



PHILADELPHIA GAS WORKS

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June 8, 2016

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

Re: SBG Management Services, Inc./Marshall Square Realty Co., LP v. PGW,
Docket No. C – 2015 – 2486618

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.322, the Philadelphia Gas Works (PGW) and the Complainant in the above captioned matter, hereby file a Joint Motion for Further Stay of proceedings.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in this matter.

Sincerely,


Danielle Leva

Enclosure

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SBG Management Services, Inc. /	:	
Marshall Square Realty Co., LP,	:	
Complainant	:	
v.	:	Docket No. C – 2015 – 2486618
	:	
Philadelphia Gas Works,	:	
Respondent	:	

Joint Motion for a Further Stay of Proceedings

Pursuant to 52 Pa. Code §5.322, the Philadelphia Gas Works (“PGW”) and the Complainants in the above captioned matter, (the “Parties”) seek to extend the Stay of Proceedings acknowledged by the Notice dated August 17, 2015 of the Cancellation of Hearings scheduled for September 1, 2015.

In support of this joint request for a further stay of proceedings, the parties offer an update on the status of this matter.

1. In August 2015, the parties entered into an agreement regarding the inspection of the Complainant’s property and the provision of the exchange information in discovery on an informal basis pursuant to 52 Pa. Code §5.321, *et seq.*, for the disposition of this matter for which the Commission stayed the proceeding.

2. The parties agreed to the inspection of the apartment building(s) which are the subject of this matter. The building(s) were visited according to a schedule prepared by the parties in association with other matters between the Complainants and PGW. The visitation schedule was interrupted due to more pressing concerns for both parties during the heating season. The Parties will resume the inspection of the buildings according the amended schedule appearing below.

- | | |
|---|------------------|
| 1. Colonial Garden Realty Company, L.P. | (August 2015) |
| 2. Elrae Garden Realty Company, L.P. | (September 2015) |
| 3. Fairmount Manor Realty Company, L.P. | (June 2016) |
| 4. Fern Rock Gardens Realty Company, L.P. | (July 2016) |
| 5. Marchwood Realty Company, L.P. | (August 2016) |
| 6. Marshall Square Realty Company, L.P. | (September 2016) |
| 7. Oak Lane Realty Company, L.P. | (October 2016) |
| 8. Simon Gardens Realty Company, L.P. | (November 2016) |

3. The parties clarified and resolved some issues as the inspections occurred. The information obtained in discovery will continue to be provided informally and in tandem with each visitation and consist of the following, where applicable:

- a. Information on new meters installed after exchange
- b. Information on the meter removed for testing.
- c. The meter test results.
- d. Technician notes on the investigation.
- e. Updated late payment analysis and account histories for the accounts at issue.

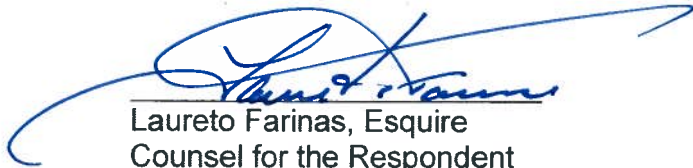
4. The Parties acknowledge that the decisions in pending matters which are, Docket Nos. C-2012-2304183, C-2012-2304215, C-2012-2304324, C-2012-2304167, C-2012-2304303, C-2012-2308454, C-2012-2308462, C-2012-2308465, involve the calculation and application of late payment charges would apply to the late payment charges currently applicable to unpaid undisputed amounts owed on the accounts in the instant matters. To that extent, the parties have agreed that the issues associated with the litigation of those issues in this matter shall be stayed pending the Commission's final determination in the 8 matters commenced in 2012 contained in this paragraph.

5. The Parties have engaged in some discussion concerning the Complainants' payments of the undisputed amount in compliance with obligations under 52 Pa. Code §56.181. To date, no agreement has resulted from this discussion. The Parties resolve to continue discussion in this regard and will soon exchange information and calculations that will facilitate the arrival at the amount to be paid as the "undisputed amount."

Accordingly, this Joint Petition for a Further Stay of Proceedings in this matter is hereby executed by counsel for the respective Parties set forth below.

Respectfully submitted by:

June 8, 2016



Laureto Farinas, Esquire
Counsel for the Respondent
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