders', 'Meter Info', 'PLP', 'Cardholder Info', 'Survey', 'LCP', 'GRT', and 'Premises'. A table below the toolbar shows columns for 'Plan Type', 'Start Date', and 'End Date'. The table is currently empty.

If a Parts and Labor Plan (PLP) is currently or was previously in effect for the premise, the plan type, start date, and end dates are displayed.

Select a plan in the table and double-click on it to display the information in form layout view.

Viewing and Navigating AIMS Data

Premise Based: Landlord Info Tab

The screenshot displays the AIMS software interface. At the top, there is a search bar and navigation tabs for 'Premise Based', 'Premise Alert', and 'Add Meter Read'. Below this, a horizontal menu contains several tabs: 'Meter Reads', 'Service', 'Party Card', 'Contacts', 'Links', 'ADMS Orders', 'BCCS Orders', 'Meter Info', 'PLP', 'Landlord Info', 'Survey', 'LCP', 'BRT', and 'Premise Info'. The 'Landlord Info' tab is currently selected. The main content area is a form with the following fields:

Address	SSN	Home Phone
Zip Code	Account	Work
Customer Name	St. CA. Discount	Mobile
USA Rate	Customer's Age	Car
Mailing Address	Meter Status	Meter OS
Alert	Service Status	SP Status
Lead Found	Threat Indicate	Carb One?
Lead Contact (Person)	Y/N	Unbilled Usage

Below the form, there is a table with columns for 'Premise ID', 'Customer Name', 'Social Security Number', 'Primary Phone Number', and 'MGA Phone'. The table is currently empty.

If the premise has a landlord listed in BCCS, the **LANDLORD INFO** tab displays the person ID, standard name, and primary phone number for the landlord. Also, if the landlord has chosen to revert the gas into their name when a tenant moves out, that information is viewable here.

Select a landlord in the table and double-click on it to display the information in form layout view.

Viewing and Navigating AIMS Data

Premise Based: Survey Tab

The screenshot displays the AIMS software interface for a 'Premise Based' customer. The window title is 'Order Creation (BY 04/20/2009 09:16 PM) (1.0.0) [CA] (CIS Workman)'. The interface includes a search bar and navigation tabs for 'Info P&D Order', 'Trouble Order', 'Add Meter Read', and 'Exchange Meter'. The main data entry area is divided into several sections:

- Address:** Includes fields for Zip Code, Customer Name, USA Rate, and Mailing Address.
- SSN:** Includes fields for Account, St. Cr. Discount, Customer's Age, Meter Status, Service Status, and Threat Indicators.
- Home Phone:** Includes fields for Work, Mobile, and Car.
- SP Status:** Set to 'Disconnected (Pon Pay) Shz Off'.
- Comb Box?** Set to 'FR 60 N5H 1R EEC'.
- Unbilled Usage:** Includes checkboxes for 'Expanded' and 'Update'.

Below the data entry area, there is a 'Last Contact' section with a dropdown menu showing 'Date: 12/17/2008, Created By: EYS, Comments: AIMS Order # 2183585 Cancelled - Group Email A(12/17/2008 12:50 PM) - Pig team here 12:17:00, \$M OFF outside, CD - Recurbed'. A 'Last Contact (Person)' dropdown is also present.

The interface features a navigation bar with tabs for 'Meter Reads', 'Service', 'Prev Cust', 'Contacts', 'Links', 'AIMS Orders', 'BCCS Orders', 'Meter Info', 'PUP', 'Landlord Info', 'Hub Survey', 'LCP', 'ERT', and 'Premise Base'. The 'Hub Survey' tab is currently selected. Below the navigation bar, there is a list of survey items with columns for 'Order #', 'Order Type', 'Tech', 'Address', 'Location', 'Read #', 'Created Date/Time', 'Check Log', 'LCP', 'BCCS', 'CD', 'Read', 'Meter', and 'Last BCCS'. The list is currently empty.

Viewing and Navigating AIMS Data

Premise Based: LCP Tab

The screenshot displays the AIMS software interface for the LCP (Landlord Cooperation Program) tab. The window title is "AIMS Data Entry - [Customer Name]". The interface includes a search bar at the top left and navigation buttons for "Initial PSD Order" and "Transfer Order". The main area is divided into several sections:

- Customer Information:** Address, Zip Code, Customer Name, USA Rate, Mailing Address, and Alert.
- Account Information:** SSN, Account, Sr. Cit. Discount, Customer's Age, Meter Status, Service Status, and Theft Indicator.
- Phone Information:** Home Phone, Work, Mobile, and Cell.
- SPS Status:** (Disconnected (In Pay) Shed Off)
- Other Information:** Curb Box? (TR En MSH TR EEC) and Unbilled Usage (Expanded).
- Loan Found:** Data 12/17/2008, Deleted By: STS, Comments: AIMS Order # 0163588 Cancelled - Georgia Began Act 12/17/2008 12:58 PM, No loan here 12/17/08, SM DFT outside, CFI - Recycled.
- Land Contact:** Landro (Person).

Below the main data entry area, there is a navigation bar with buttons for "Customer Based", "Premise Based", "Premise Alert", "Add Meter Read", and "Exchange Meter". The "Premise Based" button is currently selected. Below the navigation bar, there is a search bar and a list of tabs: "Meter Reads", "Service", "Pay Date", "Contacts", "Alerts", "Alerts Detail", "BCCS Orders", "Meter Info", "PUP", "Landlord Info", "Service", "LCP", "BRT", "Premise Bk". The "LCP" tab is currently selected. Below the tabs, there is a search bar and a list of fields: "LRance", "Premise", "People", "Find Name", "List Name", "Business Name", "EIA of", "Dues", "Est", "CCL".

This tab displays information about the landlord of premise who participates in the Landlord Cooperation Program (LCP)

Viewing and Navigating AIMS Data

Premise Based: **BRT** Tab

The screenshot shows the AIMS software interface. At the top, there are navigation buttons for 'Include PSD Order' and 'Include Order'. Below this, there are several input fields for customer and account information, including Address, Zip Code, Customer Name, USA Rate, Mailing Address, Alert, SSN, Account, St. Cal. Discount, Customer's Age, Meter Status, Service Status, Thru Indicator, Home Phone, Work, Mobile, Car, SP Status, Curb Base?, and Disabled Usage. There are also buttons for 'Expand' and 'Update'. A 'Last Contact' section shows 'Last Contact (Person)' as 'Loading...' and 'Last Contact (Premise)' with a date of 12/17/2003 and a note about a cancelled George Brown Jr. High loan.

The main section of the interface is titled 'Premise Based' and contains a sub-tab 'BRT'. Below this, there are several tabs: 'Meter Search', 'Service', 'Prev Call', 'Contacts', 'Leads', 'AIMS Orders', 'BCCS Orders', 'Mailing Info', 'PLP', 'Landlord Info', 'Survey', 'LCP', 'Help BRT', and 'Premise Info'. The 'BRT' tab is active, displaying a table of tax records for parcel 72143500.

Parcel	72143500	Sale Dt	07/05/2002	Exp Cond Dt	04/14/2010	Frag/Plac	0
Location	[Redacted]	Date Recorded	08/03/2002	Exp Cond	Sealed	Floor Plan	
Owner	[Redacted]	Price	\$14,000.00	Butt	1345	Central Air	
2nd Descr		Sale Type	Forecast, Shortl. Ben	Rooms	6	Interior Cond	Average
Building Type	ROW 2 STY MASONRY	Frontage	1.500	Bedrooms	3	Mark of Value	\$14,400.00
Sq Feet	1,022	Depth	4.400	Bathrooms	1	MLV Val Dt	2007 Jul
Zip	191341718	Total Area	66.000	Heat/Fuel	Undetermined	Land Tax	6823.00
Ward	07	Stories	2	Gas Sq Ft		Building Tax	\$3,943.00
Mailing Address							

The Premise Based Bureau of Revision of Taxes (BRT) tab displays information recorded in the Philadelphia tax records, if available. This information is used largely by the Collections, the Customer Review Unit, and the Landlord Cooperation Program Departments

Viewing and Navigating AIMS Data

Premise Based: Premise Bills Tab

The screenshot displays the 'Premise Bills' tab in the AIMS software. The interface includes a top navigation bar with 'Inhibit FED Data' and 'Enable Data' buttons. Below this is a form for customer information, including fields for Address, Zip Code, Customer Name, USA Rate, Mailing Address, and various service status indicators like 'Service Status' (ACTIVE) and 'Thrift Indicator'. A 'Last Contact' section shows a date of 12/17/2003 and a note about a cancelled George Bush M. Below the form is a navigation bar with tabs for 'Customer Based', 'Premise Based', and 'Premise Alerts'. The main area contains a table of bills for account 282079306. The table has columns for Account ID, Start, End, Monthly Amt, Account Total, Status, Days, and Ext. The bills listed are as follows:

Account ID	Start	End	Monthly Amt	Account Total	Status	Days	Ext
282079306	08/05/2003	08/19/2003	\$90.00	\$2,095.50	Frozen	14	57
282079306	07/07/2003	08/05/2003	\$118.00	\$1,908.82	Frozen	29	111
282079306	06/05/2003	07/07/2003	\$118.00	\$1,871.82	Frozen	32	134
282079306	05/06/2003	06/05/2003	\$118.00	\$1,753.82	Frozen	30	112
282079306	04/06/2003	05/06/2003	\$118.00	\$1,635.82	Frozen	30	130
282079306	03/06/2003	04/06/2003	\$118.00	\$1,517.82	Frozen	31	126
282079306	02/05/2003	03/06/2003	\$118.00	\$1,399.82	Frozen	29	149
282079306	01/07/2003	02/05/2003	\$118.00	\$1,281.82	Frozen	29	162
282079306	12/05/2002	01/07/2003	\$118.00	\$1,163.82	Frozen	33	184
282079306	11/03/2002	12/05/2002	\$118.00	\$1,045.82	Frozen	32	114
282079306	10/03/2002	11/03/2002	\$118.00	\$1,327.82	Frozen	31	79
282079306	09/04/2002	10/03/2002	\$118.00	\$1,343.82	Frozen	29	42
282079306	08/05/2002	09/04/2002	\$118.00	\$1,328.82	Frozen	30	32
282079306	07/07/2002	08/05/2002	\$118.00	\$1,241.82	Frozen	29	25

The Premise Based PREMISE BILLS tab displays all of the bills from this premise for all customers.

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:


Donna Ross, Esq.
General Counsel
SBG Management Services, Inc.
702 N. Marshall Street
Philadelphia, PA 19123

& by e-mail: fboone@sbgmanagement.com

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

& by e-mail: phil@sbgmanagement.com
ktreadwell@sbgmanagement.com

October 15, 2014


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

RECEIVED
OCT 15 2014
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

30065

30252

FedEx Package Express **US Airbill**

FedEx Tracking Number

8057 5086 4478

1 From

Date 10-15-14

Sender's Name Amurto Kooling Epa Phone 215 624-6982

Company PHIA GAS WORKS

Address 500 W MONTGOMERY AVE

City PHILADELPHIA State PA ZIP 19122-2898

2 Your Internal Billing Reference

3 To

Recipient's Name See Assembly Chevrolet Phone

Company PA PWC

Address 400 North Street
We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room

Address Commercially Registered Bldg
Use this line for the HOLD location address or for combination of your shipping address

City Harrisburg State PA ZIP 17120

HOLD Weekday
FedEx location address REQUIRED. NOT available for FedEx First Overnight.

HOLD Saturday
FedEx location address REQUIRED. Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

0114587305



8057 5086 4478

fedex.com 1800.GoFedEx 1800.463.3339

fedex.com 1800.GoFedEx 1800.463.3339

Form ID No. **0215**

Recipient's Copy

4 Express Package Service

NOTE: Service order has changed. Please select carefully.

* To most locations.

Packages up to 150 lbs.
For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

- FedEx First Overnight***
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Priority Overnight**
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight**
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

- FedEx 2Day A.M.**
Second business morning. Saturday Delivery NOT available.
- FedEx 2Day**
Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver**
Third business day. Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- FedEx Envelope***
- FedEx Pak***
- FedEx Box**
- FedEx Tube**
- Other**

6 Special Handling and Delivery Signature Options

- SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- No Signature Required**
Package may be left without obtaining a signature for delivery.
- Direct Signature**
Someone at recipient's address may sign for delivery. Fee applies.
- Indirect Signature**
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

- One box must be checked.
 - Yes** As per attached Shipper's Declaration
 - No**
 - Yes** Shipper's Declaration not required
 - Dry Ice** Dry Ice, 3 UN 1845 _____ kg
 - Cargo Aircraft Only**
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.
- Sender** Acct. No. in Section 1 will be billed.
- Recipient**
- Third Party**
- Credit Card**
- Cash/Check**

Total Packages Total Weight

Credit Card Acct.

*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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