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COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

ORIGINAL

Joseph A. Simiriglio, Jr. v. Phila-  
delphia Gas Works.

Disputing the Decision of Bureau of  
Consumer Services.

: Docket No.  
: F-01008937

Initial hearing.

Pages 1 through 24

Hearing Room 1301  
State Office Building  
Broad and Spring Garden Streets  
Philadelphia, Pennsylvania

**DOCKETED**

DEC 15 2003

Tuesday, November 4, 2003

Met, pursuant to notice, at 10:00 a.m.

BEFORE:

CHARLES E. RAINEY, Administrative Law Judge

APPEARANCES:

LAURETC A. FARINAS, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, Pennsylvania 19122  
(For Philadelphia Gas Works)

*W.F.*

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WITNESSES

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Linda Perira  
(By Mr. Farinas)

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NUMBER

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✓ No. 1 (Letter dated October 30, 2003) 8 8

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✓ No. 1 (Objections) 9 9

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PROCEEDINGS

1 ADMINISTRATIVE LAW JUDGE CHARLES E. RAINEY: Good morning.  
2  
3 My name is Charles Rainey and I am the Administrative Law Judge who has been  
4 assigned to this case, and this is the case of Joseph A. Simiriglio, Jr., versus  
5 Philadelphia Gas Works at Docket F-01008937.

6 I note the appearance of Laureto Farinas, Esquire, on behalf of Philadelphia  
7 Gas Works and the none-appearances of the Complainant in this case.

8 I referred to a letter which I received yesterday and it's dated October 30,  
9 2003, and it is from Joseph A. Simiriglio, Jr., and it is addressed to me and it states,  
10 "Dear Judge Rainey, I have enclosed a copy of a letter that I mailed today to PGW's  
11 Mr. Farinas. I am in receipt of answers to my discovery, however, (1), PGW has failed  
12 to answer 30 questions of the 75 requested as part of my discovery. (2), PGW refuses a  
13 continuance until the PUC investigation has ended and (3), PGW has placed me in  
14 collections. (See enclosed copy).

15 I don't see any settlement on November 4, 2003. If PGW wishes to continue  
16 their efforts at collecting a debt that is in error, let them continue. As they pursue me  
17 for the alleged debt, I will begin preparing a lawsuit for Common Pleas Court on a  
18 number of issues and take it from there. I will not appear on November 4, 2003. It will  
19 be a waste of your time and my time.

20 I have enclosed a letter I sent to Mr. Farinas to remove me from their list of  
21 debtors because I don't owe PGW any debts and PGW's attempt to collect from me is a  
22 waste of resources and will result in me filing a lawsuit.

23 I request that you consider extending my case until after the PUC has their  
24 investigation completed and until after PGW answers the remaining questions on my  
25 discovery papers. I am aware not appearing on November 4, 2003 will result in me

1 losing the case but since PGW has sent my "alleged debt" to a Collection Agency,  
 2 (UNETHICAL), why waste anymore time and effort. I don't owe PGW any money,"  
 3 and then he says, "I request a cancellation of the November 4, 2003. Please notify me  
 4 via phone," and then he provides his e-mail address or by US mail and it is signed by  
 5 Joseph A. Simiriglio, Jr.

6 First of all, when he refers to a PUC investigation, I am not sure exactly what  
 7 he is referring to, unless he is referring to this proceedings itself which Mr. Simiriglio  
 8 had an opportunity to participate in here today by hearing notice dated October 28,  
 9 2003. The initial hearing was to be preceded by a pre-hearing conference and the pre-  
 10 hearing conference, which we are presently involved in, was for the purposes of  
 11 addressing the outstanding discovery dispute.

12 I let me say that the discovery which Mr. Simiriglio referred to in his letter is --  
 13 was served under a cover letter dated September 7, 2003 and that he also served upon  
 14 me the same 75 questions for me to respond to as well. Of course, there is no provision  
 15 under the Commission's regulations for interrogatories or discovery to be served upon  
 16 the Judge for the Judge to answer. Therefore, his request with regard to my response to  
 17 certain interrogatories is rejected.

18 I note that as Mr. Simiriglio pointed out in his October 30, 2003 letter which I  
 19 received yesterday, that the company, PGW, did respond to 45 of the 75 questions that  
 20 were propounded and that PGW by letter dated or under cover letter dated September  
 21 17, 2003, did provide me with objections to the interrogatories and I will read from the  
 22 section Grounds for Objection. It states, "generally, PGW objects to each data request  
 23 listed below on the grounds that each is beyond the scope of the Complainant's appeal  
 24 of the BCS decision concerning the make-up bill he received. Pursuant to 52 Pa. Code  
 25 §5.321, the data requests are not relevant to the pending action.

1 The data request seeks information concerning the management issues  
 2 surrounding the selection of PGW's billing and collection systems. These have no  
 3 relevance to the accuracy of the bill that was rendered to the Complainant. In informal  
 4 discovery, PGW has provided the Complainant with information and an explanation of  
 5 the actions taken on this account for the disputed period. The data requests are beyond  
 6 the scope of this matter as they seek information on billing, metering and collection  
 7 matters that are currently under investigation of Bureau of Consumer Services by order  
 8 of the Commission. The data requests seek information in support of some other claim  
 9 than that of the Complainant's disputed bill.

10 PGW further objects to the data requests as they are very broad and would  
 11 results in an excessively time consuming investigation for documents and that would  
 12 require the reproduction of voluminous amounts of documents. This would be a waste  
 13 of resources, particularly when the broad topics of bill estimation and meter reading  
 14 practices are under the investigation of the BCS and have been the subject of the  
 15 management audit conducted by this Commission. "

16 While it would appear that Mr. Simiriglio was referring to certain investigations  
 17 of PGW's practices that are underway, however, it was incumbent upon him to be here  
 18 today in order to prosecute his complaint and Mr. Simiiriglio's complaint which was  
 19 filed on November 4, 2002, as I read it, questions whether he owes PGW \$1,285.02. He  
 20 also stated in his complaint that PGW did not provide him with a copy of all his bills  
 21 dating back to 1996 as he had requested.

22 He states that he was charged \$40 before for three of his gas bills. He also  
 23 states that the amount charged is not commensurate with his usage. He states that there  
 24 was a problem with billing that started before he requested an electronic meter reading  
 25 device. He also states that after the electronic meter reading device was installed, it did

1 not operate properly. He requests that PGW provides evidence of it's usage and  
2 payments. He also states that he is willing to settle the case for \$138.50.

3 Let me state with respect to the discovery matter and the objections that were  
4 submitted by PGW to those discovery -- to certain number of those discovery requests  
5 and again, that is regarding 30 of the interrogatories which PGW did not respond to, that I  
6 am going to, with respect to Mr. Simiriglio's subsequent letter which is dated October 2<sup>nd</sup>  
7 in which he refers to PGW's objection to the interrogatories and he states in part that each  
8 question of his interrogatories is relevant to the bill amount in dispute, I am going to -- I  
9 will look at that as being a motion to compel discovery answers.

10 I am going to deny that motion to compel and for reasons stated at Title 52 of the  
11 Pennsylvania Code, Section 5.361 and I do believe that PGW has responded to a  
12 sufficient and adequate number of interrogatories that would have allowed Mr.  
13 Simiriglio to put on his case. I also find with respect to the Commission's regulations  
14 that those which PGW did not respond to -- those 30, that they would cause an  
15 unreasonable annoyance, embarrassment, pressure, burden or expenses and also they  
16 would require the making of an unreasonable investigation by PGW.

17 With that said then, we will move into the hearing phase of this proceeding but  
18 before we do that, I will mark for admission into evidence as Commission's Exhibit 1,  
19 Mr. Simiriglio's letter dated October 30, 2003 along with the two attachments to that  
20 letter and it's my understanding that you have that letter. Mr. Farinas?

21 MR. FARINAS: I believe I have the letter that he sent to me covering the  
22 document but not the letter that you read into the record.

23 JUDGE RAINEY: Okay, why don't I do this. I did make a couple of copies  
24 of that document. Mr. Farinas, I will give one of them to you and I will give one to the  
25 Court Reporter and we will have that marked as Commission's Exhibit No. 1.

1 (Whereupon, the document was marked as  
2 Commission's Exhibit No. 1 for identification,  
3 and was received in evidence.)

4 JUDGE RAINEY: Mr. Farinas, I also want to put into the record your  
5 objections to certain interrogatories under cover letter of September 17, 2003. Do you  
6 have that, Mr. Farinas?

7 MR. FARINAS: Yes, I do.

8 JUDGE RAINEY: Would you mind having that marked as a PGW exhibit and  
9 having that put into the record?

10 MR. FARINAS: No objection, Your Honor.

11 JUDGE RAINEY: Okay, why don't you do that. I am not sure what your  
12 sequencing is but when you put on your case, why don't you also include that as well.  
13 That may be a better way of handling it and if there is nothing further to be taken up at  
14 the pre-hearing conference, why don't we then go into the hearing phase of this case  
15 and Mr. Farinas, you want to call your witness?

16 MR. FARINAS: Yes, Your Honor. Thank you very much. At this time, I  
17 would like to call Ms. Linda Perira,

18 JUDGE RAINEY: Ms. Perira, please raise your right hand.

19 WHEREUPON,

20 LINDA PERIRA

21 having been duly sworn, testified as follows:

22 JUDGE RAINEY: Please provide your full name and please spell your last  
23 name.

24 THE WITNESS: Sure. Linda Perira and it is spelt P-E-R-I-R-A.

25 JUDGE RAINEY: And Ms. Perira, by whom are you employed?

1 THE WITNESS: Philadelphia Gas Works.

2 JUDGE RAINEY: And what is your business address?

3 THE WITNESS: 1800 North 9<sup>th</sup> Street, 6<sup>th</sup> Floor, Philadelphia, 19122.

4 JUDGE RAINEY: Please proceed, Mr. Farinas

5 MR. FARINAS: Thank you, Your Honor.

6 DIRECT EXAMINATION

7 BY MR. FARINAS:

8 Q. Ms. Perira, what is your position with Philadelphia Gas Work?

9 A. I am a Customer Review Officer.

10 Q. As a Customer Review Officer, what does your duties entail?

11 A. I investigate customers complaints regarding their billing or anything  
12 actually to do with their complaint.

13 Q. Did you investigate the complaint filed by Mr. Simiriglio today?

14 A. Yes, I did.

15 MR. FARINAS: Your Honor, before we proceed, pursuant to your earlier  
16 request, I have marked and I will make copies available to every one later, the  
17 document which is PGW's objection to several of the data request propounded by the  
18 Complainant and I have marked this as PGW Exhibit 1.

19 JUDGE RAINEY: It is so admitted into evidence.

20 (Whereupon, the documents were marked as  
21 PGW's Exhibit Nos. 1 & 2 for identification  
22 and were received in evidence.)

23 BY MR. FARINAS:

24 Q. Ms. Perira, I am showing you a document which I have marked as  
25 PGW's Exhibit 2. It is a document from PGW's old computer system and it starts out

1 stating, "T-10, 2301 South 10<sup>th</sup> Street." Ms. Perira, did you obtain this document?

2 A. Yes, I did.

3 Q. And can you tell us a little bit about where it comes from?

4 A. It comes from our old computer system which in June of 1999 we  
5 converted over to the new system.

6 Q. What does this document tells us about the Complainant's account?

7 A. It tells us that Mr. Simiriglio has been a customer of record since May  
8 1st of 1996. That's towards the bottom of the document, three rows up. It also indicates  
9 another two rows up from the customer's date that this meter was installed on October  
10 15, 1996 with an AMR device. So all bills rendered since October 6<sup>th</sup> of 1996 have been  
11 based on actual meter readings. It also indicates that before the system was converted  
12 over, that Mr. Simiriglio owed a balance of \$733.01

13 JUDGE RAINEY: Where would you find that?

14 THE WITNESS: The second line from the top where it says 6/15 and next to  
15 6/15 it says \$733.01. That's the total account balance.

16 BY MR. FARINAS:

17 Q. Ms. Perira, what would you call this document?

18 A. Actually, I call this the T10 from our legacy system.

19 JUDGE RAINEY: And that was your former billing system?

20 THE WITNESS: That was our former billing system.

21 JUDGE RAINEY: What does the T stands for?

22 THE WITNESS: I guess it means transaction. I just never asked. I was  
23 trained that it was a T-10.

24 JUDGE RAINEY: Okay, I see. You may go ahead with your next question,  
25 Mr. Farinas.

1 BY MR. FARINAS:

2 Q. Ms. Perira, can you tell us what has occurred on the account since that  
3 time?

4 A. Since that time we have converted over to our new system. Mr.  
5 Simiriglio was billed up until August of '99 on the CPR Program. In August of '99,  
6 he requested to be taken off the Customer Responsibility Program and he went on  
7 regular billing. At that point, he continued to be billed each month based on actual  
8 readings and then it was discovered in April of 2001 that Mr. Simiriglio actually filed  
9 bankruptcy in 1998.

10 Q. How did you find this out?

11 A. It looks like based on the note-screen – the customer contact screen, we  
12 got the final order indicating that the bankruptcy had been discharged. I think it is  
13 discharge. I get them mixed up. Dismissed and discharged.

14 MR. FARINIAS: Your Honor, I have marked as PGW Exhibit No. 3 a  
15 document entitled History Request Report.

16 JUDGE RAINEY: Okay.

17 (Whereupon, the document was marked  
18 as PGW Exhibit No. 3 for identification.)

19 BY MR. FARINAS:

20 Q. Ms. Perira, did you prepare this document?

21 A. Yes, I did.

22 Q. Can you tell us where the information comes from?

23 A. We have a database that picks up all the history from conversion, so  
24 Your Honor, this information that we have here comes from – this information here is  
25 actually everything that has been billed on Mr. Simiriglio's account from June of '97

1 up to the time that he had filed bankruptcy. It should be up to the time that he  
2 actually completed bankruptcy or when we got notification of it.

3 JUDGE RAINEY: That would be from June of '97 to?

4 THE WITNESS: Well, we didn't get it until April 24<sup>th</sup> of 2001.  
5 That's when we did the adjustment for bankruptcy.

6 JUDGE RAINEY: April 24, 2001?

7 THE WITNESS: Yes.

8 BY MR. FARINAS:

9 Q. So can you explain what occurred on the account with respect  
10 to treating it for bankruptcy?

11 A. What we had to do is, we had to cancel our bill back to the  
12 bankruptcy date, which was 10/30/98, and then we had to in turn give Mr.  
13 Simiriglio a new account number.

14 JUDGE RAINEY: The bankruptcy date of 10/30/98, was that the  
15 date that he filed for bankruptcy?

16 THE WITNESS: That was based on the information that we got in  
17 April of 2001 that that bankruptcy was filed on October 30<sup>th</sup> of 1998, and so  
18 we adjusted the account back. We took all the bills from 2001 back to  
19 October 30, 1998 and finalized the account out, so that money is left in  
20 bankruptcy and that money totaled \$300 once the account was adjusted.

21 JUDGE RAINEY: I am sorry. What does the \$300 represent?

22 THE WITNESS: The money in bankruptcy.

23 JUDGE RAINEY: When you say "money in bankruptcy," was that  
24 amounts that was billed over that period?  
25

1 THE WITNESS: Yes. It was up to October 30, 1998. That would be  
2 the balance at that time.

3 JUDGE RAINEY: Okay. So that would have been from October 30<sup>th</sup>  
4 going back to what date?

5 THE WITNESS: To May 1, 1996. That was his balance from that  
6 period of time.

7 JUDGE RAINEY: So you are saying that from May 1, 1996 through  
8 October 30, 1998, his balance was \$300; is that correct?

9 THE WITNESS: That is correct.

10 JUDGE RAINEY: Okay. Was that \$300 credited to his account or  
11 how was that handled?

12 THE WITNESS: That was actually debited on there and that went into  
13 the bankruptcy.

14 JUDGE RAINEY: So that was an amount that he was no longer held  
15 responsible for?

16 THE WITNESS: That is correct.

17 MR. FARINAS: Your Honor, I have marked a similar document, a  
18 history request report for account and it gives the Complainant's account  
19 number and I have marked this as PGW Exhibit No. 4.  
20

21 JUDGE RAINEY: Okay

22 (Whereupon, the document was marked  
23 as PGW Exhibit No. 4 for identification.)

24 BY MR. FARINAS:

25 Q. Ms. Perira, can you tell us what this document represents?

1 A. Sure. In April of 2001, we gave Mr. Simiriglio a new account number  
2 since he had filed bankruptcy. What we did was, we took all his payments that he paid  
3 from the bankruptcy date up to April of 2001 and transferred it over to the new account  
4 number and then we billed him for all gas that was used from October 30, 1998 to April  
5 20, 2001 and after we did that, that left him a balance of \$1,201.23.

6 Q. Ms. Perira, can you walk us through where the payments that were made  
7 from the date of the filing of the bankruptcy to 2001, where does the credit for that show  
8 up and how does that affect the balance that ultimately comes forward?

9 A. Actually, it will be the first or maybe 10 to 15 lines. They all say "pay" on  
10 Exhibit No. 4. That's all the payments that he had paid, which actually would show on  
11 Exhibit 3 as being transferred over to this account number and then they cancelled all the  
12 bills, which also shows on Exhibit 3 and rebilled Mr. Simiriglio from October 30, 1998 to  
13 April 20, 2001. Once we billed him, we took his payments and subtracted that from the  
14 difference and that left a balance of \$1,201.23.

15 Q. And I am sorry if I make you repeat yourself but all of these billings that  
16 occurred which were manipulated in order to correct for the bankruptcy date, all these  
17 billings were based on actual meter readings?

18 A. Yes. This would be on Exhibit No. 3, and actually, if you would look at  
19 page 2 of Exhibit 3, you will see the Read Code R, which means that they were all based  
20 on actual readings.

21 JUDGE RAINEY: I am sorry. I do see an R Code. What does that represent?

22 THE WITNESS: That may be an estimate. There are actually three Y's on page  
23 3 because the AMR did not get read.

24 JUDGE RAINEY: Okay.

1 THE WITNESS: I do want to point out on page 4 of Exhibit 3 that prior to us  
2 going in and giving Mr. Simiriglio a new account number because of the bankruptcy  
3 that was discovered in April of 2001, Mr. Simiriglio did have a balance of \$2,028.25  
4 and that would actually be on line 3 over where it says current balance.

5 JUDGE RAINEY: Now, what happened with that?

6 THE WITNESS: Okay. When we cancelled out the bill, we then rebilled it on  
7 Mr. Simiriglio's new account number which actually would be on Exhibit 4 and about  
8 halfway down, the entry starts on 4/20/2001 and it gives you a bill for \$3,259.40, and  
9 the time period goes from October 30, 1998 to April 20, 2001. It gives you the actual  
10 reading that took place on April 20, 2001 and then once the payments were deducted  
11 from the bill, that left a balance of \$1,201.23.

12 BY MR.. FARINAS:

13 Q. So pointing to that last comment about the \$2,028 balance, even after all  
14 of the credits were given for payments made after the bankruptcy filing, his balance was  
15 brought down to the amount that we see here of \$1,201.23?

16 A. That's correct. He still had a balance after we made the adjustment back  
17 to the bankruptcy date.

18 Q. Before I leave the meter usage issue, can you tell us if when the meter  
19 was exchanged and a new meter or an Automatic Meter Reading Device was installed,  
20 was the meter tested at that time?

21 A. They were tested before they go into the property.

22 Q. Can you make any comments on the results of the test?

23 A. Actually, according to Exhibit No. 2, it does say test and it says zero,  
24 which means that it is okay.

25 JUDGE RAINEY: Where is that?

1 THE WITNESS: That would be on Exhibit 2, four lines from the bottom or  
2 five. It says Index and it gives all zeros and it says Test, zero.

3 JUDGE RAINEY: When would that have taken place? You said before it  
4 was installed?

5 THE WITNESS: That would have taken place before the meter was  
6 installed.

7 JUDGE RAINEY: But you don't know what date?

8 THE WITNESS: No, I don't.

9 JUDGE RAINEY: And with regard to that \$2,028.25 balance that is shown on  
10 PGW Exhibit No. 3, was that a balance that he accumulated over the period from  
11 October 30, 1998 to April of 2001?

12 THE WITNESS: It's an accumulation of his balances. If you actually go to  
13 page 3 of Exhibit 3, in the column where it says current balance there is a running total.  
14 So the bills are showing that they were based on readings but Mr. Simiriglio wasn't  
15 making payments each month.

16 JUDGE RAINEY: Okay. I just want to know what period it covers.

17 THE WITNESS: It covers up to April of 2001.

18 JUDGE RAINEY: Starting with October 30, 1998; is that correct?

19 THE WITNESS: That's correct.

20 BY MR. FARINAS:

21 Q. I have one final question about PGW Exhibit 4. Ms. Perira, can you  
22 identify this document?

23 A. Sure. This is the customer's contact screen under Mr. Simiriglio's new  
24 account number that was established in April of 2001. It just gives us the basics. In  
25 July of 2001, he requested a statement of his account and then in August of 2001, he

1 actually filed an informal complaint and then on September 25, 2000, we got the  
2 decision from the PUC investigator indicating that to waive the late payment charges  
3 and that the balance was correct as rendered and then it goes on to put little notes that he  
4 filed an informal complaint.

5 BY MR. FARINAS:

6 Q. Referring to the comments made that's dated 3/13/2003?

7 A. Yes. Mr. Simiriglio contacted us because his account had been placed -- a  
8 judgment had been placed on his account and on March 13th, we contacted the Law  
9 Department and started the process of removing it.

10 MR. FARINAS: Your Honor, I have marked and I will now distribute PGW  
11 Exhibit No. 5.

12 JUDGE RAINEY: Very well.

13 (Whereupon, the document was marked  
14 as PGW Exhibit No. 5 for identification.)

15 BY MR. FARINAS:

16 Q. Ms. Perira, can you identify this document?

17 A. Sure. This is the document that we got the order that the judgment was  
18 dismissed against Joseph Simiriglio.

19 Q. Actually, Ms. Perira, I believe the order is to do what?

20 A. Vacate it.

21 MR. FARINAS: As Your Honor well knows, this means that the judgment  
22 that was gotten in the collection matter against the Complainant was vacated.

23 BY MR. FARINAS:

24 Q. Can you tell us how this came to be?

25 A. Mr. Simiriglio contacted us.

1 Q. Can you tell us how he came to be the subject of this collection matter?

2 A. Because he had a debt on the account and the account was finalized.

3 JUDGE RAINEY: Now, when you say the account was finalized, are you  
4 referring to his account that preceded his bankruptcy or what account was this judgment  
5 operative with regard to?

6 THE WITNESS: It just means that he is no longer a customer of record. He  
7 requested that his service be shut off and we honored his request in May of 2002 to take  
8 the service out of his name.

9 BY MR. FARINAS:

10 Q. So that would be judgment for his account after bankruptcy?

11 A. After bankruptcy, which would have been his final bill.

12 JUDGE RAINEY: So he has not been a customer of PGW since May of 2002?

13 THE WITNESS: That is correct.

14 JUDGE RAINEY: But he owns that property. What is that? 2301 South 10<sup>th</sup>  
15 Street. Was the judgment against that property?

16 THE WITNESS: The judgment was against him.

17 JUDGE RAINEY: Oh, it was against him?

18 MR. FARINAS: Yes, it's a personal collection matter.

19 JUDGE RAINEY: Why don't we go back for a minute however. What is the  
20 address of the property referring to where PGW provides service under Mr. Simiriglio's  
21 name?

22 THE WITNESS: The address that we are referring to is 2301 South 10<sup>th</sup> Street.

23 JUDGE RAINEY: And this is a residential gas situation?

24 THE WITNESS: Yes, it is residential.

25 JUDGE RAINEY: Okay. And when was the final bill rendered?

1 THE WITNESS: May 18, 2002 is when as requested by Mr. Simiriglio, we  
2 came out there and finalized the account and took a final meter reading..

3 JUDGE RAINEY: And what was the final bill amount?

4 THE WITNESS: The balance at that time on the account when the account  
5 was finalized was \$1, 516.20.

6 BY MR. FARINAS:

7 Q. Ms. Perira, should a collection matter have been initiated against Mr.  
8 Simiriglio while he had an informal complaint pending before the PUC?

9 A. No, it should not have.

10 Q. And is this the reason for PGW obtaining an order to vacate?

11 A. Yes, it was.

12 Q. Is there anything else that occurred that shouldn't have occurred on Mr.  
13 Simiriglio's account?

14 A. Yes. We took several accounts and had sent them to collection agencies  
15 because of final bills with balance owing. Unfortunately, we took some of the accounts  
16 which were in dispute and which we have issued a letter to these customers.

17 Q. Is it your testimony that mistakenly, PGW had created a listing if you  
18 will, of accounts to have collection activities and several of these accounts should not  
19 have been appearing on the list?

20 A. That is correct.

21 Q. Has this matter been reviewed by anyone at the PUC?

22 A. It has been reviewed and we have pulled the accounts back and we are  
23 in the process of sending letters to the customers apologizing for what has happened  
24 because the account is in dispute.

25 Q. What Bureau of the PUC is reviewing this?

1 A. I believe it is the Informal Complaint.

2 Q. Would that be the Bureau of Consumer Services?

3 A. Yes.

4 MR. FARINAS: Your Honor, I have also marked a letter which would have  
5 been presented to the Complainant should he have shown up today and a copy of the  
6 letter will be sent to him in the mail.

7 JUDGE RAINEY: That is PGW Exhibit No. 6.

8 (Whereupon, the document was marked  
9 as PGW Exhibit No. 6 for identification.)

10 BY MR. FARINAS:

11 Q. Ms. Perira, can you identify this document which has been marked as  
12 PGW Exhibit No. 6?

13 A. This is a letter that we sent to the customers that were affected by us  
14 sending them to the Collection Agencies apologizing, and that it has been taken out of  
15 the Collection Agency and we notified them to stop all collection activities pending the  
16 resolution of the matter.

17 JUDGE RAINEY: When was Mr. Simiriglio's matter sent to the collection  
18 agency?

19 THE WITNESS: I don't have an exact date but the listing was the end of  
20 September, the beginning of October.

21 JUDGE RAINEY: Of this year?

22 THE WITNESS: Of this year. 2003.

23 BY MR. FARINAS:

24 Q. Ms. Perira, was there a BCS decision regarding this?

25 A. Yes, there was.

1 Q. Can you review the result of that decision?

2 A. Sure. It was decided after they had received the information provided  
3 regarding Mr. Simiriglio's account that the billings were correct as rendered and that  
4 they were based on actual meter readings. It was decided that PGW would waive  
5 \$93.12 in late payment charges along with an additional \$197.61 in late payment  
6 charges for a total of \$290.73 being waived in late payment charges.

7 It also states that the customer is responsible for the payment of the  
8 outstanding balance of \$1,364.56, which occurred in his name at 2301 South 10<sup>th</sup>  
9 Street. It also goes on to say that on May 18, 2003, the customer's account was  
10 finalized and closed and then the final thing was the informal complaint of Joseph  
11 Simiriglio, Jr., is dismissed.

12 MR. FARINAS: Your Honor, I am sorry. I have marked this document as  
13 PGW Exhibit No. 7.

14 JUDGE RAINEY: Okay.

15 (Whereupon, the document was marked  
16 as PGW Exhibit No. 7 for identification.)

17 BY MR. FARINAS:

18 Q. Ms. Perira, can you tell us what is the amount owed currently as of today  
19 on the account?

20 A. Yes. That is \$1,364.56.

21 Q. Is it PGW's position that this amount should be paid?

22 A. Yes, it is.

23 JUDGE RAINEY: Okay. Let me just be clear with regard to what that  
24 represents. The \$1,364.56, that represents the final bill of \$1,516.20 minus the \$290?  
25

1 THE WITNESS: No. We waived the late payment charges per the decision.  
2 Mr. Simiriglio also made a payment after the final bill of \$99, which also reduced that  
3 balance. Actually, he made two payments.

4 JUDGE RAINEY: And what was the reason for the Bureau of Consumer  
5 Services also having you waive the additional late payment charges?

6 THE WITNESS: When Mr. Simiriglio files a complaint, up to the time that  
7 they render a decision, any late payment charges assessed on the account we will waive.

8 JUDGE RAINEY: The initial \$93.12 that they mentioned, what did that  
9 represent?

10 THE WITNESS: What it looks like to me is that the \$197.61 had already been  
11 waived off the account and what they are saying is that we are to waive the additional  
12 late payment charges of \$93.12.

13 JUDGE RAINEY: So this is for two different periods of time?

14 THE WITNESS: Actually, what it says is that "PGW waived." We already  
15 waived the \$93.12 and then we were to waive the additional \$197 on top of that.

16 JUDGE RAINEY: Oh, I see. I got you.

17 BY MR. FARINAS:

18 Q. And this was the September 23, 2002 decision and you complied with  
19 that; is that your testimony?

20 A. Yes, we did comply with that.

21 MR. FARINAS: Your Honor, I have no further questions at this time and  
22 absent any further questions from yourself, I move that PGW Exhibits 1 through 7 be  
23 admitted into evidence.

24 JUDGE RAINEY: PGW Exhibits Nos. 2 through 7 will be admitted at this  
25 time.

1 (Whereupon, the documents marked as  
2 PGW Exhibits Nos. 2 through 7 were  
3 received in evidence.)

4 JUDGE RAINEY: Does Mr. Simiriglio have any other accounts with PGW?

5 THE WITNESS: No, I could not locate any other account.

6 JUDGE RAINEY: Okay. So what does PGW propose be done in this case?

7 MR. FARINAS: Your Honor, we would simply request an order that the  
8 amount that is currently outstanding is correct and should be paid forthwith.

9 JUDGE RAINEY: Paid forthwith?

10 MR. FARINAS: Yes.

11 JUDGE RAINEY: Ms. Perira, you may step down. Thank you very much.

12 (Witness excused.)

13 JUDGE RAINEY: I don't have any further questions. Do you have anything  
14 further, Mr. Farinas?

15 MR. FARINAS: Nothing, Your Honor.

16 JUDGE RAINEY: I want to thank you very much for appearing here today. I  
17 will be rendering a written decision with regard to this case and this hearing is  
18 adjourned. Thank you very much

19 MR. FARINAS: Thank you, Your Honor.

20 (Whereupon, at 11:02 a.m., the proceedings were concluded)

21  
22  
23  
24  
25

CERTIFICATE

I hereby certify, as the stenographic reporter, that the foregoing proceedings were taken stenographically by me, and thereafter reduced to typewriting by me or under my direction; and that this transcript is a true and accurate record to the best of my ability.

COMMONWEALTH REPORTING COMPANY, INC.

BY. Georgette McEwan  
Georgette McEwan

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FORM 1

Commission Ex. 1  
F-01008937  
11/4/03  
gm Phila

Joseph A. Simiriglio Jr.  
117 Mt. Vernon Court  
Deptford, NJ 08096  
October 30, 2003  
Phone: 856-848-7300 (office-day)  
Phone: 856-906-1801 (cell phone)

DOCUMENT  
FOLDER

RECEIVED

NOV - 3 2003

Public Utility Commission  
Philadelphia Office  
Administrative Law Judge

The Honorable Judge Charles E. Rainey, Jr.  
Pa. PUC  
Room 1302 State Office Bldg.  
Broad & Spring Garden Street  
Philadelphia, PA 19130

DOCKETED  
DEC 15 2003

Dear Judge Rainey:

I have enclosed a copy of a letter that I mailed today to PGW's Mr. Farinas. I am in receipt of answers to my Discovery, however,

1. PGW has failed to answer 30 questions of the 75-requested as part of my Discovery.
2. PGW refuses a continuance until the PUC investigation has ended.
3. PGW has placed me in "Collections (see enclosed copy).

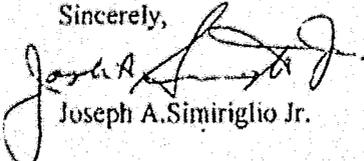
I don't see any settlement on November 4, 2003. If PGW wishes to continue their efforts at collecting a debt that is in error, let them continue, as they pursue me for the alleged debt, I will begin preparing a lawsuit for Common Pleas Court on a number of issues and take it from there. I will not appear on November 4, 2003, it will be a waste of your time and my time.

I have enclosed a letter I sent to Mr. Farinas to remove me from their list of debtors, because I don't owe PGW any debts and PGW's attempt to collect from me, is a waste of resources and will result in me filing a lawsuit.

I request that you consider extending my case until after the PUC has their investigation completed and until after PGW answers the remaining questions on my Discovery papers. I am aware not appearing on November 4, 2003, will result in me losing the case, but since PGW has sent my "Alleged Debt" to a collection agency, (UNETHICAL). Why waste any more time and effort. I don't owe PGW any money.

I request a cancellation of the November 4, 2003  
Please notify me via phone,  
e mail: JOECOUNCIL@aol.com or by U.S. Mail.

Sincerely,

  
Joseph A. Simiriglio Jr.

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SECRETARY'S BUREAU

9450069-80-261-2610  
95 James Way, Suite 113  
Southampton, PA 18966-3847

PENNCRO ASSOCIATES INC  
95 James Way, Suite 113  
Southampton, PA 18966-3847  
Telephone: 800-684-7620

Address Service Requested

OCT 14 2003

Balance Due: \$1610.08  
Claim #: 9450069  
Creditor: PHILADELPHIA GAS WORKS  
Account #: 13277973

JOSEPH SIMIRIGLIOJR  
117 MOUNT VERNON CT  
WOODBURY NJ 08096-6895

We have been retained by PHILADELPHIA GAS WORKS to collect the above delinquent account.

Therefore, we must receive payment in full.

For your records, make your check or money order payable to PHILADELPHIA GAS WORKS and mail it to our office in the return envelope provided.

Sincerely,  
Collections Department

*Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment, if one exists, and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor. This communication from a debt collector is an attempt to collect a debt. Any information obtained will be used for that purpose.*

----- Please Detach here and enclose bottom portion with your payment -----

Amount Enclosed: \_\_\_\_\_

Balance Due: \$1610.08

OCT 14 2003

Claim #: 9450069  
Creditor: PHILADELPHIA GAS WORKS  
Account #: 13277973

JOSEPH SIMIRIGLIOJR  
117 MOUNT VERNON CT  
WOODBURY NJ 08096-6895

PGW  
95 JAMES WAY  
SUITE 113  
SOUTHAMPTON PA 18966

Joseph A. Simiriglio Jr.  
117 Mt. Vernon Court  
Deptford, NJ 08096  
October 30, 2003  
Phone: 856-848-7300 (office-day)  
Phone: 856-906-1801 (cell phone)

Mr. Laureto Farnas  
Philadelphia Gas Works  
800 W. Montgomery Ave.  
Philadelphia, PA 19122

RE: Docket#F-01008937 Joseph A. Simiriglio Jr. v. PGW

Dear Mr. Farnas:

I have enclosed a letter from a Collection Agency. (See Enclosed Copy)

Do you expect me to trust PGW?, Do you expect me to pay a bill that I don't owe.

I am considering filing a Complaint in Common Pleas Court, if you do not drop your aggressive pursuit of a billing error in your system. I feel I am being harassed.

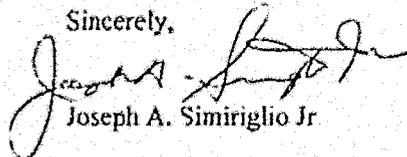
I now see that my credit situation which was on the mend, is now going to be screwed up again and I will not settle and will not pay PGW one cent on a bill, that I don't owe PGW.

Do you believe that I would spend all this time and effort *if I did* owe PGW the amount stated on the Collection form enclosed, I would have settled the matter long ago and we would not have come this far. I am too busy to waste time. I may bill PGW for my lost productivity!

**I DON'T OWE PGW ANYTHING. SHOULD I HAVE TO FILE A LAWSUIT, IT WILL COST PGW IN BADLY NEEDED RESOURCES AND FINANCIALLY.**

**I URGE YOU TO DROP THE COLLECTION AGENCY AND GET OFF MY BACK. I URGE YOU TO STOP THE OVERZEALOUS PURSUIT OF COLLECTING A DEBT THAT I DID NOT CREATE. I urge you to forward a letter to your management, the City of Philadelphia, the PUC and Judge Rainey that you are eliminating the alleged bill that I owe PGW and end the case is closed.**

Sincerely,



Joseph A. Simiriglio Jr.

cc: Judge Rainey

Philadelphia Gas Works



PGW Exhibit -

1  
11/4/03  
9/17  
F-01008937  
PHILA

800 West Montgomery Avenue, Philadelphia, PA 19122

Laureto A. Farinas, Senior Attorney  
Legal Department

Direct Dial: 215-684-6982

FAX: 215-684-6798

E-mail: laureto.farinas@pgworks.com

DOCUMENT  
FOLDER

(VIA Overnight Mail)

September 17, 2003

Charles E. Rainey, Jr.  
Administrative Law Judge  
1302 Philadelphia State Office Building  
Pennsylvania Public Utility Commission  
1400 Spring Garden Street  
Philadelphia, PA 19130

DOCKETED  
DEC 15 2003

RE: Joseph A. Simiriglio v. PGW, Complaint Docket No. F - 01008937

Dear Judge Rainey:

Pursuant to 52 Pa. Code §5.342, please find enclosed an original and three copies of the Philadelphia Gas Works' objections to the Data Requests propounded by the Complainant in the above captioned matter.

If additional information is needed about this matter, please contact me at my direct-dial number above.

Sincerely,

cc: Joseph A. Simiriglio, Jr.  
James McNulty, Secretary  
Linda Pereira

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2003 DEC -4 PM 1:35

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800 West Montgomery Avenue, Philadelphia, PA 19122  
Laureto A. Farinas, Senior Attorney  
Legal Department  
Direct Dial: 215-684-6982  
FAX: 215-684-6798  
E-mail: laureto.farinas@pgworks.com

(VIA Overnight Mail)

September 17, 2003

Charles E. Rainey, Jr.  
Administrative Law Judge  
1302 Philadelphia State Office Building  
Pennsylvania Public Utility Commission  
1400 Spring Garden Street  
Philadelphia, PA 19130

RE: Joseph A. Simiriglio v. PGW, Complaint Docket No. F – 01008937

Dear Judge Rainey:

Pursuant to 52 Pa. Code §5.342, please find enclosed an original and three copies of the Philadelphia Gas Works' objections to the Data Requests propounded by the Complainant in the above captioned matter.

If additional information is needed about this matter, please contact me at my direct-dial number above.

Sincerely,

A handwritten signature in black ink, appearing to read "Laureto Farinas", with a long, sweeping underline.

CC: Joseph A. Simiriglio, Jr.  
James McNulty, Secretary  
Linda Pereira

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joseph A. Simiriglio, Jr.

v.

Philadelphia Gas Works

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Docket No. F – 010008937

**Objections of the Philadelphia Gas Works to  
Data Requests Propounded by the Complainant**

Pursuant to 52 Pa. Code §5.342, the Philadelphia Gas Works ("PGW") hereby objects to the Complainant's data requests dated September 7, 2003 and propounded and served by upon PGW on or about September 9, 2003 in the above captioned matter. A copy of the correspondence containing the data requests is attached hereto as Exhibit "A". In support of its objections PGW, states the following.

**Facts**

This matter involves the Complainant's dispute of the balance owed on his account due to an error in accounting or metering. The Complainant also alleges that his requests for information were ignored by PGW.

The Complainant filed an informal complaint with the Bureau of Consumer Services ("BCS") under BCS Complainant No. 01008937. A BCS decision in that matter dated September 23, 2002, found that the Complainant's billing was correct as rendered. The BCS ordered the removal of late payment charges that accrued on the account in the amount of \$290.73. The Complainant's final billing was reduced to \$1364.56.

**Grounds for Objection**

Generally, PGW objects to each data request listed below on the grounds that each is beyond the scope of the Complainant's appeal of the BCS decision concerning the make up bill he received. Pursuant to 52 Pa. Code §5.321, the data requests are not relevant to the pending action.

The data requests seek information concerning the management issues surrounding the selection of PGW's billing and collection systems. These have no relevance to the accuracy of the bill that was rendered to the Complainant. In informal

discovery, PGW has provided the Complainant with information and an explanation of the actions taken on this account for the disputed period. The data requests are beyond the scope of this matter as they seek information on billing, metering and collection matters that are currently under investigation of Bureau of Consumer Services by order of the Commission. The data requests seek information in support of some other claim than that of the Complainant's disputed bill.

PGW further objects to the data requests as they are very broad and would result in an excessively time consuming investigation for documents and that would require the reproduction of voluminous amounts of documents. This would be a waste of resources, particularly when the broad topics of bill estimation and meter reading practices are under the investigation of the BCS and have been the subject of the management audit conducted by this Commission.

**Interrogatories To Which PGW Objects.**

- (3) Please provide the supplier of your Automated Meter Reader Units.
- (6) Who is the provider of PGW's Customer Billing software?
- (7) Who is the manufacturer of PGW's Customer Billing Software?
- (8) Which Operating System does PGW use for it's Customer Billing Software?
- (9) Who services PGW's Customer Billing Software?
- (10) Please list the All Dates and Years the Billing software has failed to operate as the manufacture claimed.
- (11) Please list all dates and years the Billing software interrupted billing to customers and created billing errors to all customers.
- (12) Please provide the quantity of billing errors for each year the Billing software has been in operation?
- (13) Please provide the solutions used to correct the errors in customer billing and on customer's actual bills.

- (14) How does PGW notify a customer who has been billed incorrectly?
- (15) What are the protocols used in correcting a customers bill?
- (16) What is the management structure and procedure used to correct a billing error?
- (17) How many billing corrections are performed in a single day?
- (18) How many billing disputes with non-business consumers are in litigation?
- (19) How many billing disputes with corporate entities are in litigation?
- (20) How many billing disputes with condo owners are currently being reviewed by your department?
- (21) How many billing disputes with consumers and non-consumers involve meter reading errors caused by PGW meter readers?
- (22) How many EZ READER meters have failed since their inception?
- (23) How many digital meter readers are currently installed as of June 1,2003?
- (24) How many traditional gas meters need repair or replacement due to defective meter reading errors each year?
- (27) How many errors have been caused by onsite Meter Reader Employees? Can physical errors be determined?
- (28) Are all Meter Readers employed by PGW or a Contractor?
- (29) If a Contractor, Who is/are the contractor(s)?
- (30) Have any elected officials requested you investigate my billing situation? If yes Who?
- (34) What is the amount read by your EZ READER?
- (42) Did Senator Vince Fumo request an investigation into my Utility Bill history? If so, What was his reason for such as request!
- (58) Did Councilman Frank DiCicco request at any time a copy of my PGW gas bill history? Please provide Year, Date & Time.
- (59) Did any elected official request a copy of my PGW gas bill?

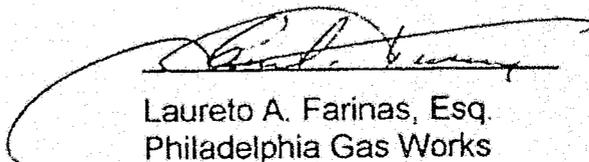
(60) If yes to question (58), please provide the name of the official and the date and time of the request?

(61) Did any Political Party or Union Official request a copy of my PGW Gas Bill? Please provide, Name, Date & Time of request and to whom the request was made too.

Wherefore, PGW respectfully requests that this Commission strike the attached data requests in this matter.

Respectfully submitted,

September 17, 2003



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

# EXHIBIT A

Joseph A. Simiriglio Jr.  
117 Mt. Vernon Court  
Deptford, NJ 08096  
September 7, 2003

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

RE: Joseph A. Simiriglio Jr v. Philadelphia Gas Works (F-01008937)

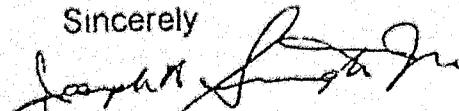
Dear Mr. Farinas:

I have enclosed on the pages following this letter "Interrogatories" for PGW.

I request the Interrogatories and Materials requested within the Interrogatories provided be dated and returned to me via U.S. Mail **No later than October 7, 2003**, or within Thirty days prior to our "Initial Hearing scheduled for November 4, 2003.

All correspondence from this day forward please do so in writing to my attention.

Sincerely

  
Joseph A. Simiriglio Jr.

*E. Lawrence*

INTERROGATORIES

Please provide each answer on a separate page using the corresponding number located to the left of the question. Thank You.

- (1) Please provide the alleged balance due?
- (2) Please provide a month to month history of "How the balance due was determined in the following format below:"

Example:

MONTH	GAS USED	AMT OF BILL	AMT OF PAYMENT RECEIVED	BALANCE DUE
JAN	50	\$25.00	\$25.00	0
FEB	75	\$37.50	\$30.00	\$7.50

- (3) Please provide the supplier of your Automated Meter Reader Units.
- (4) Please provide all repair records 90 days before and up to 90 after November 4, 2002 pertaining to 2301 S. 10<sup>th</sup> Street
- (5) Please provide all account numbers under the name Joseph A. Simiriglio Jr., pertaining to 2301 S. 10<sup>th</sup> Street.
- (6) Who is the provider of PGW's Customer Billing software?
- (7) Who is the manufacturer of PGW's Customer Billing Software?
- (8) Which Operating System does PGW use for it's Customer Billing Software?
- (9) Who services PGW's Customer Billing Software?
- (10) Please list the All Dates and Years the Billing software has failed to operate as the manufacture claimed.
- (11) Please list all dates and years the Billing software interrupted billing to customers and created billing errors to all customers.
- (12) Please provide the quantity of billing errors for each year the Billing software has been in operation?

PAGE #2

- (13) Please provide the solutions used to correct the errors in customer billing and on customer's actual bills.
- (14) How does PGW notify a customer who has been billed incorrectly?
- (15) What are the protocols used in correcting a customer's bill?
- (16) What is the management structure and procedure used to correct a billing error?
- (17) How many billing corrections are performed in a single day?
- (18) How many billing disputes with non-business consumers are in litigation?
- (19) How many billing disputes with corporate entities are in litigation?
- (20) How many billing disputes with condo owners are currently being reviewed by your department?
- (21) How many billing disputes with consumers and non-consumers involve meter reading errors caused by PGW meter readers?
- (22) How many EZ READER meters have failed since their inception?
- (23) How many digital meter readers are currently installed as of June 1, 2003?
- (24) How many traditional gas meters need repair or replacement due to defective meter reading errors each year?
- (25) Who is/are the manufacturer(s) of the traditional gas meters?
- (26) Who installs the traditional and EZ readers in Homes, businesses, Apartment complexes and Condo's?
- (27) How many errors have been caused by onsite Meter Reader Employees? Can physical errors be determined?

PAGE #3

- (28) Are all Meter Readers employed by PGW or a Contractor?
- (29) If a Contractor, Who is/are the contractor(s)?
- (30) Have any elected officials requested you investigate my billing situation? If yes Who?
- (31) If the alleged Outstanding bill was recorded electronically, please provide proof.
- (32) Provide all account numbers and any transfers of Outstanding balances which concern the current Outstanding Bill.
- (33) What is the amount of the bill as of November 4, 2002?
- (34) What is the amount read by your EZ READER?
- (35) On the PGW Statements, Please explain the purpose of "Adjustments."
- (36) Who filed the Judgement by Default against me?
- (37) I was never notified, Why?
- (38) Please send me a copy of the Judgement?
- (39) Who authorized the Judgement?
- (40) Why wasn't this individual informed that my case was in negotiation?
- (41) Why wasn't the City of Philadelphia informed I filed a grievance with the Public Utility Commission?
- (42) Did Senator Vince Fumo request an investigation into my Utility Bill history? If so, What was is reason for such as request?
- (43) Can the billing system distinguish between a payment made in person at a PGW office or via the US Mail?
- (44) How is each payment posted?
- (45) How long does PGW take to post a payment when a check, money order or cash is received?

PAGE #4

- (46) Are the payments (bills) posted manually or automated?
- (47) How long are billing records stored in the PGW system?
- (48) When do individual accounts get purged from the system?
- (49) What is the accuracy rate of the EZ READER System?
- (50) Please provide third party proof of the accuracy of the EZ READER System.
- (51) Is it possible the input of the meter reading to my bill were input erroneously by the computer operator?
- (52) Is it possible the individual reading my meter physically recorded the usage erroneously, therefore causing the excess gas bill?
- (53) Is it possible the EZ READER Malfunctioned?
- (54) Is it possible that the EZ READER DEVICE can fail to read the gas usage accurately?
- (55) Does EZ READER have a self diagnostics program to insure 100% accuracy in its recording of customer usage?
- (56) How is PGW alerted to a defective EZ READER DEVICE?
- (57) How sure \_\_\_% are you about the amount I may owe?
- (58) Did Councilman Frank DiCicco request at any time a copy of my PGW gas bill history? Please provide Year, Date & Time.
- (59) Did any elected official request a copy of my PGW gas bill?
- (60) If yes to question (58), please provide the name of the official and the date and time of the request?
- (61) Did any Political Party or Union Official request a copy of my PGW Gas Bill? Please provide, Name, Date & Time of request and to whom the request was made too.

PAGE #5

- (62) Does PGW have a procedure in place to notify the Legal Department of the City of Philadelphia when individuals like myself file a grievance with the PUC or any other dispute, in order to avoid the hassle and embarrassment caused by the Municipal Court judgement against me?
- (63) Who is the individual who filed the judgement against me?
- (64) How accurate is the EZ READER device?
- (65) How accurate are the Meter Readers Employees?
- (66) When the Gas meter is read by an employee of PGW, is the information considered accurate?
- (67) Are the input devices used by the Individual Meter Reader error proof?
- (68) Are the input devices audited for accuracy?
- (69) Who is manufacturer of the input devices used by the PGW employees and where is this company located?
- (70) Can you provide a Data book on the handheld input device?
- (71) If so, please mail it to me with your answers to this Interrogatory.
- (72) What percentage of accuracy + or -, is allowed on Onsite and EZ READER gas meter reading?
- (73) Many consumers take it for granted that the Gas Meter monthly reading is performed accurately and pay the bill accordingly, Is their ever an Audit of the Billing Department to assure accurate meter reading and accurate bills?
- (74) If an error occurs in the system, How are bills corrected to reflect an accurate gas usage reading? How is the account credited for being overbilled?
- (75) What procedures are in place to insure accurate month to month gas usage charges?

Joseph A. Simiriglio Jr.  
117 Mt. Vernon Court  
Deptford, NJ 08096  
September 7, 2003

Judge Charles E. Rainey, Jr.  
1302 Philadelphia State Office Building  
1400 West Spring Garden Street  
Philadelphia, PA 19130

Dear Judge Rainey:

Please find enclosed 2-copies of Interrogatories for you as presiding officer.

You will notice questions concerning two political figure, a major political party and a Union question within my Discovery questions. The questions are very relevant due to my political activity within the City of Philadelphia, The State of Pennsylvania and The Nation.

Sincerely,

Joseph A. Simiriglio Jr.

CERTIFICATE OF SERVICE

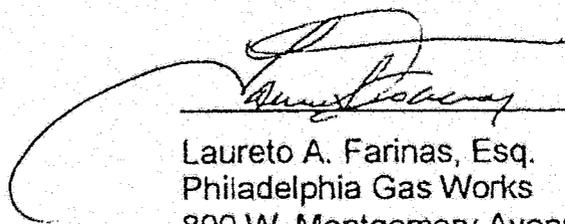
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Joseph A. Simirigilo, Jr.  
117 Mt. Vernon Court  
Deptford, NJ 08096

September 17, 2003

A handwritten signature in black ink, appearing to read "Laureto A. Farinas", is written over a horizontal line. A large, sweeping flourish extends from the left side of the signature.

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

T10- 2301 S 10TH ST 135/07/7030/67 JOSEPH SIMIRIGLIOJR AMR ON  
 6/15 733.01 RT C5 REG TAX% BUD 0032

\*\*\*\*\*  
 DATE DUE 7/15/9 \* DATE INDEX USE MOS \* PAYMENTS # ADJUSTMENTS  
 CURRENT BILL 21.92 \* 6/15/9 3700 20 01 \*  
 ARREARS 711.09 \* 5/19/9 3680 67 01 \* 70.00 1 253.00-CR

BUDGET TOTAL 22.00 \* 3/16/9 3538 217 01 \* 100.00 1 355.15-CR  
 CURR BUDGET 32.00 \* 2/17/9 3321 163 01 \*  
 BUD ARREARS 10.00- \* 1/22/9 3158 299 01 \* 56.00 1 15.82 DR

DATE 0/00/0 AMT 32 \* LAST PAYMT 6/03/9 70.00 \*HAST TRANS 6/15/9 9200  
 SUGG 150 PREV \* 6/19/8 2555 26 01 \* 20.00 1 30.98-CR  
 BUDGET MONTH 50 \* LAST BILLED 6/15/99 3700 \*LAST USE DATE 6/15/99

\*\*\*\*\*  
 CFDD 27 DOM METER NO 1852036 DEPOSIT DISPLAY  
 EXPECTED WINTER USE 0157 METER SIZE L250 REF ACCT DISPLAY  
 CUST MOS 38 RATE MOS 167 METER SET 10/15/96 - 1 MAIL BILL DISPLAY  
 CSD DISPATCH ZONE 206 INDX 00000 TEST 0 OLD METER DISPLAY T16-

ZIP 19148-3601 C010 CUST DATE 5/01/96  
 MAIL NO READ 000  
 OT RETURN SIC 00002 NEXT MR DTE 07/22/99

CHECK DIGIT- 0  
 \*\*\*\*\*  
 DECEMBER 15 2003  
 AMR INSTALLED  
 PGW-2  
 11/4/03  
 F-01008937  
 gm  
 Phil-A

HISTORY REQUEST REPORT FOR ACCOUNT # 6117527812 AND SA # 9961577248 AS OF 11/04/2003

PGW-3  
F-01008937  
Phila

Account # 6117527812 SA # 9961577248 Bill Cycle 15 Rate Class GS Phone # 4631083215

Name: SIMIRIGLIOR, JOSEPH Address: 2301 S 10TH ST/PHILA, PA

Pay Agreement Indicator N Easyway Indicator CRP Status: I

Blocker Start Date 0 Blocker End Date 0 Meter # 1652036

DOCUMENT FOLDER

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
01/01/1996	CONVRC	(\$1,178.08)	(\$56.90)	(\$56.90)							
06/24/1997	CRPCR	\$0.00	(\$67.72)	(\$67.72)							
07/02/1997	CRPDB	\$0.00	\$168.00	\$168.00							
07/21/1997	BILL	\$23.66	\$23.66	\$0.00	06/20/1997	07/21/1997	R	1420	\$23.66	23	1652036
07/23/1997	CRPCR	\$0.00	(\$13.88)	(\$13.88)							
07/24/1997	PAY	(\$50.00)	(\$50.00)	\$0.00							
08/19/1997	BILL	\$21.09	\$21.09	\$0.00	07/21/1997	08/19/1997	R	1440	\$21.09	20	1652036
08/21/1997	CRPDB	\$0.00	\$7.48	\$7.48							
09/04/1997	PAY	(\$50.00)	(\$50.00)	\$0.00							
09/17/1997	BILL	\$21.95	\$21.95	\$0.00	08/19/1997	09/17/1997	R	1492	\$21.95	21	1652036
09/19/1997	CRPDB	\$0.00	\$8.34	\$8.34							
10/17/1997	BILL	\$30.49	\$30.49	\$0.00	09/17/1997	10/17/1997	R	1492	\$30.49	31	1652036
11/03/1997	CRPDB	\$0.00	\$10.91	\$10.91							
11/03/1997	PAY	(\$50.00)	(\$50.00)	\$0.00							
11/17/1997	BILL	\$118.53	\$118.53	\$0.00	10/17/1997	11/17/1997	R	1626	\$118.53	134	1652036
11/20/1997	PAY	(\$68.45)	(\$68.45)	\$0.00							
11/20/1997	CRPDB	\$0.00	\$10.05	\$10.05							
12/17/1997	BILL	\$175.80	\$175.80	\$0.00	11/17/1997	12/17/1997	R	1827	\$175.80	201	1652036
01/21/1998	BILL	\$198.88	\$198.88	\$0.00	12/17/1997	01/21/1998	R	2056	\$198.88	228	1652036
01/23/1998	CRPDB	\$0.00	\$1.51	\$1.51							
01/23/1998	CRPDB	\$0.00	\$0.00	\$0.00							
02/19/1998	BILL	\$177.51	\$177.51	\$0.00	01/21/1998	02/19/1998	R	2258	\$177.51	203	1652036
03/23/1998	BILL	\$165.54	\$165.54	\$0.00	02/19/1998	03/23/1998	R	2447	\$165.54	189	1652036
03/30/1998	CRPCR	\$0.00	(\$230.33)	(\$230.33)							
03/30/1998	PAY	(\$268.00)	(\$268.00)	\$0.00							
04/23/1998	BILL	\$62.98	\$62.98	\$0.00	03/23/1998	04/23/1998	Y	2516	\$62.98	69	1652036
04/24/1998	CRPCR	\$0.00	(\$445.93)	(\$445.93)							
05/20/1998	BILL	\$15.12	\$15.12	\$0.00	04/23/1998	05/20/1998	R	2629	\$15.12	13	1652036

DEC 15 2003

Account # 6-1752-812

SA # 996157248

B Cycle 15

Rate Class GS

Phone # 46310800151

Name: SIMIRIGLIOJR, JOSEPH

Address: 2301 S 10TH ST/PHILA, PA

Easyway Indicator

CRF Status

Blocker Start Date 0

Blocker End Date 0

Meter # 1852036

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Reas	Current Balance	Usage	Meter #
06/19/1998	BILL	\$26.22	\$26.22	\$0.00	05/20/1998	06/19/1998	R	2555	\$26.22	26	1852036
06/24/1998	CRPCR	\$0.00	(\$30.98)	\$30.98							
06/30/1998	PAY	(\$20.00)	(\$20.00)	\$0.00							
07/22/1998	BILL	\$21.95	\$21.95	\$0.00	06/19/1998	07/22/1998	R	2576	\$21.95	21	1852036
07/23/1998	CRPDB	\$0.00	\$16.88	\$16.88							
08/19/1998	BILL	\$21.09	\$21.09	\$0.00	07/22/1998	08/19/1998	R	2596	\$21.09	20	1852036
09/16/1998	PAY	(\$50.00)	(\$50.00)	\$0.00							
09/16/1998	CRPDB	\$0.00	\$5.78	\$5.78							
09/18/1998	BILL	\$24.52	\$24.52	\$0.00	08/19/1998	09/18/1998	R	2620	\$24.52	24	1852036
10/19/1998	BILL	\$23.66	\$23.66	\$0.00	09/18/1998	10/19/1998	R	2643	\$23.66	23	1852036
10/30/1998	BILL	\$31.62	\$31.62	\$0.00	10/19/1998	10/30/1998	R	2680	\$31.62	37	1852036
11/04/1998	CRPDB	\$0.00	\$20.96	\$20.96							
11/04/1998	PAY	(\$60.00)	(\$60.00)	\$0.00							
11/18/1998	BILL	\$87.77	\$87.77	\$0.00	10/19/1998	11/18/1998	R	2741	\$87.77	98	1852036
12/17/1998	BILL	\$104.86	\$104.86	\$0.00	11/18/1998	12/17/1998	R	2859	\$104.86	118	1852036
01/22/1999	BILL	\$258.52	\$258.52	\$0.00	12/17/1998	01/22/1999	R	3158	\$258.52	299	1852036
01/28/1999	PAY	(\$56.00)	(\$56.00)	\$0.00							
01/28/1999	CRPDB	\$0.00	\$15.82	\$15.82							
02/17/1999	BILL	\$136.55	\$136.55	\$0.00	01/22/1999	02/17/1999	R	3321	\$136.55	163	1852036
03/16/1999	BILL	\$180.45	\$180.45	\$0.00	02/17/1999	03/16/1999	R	3638	\$180.45	217	1852036
04/05/1999	CRPCR	\$0.00	(\$355.15)	(\$355.15)							
04/05/1999	PAY	(\$100.00)	(\$100.00)	\$0.00							
04/09/1999	BILL	\$64.99	\$64.99	\$0.00	03/16/1999	04/09/1999	R	3613	\$64.99	75	1852036
05/19/1999	BILL	\$58.48	\$58.48	\$0.00	04/09/1999	05/19/1999	R	3580	\$58.48	67	1852036
06/03/1999	CRPCR	\$0.00	(\$253.00)	(\$253.00)							
06/03/1999	PAY	(\$70.00)	(\$70.00)	\$0.00							
06/15/1999	BILL	\$21.92	\$21.92	\$0.00	05/19/1999	06/15/1999	R	3700	\$21.92	20	1852036
06/15/1999	UNEARN	\$0.00	\$10.08	\$10.08							
07/22/1999	BILL	\$32.00	\$32.00	\$0.00	06/15/1999	07/22/1999	R	3727	\$32.00	27	1852036
08/19/1999	BILL	\$32.00	\$32.00	\$0.00	07/22/1999	08/19/1999	R	3747	\$32.00	20	1852036
08/26/1999	PAY	(\$50.00)	(\$50.00)	\$0.00							
08/27/1999	CRPFRZ	\$721.09	\$721.09	\$721.09							
08/27/1999	LIMAKE	\$200.00	\$200.00	\$200.00							

Account # 6117527812 SA # 9961577248 B1 Cycle 15 Rate Class GS Phone # 4631080(215)

Name: SIMIRIGLIOJR, JOSEPH Address: 2301 S 10TH ST PHILA, PA

Pay Agreement Indicator: N Easyway Indicator: CRP Status: I

Blocker Start Date: 0 Blocker End Date: 0 Meter # 1852036

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Road Code	End Read	Current Balance	Usage	Meter #
09/20/1999	BILL	\$11.05	\$11.05	\$0.00	09/19/1999	09/20/1999	Y	3751	\$979.49	4	1852036
09/23/1999	LPC	\$11.35	\$11.35	\$11.35							
09/29/1999	PAY	(\$200.00)	(\$200.00)	\$0.00							
10/19/1999	BILL	\$47.65	\$47.65	\$0.00	09/20/1999	10/19/1999	R	3803	\$827.14	52	1852036
11/17/1999	BILL	\$131.78	\$131.78	\$0.00	10/19/1999	11/17/1999	R	3925	\$928.92	125	1852036
12/18/1999	BILL	\$129.00	\$129.00	\$0.00	11/17/1999	12/18/1999	R	4082	\$1,057.92	156	1852036
01/25/2000	BILL	\$263.29	\$263.29	\$0.00	12/18/1999	01/25/2000	R	4411	\$1,321.21	329	1852036
02/11/2000	PAY	(\$379.00)	(\$379.00)	\$0.00							
02/23/2000	BILL	\$218.51	\$218.51	\$0.00	01/25/2000	02/23/2000	R	4684	\$1,160.72	273	1852036
03/22/2000	BILL	\$135.16	\$135.16	\$0.00	02/23/2000	03/22/2000	R	4810	\$797.37	126	1852036
03/23/2000	PAY	(\$468.51)	(\$468.51)	\$0.00							
04/22/2000	BILL	\$58.12	\$58.12	\$0.00	03/22/2000	04/22/2000	R	4875	\$855.49	65	1852036
05/19/2000	BILL	\$39.61	\$39.61	\$0.00	04/22/2000	05/19/2000	R	4915	\$895.10	41	1852036
06/19/2000	BILL	\$30.35	\$30.35	\$0.00	05/19/2000	06/19/2000	Y	4945	\$925.46	29	1852036
07/17/2000	PAY	(\$30.36)	(\$30.36)	\$0.00							
07/20/2000	BILL	\$21.88	\$21.88	\$0.00	06/19/2000	07/20/2000	R	4963	\$930.40	18	1852036
07/25/2000	LPC	\$13.42	\$13.42	\$13.42							
07/27/2000	PAY	(\$21.88)	(\$21.88)	\$0.00							
08/15/2000	PAY	(\$35.30)	(\$35.30)	\$0.00							
08/18/2000	BILL	\$24.20	\$24.20	\$0.00	07/20/2000	08/18/2000	R	4984	\$910.51	21	1852036
08/22/2000	LPC	\$13.09	\$13.09	\$13.09							
09/19/2000	BILL	\$76.51	\$76.51	\$0.00	08/18/2000	09/19/2000	R	5008	\$950.48	24	1852036
09/21/2000	LPC	\$13.46	\$13.46	\$13.46							
10/12/2000	PAY	(\$26.51)	(\$26.51)	\$0.00							
10/19/2000	BILL	\$31.13	\$31.13	\$0.00	09/19/2000	10/19/2000	R	5038	\$968.95	30	1852036
10/21/2000	LPC	\$13.85	\$13.85	\$13.85							
11/17/2000	BILL	\$75.08	\$75.08	\$0.00	10/19/2000	11/17/2000	R	5125	\$1,056.35	87	1852036
11/21/2000	LPC	\$14.32	\$14.32	\$14.32							
12/19/2000	BILL	\$232.06	\$232.06	\$0.00	11/17/2000	12/19/2000	R	5363	\$1,305.86	238	1852036
12/20/2000	LPC	\$15.45	\$15.45	\$15.45							
01/22/2001	BILL	\$405.74	\$405.74	\$0.00	12/19/2000	01/22/2001	R	5703	\$1,730.53	340	1852036
01/24/2001	LPC	\$18.93	\$18.93	\$18.93							
01/26/2001	PAY	(\$300.00)	(\$300.00)	\$0.00							

Account # 617527812

SA # 9961577248

B Cycle 15

Rate Class GS

Phone # 4631080215

Name: SIMIRIGLIOJR, JOSEPH

Address: 2301 S 10TH ST/PHILA, PA

Easyway Indicator

CRP Status I

Blocker Start Date 0

Blocker End Date 0

Meter # 1852036

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
02/20/2001	BILL	\$289.86	\$289.86	\$0.00	01/22/2001	02/20/2001	R	5923	\$1,741.84	220	1852036
02/22/2001	LPC	\$21.45	\$21.45	\$21.45							
03/21/2001	BILL	\$260.61	\$260.61	\$0.00	02/20/2001	03/21/2001	R	6112	\$2,028.25	185	1852036
03/23/2001	LPC	\$25.80	\$25.80	\$25.80							
03/27/2001	PAY	(\$260.61)	(\$260.61)	\$0.00							
04/23/2001	LPCWWE	(\$161.12)	(\$161.12)	(\$161.12)							
04/24/2001	CANP	\$468.51	\$468.51	\$0.00							
04/24/2001	CA-IB	(\$405.74)	(\$405.74)	\$0.00							
04/24/2001	CANP	\$100.00	\$100.00	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$100.00							
04/24/2001	CANP	\$200.00	\$200.00	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$101.78)							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$200.00							
04/24/2001	CANB	(\$101.78)	(\$101.78)	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$468.51							
04/24/2001	CANP	\$30.36	\$30.36	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$30.36							
04/24/2001	CANB	(\$26.51)	(\$26.51)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	\$26.51							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$129.00)							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$60.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$405.74)							
04/24/2001	CANB	(\$75.08)	(\$75.08)	\$0.00							
04/24/2001	CANP	\$60.00	\$60.00	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$289.86)							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$75.08)							
04/24/2001	CANB	(\$136.55)	(\$136.55)	\$0.00							
04/24/2001	CANP	\$56.00	\$56.00	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$55.00							
04/24/2001	CANP	\$70.00	\$70.00	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$70.00							
04/24/2001	CANP	\$26.51	\$26.51	\$0.00							
04/24/2001	CANB	(\$30.36)	(\$30.36)	\$0.00							

Account # 6117527812 SA # 996157248 Rate Class GS Phone # 4531080219

Name: SIMIRIGLIOJR, JOSEPH Address: 2301 S 10TH ST/PHILA, PA

Pay Agreement Indicator N Easyway Indicator CRP Status I

Blocker Start Date C Blocker End Date C Meter # 1852035

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Reac	Current Balance	Usage	Meter #
04/24/2001	CANB	(\$289.86)	(\$289.86)	\$0.00							
04/24/2001	CANB	(\$129.00)	(\$129.00)	\$0.00							
04/24/2001	CANB	(\$31.13)	(\$31.13)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$31.13)							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$30.96)							
04/24/2001	CANB	(\$58.12)	(\$58.12)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$58.12)							
04/24/2001	CANB	(\$263.29)	(\$263.29)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$263.29)							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$26.51							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$58.48)							
04/24/2001	CANB	(\$180.45)	(\$180.45)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$47.65)							
04/24/2001	CANB	(\$11.05)	(\$11.05)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$11.05)							
04/24/2001	CANB	(\$32.00)	(\$32.00)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$32.00)							
04/24/2001	CANB	(\$32.00)	(\$32.00)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$32.00)							
04/24/2001	CANB	(\$21.92)	(\$21.92)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$21.92)							
04/24/2001	CANB	(\$58.48)	(\$58.48)	\$0.00							
04/24/2001	CANB	(\$105.16)	(\$105.16)	\$0.00							
04/24/2001	CANB	(\$64.99)	(\$64.99)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$64.99)							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$64.99)							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$64.99)							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$64.99)							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$64.99)							
04/24/2001	CANB	(\$258.52)	(\$258.52)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$258.52)							
04/24/2001	CANB	(\$104.86)	(\$104.86)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$104.86)							
04/24/2001	CANB	(\$87.77)	(\$87.77)	\$0.00							
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$87.77)							

Account # 617527872 SA # 995157248 Bill Cycle 15 Rate Class GS Phone # 4631080(215)  
 Name: SIMIRIGLIOR, JOSEPH Address: 2301 S 10TH ST/PHILA, PA  
 Pay Agreement Indicator N Easyway Indicator CRP Status I  
 Blocker Start Date 0 Blocker End Date 0 Meter # 1852035

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Reac	Current Balance	Usage	Meter #
04/24/2001	AUTOCN	\$0.00	\$0.00	(\$21.92)							
04/24/2001	CANP	\$260.61	\$260.61	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$21.88)							
04/24/2001	CANP	\$50.00	\$50.00	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$50.00							
04/24/2001	CANP	\$379.00	\$379.00	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$379.00							
04/24/2001	CANP	\$21.88	\$21.88	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$21.88							
04/24/2001	CANP	\$35.30	\$35.30	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$35.30							
04/24/2001	CANB	(\$47.65)	(\$47.65)	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$300.00							
04/24/2001	CANB	(\$21.88)	(\$21.88)	\$0.00							
04/24/2001	PAYCAN	\$0.00	\$0.00	\$260.61							
04/24/2001	CANB	(\$218.51)	(\$218.51)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$218.51)							
04/24/2001	CANB	(\$260.61)	(\$260.61)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$260.61)							
04/24/2001	CANB	(\$232.06)	(\$232.06)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$232.06)							
04/24/2001	CANB	(\$24.20)	(\$24.20)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$24.20)							
04/24/2001	CANB	(\$39.61)	(\$39.61)	\$0.00							
04/24/2001	BSEGCN	\$0.00	\$0.00	(\$39.61)							
04/24/2001	CANP	\$300.00	\$300.00	\$0.00							
08/05/2001	PAY	(\$47.17)	(\$47.17)	\$0.00							
07/30/2002	WO	(\$300.00)	(\$300.00)	(\$300.00)							

**Contacts for Account: Simirigliojr, Joseph**

Account: 0061 1752 7812      Simirigliojr, Joseph       Transaction History       Full Comments

Date	Type	Comment	Person
07/03/2001	BILL	corresp recd letter, cust requesting statement for acct numbers 0013277973, 006117527812 sent statements	Simirigliojr, Joseph
04/20/2001	BANK	forward contact to luis roman, to have bankruptcy prorated bk to 10/30/1998	Simirigliojr, Joseph
04/16/2001	BILL	corresp recd letter sent letter call about payment arrangement	Simirigliojr, Joseph
08/26/1999	HIST	CUSTOMER REQUEST WE REMOVE FROM CRP DATE 08/26/99	Simirigliojr, Joseph

HISTORY REQUEST REPORT FOR ACCOUNT # 13277973 AND SA # 751288125 AS OF 11/04/2003

Y

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PGW-4  
F 01008937  
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Account # 13277973	SA # 751288125	Bill Cycle 21	Rate Class GS	Phone # 4631080(215)
Name: SIMIRIGLIOR, JOSEPH	Address: 2301 S 10TH ST/PHILA PA	Blocker End Date 20031114	Meter # 1652036	
Pay Agreement Indicator N	Easyway Indicator	CRP Status		
Blocker Start Date 20021129				

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Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
11/04/998	PAY	(\$60.00)	(\$60.00)	\$0.00							
01/28/999	PAY	(\$56.00)	(\$56.00)	\$0.00							
04/05/1999	PAY	(\$100.00)	(\$100.00)	\$0.00							
06/03/1999	PAY	(\$70.00)	(\$70.00)	\$0.00							
08/26/1999	PAY	(\$50.00)	(\$50.00)	\$0.00							
09/29/1999	PAY	(\$200.00)	(\$200.00)	\$0.00							
02/11/2000	PAY	(\$379.00)	(\$379.00)	\$0.00							
03/23/2000	PAY	(\$468.51)	(\$468.51)	\$0.00							
07/17/2000	PAY	(\$30.36)	(\$30.36)	\$0.00							
07/27/2000	PAY	(\$21.88)	(\$21.88)	\$0.00							
08/15/2000	PAY	(\$35.30)	(\$35.30)	\$0.00							
10/12/2000	PAY	(\$26.51)	(\$26.51)	\$0.00							
01/26/2001	PAY	(\$300.00)	(\$300.00)	\$0.00							
03/27/2001	PAY	(\$260.61)	(\$260.61)	\$0.00							
04/20/2001	BILL	\$3,259.40	\$3,259.40	\$0.00	04/20/2001	04/20/2001	R	6226	\$1,201.23	3546	1852036
05/21/2001	BILL	\$40.94	\$40.94	\$0.00	04/20/2001	05/21/2001	R	6248	\$1,260.18	22	1852036
05/23/2001	LPC	\$18.01	\$18.01	\$18.01							
06/21/2001	BILL	\$43.60	\$43.60	\$0.00	05/21/2001	06/21/2001	R	6272	\$1,281.12	24	1852036
06/22/2001	PAY	(\$40.94)	(\$40.94)	\$0.00							
06/23/2001	LPC	\$18.28	\$18.28	\$18.28							
07/09/2001	PAY	(\$43.60)	(\$43.60)	\$0.00							
07/23/2001	BILL	\$42.27	\$42.27	\$0.00	06/21/2001	07/23/2001	R	6295	\$1,298.35	23	1852036
07/25/2001	LPC	\$18.56	\$18.56	\$18.56							
08/09/2001	PAY	(\$42.27)	(\$42.27)	\$0.00							
08/21/2001	BILL	\$39.61	\$39.61	\$0.00	07/23/2001	08/21/2001	R	6316	\$1,314.53	21	1852036
08/23/2001	LPC	\$18.84	\$18.84	\$18.84							
09/20/2001	BILL	\$36.36	\$36.36	\$0.00	08/21/2001	09/20/2001	R	6337	\$1,370.32	21	1852036
09/22/2001	LPC	\$19.43	\$19.43	\$19.43							

Account # 13277973      SA # 75288125      Bi Cycle 21      Rate Class GS      Phone # 4631050215  
 Name: SIMIRIGLIO, JOSEPH      Address: 2301 S 10TH ST/PHILA PA  
 Easyway Indicator      CRP Status  
 Blocker Start Date 20021129      Blocker End Date 20031114      Meter # 1852036

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust.Amt.	Segment Start Date	Segment End Date	Road Code	End Read	Current Balance	Usage	Meter #
09/24/2001	PAY	(\$39.61)	(\$39.61)	\$0.00							
09/28/2001	PAY	(\$36.36)	(\$36.36)	\$0.00	09/20/2001	10/22/2001	R	6372	\$1,364.54	35	1852036
10/22/2001	BILL	\$50.78	\$50.78	\$0.00							
10/24/2001	LPC	\$19.41	\$19.41	\$19.41							
11/03/2001	PAY	(\$50.78)	(\$50.78)	\$0.00							
11/20/2001	BILL	\$96.63	\$96.63	\$0.00	10/22/2001	11/20/2001	R	6447	\$1,430.09	75	1852036
11/22/2001	LPC	\$19.70	\$19.70	\$19.70							
12/19/2001	BILL	\$107.29	\$107.29	\$0.00	11/20/2001	12/19/2001	R	6538	\$1,556.53	91	1852036
12/21/2001	LPC	\$21.15	\$21.15	\$21.15							
01/07/2002	PAY	(\$96.63)	(\$96.63)	\$0.00							
01/22/2002	BILL	\$297.21	\$297.21	\$0.00	12/19/2001	01/22/2002	R	6822	\$1,672.13	284	1852036
01/23/2002	PAY	(\$107.29)	(\$107.29)	\$0.00							
01/24/2002	LPC	\$20.31	\$20.31	\$20.31							
02/20/2002	BILL	\$185.74	\$185.74	\$0.00	01/22/2002	02/20/2002	R	6995	\$1,882.64	173	1852036
02/22/2002	LPC	\$24.77	\$24.77	\$24.77							
03/20/2002	BILL	\$141.00	\$141.00	\$0.00	02/20/2002	03/20/2002	R	7138	\$2,051.20	143	1852036
03/22/2002	LPC	\$27.56	\$27.56	\$27.56							
03/27/2002	PAY	(\$297.21)	(\$297.21)	\$0.00							
03/27/2002	PAY	(\$185.74)	(\$185.74)	\$0.00							
04/19/2002	BILL	\$99.99	\$99.99	\$0.00	03/20/2002	04/19/2002	R	7238	\$1,691.76	100	1852036
04/23/2002	LPC	\$23.52	\$23.52	\$23.52							
04/24/2002	PAY	(\$141.00)	(\$141.00)	\$0.00							
05/18/2002	BILL	\$43.67	\$43.67	\$0.00	04/19/2002	05/18/2002	R	7272	\$1,516.20	34	1852036
05/20/2002	PAY	(\$99.99)	(\$99.99)	\$0.00							
05/21/2002	LPC	\$21.76	\$21.76	\$21.76							
06/20/2002	LPC	\$22.41	\$22.41	\$22.41							
06/20/2002	PAY	(\$43.67)	(\$43.67)	\$0.00							
07/18/2002	LPC	\$22.41	\$22.41	\$22.41							
08/17/2002	LPC	\$22.41	\$22.41	\$22.41							
09/19/2002	LPC	\$22.41	\$22.41	\$22.41							
09/25/2002	LPCWVE	(\$197.61)	(\$197.61)	(\$197.61)							
10/18/2002	LPC	\$20.46	\$20.46	\$20.46							
11/19/2002	LPC	\$20.46	\$20.46	\$20.46							

Account # 13277973      SA # 75288125      Bill Cycle 21      Rate Class GS      Phone # 4631080215  
 Name: SIMIRIGLIOJR, JOSEPH      Address: 2301 S 10TH ST/PHILA PA  
 Pay Agreement Indicator N      Easyway Indicator      CRP Status  
 Blocker Start Date: 20021129      Blocker End Date: 20031114      Meter # 185203E

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
12/19/2002	LPC	\$20.46	\$20.46	\$20.46							
01/18/2003	LPC	\$20.46	\$20.46	\$20.46							
02/20/2003	LPC	\$20.46	\$20.46	\$20.46							
03/19/2003	LPC	\$20.46	\$20.46	\$20.46							
04/18/2003	LPC	\$20.46	\$20.46	\$20.46							
05/20/2003	LPC	\$20.46	\$20.46	\$20.46							
06/19/2003	LPC	\$20.46	\$20.46	\$20.46							
07/18/2003	LPC	\$20.46	\$20.46	\$20.46							
08/19/2003	LPC	\$20.46	\$20.46	\$20.46							
09/18/2003	LPC	\$20.46	\$20.46	\$20.46							
11/04/2003	LPCWVE	(\$245.52)	(\$245.52)	(\$245.52)							

**Contacts for Account: Simirigliojr, Joseph**

Account: 000013277973      Simirigliojr, Joseph       Transaction History       Full Comments

Date	Type	Comment	Person
03/13/2003	L&J	call the city law dept to vacate judgment Lucille Coleman 215-683-5255 March 14, 2003 waiting for paper	Simirigliojr, Joseph
02/13/2003	L&J	Formal PUC complaint pending since 11/2002. Default Judgment filed 1/2003. Need to know why the account wasn't pulled after complaint filed. Sent email to AFC	Simirigliojr, Joseph
12/13/2002	L&J	SC # 0212340331 01/16/2003 RM 4L (CJ)	Simirigliojr, Joseph
12/09/2002	COLL	owner of property called, stated tenant has moved for address there is no forwarding address but his company is Frontier Electronics	Simirigliojr, Joseph
12/04/2002	CRU	Formal Report to L. Fairns Bankruptcy acct 61-1752-7812	Simirigliojr, Joseph
11/29/2002	CRU	CUSTOMER HAS FILED A FORMAL COMPLAINT W/PUC ON 11/14/02 F-01008937 DO NOT TAKE ANY ACTION ON THIS ACCOUNT, CONTACT CRU AT (215) 787-1250	Simirigliojr, Joseph
09/25/2002	CRU	Per PUC Investigator Thomas-PGW to waive \$197.61 as lpc's customer is responsible for balance of \$1354.56 case dismissed BCS# 1008937 Case closed 9/23/02	Simirigliojr, Joseph
05/16/2002	SER1	shut off sched 5/18/02	Simirigliojr, Joseph
09/25/2001	CRU	BCS# 1008937 Report to PUC No decision	Simirigliojr, Joseph
08/30/2001	CRU	bcas 1008937 tax received 8/29/01	Simirigliojr, Joseph
07/05/2001	BILL	send statement per cust request	Simirigliojr, Joseph

CITY OF PHILADELPHIA  
PHILADELPHIA GAS WORKS

PGW-5  
F-01008937  
11/4/03  
9m  
Phila  
COUNTY OF PHILADELPHIA

VS.

Trial Division  
THE MUNICIPAL COURT  
TERM

JOSEPH SIMIRIGLIO, JR  
2301 S. 10TH STREET  
PHILADELPHIA, PA 19148

: NO. 02 12 34 0331 (1/16/03)

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ORDER TO VACATE

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DEC 15 2003

TO: PATRICIA McDERMOTT, Deputy Court Administrator  
Municipal Court

A Judgment by Default was entered inadvertently in the above captioned matter.

The plaintiff, City of Philadelphia, hereby requests that the Judgment against

JOSEPH SIMIRIGLIO, JR. be vacated and that the case be marked Settled,

Discontinued and Ended from the Court list because (s)he filed a complaint with  
the Public Utility Commission (PUC) before the hearing.

City of Philadelphia

NELSON A. DIAZ  
City Solicitor

Dated: March 14, 2003

By:

  
ELIJAH J. WATERMAN, I.D. #90194  
Assistant City Solicitor

APPROVED BY THE COURT:

Date: 3/26/03

SECRETARY'S BUREAU

2003 DEC -4 PM 1:36

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PGW-6  
F-01008937  
11/4/03  
gm  
phk

October 2003

Joseph Simiriglio, Jr.  
117 Mt Vernon Court  
Deptford, N.J. 08096

DOCUMENT  
FOLDER

Re: Collection Agency Contact  
2301 S. 10<sup>th</sup> Street  
Account #00-1327-7973  
Balance: \$1610.08

DOCKETED  
DEC 15 2003

Dear Debtor:

PGW recently place past due accounts with agencies in an effort to collect outstanding balances. PGW records indicate that prior to this placement you had filed a billing dispute. The collection agencies have been notified to stop all collection efforts pending the resolution of this matter. If an agent attempts to contact you before your dispute has been resolved inform the agent of your pending dispute and refer them back to PGW. If the agent refuses or continues trying to collect the debt please contact PGW at the number listed below.

PGW's apologizes for any difficulty this may have caused.

Philadelphia Gas Works  
Credit/Collection Department  
215-235-1777

SECRETARY'S BUREAU  
DEC 15 2003

2003 DEC -4 PM 1:36

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BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Mr. Joseph Simiriglio Jr.  
2301 S. 10<sup>th</sup> Street  
Philadelphia, PA. 19148

Philadelphia Gas Works  
v. 800 W. Montgomery Avenue  
Philadelphia, PA. 19122

PGW-7  
F-01008937  
11/4/03  
AM  
PHILA

Case Number 1008937

Account Number: 0013277973

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FOLDER

Decision On Informal Complaint by the Bureau of Consumer Services:

Statement of Complaint:

1. The customer is disputing his bills in the amount of \$1,275 00 The customer feels that he doesn't owe this amount, because he feels he did not use that much gas and PGW can not show him proof that he owes this amount.

Investigation by Staff of the Bureau of Consumer Services Revealed:

1. The customer gas service at 2301 S. 10<sup>th</sup> Street was established in his name on May 1, 1996.
2. The customer's bills are based on actual meter readings
3. The customer's residence is equipped with an AMR automatic meter reading device.
4. PGW completed a usage analysis, which shows the customer's usage is in line with his degree-days. See Attached usage analysis.
5. As of the date of this decision the customer's outstanding balance is \$1,562 17

Based On These Findings, The Bureau of Consumer Services Concludes:

1. The customer's bills are correct as rendered.

DOCKETED  
DEC 15 2003

Therefore It Is Decided:

1. PGW waived \$93.12 in late payment charges and shall waive an additional \$197.61 for a total of \$290.73
2. The customer is responsible for payment of the outstanding balance of \$1,364.56, which accrued in his name at 2301 S. 10<sup>th</sup> Street Philadelphia, PA 19148
3. On May 18, 2002 the customer's account was finalized and closed.
4. The informal complaint of Joseph Simiriglio Jr. is dismissed.

SECRETARY'S BUREAU  
2003 DEC -4 PM 1:36

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Date September 23, 2002



Signature

Mr. Derrick Thomas  
Utility Complaint Investigator  
Bureau of Consumer Services  
PA Public Utility Commission



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

September 23, 2002

BCS No. 1008937

Mr. Joseph Simiriglio Jr.  
2301 S. 10<sup>th</sup> Street  
Philadelphia, PA. 19148

Dear Mr. Simiriglio

The Bureau of Consumer Services (BCS) has completed its investigation into your informal complaint. Attached is the decision resulting from that investigation. A copy of this decision has also been sent to your utility company. This decision is binding on all parties, and unless it is appealed will become final 20 days after the date of this letter.

If you do not agree with any part of this decision you may appeal it by filing a formal complaint. You can do this by completing the attached Request for Formal Complaint Forms. Return this form to the Public Utility Commission, and the formal complaint forms will be mailed to you. If you wish to appeal, you must return this form to the Public Utility Commission by the date shown on the form. Your complaint will be assigned to an Administrative Law Judge, and a hearing date will be assigned.

You do not need a lawyer to file an appeal.

You must make all of the payments required by this decision. If you do not make these payments the utility company is permitted to terminate your utility service.

If you have any questions about the terms and conditions of this decision or about the Public Utility Commission's appeal procedures you may call me directly at (215) 644-0692.

Sincerely,

A handwritten signature in black ink, appearing to read 'Derrick Thomas', written over a horizontal line.

Mr. Derrick Thomas  
Utility Complaint Investigator

Philadelphia Gas Works