



SBG Management Services, Inc.

P.O. Box 549 Abington, PA 19001

Phone 215.938.6665

Fax 215.935.6987

The Honorable Rosemary Chiavetta
Secretary, Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Allen's Lane Realty Co., LP v. PGW, Docket No. C-2014-2444966

Dear Secretary Chiavetta:

Kindly accept for filing Complainant's Motion to Consolidate and/or for Listing for Call of the Docket. Thank you for your time and consideration.

Sincerely,

Donna S. Ross
Attorney for Complainants

Cc: Laureto Farinas, Esquire
Counsel for Respondent
SBG Management Services, Inc. on behalf of Allen's Lane
Client

RECEIVED

2014 OCT 30 PM 2:08

PA P.U.C.
SECRETARY'S BUREAU

RECEIVED

Donna S. Ross, Esquire
SBG Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Fax: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

Attorney for Complainants
2014 OCT 30 PM 2: 08

PA P.U.C.
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

ALLEN'S LANE REALTY CO., LP	:	
<i>Complainant</i>	:	DOCKET NO. C-2014-2444966
V.	:	
	:	
PHILADELPHIA GAS WORKS aka "PGW"	:	
<i>Respondent</i>	:	

MOTION TO CONSOLIDATE and/or LIST FOR THE CALL OF THE DOCKET

AND NOW, comes Complainant, SBG Management Services, Inc. as agent for and on behalf of Allen's Lane Realty Co., LP, ("Allen's") by and through their attorney, Donna S. Ross, who respectfully moves this Commission to recommend the above-captioned matter be consolidated with the other cases currently pending before the Commission, under the following docket numbers: C-2012-2304183, C-2012-2304215, C-2012-2304324, C-2012-2304167, C-2012-2304167, C-2012-2304303, C-2012-2308454, C-2012-2308462, C-2012-2308465, C-2012-2334253 and/or in the alternative be placed for Call of the Docket. In support of this motion Complainant avers as follows:

1. Complainant, SBG Management Services, Inc. is the authorized agent and property manager for the premises owned and operated by Allen's Lane Realty Co., LP, located at 136 W. Allen's Lane, Philadelphia, PA 19119.
2. Respondent, Philadelphia Gas Works, aka "PGW", is the public utility that supplies gas services to customers at the premise address known as Allen's Lane Realty Co., LP.
3. On June 26, 2013, Allen's acquired the property located at 126-136 Allens Lane, Philadelphia, PA 19119 from Allens Lane Lender, LLC, ("Previous Owner"). See Settlement Sheet attached hereto as Exhibit "A".
4. Prior to acquisition, the premises was uninhabitable. According to the Previous Owner the property had been vacant for approximately 2 years prior to the settlement date of June 26, 2013.

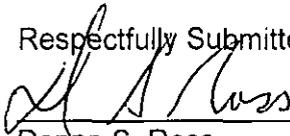
5. After the date of acquisition, construction commenced on the uninhabitable units, and on or about August 2013, a single tenant moved into the property and applied for gas service in their own name with PGW.
6. On or about July 2014, additional tenants moved into the property and each tenant applied for gas services with PGW in their own name as customer of record.
7. Complainant does not have a gas account with PGW for this premise address, nor are they the customer of record on any of the tenant accounts located at the premise address.
8. Shortly after August 21, 2014, Complainant received several pre-lien notification letters from PGW, which are attached hereto as "Exhibit B".
9. On or about September 9, 2014, Complainant confirmed with PGW personnel and the settlement agent at the Keystone Agency Title company that the underlying debts contained in the pre-lien notification letters resulted from gas usage from other customers of record which predated SBG/Allen's acquisition of the property. See Account Pay-Off Inquiry Form and supporting documentation attached hereto as "Exhibit C".
10. Complainant avers that PGW has established a pattern of making gross accounting errors which cause Complainant great financial harm resulting in inflated utility bills and unlawful collection practices.
11. Complainant avers that Respondent's actions violate the Public Utility Code at 52 Pa.Code §56.1 et seq and the Pennsylvania Consumer Protections Laws codified at 73 P.S. §201-1 thru 201.9.2 by imposing a debt on Complainant that is not due to PGW.
12. Pending before the Commission are several consolidated cases involving SBG Management Services, Inc. on behalf of various real estate entities versus Respondent, PGW. The dockets are as follows: C-2012-2304183, C-2012-2304215, C-2012-2304324, C-2012-2304167, C-2012-2304167, C-2012-2304303, C-2012-2308454, C-2012-2308462, C-2012-2308465, C-2012-2334253.
13. In each of the above-referenced docketed Complaints, along with this Complaint before the Commission, Complainants aver that PGW has an established practice of acting with wanton and willful disregard by perpetuating intentionally negligent, fraudulent and abusive billing and collection practices that unlawfully compromises Complainant's property interest and financial well-being by seeking monies that are not lawfully owed and due to PGW.

14. In this action before the Commission, there is a genuine and material issue of law and fact that must be decided by the Commission.
15. In the parties' pending docketed cases, the issues complained of are similar in nature and scope, concern the same parties in interest, and may be adjudicated using the same legal principles and authorities.
16. The above-referenced dockets listed herein in paragraph 12 are currently in active litigation before the Commission, therefore, it is in the interest of judicial economy for the Commission to consolidate this action with the others in order to make an expedient decision on Complainants' claims.
17. Respondent owes a duty to Complainant to provide service in good faith, with honesty and fair dealing, in accordance with 52 Pa.Code §56.1 et seq.
18. Respondent continually violates its' obligations and duties owed to Complainant to provide good service, fair dealings and honest business practices under the Public Utility Code.
19. Respondent's repeated failures and violations of the Pennsylvania Public Utility Code forces Complainant to seek redress from this Commission.
20. Respondent's conduct constitutes actions for which only the Commission may adjudicate and impose penalties and sanctions in accordance with the Public Utility Code.
21. Respondent's answer to the Complaint requests dismissal of the action and that the matter not be placed on the Call of the Docket, however, as averred above, Respondent's conduct demonstrates there are genuine material issues of law and fact that exists and the Commission is the adjudicating authority for which the Complainant may find redress against Respondent's negligent conduct.

WHEREFORE, for the reasons set forth above, Complainant respectfully moves that the Commission: 1) consolidate this Complaint with the other matters referenced herein under the dockets: C-2012-2304183, C-2012-2304215, C-2012-2304324, C-2012-2304167, C-2012-2304167, C-2012-2304303, C-2012-2308454, C-2012-2308462, C-2012-2308465, C-2012-2334253, which are in active litigation and pending review before the Commission; and/or in the alternative, 2) schedule this matter for the Call of the Docket in accordance with the policies, procedures, codes, regulations and laws under which the Commission is bound to review the Complaints that come before them.

Date: 10/28/14

Respectfully Submitted By:



Donna S. Ross
Counsel for Complainant

RECEIVED

2014 OCT 30 PM 2:09

PA P.U.C.
SECRETARY'S BUREAU

Donna S. Ross, Esquire
SBG Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Fax: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

Attorney for Complainants

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

ALLEN'S LANE REALTY CO., LP <i>Complainant</i>	:	
V.	:	DOCKET NO. C-2014-2444966
	:	
	:	
PHILADELPHIA GAS WORKS aka "PGW" <i>Respondent</i>	:	

CERTIFICATE OF SERVICE

I hereby certify that on the date below, I have served the foregoing Complainants' **Motion To Consolidate and List for Call of the Docket** and original "**Notice to Plead**" upon the Secretary for the Pennsylvania Public Utility by mailing, via First Class, 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:

For the PUC:
Secretary Rosemary Chiavetta, Esq.
400 North Street
Harrisburg, PA 17120

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 28, 2014

BY: 

DONNA S. ROSS, Attorney for Complainant
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

RECEIVED
2014 OCT 30 PM 2:09
PA P.U.C.
SECRETARY'S BUREAU



PHILADELPHIA GAS WORKS

800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Aug 21, 2014

000028 000000274



ALLENS LANE REALTY CO. LP
1095 RYDAL RD STE 325
RYDAL PA 19146-1711

RE: 136 W Allens Ln,Util
Subject to Lien: \$106.40
Property Parcel Number: 881048000



Dear ALLENS LANE REALTY CO. LP,

This correspondence will serve as your notification that the City of Philadelphia ("City"), for the City owned Philadelphia Gas Works ("PGW"), will be filing a municipal lien against your Property, set forth above, in accordance with, among other laws, the Municipal Claim and Tax Liens Act (53 Pa.Stat. Ann. §§ 7101, et seq.); the Natural Gas Choice and Competition Act (66 Pa.C.S. §§ 2201, et seq.); and the Responsible Utility Customer Protection Act (66 Pa.C.S. §§ 1401, et seq.), in the amount of \$106.40

This municipal lien is based on a claim for delinquent unpaid gas bills for the Property, together with late charges, and does not include prior lien amounts. Unless the entire amount of this lien, as well as the full amount of prior liens on the Property, is paid within 30 days from the date of this letter, the City will file this lien against the Property. The filed lien amount will reflect payments received prior to the filing date.

Payment may be made via mail with a cashier's check, certified check or money order made payable to Philadelphia Gas Works. Payments should be mailed to:

PGW
Commercial Resource Center
800 W. Montgomery Avenue, 3rd Floor
Philadelphia, PA 19122
Attn: Commercial Resource Center

You may also make payment by phone via check or credit card by calling PGW at 215-235-7077.

Nothing in this letter shall be deemed a waiver, relinquishment, or election of any rights or remedies by the City or PGW, which expressly reserve all legal and equitable rights and remedies. All information in this letter has been provided by PGW to provide you with information pertinent to your Property rights and obligations, and should not be interpreted as pertinent to the obligation of any consumer other than you, as the Property owner. The information herein is not provided for your debt collection purposes.

Very truly yours,

PGW
Commercial Resource Center

Exhibit "B"



PHILADELPHIA GAS WORKS

800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Aug 21, 2014

000030 000000272



ALLENS LANE REALTY CO. LP
1095 RYDAL RD STE 325
RYDAL PA 19046-1711



RE: 136 W Allens Ln.B Util

Subject to Lien: \$117.74

Property Parcel Number: 881048000



Dear ALLENS LANE REALTY CO. LP,

This correspondence will serve as your notification that the City of Philadelphia ("City"), for the City owned Philadelphia Gas Works ("PGW"), will be filing a municipal lien against your Property, set forth above, in accordance with, among other laws, the Municipal Claim and Tax Liens Act (53 Pa.Stat. Ann. §§ 7101, et seq.); the Natural Gas Choice and Competition Act (66 Pa.C.S. §§ 2201, et seq.); and the Responsible Utility Customer Protection Act (66 Pa.C.S. §§ 1401, et seq.), in the amount of \$117.74

This municipal lien is based on a claim for delinquent unpaid gas bills for the Property, together with late charges, and does not include prior lien amounts. Unless the entire amount of this lien, as well as the full amount of prior liens on the Property, is paid within 30 days from the date of this letter, the City will file this lien against the Property. The filed lien amount will reflect payments received prior to the filing date.

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Commercial Resource Center
800 W. Montgomery Avenue, 3rd Floor
Philadelphia, PA 19122
Attn: Commercial Resource Center

You may also make payment by phone via check or credit card by calling PGW at 215-235-7077.

Nothing in this letter shall be deemed a waiver, relinquishment, or election of any rights or remedies by the City or PGW, which expressly reserve all legal and equitable rights and remedies. All information in this letter has been provided by PGW to provide you with information pertinent to your Property rights and obligations, and should not be interpreted as pertinent to the obligation of any consumer other than you, as the Property owner. The information herein is not provided for your debt collection purposes.

Very truly yours,

PGW
Commercial Resource Center



PHILADELPHIA GAS WORKS

800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Aug 21, 2014

000032 000000270



ALLENS LANE REALTY CO. LP

1095 RYDAL RD STE 325

RYDAL PA 19046-1711

RE: 136 W Allens Ln,B3A

Subject to Lien: \$187.41

Property Parcel Number: 881048000



Dear ALLENS LANE REALTY CO. LP,

This correspondence will serve as your notification that the City of Philadelphia ("City"), for the City owned Philadelphia Gas Works ("PGW"), will be filing a municipal lien against your Property, set forth above, in accordance with, among other laws, the Municipal Claim and Tax Liens Act (53 Pa.Stat. Ann. §§ 7101, et seq.); the Natural Gas Choice and Competition Act (66 Pa.C.S. §§ 2201, et seq.); and the Responsible Utility Customer Protection Act (66 Pa.C.S. §§ 1401, et seq.), in the amount of \$187.41

This municipal lien is based on a claim for delinquent unpaid gas bills for the Property, together with late charges, and does not include prior lien amounts. Unless the entire amount of this lien, as well as the full amount of prior liens on the Property, is paid within 30 days from the date of this letter, the City will file this lien against the Property. The filed lien amount will reflect payments received prior to the filing date.

Payment may be made via mail with a cashier's check, certified check or money order made payable to Philadelphia Gas Works. Payments should be mailed to:

PGW
Commercial Resource Center
800 W. Montgomery Avenue, 3rd Floor
Philadelphia, PA 19122
Attn: Commercial Resource Center

You may also make payment by phone via check or credit card by calling PGW at 215-235-7077.

Nothing in this letter shall be deemed a waiver, relinquishment, or election of any rights or remedies by the City or PGW, which expressly reserve all legal and equitable rights and remedies. All information in this letter has been provided by PGW to provide you with information pertinent to your Property rights and obligations, and should not be interpreted as pertinent to the obligation of any consumer other than you, as the Property owner. The information herein is not provided for your debt collection purposes.

Very truly yours,

PGW
Commercial Resource Center



PHILADELPHIA GAS WORKS
 800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Aug 21, 2014

000026 000000276



ALLENS LANE REALTY CO. LP
 1095 RYDAL RD STE 325
 RYDAL PA 19346-1711

RE: 136 W Allens Ln,B3C
 Subject to Lien: \$439.94
 Property Parcel Number: 881048000



Dear ALLENS LANE REALTY CO. LP,

This correspondence will serve as your notification that the City of Philadelphia ("City"), for the City owned Philadelphia Gas Works ("PGW"), will be filing a municipal lien against your Property, set forth above, in accordance with, among other laws, the Municipal Claim and Tax Liens Act (53 Pa.Stat. Ann. §§ 7101, et seq.); the Natural Gas Choice and Competition Act (66 Pa.C.S. §§ 2201, et seq.); and the Responsible Utility Customer Protection Act (66 Pa.C.S. §§ 1401, et seq.), in the amount of \$439.94

This municipal lien is based on a claim for delinquent unpaid gas bills for the Property, together with late charges, and does not include prior lien amounts. Unless the entire amount of this lien, as well as the full amount of prior liens on the Property, is paid within 30 days from the date of this letter, the City will file this lien against the Property. The filed lien amount will reflect payments received prior to the filing date.

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PGW
 Commercial Resource Center
 800 W. Montgomery Avenue, 3rd Floor
 Philadelphia, PA 19122
 Attn: Commercial Resource Center

You may also make payment by phone via check or credit card by calling PGW at 215-235-7077.

Nothing in this letter shall be deemed a waiver, relinquishment, or election of any rights or remedies by the City or PGW, which expressly reserve all legal and equitable rights and remedies. All information in this letter has been provided by PGW to provide you with information pertinent to your Property rights and obligations, and should not be interpreted as pertinent to the obligation of any consumer other than you, as the Property owner. The information herein is not provided for your debt collection purposes.

Very truly yours,

PGW
 Commercial Resource Center



PHILADELPHIA GAS WORKS

800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Aug 21, 2014

000029 003000273



ALLENS LANE REALTY CO. LP
1095 RYDAL RD STE 325
RYDAL PA 19046-1711

RE: 136 W Allens Ln.B3E
Subject to Lien: \$191.68
Property Parcel Number: 881048000



Dear ALLENS LANE REALTY CO. LP,

This correspondence will serve as your notification that the City of Philadelphia ("City"), for the City owned Philadelphia Gas Works ("PGW"), will be filing a municipal lien against your Property, set forth above, in accordance with, among other laws, the Municipal Claim and Tax Liens Act (53 Pa.Stat. Ann. §§ 7101, et seq.); the Natural Gas Choice and Competition Act (66 Pa.C.S. §§ 2201, et seq.); and the Responsible Utility Customer Protection Act (66 Pa.C.S. §§ 1401, et seq.), in the amount of \$191.68

This municipal lien is based on a claim for delinquent unpaid gas bills for the Property, together with late charges, and does not include prior lien amounts. Unless the entire amount of this lien, as well as the full amount of prior liens on the Property, is paid within 30 days from the date of this letter, the City will file this lien against the Property. The filed lien amount will reflect payments received prior to the filing date.

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PGW
Commercial Resource Center
800 W. Montgomery Avenue, 3rd Floor
Philadelphia, PA 19122
Attn: Commercial Resource Center

You may also make payment by phone via check or credit card by calling PGW at 215-235-7077.

Nothing in this letter shall be deemed a waiver, relinquishment, or election of any rights or remedies by the City or PGW, which expressly reserve all legal and equitable rights and remedies. All information in this letter has been provided by PGW to provide you with information pertinent to your Property rights and obligations, and should not be interpreted as pertinent to the obligation of any consumer other than you, as the Property owner. The information herein is not provided for your debt collection purposes.

Very truly yours,

PGW
Commercial Resource Center



PHILADELPHIA GAS WORKS

800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Aug 21, 2014

000031 000000271



ALLENS LANE REALTY CO. LP
1095 RYDAL RD STE 325
RYDAL PA 19046-1711

RE: 136 W Allens Ln,F Util
Subject to Lien: \$116.10
Property Parcel Number: 881048000



Dear ALLENS LANE REALTY CO. LP,

This correspondence will serve as your notification that the City of Philadelphia ("City"), for the City owned Philadelphia Gas Works ("PGW"), will be filing a municipal lien against your Property, set forth above, in accordance with, among other laws, the Municipal Claim and Tax Liens Act (53 Pa.Stat. Ann. §§ 7101, et seq.); the Natural Gas Choice and Competition Act (66 Pa.C.S. §§ 2201, et seq.); and the Responsible Utility Customer Protection Act (66 Pa.C.S. §§ 1401, et seq.), in the amount of \$116.10

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800 W. Montgomery Avenue, 3rd Floor
Philadelphia, PA 19122
Attn: Commercial Resource Center

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Very truly yours,

PGW
Commercial Resource Center



PHILADELPHIA GAS WORKS

800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Aug 21, 2014

000027 00000275



ALLENS LANE REALTY CO. LP
1095 RYDAL RD STE 325
RYDAL PA 19046-1711

RE: 136 W Allens Ln,F2D
Subject to Lien: \$463.67
Property Parcel Number: 881048000



Dear ALLENS LANE REALTY CO. LP,

This correspondence will serve as your notification that the City of Philadelphia ("City"), for the City owned Philadelphia Gas Works ("PGW"), will be filing a municipal lien against your Property, set forth above, in accordance with, among other laws, the Municipal Claim and Tax Liens Act (53 Pa.Stat. Ann. §§ 7101, et seq.); the Natural Gas Choice and Competition Act (66 Pa.C.S. §§ 2201, et seq.); and the Responsible Utility Customer Protection Act (66 Pa.C.S. §§ 1401, et seq.), in the amount of \$463.67

This municipal lien is based on a claim for delinquent unpaid gas bills for the Property, together with late charges, and does not include prior lien amounts. Unless the entire amount of this lien, as well as the full amount of prior liens on the Property, is paid within 30 days from the date of this letter, the City will file this lien against the Property. The filed lien amount will reflect payments received prior to the filing date.

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Philadelphia, PA 19122
Attn: Commercial Resource Center

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Very truly yours,

PGW
Commercial Resource Center

M.S. Baurer

From: "Savage III, Ralph T" <Theodore.Savage@pgiworks.com>
Date: Thursday, April 10, 2014 4:27 PM
To: <msb@katitle.com>
Subject: 126-138 W. Allens La

Michael,

I double checked the figures from the Pay Off Request we put together and sent to your office on 5-31-13. The total owed to clear the debt to 6/26/13 is \$5094.14. It consists of the five accounts listed and the individual debt associated with each account. If you have any questions call me. I am in the office until 5:00.

Regards

TED SAVAGE

R. Theodore Savage
Director, Commercial Resource Center
800-3 W. Montgomery Ave.
Philadelphia, PA 19122
(215) 684-6429
Theodore.savage@pgiworks.com

Exhibit "C"



Philadelphia Gas Works

PGW Credit and Collections Department
Telephone: (215) 978-1053
Fax: (215) 684-6150

ACCOUNT PAY-OFF INQUIRY FORM

ABSTRACT/TITLE
COMPANY
TELEPHONE # _____

Requestor: _____

FASCIMILE # _____

Date of Settlement: _____

Property Information (Please provide below any account or lien information you may have):

Address: 136 W Allens Ln PGW Account No. _____

Owner/Seller: _____ Buyer: _____

Purpose: Purchase _____ Refinance _____

-If Previously Acquired in Foreclosure, Defendant Name: _____

BOOK _____ WRIT _____ Amount Withheld by Sheriff _____

Judgment/Lien CASE NO: _____ FILED: _____ Amount: _____
Judgment/Lien CASE NO: _____ FILED: _____ Amount: _____
Judgment/Lien CASE NO: _____ FILED: _____ Amount: _____

FOR PGW USE ONLY

TOTAL \$610.70

TOTAL AMOUNT DUE:

Account #: 8119953098 Amount: \$51.56 Current through: 7.2.12
Account #: 9119953738 Amount: \$264.71 Current through: 6.27.13
Account #: 9119953284 Amount: \$294.43 Current through: 6.27.13

-#A26
-UTILITY F
-UTILITY B

No Premise/Service Found (1) Verify Type and Status of Services with Owner

Floor _____ Meter#: _____ Index _____ Actual _____ Est _____ Final _____ READ DATE: _____
Floor _____ Meter#: _____ Index _____ Actual _____ Est _____ Final _____ READ DATE: _____
Floor _____ Meter#: _____ Index _____ Actual _____ Est _____ Final _____ READ DATE: _____

SHERIFF FUNDS (BK _____ WRIT _____) RECEIVED? YES ___ NO ___

Judgment/Lien # _____ Filed: _____ Paid: Yes ___ No ___ Status _____
Judgment/Lien # _____ Filed: _____ Paid: Yes ___ No ___ Status _____
Judgment/Lien # _____ Filed: _____ Paid: Yes ___ No ___ Status _____

All liens and judgments will be satisfied once the payment has been credited against the account

PREPARED BY Kewylik DATE 5.31.13

DISCLAIMER The pay-off information provided by PGW is based on the property and owner information provided by the abstract agency. Failure to provide accurate information could affect the accuracy of the pay-off information reported by PGW.

Make checks payable to PGW and return this completed form with payment to

PGW Collections Dept
800 W. Montgomery Avenue, 3rd floor
Philadelphia, PA 19122
Attn: Liens & Judgments

Failure to return this form along with your payment may result in a delay or incorrect processing of payment

136 W Athens

ACCOUNT PAY-OFF INQUIRY FORM

(Page 2 of 2)



List of All Debt

Account#:	Customer of Record:	Start Date:	End Date:	Amount:	Paid Through Date:	Amount Due:
879215204	Josun Friedland					
UNIT B2c				\$ 170.07		\$ 170.07
UNIT B2a				\$ 419.48		\$ 419.48
UNIT B3F				\$ 121.05		\$ 121.05
UNIT F3d				\$ 113.16		\$ 113.16
UNIT A2a				\$ 171.70		\$ 171.70
UNIT B1d				\$ 332.06		\$ 332.06

Judgment/Lien _____ Docket #: _____ File Date: _____
 Judgment/Lien _____ Docket #: _____ File Date: _____
 Judgment/Lien _____ Docket #: _____ File Date: _____

TOTAL AMOUNT DUE:
 \$ 1327.52

All liens and judgments will be satisfied once full payment has been credited against the relevant account.

PREPARED BY: KWAK DATE: 5.31.13 PAGE 3 OF 3

136 W Allens Ln

ACCOUNT PAY-OFF INQUIRY FORM

(Page 2 of 2)

PGW ONLY - Credit from S. 1000

List of All Debt

Account#:	Customer of Record:	Start Date:	End Date:	Amount:	Paid Through Date:	Amount Due:
40441353	JASY INC					
UNIT-A1d	"			\$ 300.05		\$ 300.05
UNIT-B3E	"			\$ 216.83		\$ 216.83
VT, 1/Try	"			\$ 257.01		\$ 257.01
UNIT B 3a	"			\$ 202.48		\$ 202.48
UNIT F 2d	"			\$ 1101.62		\$ 1101.62
UNIT B 3c	"			\$ 1077.73		\$ 1077.73

Judgment/Lien _____
 Judgment/Lien _____
 Judgment/Lien _____

Docket #: _____
 Docket #: _____
 Docket #: _____

File Date: _____
 File Date: _____
 File Date: _____

TOTAL AMOUNT DUE:
 \$ 3,155.92

\$ 3,155.92

All liens and judgments will be satisfied once full payment has been credited against the relevant account.

PREPARED BY: Kemper DATE: 5.31.13 PAGE 2 OF 3

1525 Locust Street, Suite 301
Philadelphia, Pa 19102
Phone (215) 732-3764
Fax (215) 545-5329

Keystone Agency, Inc.

Date: April 25, 2014

PGW Collections Dept.
800-03 W. Montgomery Avenue
Philadelphia, PA 19122
ATTN: R. Theodore Savage,
Director, Commercial Resource Center

Re: 126-136 W. Allens Lane, Philadelphia, PA
Our File #13-13660-P

Dear Ted:

Enclosed please find our Check #3113 payable to PGW in the amount of \$5,094.14, for the accounts listed on the attached payoff. Based on our telephone conversation and your confirmatory email dated 4/10/14, it is our understanding that this check represents payment in full through June 26, 2013 for all prior balances and liens associated therewith owed by the prior owner of the above-captioned property.

As always, thank you for your help in getting this matter resolved.

Sincerely yours,

Michael S. Baurer

KEYSTONE AGENCY, INC.

Fedex

From: (215) 732-3764
Michael Baurer
Keystone Agency Inc.
1525 Locust Street
Suite 301
Philadelphia, PA 19102

Origin ID: MUVA



J14101402070320

Ship Date: 25APR14
ActWgt: 0.2 LB
CAD: 4291238/NET3480

Delivery Address Bar Code



SHIP TO: (215) 684-6429
Theodore Savage
Philadelphia Gas Works
800-03 W MONTGOMERY AVE
Commercial Resource Center
PHILADELPHIA, PA 19122

BILL SENDER

Ref # 128-136 W. Allens Lane
Invoice #
PO #
Dept #

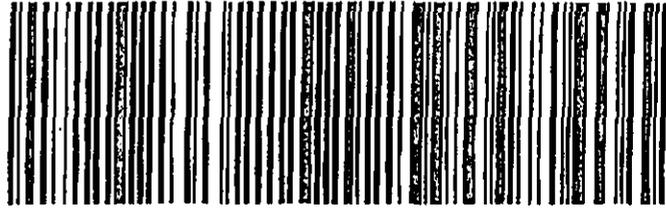
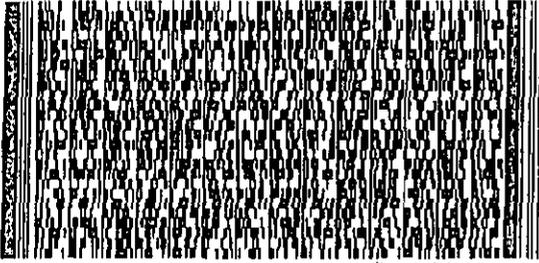
MON - 28 APR 10:30A
PRIORITY OVERNIGHT

TRK# 7986 6257 0492

0201

17 BBXA

DSR
19122
PA-US
PHL



522G1176091F220

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M.S. Baurer

From: "Savage III, Ralph T" <Theodore.Savage@pgworks.com>
Date: Wednesday, April 30, 2014 10:33 AM
To: <msb@katitle.com>
Subject: 126-136 W. Allens Lane

Michael,

We have processed the check for \$5094.14 and applied the money to the five accounts. I have also noted on each account that the remaining balance is not collectible because of the change in ownership. I hope this will suffice as proof of our processing the payoff request check. As always Thank-you for your assistance.

Regards
TED SAVAGE

R. Theodore Savage
Director, Commercial Resource Center
800-3 W. Montgomery Ave.
Philadelphia, PA 19122
(215) 684-6429
theodore.savage@pgworks.com

Exhibit "D"

4/30/2014



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If your filing exceeds 250 pages, you are required to submit one paper copy of the filing within 3 business days of submitting the electronic filing. This paper copy can be mailed to: Secretary, Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, 2nd Floor, Harrisburg, PA 17120 . Please print a copy of this page and attach it to the paper copy of your filing as the first page.

eFiling Confirmation	
Docket Number:	C-2014-2444966
Description:	Complaint
Transmission Date:	10/28/2014 4:00:51 PM
Filed On:	10/28/2014 4:00:51 PM
eFiling Confirmation Number:	1569899

Uploaded File List

File Name	Document Class	Document Type
Allen's Lane Motion to Consolidate.pdf	Supporting Documentation	Motion

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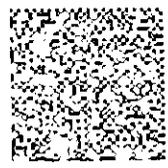
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Customer Hotline 1-800-692-7380 | PUC Webmaster

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SBG Man
P.O. Box 5
Abington, PA 19001-0005



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Secretary Rosemary Chiavetta, Esquire
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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