



**SBG Management Services, Inc.**

P.O. Box 549 Abington, PA 19001

Phone 215.938.6665

Fax 215.935.6987

November 3, 2014

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 Amended Notice to Plead for Complainant's Motion to Consolidate and/or for Listing for Call of the Docket filed on October 28, 2014. To the extent that the original Motion was filed with a five day Notice instead of a twenty day notice, Complainant will extend Respondent's response time to twenty days from the date of the filing of the Amended Notice to Plead. Thank you for your time and consideration.

Sincerely,

*Donna S. Ross /s/*

Donna S. Ross  
Attorney for Complainants

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

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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  
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Email: [dsross90@gmail.com](mailto:dsross90@gmail.com); [dsross@sbgmanagement.com](mailto:dsross@sbgmanagement.com)  
Pennsylvania Attorney ID. NO. 59747

Attorney for Complainants

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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--- AMENDED 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 Consolidate and to List for the Call of the Docket, which was served on this date, of the above-captioned matters, within twenty (20) 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: November 3, 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](mailto:dsross@sbgmanagement.com); [dsross90@gmail.com](mailto:dsross90@gmail.com)

Attorney I.D. No. 59747

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Pennsylvania Attorney ID. NO. 59747

Attorney for Complainants

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

**ALLEN'S LANE REALTY CO., LP**

*Complainant*

**V.**

**PHILADELPHIA GAS WORKS aka "PGW"**

*Respondent*

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**DOCKET NO. C-2014-2444966**

**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 "**Amended 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, 4<sup>th</sup> 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: November 3, 2014

BY: 

**DONNA S. ROSS, Attorney for Complainant**

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ABINGTON, PA 19001

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Electronic Mail Address: [dsross@sbgmanagement.com](mailto:dsross@sbgmanagement.com); [dsross90@gmail.com](mailto:dsross90@gmail.com)

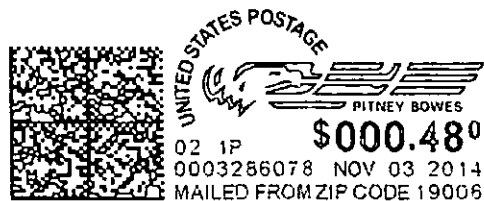
Attorney I.D. No. 59747

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SBG Management  
P.O. Box 549  
Abington, PA 19001-0549

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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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