

Exhibit A



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Attorneys at Law

JUL 10 2017

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July 6, 2017

VIA FEDERAL EXPRESS

PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Centre Park Historic District, Inc. v. UGI Utilities, Inc.
Docket No. C-2015-2516051
City of Reading v. UGI Utilities, Inc.
Docket No. C-2016-2530475

Dear Sir/Madam:

Enclosed for filing with your office please find a Motion for Partial Summary Judgment, supporting affidavit and exhibits, and brief in connection with the above-referenced matters. Also enclosed is a CD of the materials.

I have enclosed an additional copy of the documents for time-stamping and return of same to me in the self-addressed, stamped envelope provided.

Thank you for your courtesies in this matter.

Very truly yours,


Michael E. Peters

MEP/al

Enclosures

cc: The Honorable Mary D. Long
Christopher Wright, Esquire
Devin Ryan, Esquire
Danielle Jouenne, Esquire
Mark Morrow, Esquire
David MacGregor, Esquire
Michael Swindler, Esquire

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*Attorneys for Centre Park Historic
District, Inc. and City of Reading*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CENTRE PARK HISTORIC DISTRICT,
INC.

vs.

UGI UTILITIES, INC.

:
:
:
Docket No. C-2015-2516051
:
:

CITY OF READING,

v.

UGI UTILITIES, INC.

:
:
Docket No. C-2016-2530475
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:

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.102(b) AND 5.103(c), YOU MAY ANSWER THE ENCLOSED MOTION WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE. YOUR ANSWER SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

EASTBURN AND GRAY, P.C.



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Dated: July 6, 2017

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Docket No. C-2015-2516051

CITY OF READING,

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UGI UTILITIES, INC.

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Docket No. C-2016-2530475

**MOTION FOR PARTIAL SUMMARY JUDGMENT OF THE
CENTRE PARK HISTORIC DISTRICT, INC. AND CITY OF READING**

TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:

AND NOW, comes Centre Park Historic District, Inc. (“CPHD”) and the City of Reading (the “City”), by and through their attorneys, Eastburn and Gray, P.C. and Michael J. Savona, Esquire, Michael E. Peters, Esquire, and Michael T. Pidgeon, Esquire, and file this Motion for Summary Judgment pursuant to Section 5.102 of the Pennsylvania Public Utility Commission’s

("Commission") regulations, 52 Pa. Code § 5.102, and respectfully requests summary judgment in their favor as follows:

I. BACKGROUND AND PROCEDURAL HISTORY

1. On November 25, 2015, CPHD filed a formal complaint which alleged that UGI Utilities, Inc. ("UGI") violated Section 59.18 of the Commission's regulations, 52 Pa. Code § 59.18, regarding the placement of meters in the historic districts of the City of Reading.

2. UGI filed an answer to CPHD's formal complaint on December 15, 2015.

3. On February 17, 2016, the City filed a formal complaint against UGI, also challenging UGI's meter relocation program within the City's historic districts on the basis that UGI violated Section 59.18. The City also challenged UGI's outside meter placements on the basis that UGI had placed meters in dangerous locations/conditions, in violation of Section 59.18 and 49 CFR § 192.353, in locations throughout the City.

4. More specifically, in its formal complaint the City, *inter alia*:

a. Challenged UGI's meter relocation program on the basis that UGI has placed meters in dangerous locations/conditions in violation of Section 59.18 and 49 CFR § 192.353.

b. Sought a determination regarding the breadth of Section 59.18's requirements regarding exterior meter placement in light of the City's powers to regulate and protect historic resources.

5. UGI filed an answer to the City's formal complaint on March 14, 2016, as well as preliminary objections which were denied by interim order dated March 29, 2016.

6. The formal complaints of CPHD and the City were consolidated by order dated March 30, 2016.

7. By her Sixth Prehearing Order dated March 21, 2017, the Honorable Mary D. Long ordered the City and CPHD to prepare a spreadsheet listing the meters contested by the City, and indicating (1) the date a permit was issued, if any, by the City and (2) the date the meter was relocated. The prehearing order directed UGI to respond and either stipulate or object to the data provided.

8. The City and CPHD were excused from providing “the date the meter was relocated” by the Eighth Prehearing Order in this matter, on the basis that they did not have sufficient information to provide the date. The Eighth Prehearing Order directed UGI to provide the date of service line installation for each of the contested meters.

9. The City and CPHD served their spreadsheet containing the contested meters on April 27, 2017 (the “Matrix”).

10. UGI filed its objections/stipulations to the City’s data on May 15, 2017 and provided additional data reflecting (1) the date service was installed and (2) providing additional permit data, if available.

11. The City filed its objections/stipulations to UGI’s response on May 24, 2017.

12. Discovery in this matter has closed, and certain issues are ready for disposition, there being no genuine issue of material fact in dispute, as set forth in paragraph 15, *infra*.

II. STANDARD OF REVIEW FOR SUMMARY JUDGMENT

13. Section 5.102 of the Commission’s regulations, 52 Pa. Code §§ 5.102(d)(1), (2), provides the standard of review for summary judgment motions:

- (1) *Standard for grant or denial on all counts.* The presiding officer will grant or deny a motion for judgment on the pleadings or a motion for summary judgment, as appropriate. The judgment sought will be rendered if the applicable pleadings, depositions, answers to

interrogatories and admissions, together with affidavits, if any, show that there is no genuine issue as to a material fact and that the moving party is entitled to a judgment as a matter of law.

- (2) *Standard for grant or denial in part.* The presiding officer may grant a partial summary judgment if the pleadings, depositions, answers to interrogatories and admissions, together with affidavits, if any, show that there is no genuine issue as to a material fact and that the moving party is entitled to judgment as a matter of law on one or more but not all outstanding issues.

52 Pa. Code §§ 5.102(d)(1), (2).

14. A hearing is necessary only to resolve disputed questions of fact, and when the question is one of law, the Commission need not hold a hearing. *Lehigh Valley Power Comm'n. v. Pa. Pub. Util. Comm'n.*, 563 A.2d 5448 (Pa. Commw. Ct. 1989); *Edan Transp. Corp. v. Pa. Public Utility Comm'n.*, 623 A.2d 6 (Pa. Commw. Ct. 1993).

15. For the reasons set forth more fully below, certain issues do not involve disputed questions of fact and can be disposed of at this stage of the proceedings by summary judgment. Specifically, the City is entitled to partial summary judgment that UGI violated Section 59.18 by locating meters in dangerous locations:

- (i) For the purposes of this motion, a total of 289 properties contain gas meters violation Section 59.18(a)(8)(i) because they are located “beneath or in front of windows or other building openings that may directly obstruct emergency fire exits.”
- (ii) For the purposes of this motion, a total of 10 properties contain gas meters violating Section 59.18(a)(8)(v) because they are located “[n]ear building air intakes under local or State building codes.”

- (iii) For the purposes of this motion, a total of 14 properties contain gas meters violating Section 59.18(a)(8)(vi) because they are located “[i]n contact with soil or other potentially corrosive materials.”

III. THE CITY AND CPHD ARE ENTITLED TO PARTIAL SUMMARY JUDGMENT

- A. **At least 289 properties contain gas meters violating Section 59.18(a)(8)(i) because they are located “beneath or in front of windows or other building openings that may directly obstruct emergency fire exits.”**
16. The City and CPHD incorporate paragraphs 1 through 15, *supra*, as if fully set forth.
17. Section 59.18(a)(8)(i) plainly prohibits utilities from locating meters and service regulators “beneath or in front of windows or other building openings that may directly obstruct emergency fire exits.” 52 Pa. Code § 59.18(a)(8)(i).
18. The properties set forth above are catalogued in Exhibit “A” to the Affidavit of John Slifko (hereinafter “Slifko Exhibit ‘A’”) and accompanied by photographs documenting each specific violation. The relevant photographs are in section A-1 of Slifko Exhibit A and highlighted in the matrices in green.
19. The photographs speak for themselves. There are no material facts in dispute with respect to the location of the gas meters beneath or in front of windows or other building openings that may directly obstruct emergency fire exits in violation of Section 59.18(a)(8)(i).
20. The City and CPHD are entitled to judgment in their favor as a matter of law, since the location of the meters on the properties identified in Slifko Exhibit “A” and as further attached as Exhibit 1 violate the placement requirements clearly set forth under Section 59.18(a)(8)(i).

WHEREFORE, CPHD and the City respectfully request that the Honorable Administrative Law Judge enter an order granting the instant Motion for Partial Summary Judgment and entering judgment in their favor as set forth above and in the attached proposed order and as follows:

1) The Commission finds that UGI has relocated the gas meters located at properties identified in Exhibit 1 to this Motion in violation of the safety provisions of 52 Pa. Code § 59.18(a)(8)(i) and that the current placement of such meters amounts to a violation of § 59.18.

2) UGI is hereby ORDERED and DIRECTED to relocate all gas meters located at the properties identified in Exhibit 1 to this Motion from their current locations to an alternate location that does not violate 52 Pa. Code § 59.18 within 60 days of this Order. In relocating said meters, UGI shall ensure that the relocated meters are placed in locations which comply, in all respects, with the requirements of § 59.18. In regard to the relocation of meters within any historic district of the City, UGI shall relocate such meters to the interior of structures unless such placement amounts to a specific further safety violation.

B. At least 10 properties contain gas meters violating Section 59.18(a)(8)(v) because they are located “[n]ear building air intakes under local or State building codes.”

21. The City incorporates paragraphs 1 through 20, *supra*, as if fully set forth.

22. Section 59.18(a)(8)(v) prohibits utilities from locating meters and service regulators “[n]ear building air intakes under local or State building codes.” 52 Pa. Code § 59.18(a)(8)(v).

23. At least 17 properties contain gas meters located near building air intakes under local or State building codes. These properties are identified in Slifko Exhibit “A” and the accompanying photographs, which show each meter and its location.

24. The photographs speak for themselves. There are no material facts in dispute with respect to the location of the gas meters near building air intakes, in violation of Section

59.18(a)(8)(v). The relevant photographs are in section A-2 of Slifko Exhibit A and highlighted in the matrices in blue.

25. The City and CPHD are entitled to judgment in their favor as a matter of law, on since the location of the meters on the properties identified in Slifko Exhibit "A" and further attached hereto as Exhibit 2 violate the placement requirements clearly set forth under Section 59.18(a)(8)(v).

WHEREFORE, CPHD and the City respectfully request that the Honorable Administrative Law Judge enter an order granting the instant Motion for Partial Summary Judgment and entering judgment in their favor as set forth above and in the attached proposed order and as follows:

1) The Commission finds that UGI has relocated the gas meters located at properties identified in Exhibit 2 to this Motion in violation of the safety provisions of 52 Pa. Code § 59.18(a)(8)(v) and that the current placement of such meters amounts to a violation of § 59.18.

2) UGI is hereby ORDERED and DIRECTED to relocate all gas meters located at the properties identified in Exhibit 2 to this Motion from their current locations to an alternate location that does not violate 52 Pa. Code § 59.18 within 60 days of this Order. In relocating said meters, UGI shall ensure that the relocated meters are placed in locations which comply, in all respects, with the requirements of § 59.18. In regard to the relocation of meters within any historic district of the City, UGI shall relocate such meters to the interior of structures unless such placement amounts to a specific further safety violation.

C. At least 14 properties contain gas meters violating Section 59.18(a)(8)(vi) because they are located "[i]n contact with soil or other potentially corrosive materials."

26. The City and CPHD incorporate paragraphs 1 through 25, *supra*, as if fully set forth.

27. Section 59.18(a)(8)(vi) prohibits utilities from locating meters and service regulators “[i]n contact with soil or other potentially corrosive materials.” 52 Pa. Code § 59.18(a)(8)(vi).

28. Of the properties surveyed by the City, 14 properties are identified as having verifiable gas meters located in contact with soil or other potentially corrosive materials. These properties are identified Slifko Exhibit “A,” along with a photograph of each meter showing its location. A list of the addresses of these properties is attached to this Motion as Exhibit 3.

29. The photographs speak for themselves. There are no material facts in dispute with respect to the location of the gas meters in contact with soil or other potentially corrosive materials. The relevant photographs are in section A-3 of Slifko Exhibit A and highlighted in the matrices in beige.

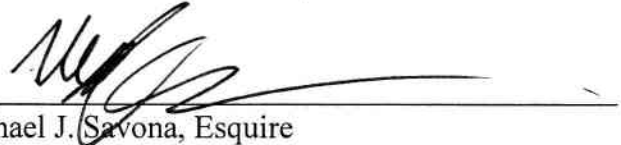
30. The City and CPHD are entitled to judgment in their favor as a matter of law since the location of the meters on the properties identified in Slifko Exhibit “A” violate the placement requirements clearly set forth under Section 59.18(a)(8)(vi) and further attached hereto as Exhibit 3.

WHEREFORE, CPHD and the City respectfully request that the Honorable Administrative Law Judge enter an order granting the instant Motion for Partial Summary Judgment and entering judgment in their favor as set forth above and in the attached proposed order and as follows:

- 1) The Commission finds that UGI has relocated the gas meters located at properties identified in Exhibit 3 to this Motion in violation of the safety provisions of 52 Pa. Code § 59.18(a)(8)(vi) and that the current placement of such meters amounts to a violation of § 59.18.

2) UGI is hereby ORDERED and DIRECTED to relocate all gas meters located at the properties identified in Exhibit 3 to this Motion from their current locations to an alternate location that does not violate 52 Pa. Code § 59.18 within 60 days of this Order. In relocating said meters, UGI shall ensure that the relocated meters are placed in locations which comply, in all respects, with the requirements of § 59.18. In regard to the relocation of meters within any historic district of the City, UGI shall relocate such meters to the interior of structures unless such placement amounts to a specific further safety violation.

EASTBURN AND GRAY, P.C.



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mpeters@eastburngray.com
mpidgeon@eastburngray.com

Dated: July 6, 2017

VERIFICATION

I, John Slifko, verify that the facts set forth in the foregoing Motion are true and correct to the best of my knowledge, information, and belief.

I further understand that this Verification is made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

Date: July 6, 2017

John Slifko
John Slifko

Exhibit 1: Gas Meters in Violation of 52 Pa. Code § 59.18(a)(8)(i)

- | | | | |
|-----|------------------------------|-----|--------------------------------|
| 1. | 1617 Bern St, Reading, PA | 26. | 1359 Cotton St, Reading, PA |
| 2. | 647 Bingaman St, Reading, PA | 27. | 1408 Cotton St, Reading, PA |
| 3. | 633 Clinton St, Reading, PA | 28. | 1547 Cotton St, Reading, PA |
| 4. | 657 Clinton St, Reading, PA | 29. | 1600 Cotton St, Reading, PA |
| 5. | 671 Clinton St, Reading, PA | 30. | 1733 Cotton St, Reading, PA |
| 6. | 514 Chestnut St, Reading, PA | 31. | 1753 Cotton St, Reading, PA |
| 7. | 911 Cotton St, Reading, PA | 32. | 1754 Cotton St, Reading, PA |
| 8. | 927 Cotton St, Reading, PA | 33. | 1761 Cotton St, Reading, PA |
| 9. | 939 Cotton St, Reading, PA | 34. | 1817 Cotton St, Reading, PA |
| 10. | 945 Cotton St, Reading, PA | 35. | 1825 Cotton St, Reading, PA |
| 11. | 953 Cotton St, Reading, PA | 36. | 603 Eisenbrown St, Reading, PA |
| 12. | 955 Cotton St, Reading, PA | 37. | 609 Eisenbrown St, Reading, PA |
| 13. | 1032 Cotton St, Reading, PA | 38. | 613 Eisenbrown St, Reading, PA |
| 14. | 1047 Cotton St, Reading, PA | 39. | 652 Eisenbrown St, Reading, PA |
| 15. | 1121 Cotton St, Reading, PA | 40. | 656 Eisenbrown St, Reading, PA |
| 16. | 1125 Cotton St, Reading, PA | 41. | 658 Eisenbrown St, Reading, PA |
| 17. | 1135 Cotton St, Reading, PA | 42. | 664 Eisenbrown St, Reading, PA |
| 18. | 1136 Cotton St, Reading, PA | 43. | 666 Eisenbrown St, Reading, PA |
| 19. | 1205 Cotton St, Reading, PA | 44. | 809 Gordon St, Reading, PA |
| 20. | 1221 Cotton St, Reading, PA | 45. | 818 Gordon St, Reading, PA |
| 21. | 1259 Cotton St, Reading, PA | 46. | 819 Gordon St, Reading, PA |
| 22. | 1317 Cotton St, Reading, PA | 47. | 1200 Hampden Blvd, Reading, PA |
| 23. | 1333 Cotton St, Reading, PA | 48. | 135 Hudson St, Reading, PA |
| 24. | 1341 Cotton St, Reading, PA | 49. | 517 Laurel St, Reading, PA |
| 25. | 1343 Cotton St, Reading, PA | 50. | 527 Laurel St, Reading, PA |

51. 1320 Linden St, Reading, PA
52. 517 Minor St, Reading, PA
53. 107 Mulberry St, Reading, PA
54. 805 N 10th St, Reading, PA
55. 813 N 10th St, Reading, PA
56. 820 N 10th St, Reading, PA
57. 830 N 10th St, Reading, PA
58. 832 N 10th St, Reading, PA
59. 848 N 10th St, Reading, PA
60. 900 N 10th St, Reading, PA
61. 908 N 10th St, Reading, PA
62. 916 N 10th St, Reading, PA
63. 1001 N 10th St, Reading, PA
64. 1002 N 10th St, Reading, PA
65. 1007 N 10th St, Reading, PA
66. 1011 N 10th St, Reading, PA
67. 1012 N 10th St, Reading, PA
68. 1018 N 10th St, Reading, PA
69. 1040 N 10th St, Reading, PA
70. 1050 N 10th St, Reading, PA
71. 1056 N 10th St, Reading, PA
72. 1058 N 10th St, Reading, PA
73. 1113 N 10th St, Reading, PA
74. 1126 N 10th St, Reading, PA
75. 1128 N 10th St, Reading, PA
76. 1155 N 10th St, Reading, PA
77. 1159 N 10th St, Reading, PA
78. 1202 N 10th St, Reading, PA
79. 1204 N 10th St, Reading, PA
80. 1205 N 10th St, Reading, PA
81. 1206 N 10th St, Reading, PA
82. 1207 N 10th St, Reading, PA
83. 1208 N 10th St, Reading, PA
84. 1216 N 10th St, Reading, PA
85. 1240 N 10th St, Reading, PA
86. 1242 N 10th St, Reading, PA
87. 1257 N 10th St, Reading, PA
88. 1332 N 10th St, Reading, PA
89. 1338 N 10th St, Reading, PA
90. 1346 N 10th St, Reading, PA
91. 1354 N 10th St, Reading, PA
92. 1357 N 10th St, Reading, PA
93. 1406 N 10th St, Reading, PA
94. 1408 N 10th St, Reading, PA
95. 1412 N 10th St, Reading, PA
96. 1420 N 10th St, Reading, PA
97. 1437 N 10th St, Reading, PA
98. 1441 N 10th St, Reading, PA
99. 1445 N 10th St, Reading, PA
100. 1450 N 10th St, Reading, PA
101. 1453 N 10th St, Reading, PA
102. 1456 N 10th St, Reading, PA

103. 1462 N 10th St, Reading, PA
104. 1500 N 10th St, Reading, PA
105. 1504 N 10th St, Reading, PA
106. 1506 N 10th St, Reading, PA
107. 1510 N 10th St, Reading, PA
108. 1512 N 10th St, Reading, PA
109. 1561 N 10th St, Reading, PA
110. 1568 N 10th St, Reading, PA
111. 1644 N 10th St, Reading, PA
112. 1646 N 10th St, Reading, PA
113. 1648 N 10th St, Reading, PA
114. 1649 N 10th St, Reading, PA
115. 1657 N 10th St, Reading, PA
116. 1664 N 10th St, Reading, PA
117. 1666 N 10th St, Reading, PA
118. 1649 N 10th St, Reading, PA
119. 516 N 10th St, Reading, PA
120. 525 N 10th St, Reading, PA
121. 646 N 10th St, Reading, PA
122. 729 N 10th St, Reading, PA
123. 732 N 10th St, Reading, PA
124. 1663 N 10th St, Reading, PA
125. 1139 N 13th St, Reading, PA
126. 1164 N 13th St, Reading, PA
127. 1307 N 13th St, Reading, PA
128. 1400 N 13th St, Reading, PA
129. 419 Oley St, Reading, PA
130. 1816 Olive St, Reading, PA
131. 1931 Olive St, Reading, PA
132. 107 S 4th St, Reading, PA
133. 108 S 4th St, Reading, PA
134. 110 S 4th St, Reading, PA
135. 116 S 4th St, Reading, PA
136. 136 S 4th St, Reading, PA
137. 200 S 4th St, Reading, PA
138. 202 S 4th St, Reading, PA
139. 204 S 4th St, Reading, PA
140. 207 S 4th St, Reading, PA
141. 209 S 4th St, Reading, PA
142. 215 S 4th St, Reading, PA
143. 219 S 4th St, Reading, PA
144. 225 S 4th St, Reading, PA
145. 232 S 4th St, Reading, PA
146. 252 S 4th St, Reading, PA
147. 303 S 4th St, Reading, PA
148. 339 S 4th St, Reading, PA
149. 343 S 4th St, Reading, PA
150. 409 S 4th St, Reading, PA
151. 310 N 5th St, Reading, PA
152. 319 N 5th St, Reading, PA
153. 321 N 5th St, Reading, PA
154. 323 N 5th St, Reading, PA

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|------|---------------------------------|------|---------------------------------|
| 155. | 331 N 5th St, Reading, PA | 173. | 630 Thorn St, Reading, PA |
| 156. | 336 N 5th St, Reading, PA | 174. | 534 Tulpehocken St, Reading, PA |
| 157. | 417 S 5th St, Reading, PA | 175. | 552 Tulpehocken St, Reading, PA |
| 158. | 614 S 7th St, Reading, PA | 176. | 146 W Green St, Reading, PA |
| 159. | 508 Schuylkill Ave, Reading, PA | 177. | 158 W Green St, Reading, PA |
| 160. | 540 Schuylkill Ave, Reading, PA | 178. | 178 W Green St, Reading, PA |
| 161. | 546 Schuylkill Ave, Reading, PA | 179. | 182 W Green St, Reading, PA |
| 162. | 631 Schuylkill Ave, Reading, PA | 180. | 186 W Green St, Reading, PA |
| 163. | 633 Schuylkill Ave, Reading, PA | 181. | 188 W Green St, Reading, PA |
| 164. | 634 Schuylkill Ave, Reading, PA | 182. | 194 W Green St, Reading, PA |
| 165. | 637 Schuylkill Ave, Reading, PA | 183. | 260 W Oley St, Reading, PA |
| 166. | 639 Schuylkill Ave, Reading, PA | 184. | 478 W Oley St, Reading, PA |
| 167. | 718 Schuylkill Ave, Reading, PA | 185. | 127 W Windsor St, Reading, PA |
| 168. | 724 Schuylkill Ave, Reading, PA | 186. | 148 W Windsor St, Reading, PA |
| 169. | 728 Schuylkill Ave, Reading, PA | 187. | 150 W Windsor St, Reading, PA |
| 170. | 742 Schuylkill Ave, Reading, PA | 188. | 154 W Windsor St, Reading, PA |
| 171. | 808 Schuylkill Ave, Reading, PA | 189. | 163 W Windsor St, Reading, PA |
| 172. | 434 Spring St, Reading, PA | | |

Exhibit 2: Gas Meters in Violation of 52 Pa. Code § 59.18(a)(8)(v)

1. 1234 Alsace Rd, Reading, PA
2. 1034 N 10th St, Reading, PA
3. 638 N 10th St, Reading, PA
4. 1708 Olive St, Reading, PA
5. 1710 Olive St, Reading, PA
6. 823 Schuylkill Ave, Reading, PA
7. 731 Thorn St, Reading, PA
8. 523 Tulpehocken St, Reading, PA
9. 527 Tulpehocken St, Reading, PA
10. 1032 Weiser St, Reading, PA

Exhibit 3: Gas Meters in Violation of 52 Pa. Code § 59.18(a)(8)(vi)

1. 454 Douglass St, Reading, PA
2. 746 Gordon St, Reading, PA
3. 1102 Hampden Blvd, Reading, PA
4. 1316 N 14th St, Reading, PA
5. 1516 N 15th St, Reading, PA
6. 726 N 2nd St, Reading, PA
7. 947 N 5th St, Reading, PA
8. 1034 N 5th St, Reading, PA
9. 1037 N 5th St, Reading, PA
10. 1041 N 5th St, Reading, PA
11. 1421 Palm St, Reading, PA
12. 1503 Palm St, Reading, PA
13. 1020 Weiser St, Reading, PA
14. 1040 Weiser St, Reading, PA

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*Attorneys for Centre Park Historic
District, Inc. and City of Reading*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CENTRE PARK HISTORIC DISTRICT, :
INC. :
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vs. : Docket No. C-2015-2516051
 :
UGI UTILITIES, INC. :

CITY OF READING, :
 :
v. : Docket No. C-2016-2530475
 :
UGI UTILITIES, INC. :

**BRIEF IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT
OF THE CENTRE PARK HISTORIC DISTRICT, INC. AND CITY OF READING**

The Centre Park Historic District (“CPHD”) and the City of Reading (the “City”), by and through its attorneys, Eastburn and Gray, P.C., and Michael J. Savona, Esquire, Michael E. Peters, Esquire, and Michael T. Pidgeon, Esquire, files this Brief in Support of their Motion for Partial Summary Judgment pursuant to 52 Pa. Code § 5.102 and 5.501.

I. CONCISE STATEMENT OF THE CASE

The City and CPHD file this Motion for Partial Summary Judgment to correct obvious and indisputable violations of the gas meter safety standards required under 52 Pa. Code § 59.18 by UGI Utilities, Inc. (“UGI”), relating to the relocation and installation of residential gas meters in historic districts in the City of Reading as well as generally throughout the City. In filing the instant Motion , the City seeks specific relief for meter placements which clearly and unambiguously violate pertinent regulatory requirements, and to which there is no dispute regarding the facts or law entitling the City and CPHD to the requested relief. The PUC should immediately Order UGI to correct these violations.

II. PROCEDURAL HISTORY

On November 25, 2015, CPHD filed a formal complaint which alleged that UGI violated Section 59.18 of the Commission’s regulations, 52 Pa. Code § 59.18, regarding the placement of meters in the historic districts of the City of Reading. UGI filed an answer to CPHD’s formal complaint on December 15, 2015.

On February 17, 2016, the City filed a formal complaint against UGI, also challenging UGI’s meter relocation program within the City’s historic districts on the basis that UGI violated Section 59.18. The City also challenged UGI’s outside meter placements on the basis that UGI placed meters in dangerous locations/conditions, in violation of Section 59.18 and 49 CFR § 192.353. More specifically, in its formal complaint the City:

- a. Challenged UGI’s meter relocation program on the basis that UGI has placed meters in dangerous locations/conditions in violation of Section 59.18 and 49 CFR § 192.353.

- b. Sought a determination regarding the breadth of Section 59.18's requirements regarding exterior meter placement in light of the City's powers to regulate and protect historic resources.

UGI filed an answer to the City's formal complaint on March 14, 2016, as well as preliminary objections which were denied by interim order dated March 29, 2016. The formal complaints of CPHD and the City were consolidated by order dated March 30, 2016. UGI then filed a Petition for Interlocutory Review, and by Opinion and Order dated February 9, 2017, the PUC denied that application.

By her Sixth Prehearing Order dated March 21, 2017, the Honorable Mary D. Long ordered the City and CPHD to prepare a spreadsheet listing the meters contested by the City, and indicating (1) the date a permit was issued, if any, by the City and (2) the date the meter was relocated. The prehearing order directed UGI to respond and either stipulate or object to the data provided. The City and CPHD were excused from providing "the date the meter was relocated" by the Eighth Prehearing Order in this matter, on the basis that they did not have sufficient information to provide the date. The Eighth Prehearing Order directed UGI to provide the date of service line installation for each of the contested meters.

The City and CPHD served their spreadsheet containing the contested meters on April 27, 2017 (the "Matrix"). UGI filed its objections/stipulations to the City's data on May 15, 2017 and provided additional data reflecting (1) the date service was installed and (2) providing additional permit data, if available. The City filed its objections/stipulations to UGI's response on May 24, 2017. The City has now identified a specific number of meters drawn from that Matrix as being appropriate for summary judgment and has attached a highlighted version of the Matrix to the Affidavit of Councilman John Slifko, submitted in support of the instant Motion..

Discovery in this matter has closed, and certain issues are ready for disposition, there being no genuine issue of material fact in dispute with regard to the questions presented in this motion.

III. STATEMENT OF FACTS

After the Commission issued its Final Rulemaking Order and amended Section 59.18, UGI began to undertake certain “betterment” projects within the City in order to comply with the new PUC regulation. (Slifko Aff., ¶ 2). UGI has replaced gas mains and laterals and moved meters outside of buildings both within and outside of historic districts. (Slifko Aff., ¶ 3). In its rush to relocate meters to the outside of properties, UGI has failed to consider inside meter placement (a fact not at issue in this motion), but has also relocated meters to locations which violate safety regulations contained within Section 59.18, to wit:

1. UGI located meters on at least 289 properties beneath or in front of windows or other building openings that may directly obstruct emergency fire exits. *See* Section 59.18(a)(8)(i). (Slifko Aff., Ex. A and A-1).
2. UGI located meters on at least 10 properties near building air intakes under local or State building codes. *See* Section 59.18(a)(8)(v). (Slifko Aff., Ex. A and A-2)
4. UGI by located gas meters on at least 14 properties in contact with soil or other potentially corrosive materials. *See* Section 59.18(a)(8)(vi). (Slifko Aff., Ex. A and A-3).

The Matrix compiled in this matter documents, *inter alia*, all of the foregoing violations. While the City’s Formal Complaint identifies additional violations and issues, the City and CPHD have limited this Motion to the properties and meters specifically identified herein, as the photographs and evidence produced to date clearly establish that UGI violated Section 59.18 in the placement of the foregoing 313 meters and the obvious violations merit summary judgment

in favor of the City and CPHD. The photographs documenting the violations are attached to the Affidavit of Councilman John Slifko as Exhibit "A."

IV. QUESTIONS PRESENTED

A. Whether UGI violated Section 59.18 by locating meters in dangerous locations, and specifically:

1. Whether UGI violated Section 59.18(a)(8)(i) by locating meters on 289 properties beneath or in front of windows or other building openings that may directly obstruct emergency fire exits?
2. Whether UGI violated Section 59.18(a)(8)(v) by locating meters on 10 properties near building air intakes under local or State building codes?
3. Whether UGI violated Section 59.18(a)(8)(vi) by locating gas meters on 14 properties in contact with soil or other potentially corrosive materials?

[Suggested Answer: **Yes.**]

V. ARGUMENT

A. Summary of Argument

The argument presented in this motion is straightforward and simple. In sum, City and CPHD contend that UGI violated Section 59.18(a)(8) by installing meters: 1) under windows; 2) near building air intakes; and 3) in contact with soil or other corrosive material. The City and CPHD request that the Commission grant summary relief regarding the contested meters and order UGI to remedy these obvious violations, which are based on undisputable facts and a clear legal obligation.

B. Summary Judgment Standard

Section 5.102 of the Commission's regulations, 52 Pa. Code §§ 5.102(d)(1), (2). provide the standard of review for summary judgment motions, as follows:

- (1) *Standard for grant or denial on all counts.* The presiding officer will grant or deny a motion for judgment on the pleadings or a motion for summary judgment, as appropriate. The judgment sought will be rendered if the applicable pleadings, depositions, answers to interrogatories and admissions, together with affidavits, if any, show that there is no genuine issue as to a material fact and that the moving party is entitled to a judgment as a matter of law.
- (2) *Standard for grant or denial in part.* The presiding officer may grant a partial summary judgment if the pleadings, depositions, answers to interrogatories and admissions, together with affidavits, if any, show that there is no genuine issue as to a material fact and that the moving party is entitled to judgment as a matter of law on one or more but not all outstanding issues.

52 Pa. Code §§ 5.102(d)(1), (2).

A hearing is necessary only to resolve disputed questions of fact, and when the question is one of law, the Commission need not hold a hearing. *Lehigh Valley Power Comm'n. v. Pa. Pub. Util. Comm'n.*, 563 A.2d 5448 (Pa. Commw. Ct. 1989); *Edan Transp. Corp. v. Pa. Public Utility Comm'n.*, 623 A.2d 6 (Pa. Commw. Ct. 1993). Based upon the foregoing, the City and CPHD have a clear right to partial summary judgment.

C. UGI violated Section 59.18 by locating meters in dangerous locations prohibited by Section 59.18(a)(8).

UGI violated the terms of Section 59.18 by locating meters in dangerous locations. The Affidavit of John Slifko, which incorporates a chart of the violations of Section 59.18 as outlined above along with corresponding pictures of the violations, clearly establishes the violations

detailed in the City and CPHD Motion for Partial Summary Judgment. This evidence clearly establishes the violations alleged by the City and CPHD, and provides the Commission with sufficient basis to conclude that the City and CPHD are entitled to judgment as a matter of law. No hearing is required to establish the violations attendant to the placement of the contested meters where, as here, there is clear photographic evidence of the respective violations of Section 59.18 which exist as a result of UGI's meter installation at the subject properties. The photographs speak for themselves, and clearly establish the violations referenced.

VI. CONCLUSION

In consideration of the foregoing, the City and CPHD respectfully request summary judgment in their favor as set forth in the Motion for Partial Summary Judgment and proposed form of Order.

Respectfully submitted,

EASTBURN & GRAY, PC

BY: 

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Pa ID# 78076

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Pa ID# 314266

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Pa ID# 315147

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Dated: July 6, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Centre Park Historic District, Inc.	:	
	:	
v.	:	C-2015-2516051
	:	
UGI Utilities, Inc. – Gas Division	:	
	:	
City of Reading	:	
	:	
v.	:	C-2016-2530475
	:	
UGI Utilities, Inc.	:	

ORDER

On November 25, 2015, the Centre Park Historic District, Inc. (CPHD) filed a formal complaint which alleged that UGI Utilities, Inc. – Gas Division (UGI), violated the Commission’s regulation regarding the placement of meters in historic districts of Reading, Pennsylvania. 52 Pa.Code § 59.18. UGI filed an answer denying the material allegations of the complaint on December 15, 2015. It is UGI’s position that Section 59.18 grants it discretion in the placement of meters in historic areas and that its actions have been appropriate as required by the Public Utility Code.

On February 17, 2016, the City of Reading filed a formal complaint against UGI Utilities, Inc. (UGI), challenging UGI’s placement of meters in historic districts as well as the outside placement of meters in unsafe locations in other districts of the city. On March 14, 2016, UGI filed an answer denying the material allegations of the complaint and also preliminary objections seeking dismissal of the complaint. The City of Reading filed an answer to the preliminary objections on March 24, 2016. By interim order dated March 29, 2016, the

preliminary objections were denied. The complaints of CPHD and the City of Reading (Complainants) were consolidated by order entered March 30, 2016.

On July 6, 2017, CPHD and the City of Reading filed a Motion for Summary Judgment requesting relief ordering UGI to relocate meters that violate certain safety provisions under 52 Pa.Code § 59.18.

THEREFORE,

IT IS ORDERED:

- 1) Complainants' Motion for Partial Summary Judgment is GRANTED.
- 2) The Commission finds that UGI has relocated the gas meters located at properties identified in Exhibit 1 to this Order in violation of the safety provisions of 52 Pa. Code § 59.18(a)(8)(i) and that the current placement of such meters amounts to a violation of § 59.18.
- 3) The Commission finds that UGI has relocated the gas meters located at properties identified in Exhibit 2 to this Order in violation of the safety provisions of 52 Pa. Code § 59.18(a)(8)(v) and that the current placement of such meters amounts to a violation of § 59.18.
- 4) The Commission finds that UGI has relocated the gas meters located at properties identified in Exhibit 3 to this Order in violation of the safety provisions of 52 Pa. Code § 59.18(a)(8)(vi) and that the current placement of such meters amounts to a violation of § 59.18.
- 5) UGI is hereby ORDERED and DIRECTED to relocate all gas meters located at the properties identified in Exhibits 1, 2 and 3 to this Order from their current locations to an alternate location that does not violate 52 Pa. Code § 59.18 within 60 days of the date of this Order. In relocating said meters, UGI shall insure that the relocated meters are placed in locations which comply, in all respects, with the requirements of Section 59.18. In regard to the relocation of meters within any historic district of the City, UGI

shall relocate such meters to the interior of structures unless such placement amounts to a specific further safety violation.

Date:

Mary D. Long
Administrative Law Judge

C-2015-2516051 - CENTRE PARK HISTORIC DISTRICT INC v. UGI UTILITIES INC

C-2016-2530475 - CITY OF READING v. UGI UTILITIES, INC.

Revised 6/15/17

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Exhibit 1: Gas Meters in Violation of 52 Pa. Code § 59.18(a)(8)(i)

- | | | | |
|-----|------------------------------|-----|--------------------------------|
| 1. | 1617 Bern St, Reading, PA | 26. | 1359 Cotton St, Reading, PA |
| 2. | 647 Bingaman St, Reading, PA | 27. | 1408 Cotton St, Reading, PA |
| 3. | 633 Clinton St, Reading, PA | 28. | 1547 Cotton St, Reading, PA |
| 4. | 657 Clinton St, Reading, PA | 29. | 1600 Cotton St, Reading, PA |
| 5. | 671 Clinton St, Reading, PA | 30. | 1733 Cotton St, Reading, PA |
| 6. | 514 Chestnut St, Reading, PA | 31. | 1753 Cotton St, Reading, PA |
| 7. | 911 Cotton St, Reading, PA | 32. | 1754 Cotton St, Reading, PA |
| 8. | 927 Cotton St, Reading, PA | 33. | 1761 Cotton St, Reading, PA |
| 9. | 939 Cotton St, Reading, PA | 34. | 1817 Cotton St, Reading, PA |
| 10. | 945 Cotton St, Reading, PA | 35. | 1825 Cotton St, Reading, PA |
| 11. | 953 Cotton St, Reading, PA | 36. | 603 Eisenbrown St, Reading, PA |
| 12. | 955 Cotton St, Reading, PA | 37. | 609 Eisenbrown St, Reading, PA |
| 13. | 1032 Cotton St, Reading, PA | 38. | 613 Eisenbrown St, Reading, PA |
| 14. | 1047 Cotton St, Reading, PA | 39. | 652 Eisenbrown St, Reading, PA |
| 15. | 1121 Cotton St, Reading, PA | 40. | 656 Eisenbrown St, Reading, PA |
| 16. | 1125 Cotton St, Reading, PA | 41. | 658 Eisenbrown St, Reading, PA |
| 17. | 1135 Cotton St, Reading, PA | 42. | 664 Eisenbrown St, Reading, PA |
| 18. | 1136 Cotton St, Reading, PA | 43. | 666 Eisenbrown St, Reading, PA |
| 19. | 1205 Cotton St, Reading, PA | 44. | 809 Gordon St, Reading, PA |
| 20. | 1221 Cotton St, Reading, PA | 45. | 818 Gordon St, Reading, PA |
| 21. | 1259 Cotton St, Reading, PA | 46. | 819 Gordon St, Reading, PA |
| 22. | 1317 Cotton St, Reading, PA | 47. | 1200 Hampden Blvd, Reading, PA |
| 23. | 1333 Cotton St, Reading, PA | 48. | 135 Hudson St, Reading, PA |
| 24. | 1341 Cotton St, Reading, PA | 49. | 517 Laurel St, Reading, PA |
| 25. | 1343 Cotton St, Reading, PA | 50. | 527 Laurel St, Reading, PA |

51. 1320 Linden St, Reading, PA
52. 517 Minor St, Reading, PA
53. 107 Mulberry St, Reading, PA
54. 805 N 10th St, Reading, PA
55. 813 N 10th St, Reading, PA
56. 820 N 10th St, Reading, PA
57. 830 N 10th St, Reading, PA
58. 832 N 10th St, Reading, PA
59. 848 N 10th St, Reading, PA
60. 900 N 10th St, Reading, PA
61. 908 N 10th St, Reading, PA
62. 916 N 10th St, Reading, PA
63. 1001 N 10th St, Reading, PA
64. 1002 N 10th St, Reading, PA
65. 1007 N 10th St, Reading, PA
66. 1011 N 10th St, Reading, PA
67. 1012 N 10th St, Reading, PA
68. 1018 N 10th St, Reading, PA
69. 1040 N 10th St, Reading, PA
70. 1050 N 10th St, Reading, PA
71. 1056 N 10th St, Reading, PA
72. 1058 N 10th St, Reading, PA
73. 1113 N 10th St, Reading, PA
74. 1126 N 10th St, Reading, PA
75. 1128 N 10th St, Reading, PA
76. 1155 N 10th St, Reading, PA
77. 1159 N 10th St, Reading, PA
78. 1202 N 10th St, Reading, PA
79. 1204 N 10th St, Reading, PA
80. 1205 N 10th St, Reading, PA
81. 1206 N 10th St, Reading, PA
82. 1207 N 10th St, Reading, PA
83. 1208 N 10th St, Reading, PA
84. 1216 N 10th St, Reading, PA
85. 1240 N 10th St, Reading, PA
86. 1242 N 10th St, Reading, PA
87. 1257 N 10th St, Reading, PA
88. 1332 N 10th St, Reading, PA
89. 1338 N 10th St, Reading, PA
90. 1346 N 10th St, Reading, PA
91. 1354 N 10th St, Reading, PA
92. 1357 N 10th St, Reading, PA
93. 1406 N 10th St, Reading, PA
94. 1408 N 10th St, Reading, PA
95. 1412 N 10th St, Reading, PA
96. 1420 N 10th St, Reading, PA
97. 1437 N 10th St, Reading, PA
98. 1441 N 10th St, Reading, PA
99. 1445 N 10th St, Reading, PA
100. 1450 N 10th St, Reading, PA
101. 1453 N 10th St, Reading, PA
102. 1456 N 10th St, Reading, PA

103. 1462 N 10th St, Reading, PA
104. 1500 N 10th St, Reading, PA
105. 1504 N 10th St, Reading, PA
106. 1506 N 10th St, Reading, PA
107. 1510 N 10th St, Reading, PA
108. 1512 N 10th St, Reading, PA
109. 1561 N 10th St, Reading, PA
110. 1568 N 10th St, Reading, PA
111. 1644 N 10th St, Reading, PA
112. 1646 N 10th St, Reading, PA
113. 1648 N 10th St, Reading, PA
114. 1649 N 10th St, Reading, PA
115. 1657 N 10th St, Reading, PA
116. 1664 N 10th St, Reading, PA
117. 1666 N 10th St, Reading, PA
118. 1649 N 10th St, Reading, PA
119. 516 N 10th St, Reading, PA
120. 525 N 10th St, Reading, PA
121. 646 N 10th St, Reading, PA
122. 729 N 10th St, Reading, PA
123. 732 N 10th St, Reading, PA
124. 1663 N 10th St, Reading, PA
125. 1139 N 13th St, Reading, PA
126. 1164 N 13th St, Reading, PA
127. 1307 N 13th St, Reading, PA
128. 1400 N 13th St, Reading, PA
129. 419 Oley St, Reading, PA
130. 1816 Olive St, Reading, PA
131. 1931 Olive St, Reading, PA
132. 107 S 4th St, Reading, PA
133. 108 S 4th St, Reading, PA
134. 110 S 4th St, Reading, PA
135. 116 S 4th St, Reading, PA
136. 136 S 4th St, Reading, PA
137. 200 S 4th St, Reading, PA
138. 202 S 4th St, Reading, PA
139. 204 S 4th St, Reading, PA
140. 207 S 4th St, Reading, PA
141. 209 S 4th St, Reading, PA
142. 215 S 4th St, Reading, PA
143. 219 S 4th St, Reading, PA
144. 225 S 4th St, Reading, PA
145. 232 S 4th St, Reading, PA
146. 252 S 4th St, Reading, PA
147. 303 S 4th St, Reading, PA
148. 339 S 4th St, Reading, PA
149. 343 S 4th St, Reading, PA
150. 409 S 4th St, Reading, PA
151. 310 N 5th St, Reading, PA
152. 319 N 5th St, Reading, PA
153. 321 N 5th St, Reading, PA
154. 323 N 5th St, Reading, PA

155. 331 N 5th St, Reading, PA
156. 336 N 5th St, Reading, PA
157. 417 S 5th St, Reading, PA
158. 614 S 7th St, Reading, PA
159. 508 Schuylkill Ave, Reading, PA
160. 540 Schuylkill Ave, Reading, PA
161. 546 Schuylkill Ave, Reading, PA
162. 631 Schuylkill Ave, Reading, PA
163. 633 Schuylkill Ave, Reading, PA
164. 634 Schuylkill Ave, Reading, PA
165. 637 Schuylkill Ave, Reading, PA
166. 639 Schuylkill Ave, Reading, PA
167. 718 Schuylkill Ave, Reading, PA
168. 724 Schuylkill Ave, Reading, PA
169. 728 Schuylkill Ave, Reading, PA
170. 742 Schuylkill Ave, Reading, PA
171. 808 Schuylkill Ave, Reading, PA
172. 434 Spring St, Reading, PA
173. 630 Thorn St, Reading, PA
174. 534 Tulpehocken St, Reading, PA
175. 552 Tulpehocken St, Reading, PA
176. 146 W Green St, Reading, PA
177. 158 W Green St, Reading, PA
178. 178 W Green St, Reading, PA
179. 182 W Green St, Reading, PA
180. 186 W Green St, Reading, PA
181. 188 W Green St, Reading, PA
182. 194 W Green St, Reading, PA
183. 260 W Oley St, Reading, PA
184. 478 W Oley St, Reading, PA
185. 127 W Windsor St, Reading, PA
186. 148 W Windsor St, Reading, PA
187. 150 W Windsor St, Reading, PA
188. 154 W Windsor St, Reading, PA
189. 163 W Windsor St, Reading, PA

Exhibit 2: Gas Meters in Violation of 52 Pa. Code § 59.18(a)(8)(v)

1. 1234 Alsace Rd, Reading, PA
2. 1034 N 10th St, Reading, PA
3. 638 N 10th St, Reading, PA
4. 1708 Olive St, Reading, PA
5. 1710 Olive St, Reading, PA
6. 823 Schuylkill Ave, Reading, PA
7. 731 Thorn St, Reading, PA
8. 523 Tulpehocken St, Reading, PA
9. 527 Tulpehocken St, Reading, PA
10. 1032 Weiser St, Reading, PA

Exhibit 3: Gas Meters in Violation of 52 Pa. Code § 59.18(a)(8)(vi)

1. 454 Douglass St, Reading, PA
2. 746 Gordon St, Reading, PA
3. 1102 Hampden Blvd, Reading, PA
4. 1316 N 14th St, Reading, PA
5. 1516 N 15th St, Reading, PA
6. 726 N 2nd St, Reading, PA
7. 947 N 5th St, Reading, PA
8. 1034 N 5th St, Reading, PA
9. 1037 N 5th St, Reading, PA
10. 1041 N 5th St, Reading, PA
11. 1421 Palm St, Reading, PA
12. 1503 Palm St, Reading, PA
13. 1020 Weiser St, Reading, PA
14. 1040 Weiser St, Reading, PA

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CENTRE PARK HISTORIC DISTRICT, INC. :
 :
 vs. : Docket No. C-2015-2516051
 :
UGI UTILITIES, INC. :

City of Reading, :
 :
 v. : Docket No. C-2016-2530475
 :
UGI Utilities, Inc. :

CERTIFICATE OF SERVICE

It is hereby certified that on July 6, 2017, Michael T. Pidgeon, Esquire served, by electronic mail and first class mail, postage prepaid, a true and correct copy of the foregoing Motion for Partial Summary Judgment and a supporting brief on the following:

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The Honorable Mary D. Long
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CENTRE PARK HISTORIC DISTRICT, :
INC. :

vs. :

Docket No. C-2015-2516051

UGI UTILITIES, INC. :

CITY OF READING, :

v. :

Docket No. C-2016-2530475

UGI UTILITIES, INC. :

AFFIDAVIT OF JOHN SLIFKO

IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

John Slifko, being duly sworn, hereby deposes and says:

1. I am a member of the City Council of the City of Reading. I am familiar with the facts set forth herein.

2. UGI Utilities, Inc. (“UGI”) has undertaken a number of “betterment” projects in the City of Reading (the “City”).

3. During this process UGI replaced gas mains, laterals, and relocated gas meters from the interior of buildings to the exterior of buildings.

4. UGI has relocated a number of meters from interior to exterior locations both within and outside historic districts in the City of Reading (the “City”).

5. The City has six designated historic districts: the Callowhill Historic District (locally designated), the Centre Park Historic District (locally designated), the Heights Historic District (locally designated), the Prince Historic District (locally designated), the Penn’s Commons Historic District (locally designated), and the Queen Anne Historic District (nationally registered).

6. Between August 2016 and April 2017, I supervised an effort to survey all of the meter relocations in the City’s six historic districts, and selected non-historic areas.

7. I participated in the training of other City employees to do the same.

8. In addition to myself, the City hired five other surveyors: Anita Donatelli, Beth Ireland, Maria Ballas, Melvyn Jacobson, and Nadine Smet-Weiss.

9. After receiving training on the survey instrument, which was targeted at identifying specific violations with regard to 52 Pa. Code § 59.18, each surveyor was given a list of properties where City records indicated UGI had installed gas meters on the exterior of buildings in the historic districts.

10. Surveyors visited each of the properties assigned to them and filled out the survey instrument for each property.

11. While surveyors were reviewing their assigned properties, they also identified additional properties on the same streets where gas meters were found on the exterior of buildings.

12. Each surveyor was provided with a City-owned Amazon Fire tablet device that was capable of taking color photographs.

13. For any property where an exterior meter was found, the surveyor took pictures of the house number; the exterior meter; any specific violations of 59.18 noted on the survey instrument; and any alternative, less intrusive locations for an exterior meter.

14. In some cases this information was captured in a single photograph, and in some cases, multiple photographs were necessary.

15. After the surveyor completed their assigned areas, the surveyor returned the completed survey instrument forms and Amazon Fire to the City Clerk's office, where the pictures were downloaded and transmitted to our legal counsel.

16. Surveys were taken each day from August 19 through August 31, 2016, with additional surveys being performed on April 3, April 4, April 7, and April 12, 2017.

17. I personally surveyed 150 properties in the Centre Park, Heights, Penn's Commons, and Queen Anne Historic Districts, as well as all 673 properties in non-historic areas of the City on August 22, 23, 24, 26, and 27, 2016 and April 3, 4, 7, and 12, 2017.


18. The properties inspected by me as referenced in paragraph 17 are identified in the CITY OF READING GAS METER SURVEY RESULTS MATRIX (Historic District and Non-Historic Properties) attached hereto as Exhibit "A" to this Affidavit. Each meter that I inspected is noted on Exhibit "A," and the photographs identified by Bates number for each meter were

taken by me as a part of the survey of each property. These photographs are attached as part of Exhibit A.

19. Some of the most urgent violations that need to be addressed are safety violations. For the purposes of this affidavit, I have attached a spreadsheet with accompanying photographs documenting individual properties and the locations to which UGI relocated their gas meters as Exhibit "A."

20. I either personally took the photographs in these pictures or am familiar with the properties and current conditions thereon and verify that the photographs are a fair and accurate depiction of the properties and current conditions thereon. True and correct copies of these photographs are attached hereto as part of Exhibit "A", as Exhibits A-1, A-2, and A-3.

21. I am authorized to make this Affidavit on behalf of the City of Reading, being the holder of the office of City Councilman, and that the facts set forth above are true and correct to the best of my knowledge, information, and belief.



John Slifko


Sworn to and subscribed to me

this 5 day of July 2017.


Notary Public

My Commission Expires
COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Linda A. Kelleher, Notary Public
City of Reading, Berks County
My Commission Expires April 17, 2020
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Exhibit A-1

**Gas Meters in Violation of
52 Pa. Code § 59.18(a)(8)(i)**

Historic District – Meter Under a Window

1200 Hampden Blvd Reading

_02516 _02516



CityCPHD_02516

Historic District – Meter Under a Window

1139 N 13th St Reading _02545 _02545



CityCPHD_02545

Historic District – Meter Under a Window

1164 N 13th St Reading _02565 _02565



CityCPHD_02565

Historic District – Meter Under a Window

1307 N 13th St Reading _02585 _02586





CINCPHO_02586

Historic District – Meter Under a Window

1931 Olive St Reading

_02870 _02870



Historic District – Meter Under a Window

630 Thorn St Reading

_02920 _02922



630

CityCPHD_08920



CityCPHD_02921



Historic District – Meter Under a Window

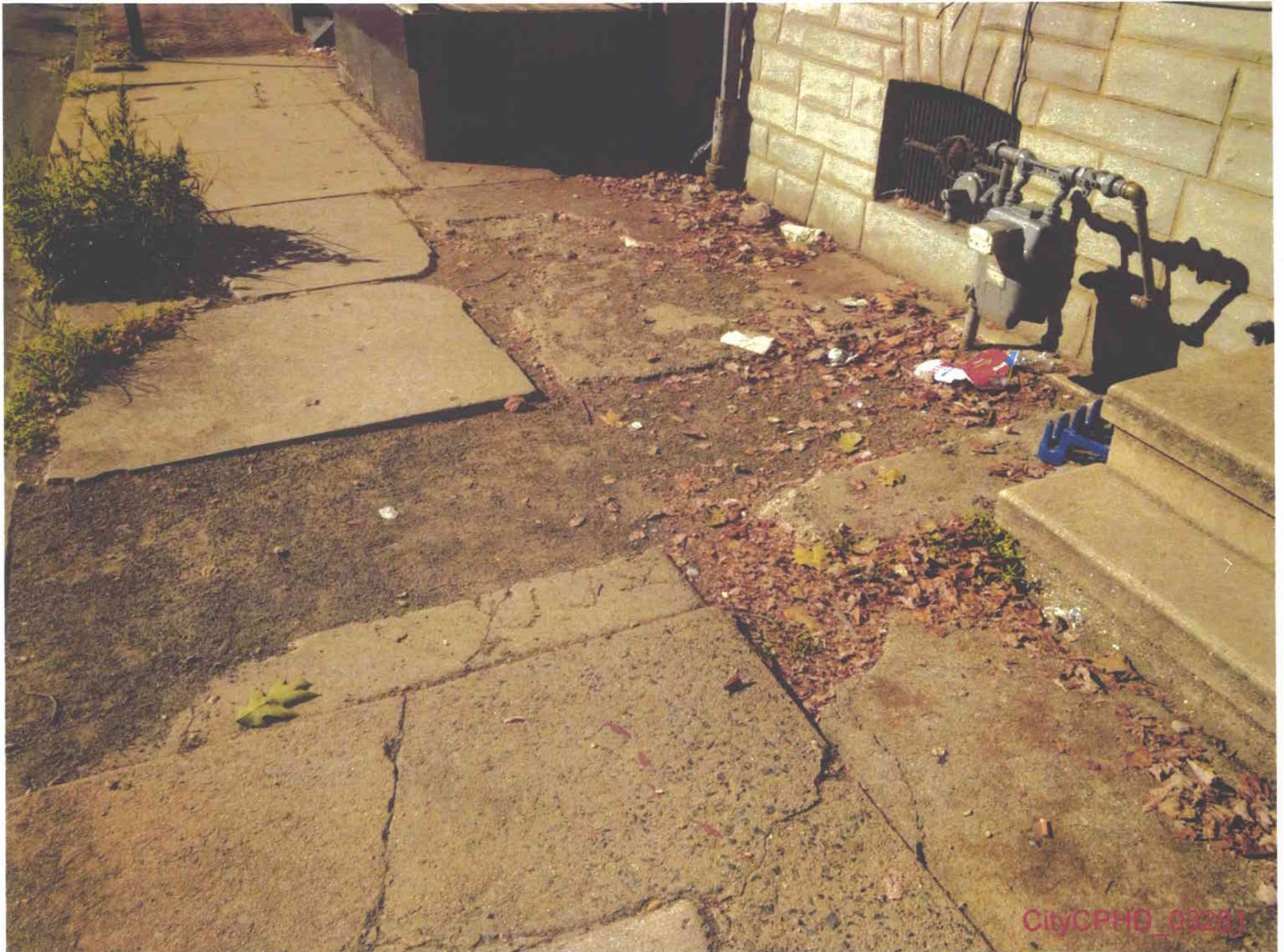
508 Schuylkill Ave Reading _03279 _03281



CityCPHD_03279



CityCPHD_03280



Historic District – Meter Under a Window

540 Schuylkill Ave Reading _03290 _03293



CityCPHD_03290



CityCPHD_03291



CityCPHD_03292



CityCPHD_03293

Historic District – Meter Under a Window

546 Schuylkill Ave Reading _03294 _03296



CityCPHD_03294



CityCPHD_03295



CityCPHD_03296

Historic District – Meter Under a Window

631 Schuylkill Ave Reading _03311 _03313

631

CITYCPHD_03311



631

CityCPHD_03312



CityCPHD_03313

Historic District – Meter Under a Window

633 Schuylkill Ave Reading _03314 _03315



633

635

CityCPHD_03314



CityCPHD_03316

Historic District – Meter Under a Window

637 Schuylkill Ave Reading _03319 _03321



637

LOS
Y TAMALES
COMIDA, C.A.

FOR
RENT

FOR
RENT

CityCPHD_03319



637

**Weichert
Realtors**

Neighborhood One
484-525-0112
www.NeighborhoodOne.com

FOR
RENT

FOR
RENT

CityCPHD_03320



CityCPHD_03321

Historic District – Meter Under a Window

639 Schuylkill Ave Reading _03322 _03324



CityCPHD_03322



CityCPHD_03323



CityCPHD_03324

Historic District – Meter Under a Window

634 Schuylkill Ave Reading _03331 _03334

634

BEWARE
OF DOG

CityCRHD_03331



637

BEWARE
DOG

CityCPHD_03332



CityCPHD_03333



CityCPHD_03334

Historic District – Meter Under a Window

718 Schuylkill Ave Reading _03354 _03354



CityCPHD_03354

Historic District – Meter Under a Window

724 Schuylkill Ave Reading _03355 _03357



CIYCPHD_03355



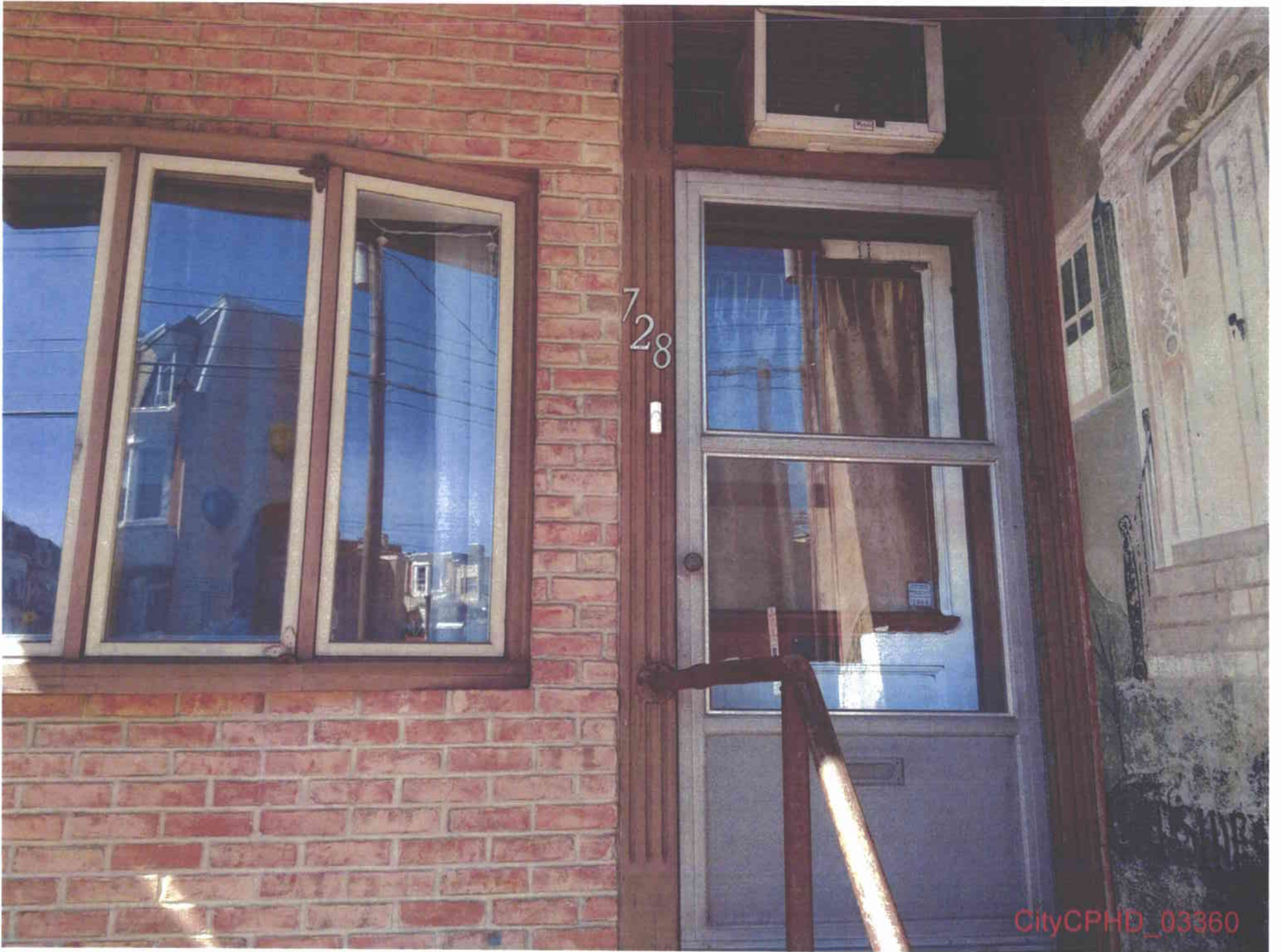
CITYCPHD 08356



CityCPHD_0335T

Historic District – Meter Under a Window

728 Schuylkill Ave Reading _03360 _03363



728

CityCPHD_03360



CityCPHD_03361



CityCPHD_03362



CityCPHD_03363

Historic District – Meter Under a Window

742 Schuylkill Ave Reading _03367 _03367



CityCPHD_03367

Historic District – Meter Under a Window

808 Schuylkill Ave Reading _03407 _03408



CityCPHD_03407



CityCPHD_03408

Historic District – Meter Under a Window

809 Gordon St Reading _03600 _03601

809

809

CityCPHD_03600





CityCPHD_03601

Historic District – Meter Under a Window

818 Gordon St Reading _03610 _03612



CityCPHD_03610



CityCPHD_03611



CityCPHD_03612

Historic District – Meter Under a Window

819 Gordon St Reading _03613 _03616



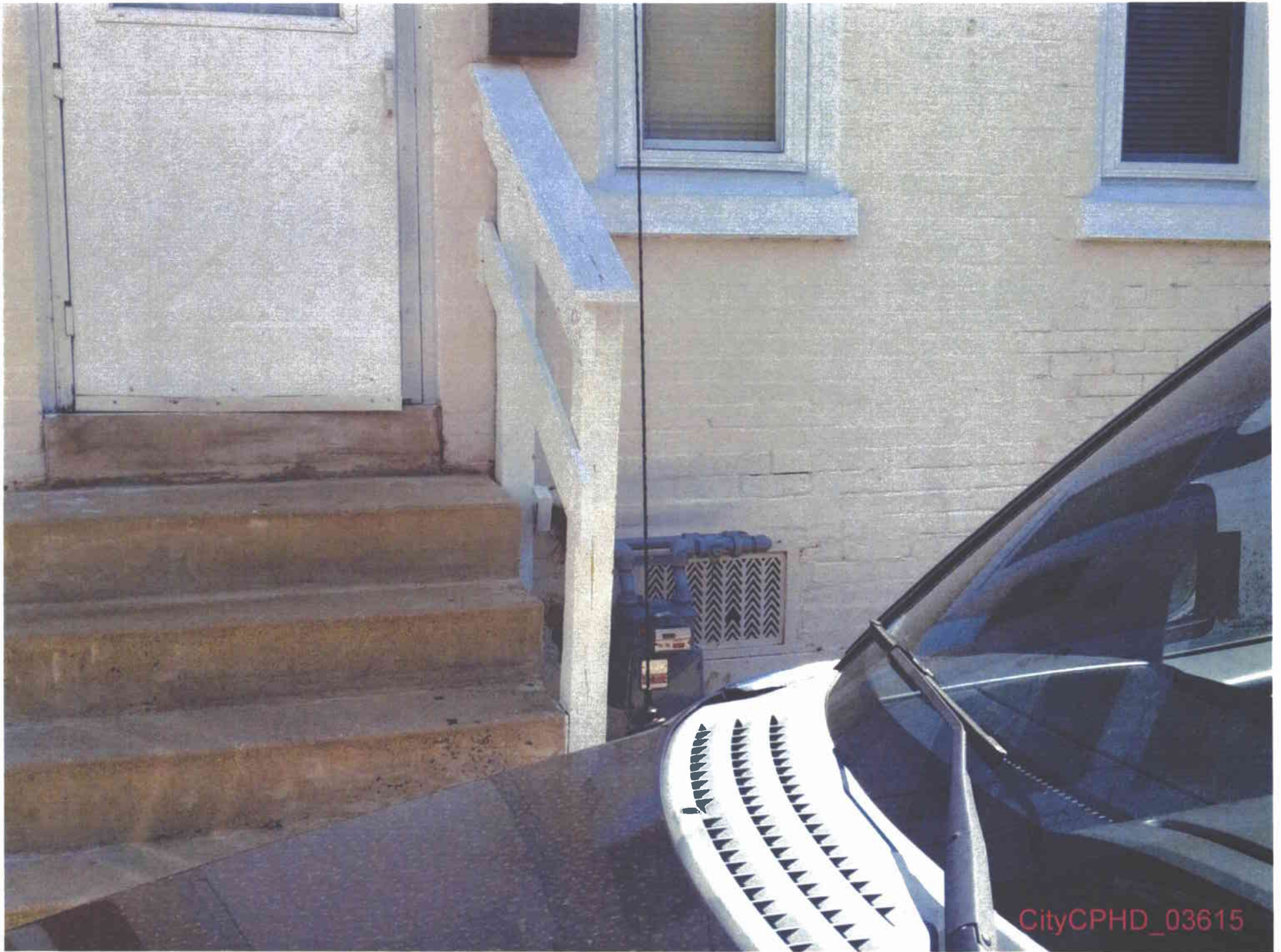
819

819

CityCPHD_03613



CityGPHD_03614



CityCPHD_03615



CityCPHD_03616

Historic District – Meter Under a Window

666 Eisenbrown St Reading _03631 _03631



CityCPHD_03631

Historic District – Meter Under a Window

664 Eisenbrown St Reading _03632 _03632



662

664

6
6
2

CityCPHD_03632

Historic District – Meter Under a Window

658 Eisenbrown St Reading _03633 _03634



658

CityCPHD_03633



CityCPHD_03634

Historic District – Meter Under a Window

656 Eisenbrown St Reading _03635 _03639



656

CityCPHD_03635



CityCPHD_03636



CityCPHD_03637



CITYCPHD_03638



CityCPHD_03639

Historic District – Meter Under a Window

652 Eisenbrown St Reading _03640 _03642



652

CityCPHD_03640

652



CityCPHD



CITYCPHD_03642

Historic District – Meter Under a Window

613 Eisenbrown St Reading _03644 _03645

613



CityCPHD_03645

Historic District – Meter Under a Window

614 Eisenbrown St Reading _03646 _03647

614

CityCPHD_03646



CityCPHD_03647

Historic District – Meter Under a Window

609 Eisenbrown St Reading _03648 _03649



609

CityCPHD_03648



CityCPHD_03649

Historic District – Meter Under a Window

603 Eisenbrown St Reading _03654 _03655

603

Mail

CityCPHD_03654



CITYCPHD_03855

Historic District – Meter Under a Window

633 Clinton St Reading _03660 _03661

633

CityCPHD_03660



CityCPHD_03661

Historic District – Meter Under a Window

657 Clinton St Reading 03669 03670



CityCPHD_03669



CityCPHD_03670

Historic District – Meter Under a Window

534 Tulpehocken St Reading

_03697 _03697



CityCPHD_03697

Historic District – Meter Under a Window

552 Tulpehocken St Reading

_03704 _03705



CityCPHD_03704



CityCPHID 1/10/05

Historic District – Meter Under a Window

127 W Windsor St Reading _04184 _04184



CityCPHD_04184

Historic District – Meter Under a Window

163 W Windsor St Reading _04195 _04195



CityCPFD_04195

Historic District – Meter Under a Window

154 W Windsor St Reading _04199 _04199



CityCPH12-04199

Historic District – Meter Under a Window

150 W Windsor St Reading _04201 _04201



CityCPHD_04201

Historic District – Meter Under a Window

148 W Windsor St Reading _04202 _04202



CityCPHD_04202

Historic District – Meter Under a Window

478 W Oley St Reading _04343 _04343



478
W
OLEY

CITYCPHD 04343

Historic District – Meter Under a Window

260 W Oley St Reading _04374 _04375



CITYCPHD_04374



CITYCPHD_04375

Historic District – Meter Under a Window

194 W Green St Reading

_04698 _04700



194

No Soliciting

CITYCPHD_04698



No Soliciting

CITYCPHD_04699



CITYPHD_04700

Historic District – Meter Under a Window

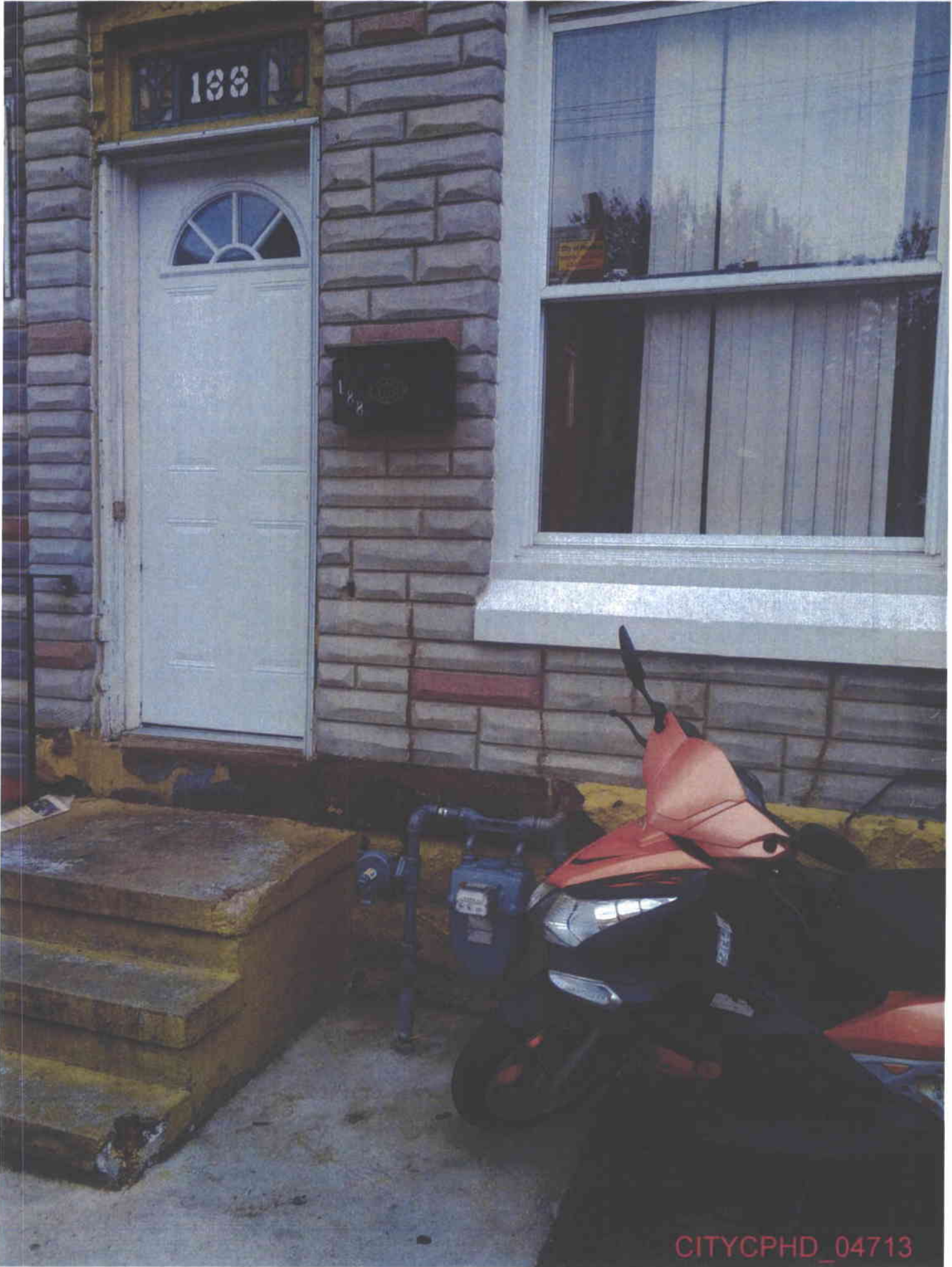
188 W Green St Reading

_04712 _04714



188

CITYCPHD_04712



CITYCPHD_04713



CITYCPHD_04714

Historic District – Meter Under a Window

186 W Green St Reading

_04715 _04716



186



CITYCPHO_04716

Historic District – Meter Under a Window

182 W Green St Reading

_04717 _04718



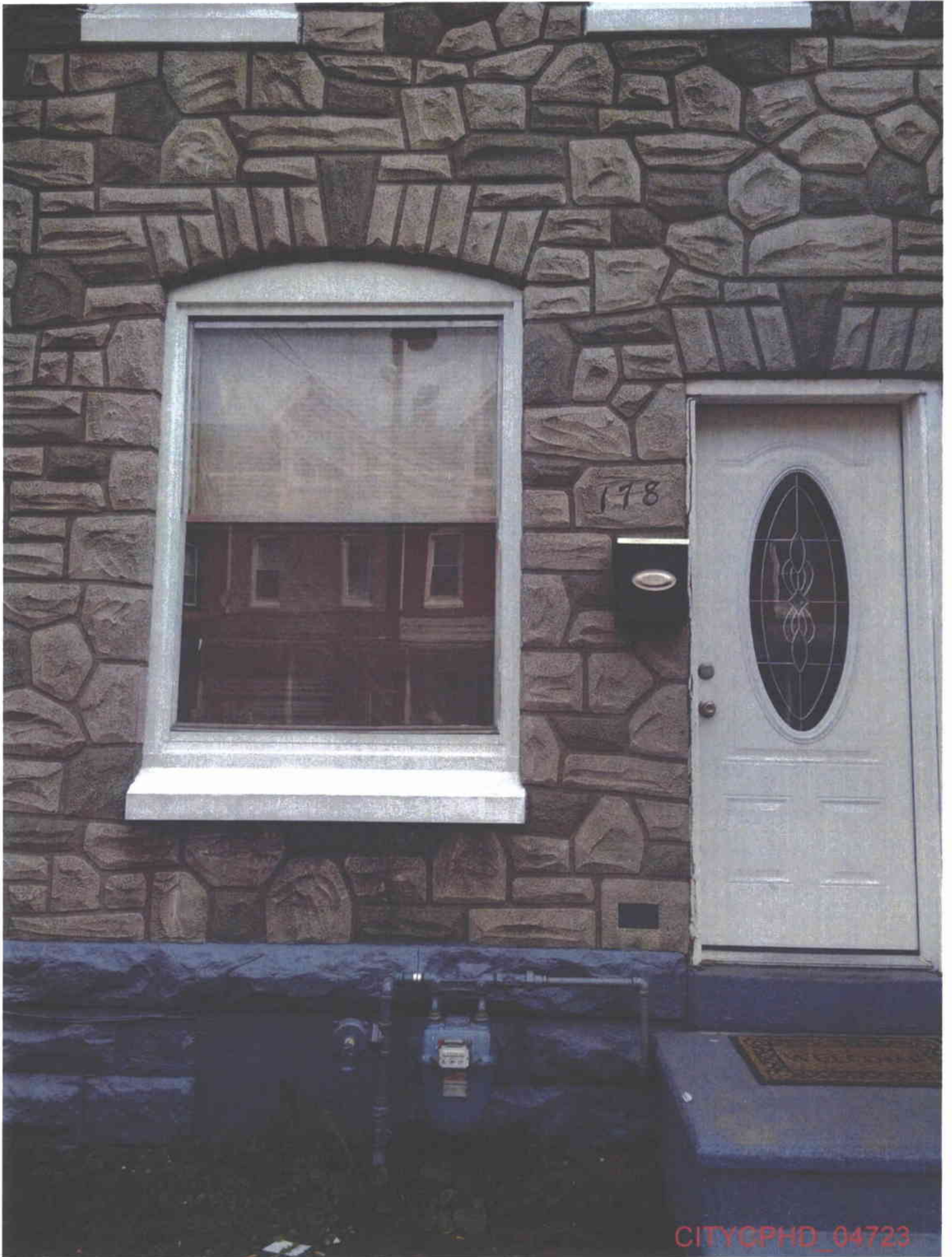
CITYCPHD 04717



Historic District – Meter Under a Window

178 W Green St Reading

_04723 _04723



CITYCPHD_04723

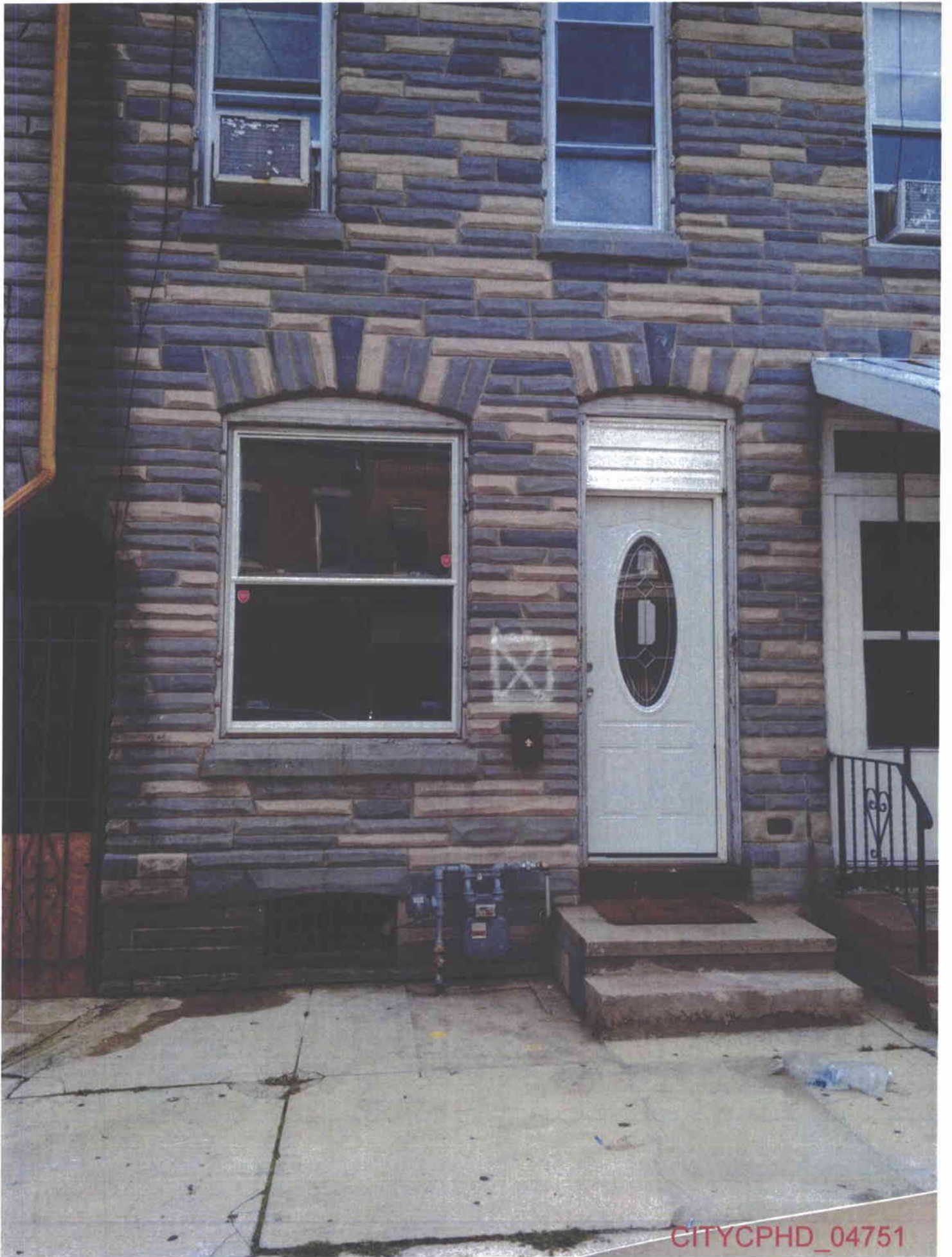
Historic District – Meter Under a Window

158 W Green St Reading

_04750 _04752



CITYCPHD_04750



CITYCPHD_04751



CITYCPHD_04752

Historic District – Meter Under a Window

146 W Green St Reading

_04764 _04767



CITYCPHD_04764



CITYCPHD_04765



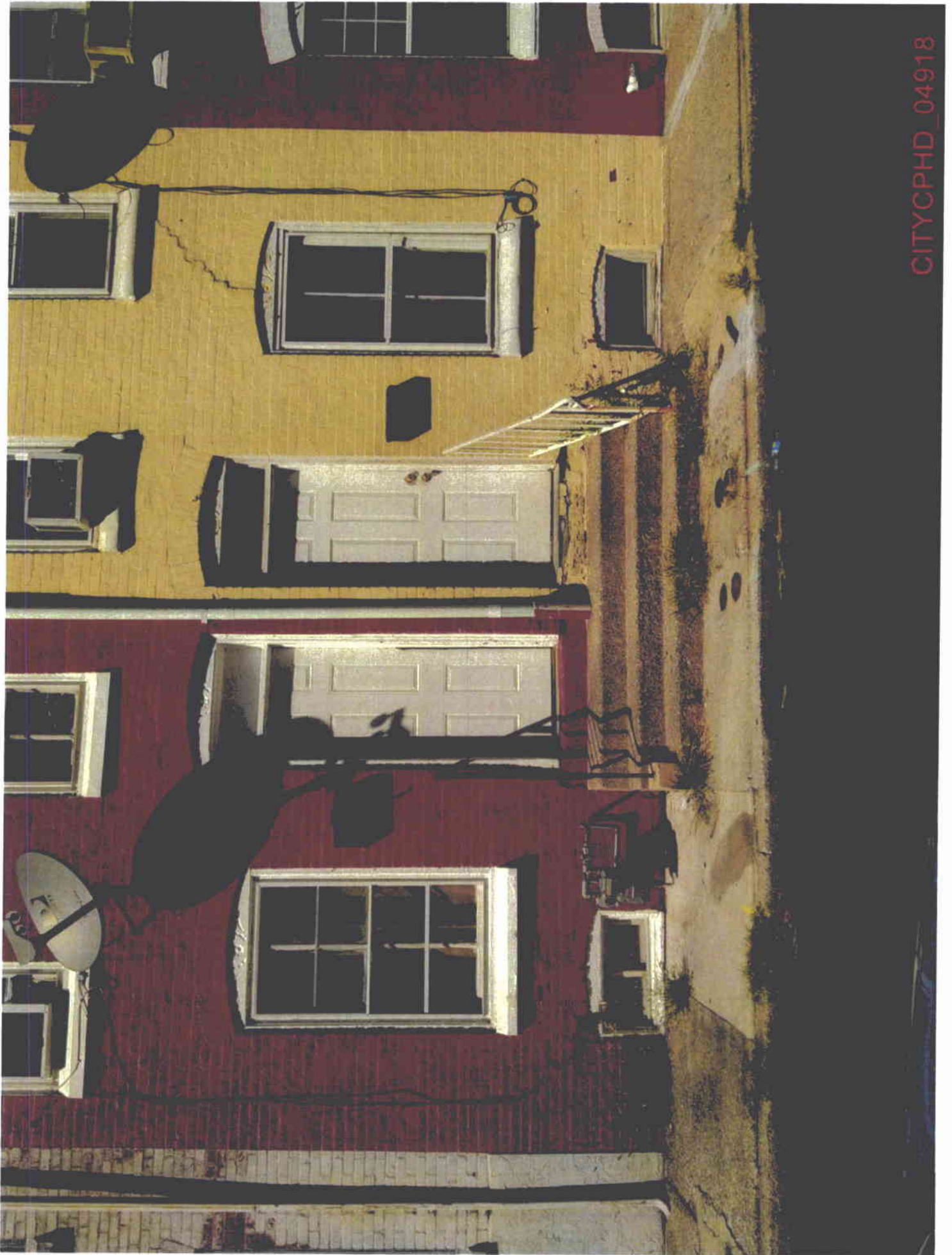
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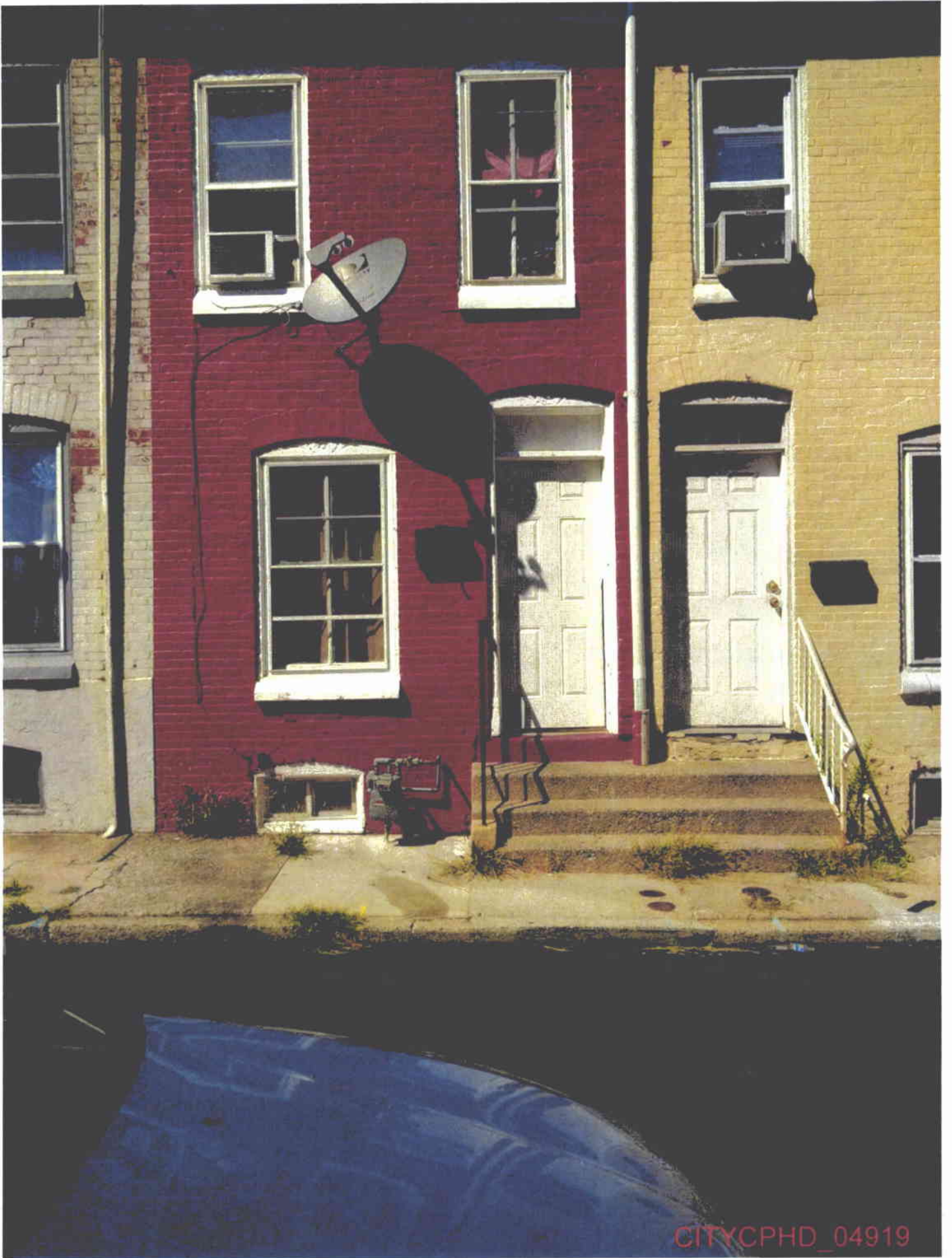
CITYCPHD_04767

Historic District – Meter Under a Window

135 Hudson St Reading _04918 _04919



CITYCPHD_04918



CITYCPHD_04919

Historic District – Meter Under a Window

1617 Bern St Reading

_07055 _07056



CityCPHD_07055



CityCPHD_07056

Historic District – Meter Under a Window

1320 Linden St Reading _07205 _07205



CityCPHD_07205

Historic District – Meter Under a Window

1400 N 13th St Reading _07292 _07292



GUYCHD_07292

Historic District – Meter Under a Window

1816 Olive St Reading

_07304 _07305



CityCPHD_07304



CITYCPHD_07305

Historic District – Meter Under a Window

107 Mulberry St Reading

_07326 _07326



CityCPHD_07326

Historic District – Meter Under a Window

671 Clinton St Reading 07405 07405



CityCRHD_07405

Non-Historic – Meter Under a Window

1666 N 10th St Reading _04960 _04960



CityCPHD_04960

Non-Historic – Meter Under a Window

1664 N 10th St Reading _04966 _04966



CityCPHD_04966

Non-Historic – Meter Under a Window

1648 N 10th St Reading _04970 _04970



Non-Historic – Meter Under a Window

1646 N 10th St Reading _04971 _04971



CITYCPHD_04971

Non-Historic – Meter Under a Window

1644 N 10th St Reading _04972 _04972



CityCPHD_04972

Non-Historic – Meter Under a Window

1649 N 10th St Reading _04989 _04989



CityCPHD_04989

Non-Historic – Meter Under a Window

1657 N 10th St Reading _04994 _04994



CityCPHD_04994

Non-Historic – Meter Under a Window

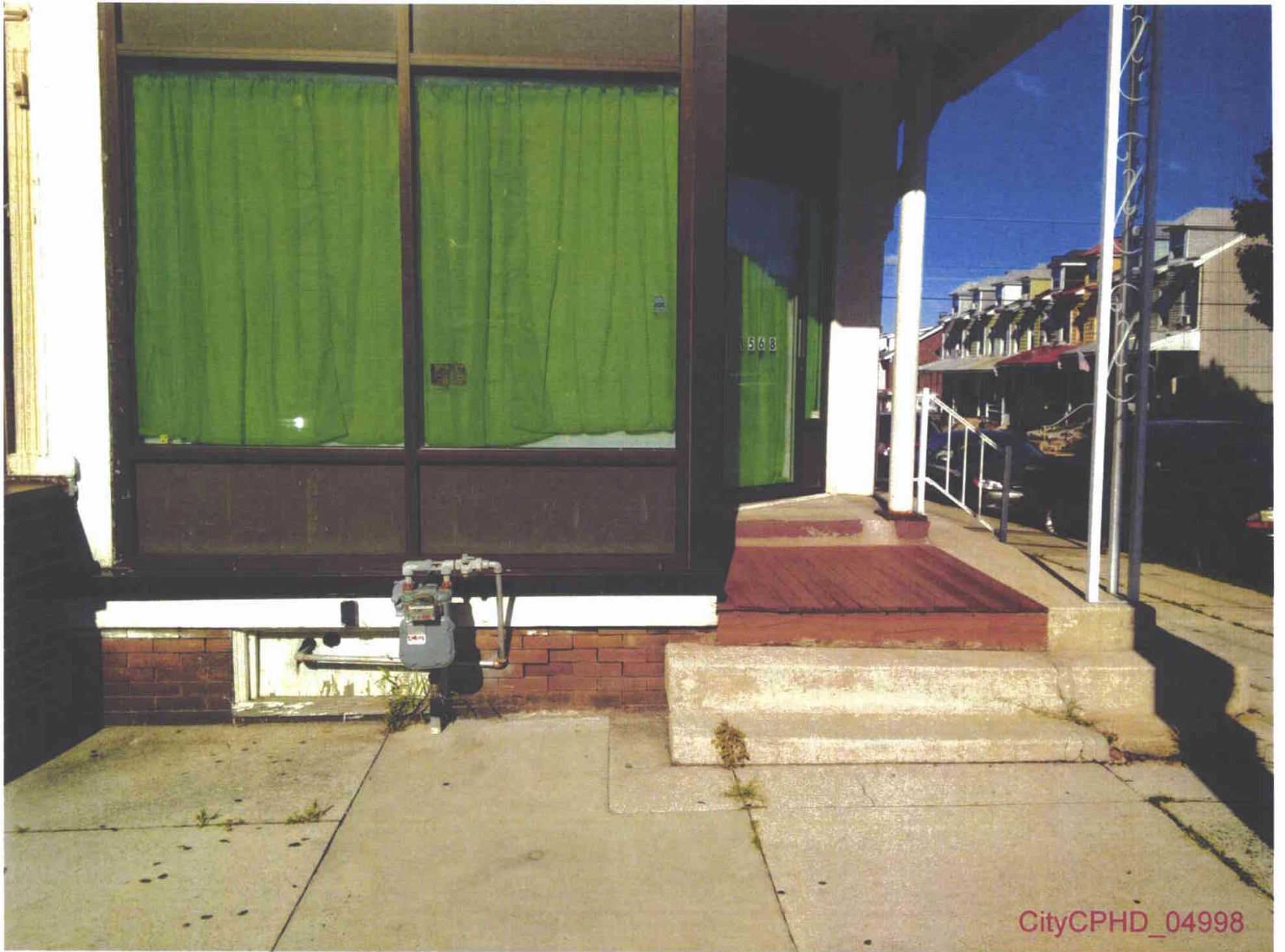
1663 N 10th St Reading _04997 _04997



CityCPHD_04997

Non-Historic – Meter Under a Window

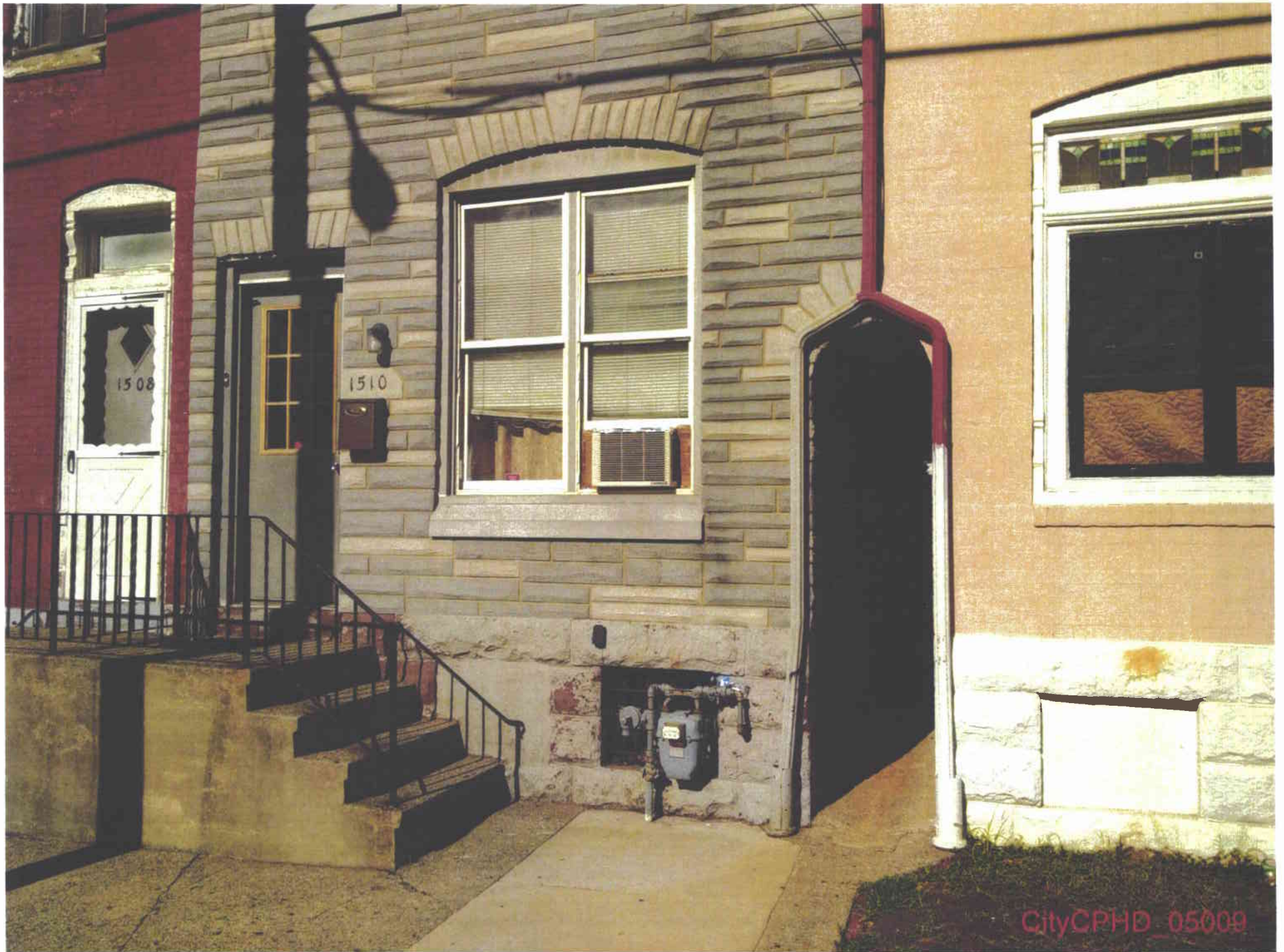
1568 N 10th St Reading _04998 _04998



CityCPHD_04998

Non-Historic – Meter Under a Window

1510 N 10th St Reading __05009 _05009



CityCPHD_05009

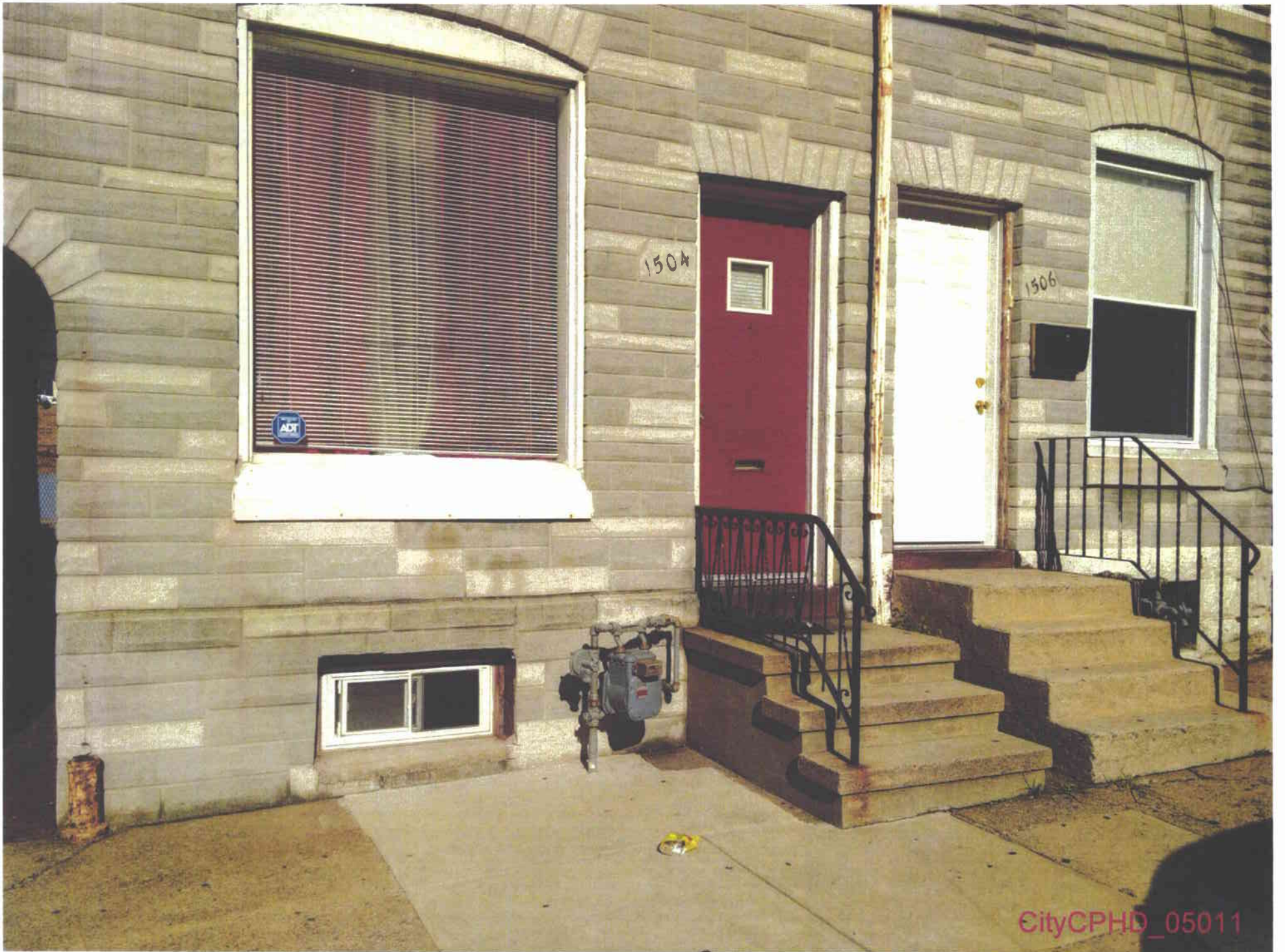
Non-Historic – Meter Under a Window

1506 N 10th St Reading _05010 _05010



Non-Historic – Meter Under a Window

1504 N 10th St Reading _05011 _05011



CityCPHD_05011

Non-Historic – Meter Under a Window

1500 N 10th St Reading _05013 _05013



CITYCPHD_05013

Non-Historic – Meter Under a Window

1561 N 10th St Reading _05028 _05028



CityCPHD_05028

Non-Historic – Meter Under a Window

1462 N 10th St Reading _05035 _05035



QNYCPHD_06835

Non-Historic – Meter Under a Window

1456 N 10th St Reading _05038 _05038



CityCPHD_05038

Non-Historic – Meter Under a Window

1450 N 10th St Reading _05041 _05041



CityCPHD_05041

Non-Historic – Meter Under a Window

1420 N 10th St Reading __05050 __05050



CityCPHD_05050

Non-Historic – Meter Under a Window

1412 N 10th St Reading _05054 _05054



1412

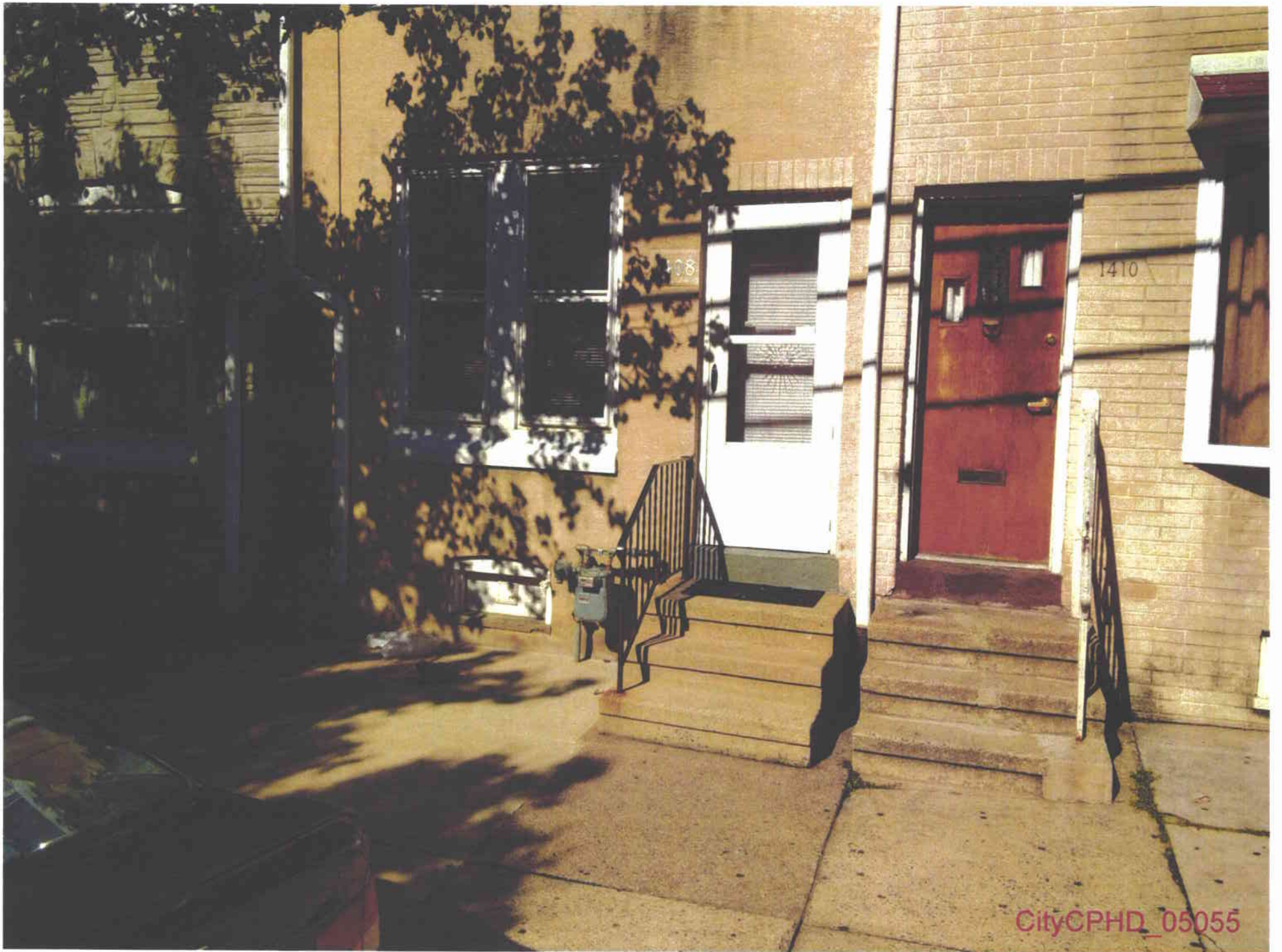
Fourteen Town

1414

CityCPHD_05054

Non-Historic – Meter Under a Window

1408 N 10th St Reading _05055 _05055



CityCPHD_05055

Non-Historic – Meter Under a Window

1406 N 10th St Reading _05056 _05056



CityCPHD_05056

Non-Historic – Meter Under a Window

1437 N 10th St Reading _05076 _05076



CityCPHD_05076

Non-Historic – Meter Under a Window

1441 N 10th St Reading _05078 _05078



Non-Historic – Meter Under a Window

1445 N 10th St Reading _05080 _05080



CityCPHD_05080

Non-Historic – Meter Under a Window

1453 N 10th St Reading _05082 _05082



CityCPHD_05082

Non-Historic – Meter Under a Window

1354 N 10th St Reading _05087 _05087



CityCPHD_05087

Non-Historic – Meter Under a Window

1346 N 10th St Reading _05089 _05089



1346

CityCPHD_05089

Non-Historic – Meter Under a Window

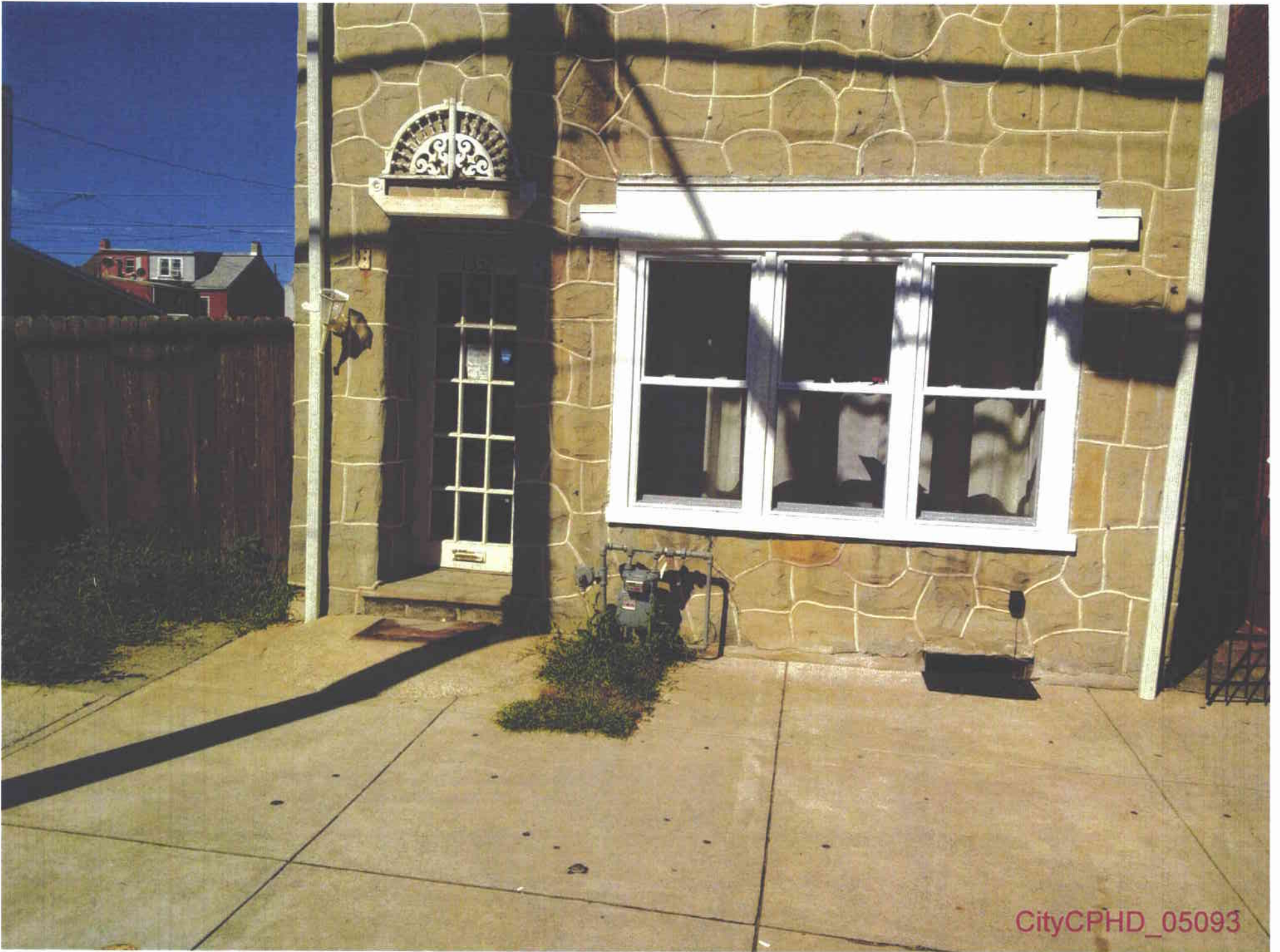
1338 N 10th St Reading _05091 _05091



CityCPHD_05091

Non-Historic – Meter Under a Window

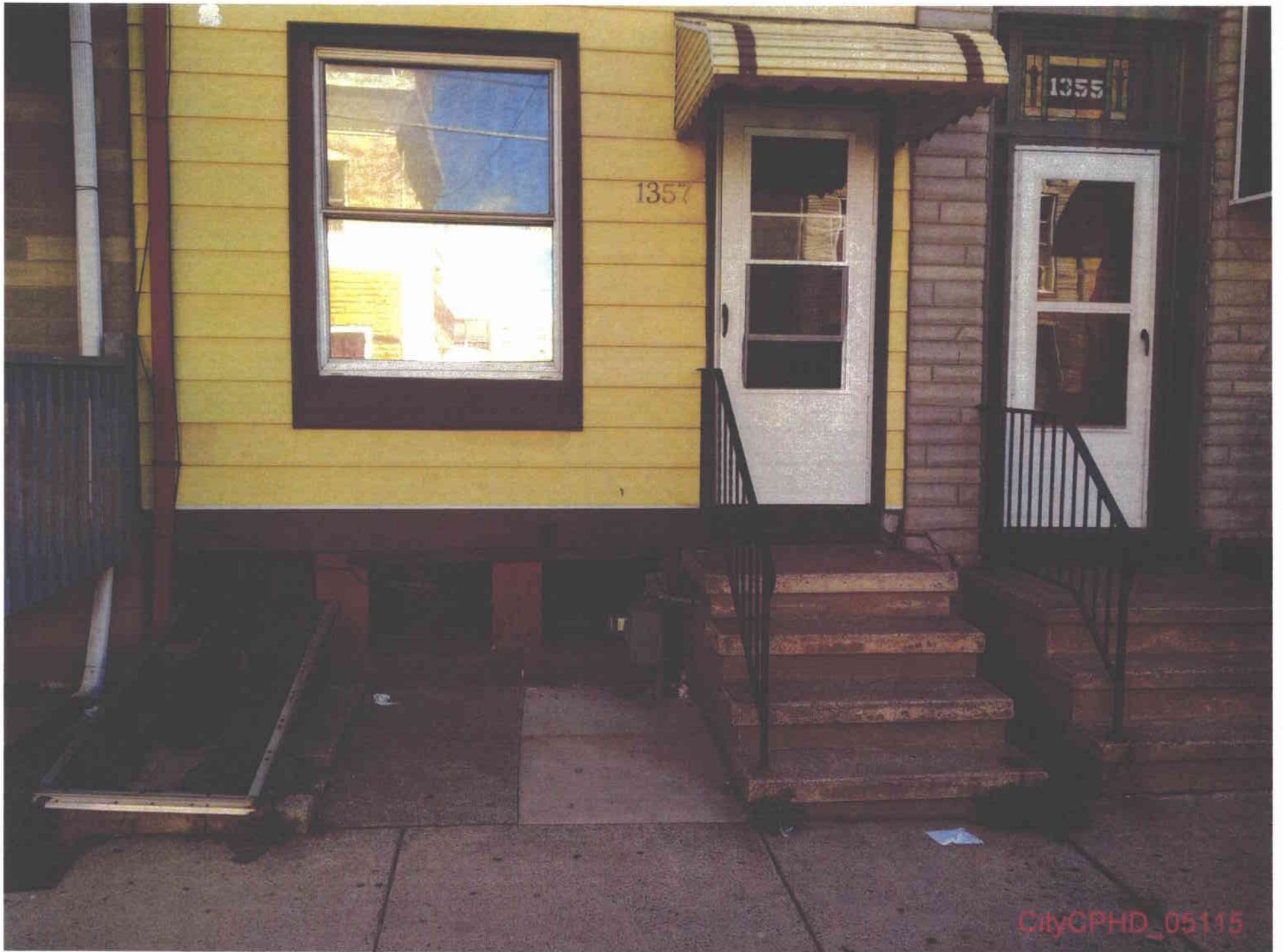
1332 N 10th St Reading __05093 _05093



CityCPHD_05093

Non-Historic – Meter Under a Window

1357 N 10th St Reading _05115 _05115



CityGPHD_05115

Non-Historic – Meter Under a Window

1242 N 10th St Reading _05124 _05124



CityCPHD_05124

Non-Historic – Meter Under a Window

1240 N 10th St Reading _05125 _05125



CityCPHD_05125

Non-Historic – Meter Under a Window

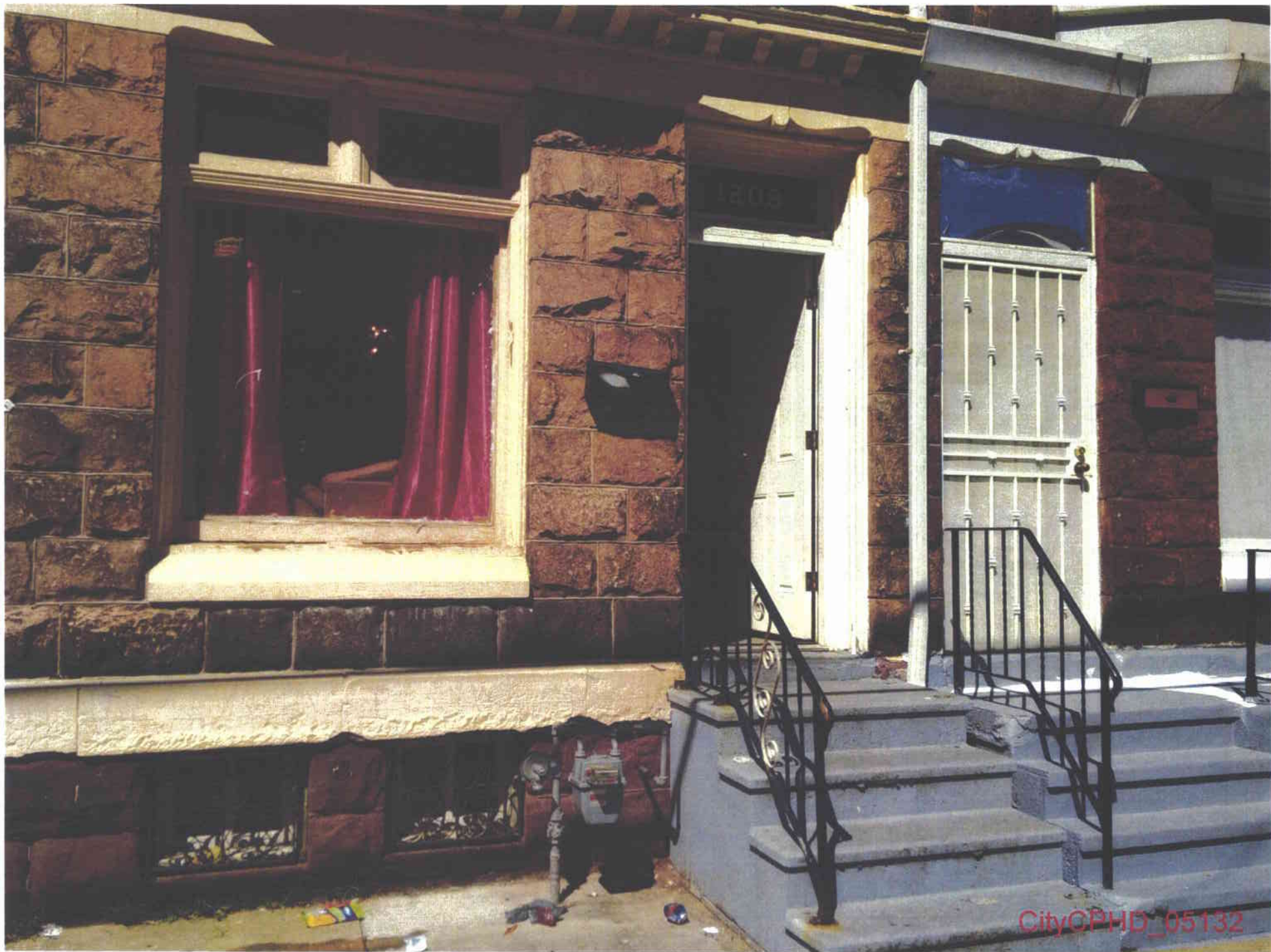
1216 N 10th St Reading _05130 _05130



-CityCPHD_05130

Non-Historic – Meter Under a Window

1208 N 10th St Reading _05132 _05132



CityOPHD_05132

Non-Historic – Meter Under a Window

1206 N 10th St Reading _05133 _05133



Non-Historic – Meter Under a Window

1204 N 10th St Reading _05134 _05134



CityOPHO_05134

Non-Historic – Meter Under a Window

1202 N 10th St Reading _05135 _05135



CityCPHD_05135

Non-Historic – Meter Under a Window

1205 N 10th St Reading _05137 _05138



CityCPHD_05137



Non-Historic – Meter Under a Window

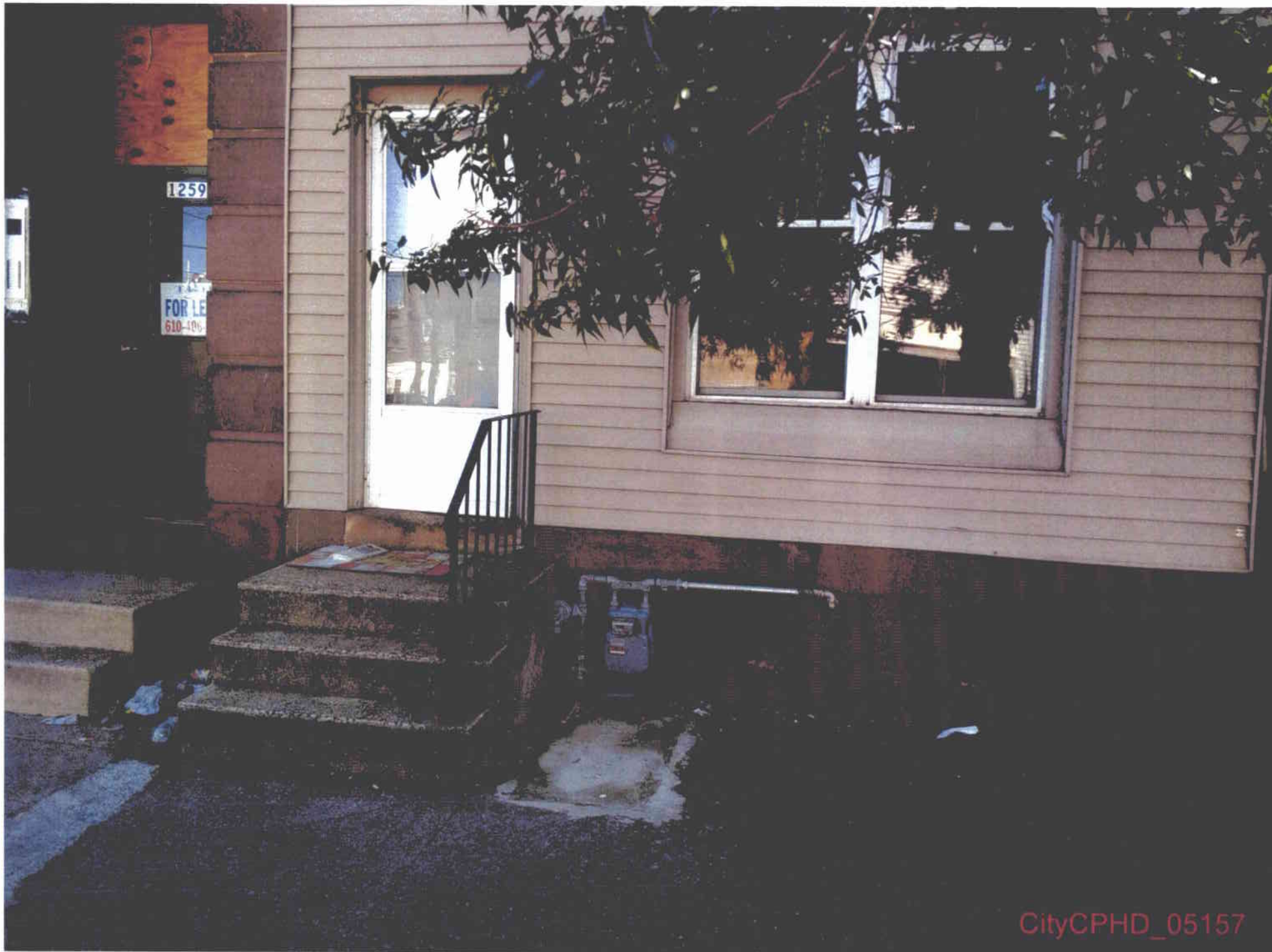
1207 N 10th St Reading _05139 _05139



CityCPHD_05139

Non-Historic – Meter Under a Window

1257 N 10th St Reading _05157 _05157



CityCPHD_05157

Non-Historic – Meter Under a Window

1128 N 10th St Reading _05166 _05166



CityCPHD_05166

Non-Historic – Meter Under a Window

1126 N 10th St Reading _05167 _05167



51064-

426

CityOPHD_05167

Non-Historic – Meter Under a Window

1113 N 10th St Reading _05183 _05183



CITYCPHD_05183

Non-Historic – Meter Under a Window

1155 N 10th St Reading _05199 _05199



CityCPHD_05199

Non-Historic – Meter Under a Window

1159 N 10th St Reading _05200 _05200



CityCPHD_05200

Non-Historic – Meter Under a Window

1058 N 10th St Reading _05202 _05202



CITYCPHD_05202

Non-Historic – Meter Under a Window

1056 N 10th St Reading _05203 _05203



CityCPHD_05203

Non-Historic – Meter Under a Window

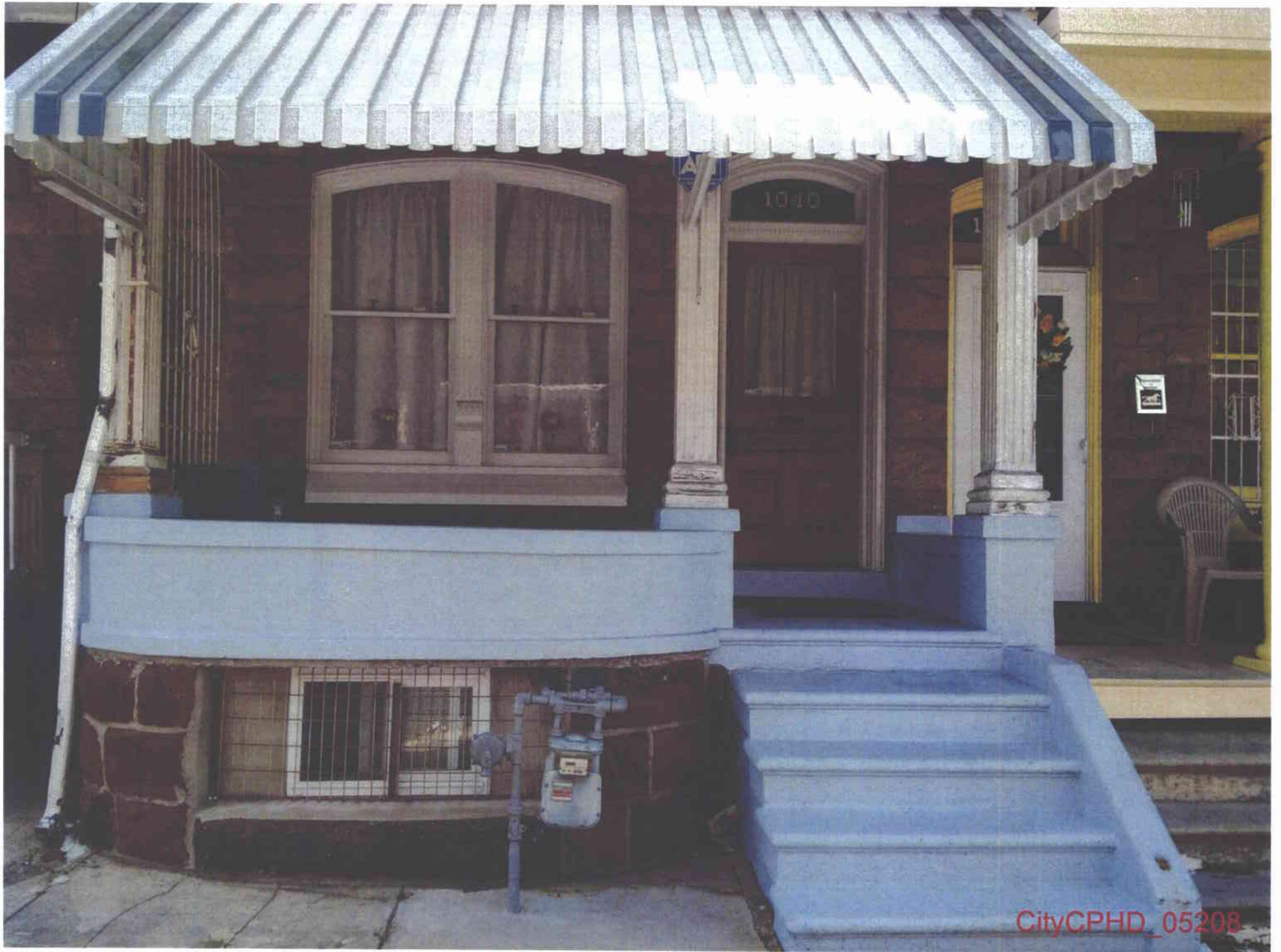
1050 N 10th St Reading _05205 _05205



CityCPHD_05205

Non-Historic – Meter Under a Window

1040 N 10th St Reading _05208 _05208



CityCPHD_05208

Non-Historic – Meter Under a Window

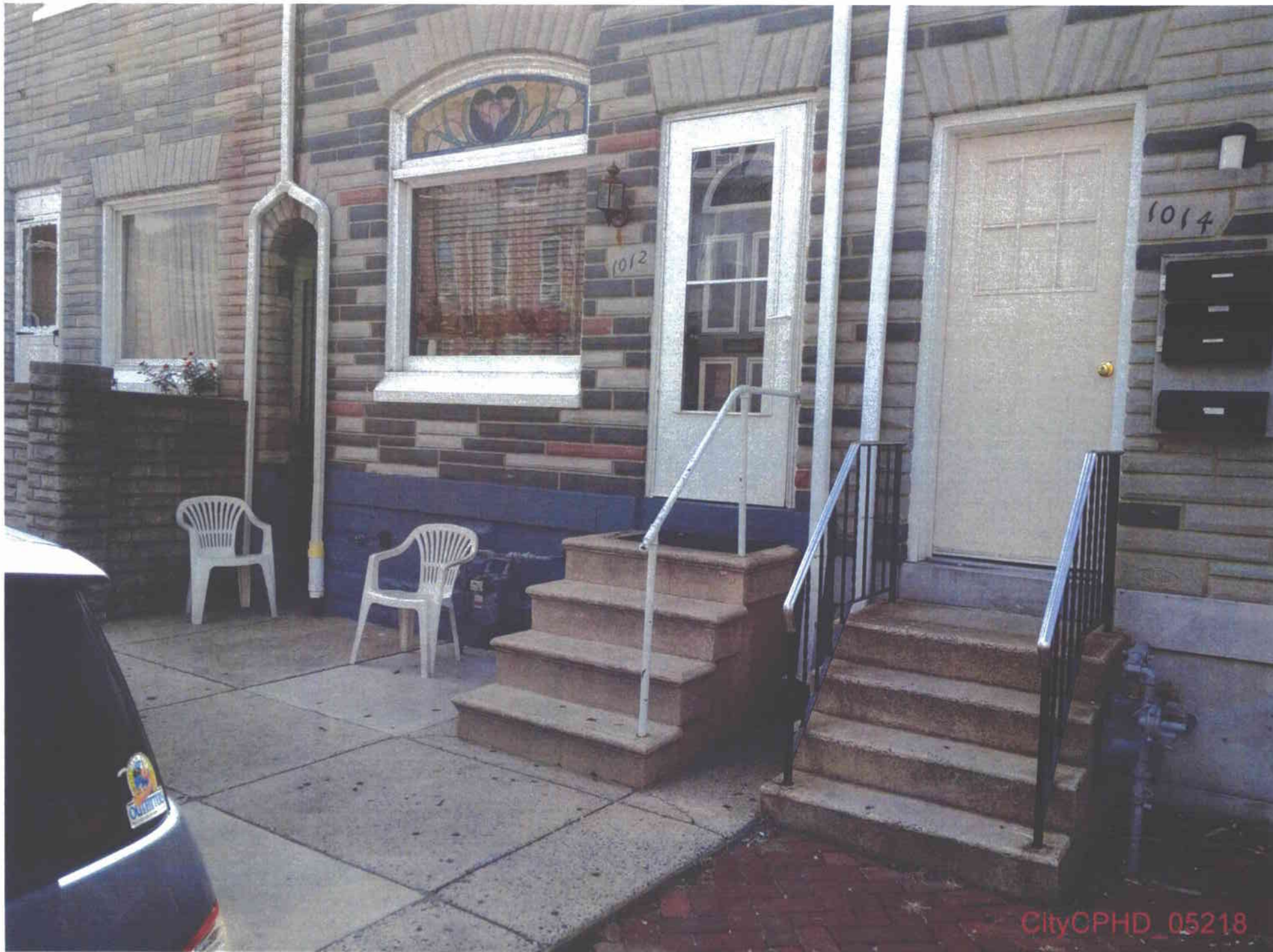
1018 N 10th St Reading _05215 _05215



CityCPHD_05215

Non-Historic – Meter Under a Window

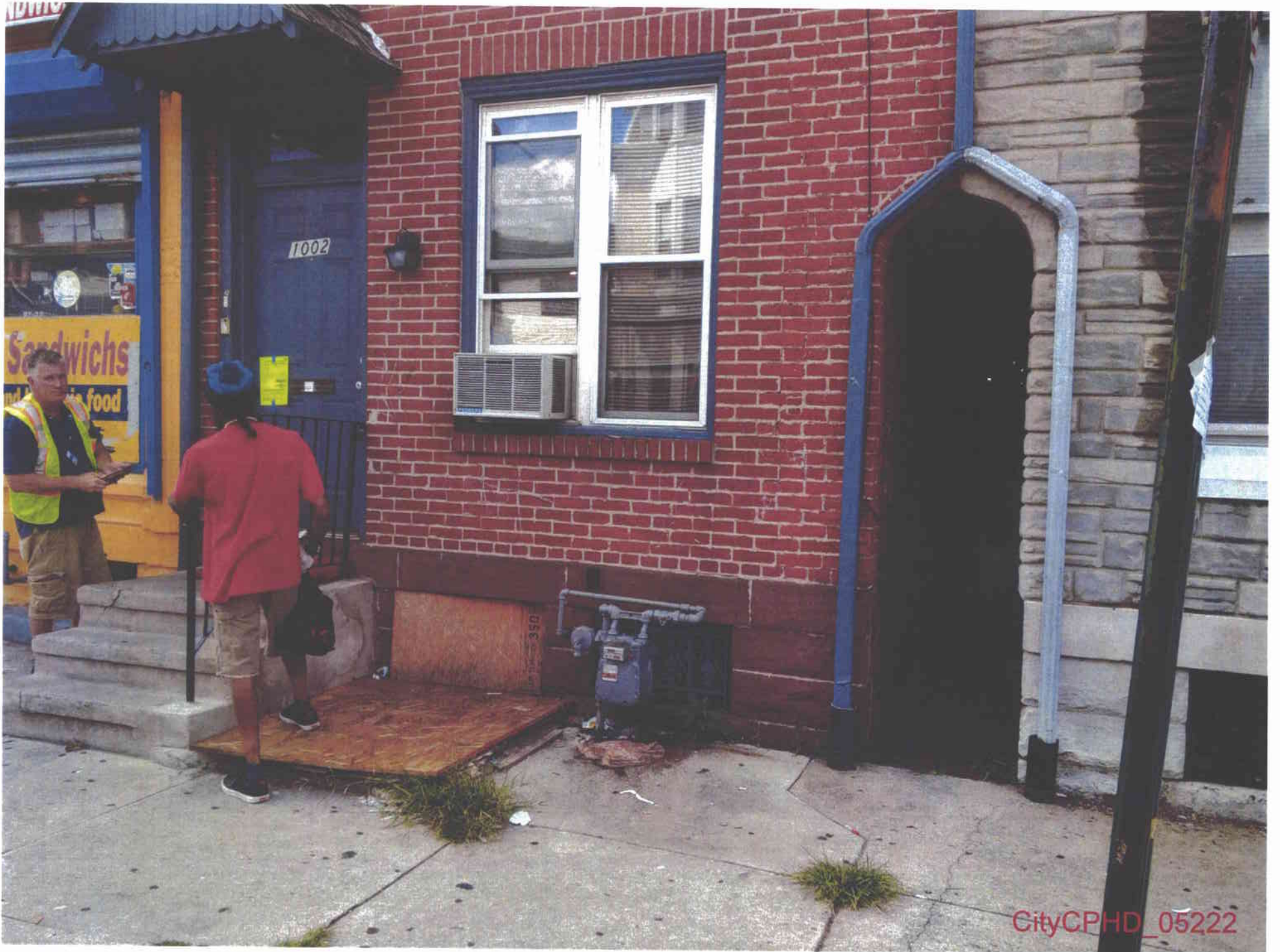
1012 N 10th St Reading _05218 _05218



CityCPHD_05218

Non-Historic – Meter Under a Window

1002 N 10th St Reading _05222 _05222



CityCPHD_05222

Non-Historic – Meter Under a Window

1001 N 10th St Reading _05223 _05223



CityCPHD_05223

Non-Historic – Meter Under a Window

1007 N 10th St Reading _05225 _05225



CityGPHD_05225

Non-Historic – Meter Under a Window

1011 N 10th St Reading _05227 _05227



CityCPHD_05227

Non-Historic – Meter Under a Window

916 N 10th St Reading _05248 _05248



CityCPHD_05248

Non-Historic – Meter Under a Window

908 N 10th St Reading _05252 _05252



CityCPHD_05252

Non-Historic – Meter Under a Window

900 N 10th St Reading _05253 _05253

WELGER'S BAKERY
10-372-6545 WEDDING CAKES SWEET BREAD MEXICAN BREAD

WADERIA
OPEN
MEXICANA
0)372-6545

WELGERS BAKERY

FAMOUS STICKY BUNS
PLUMB BUNS, PASTRY
PIES & CHEESE CAKE



CityCPHD_05253

Non-Historic – Meter Under a Window

848 N 10th St Reading 05259 05259



846

848

LUNA Y GRANJEN BARRAJON

OPEN

Se Busca Estilista

CORTES A \$12

Call for Appointment

CityCPHD_05259

Non-Historic – Meter Under a Window

832 N 10th St Reading _05265 _05265



CityCPHD_05255

Non-Historic – Meter Under a Window

830 N 10th St Reading _05266 _05266



CityCPHD_05268

Non-Historic – Meter Under a Window

820 N 10th St Reading __05268 _05268



CityCPHD_05268

Non-Historic – Meter Under a Window

805 N 10th St Reading

_05273 _05273



CityCPHD_65273

Non-Historic – Meter Under a Window

813 N 10th St Reading _05275 _05275



CAVCPHD_05275

Non-Historic – Meter Under a Window

729 N 10th St Reading _05286 _05286



CityCPHD_05286

Non-Historic – Meter Under a Window

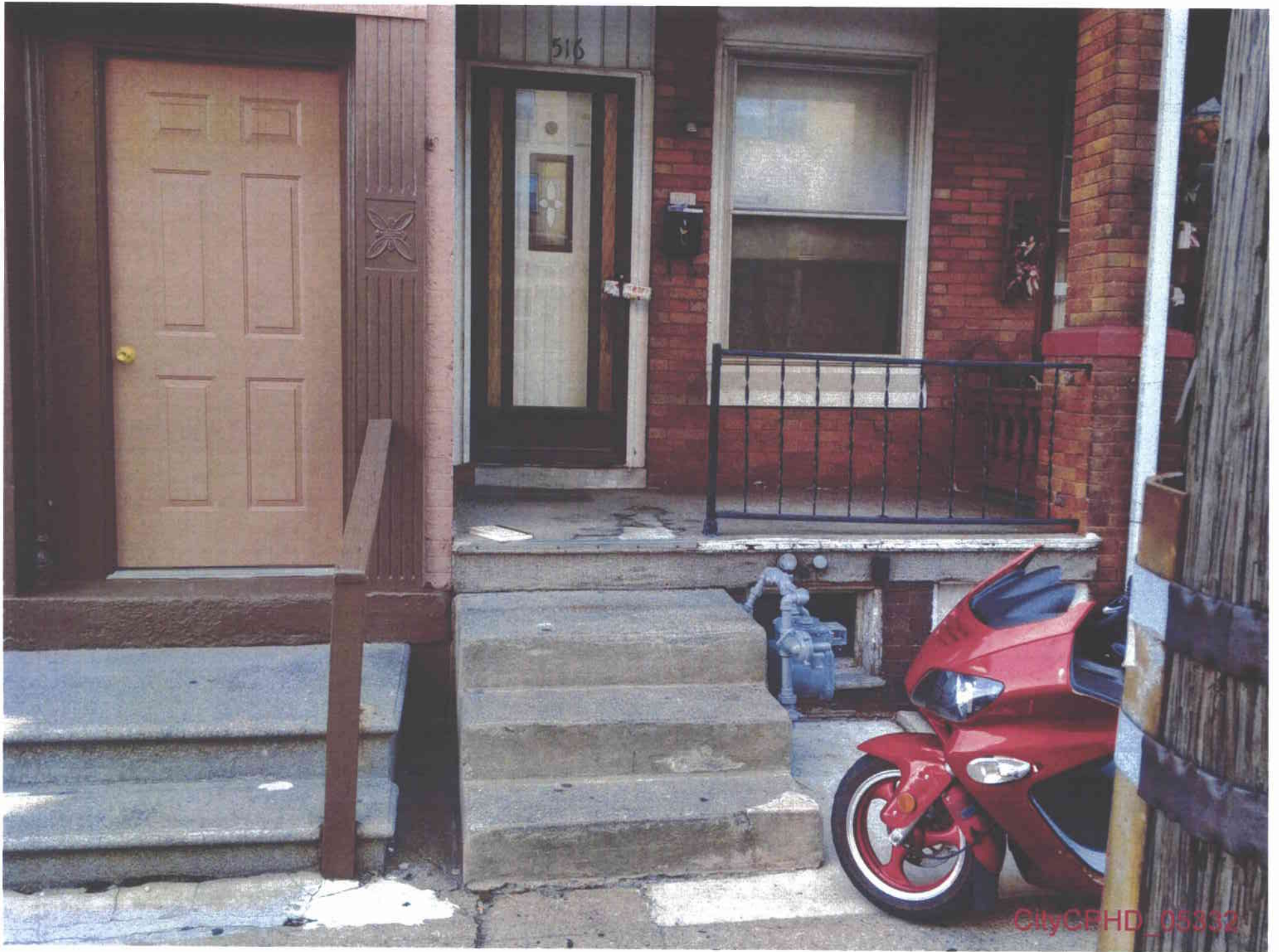
646 N 10th St Reading 05290 05290



CityCPFD_05290

Non-Historic – Meter Under a Window

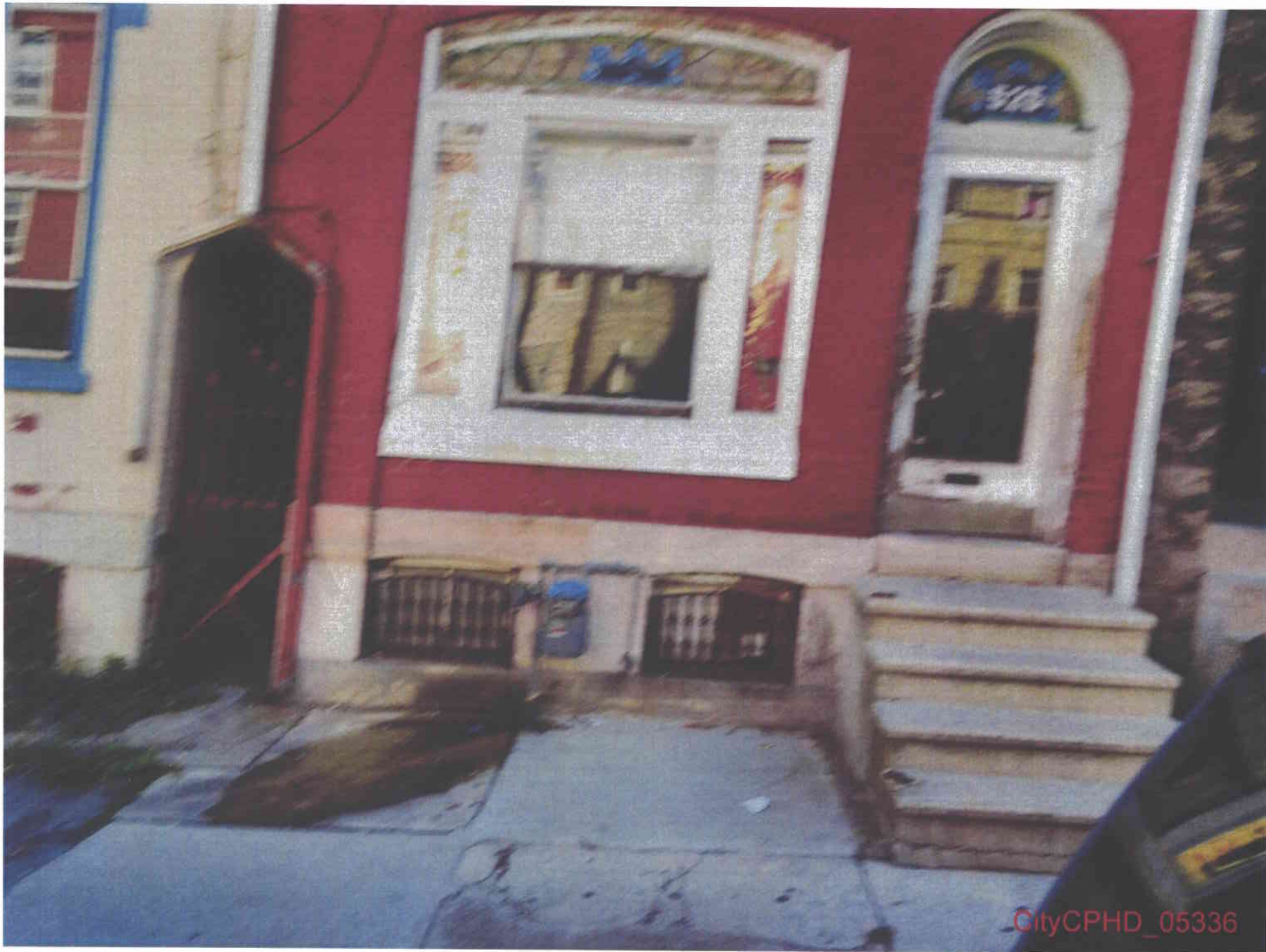
516 N 10th St Reading 05332 05332



CityCPHD_05332

Non-Historic – Meter Under a Window

525 N 10th St Reading _05336 _05336



CityCPHD_05336

Non-Historic – Meter Under a Window

945 Cotton St Reading _05346 _05346



Non-Historic – Meter Under a Window

953 Cotton St Reading _05349 _05349



CityCPHO_05349

Non-Historic – Meter Under a Window

955 Cotton St Reading _05349 _05349



CityCPHD_05349

Non-Historic – Meter Under a Window

939 Cotton St Reading

_05353 _05353



CityCPHD_05353

Non-Historic – Meter Under a Window

927 Cotton St Reading _05354 _05354



CityCPHD_05354

Non-Historic – Meter Under a Window

911 Cotton St Reading _05357 _05357



Non-Historic – Meter Under a Window

1032 Cotton St Reading _05363 _05363



CityCPHD_05363

Non-Historic – Meter Under a Window

1047 Cotton St Reading _05368 _05368



CityCPHD_05368

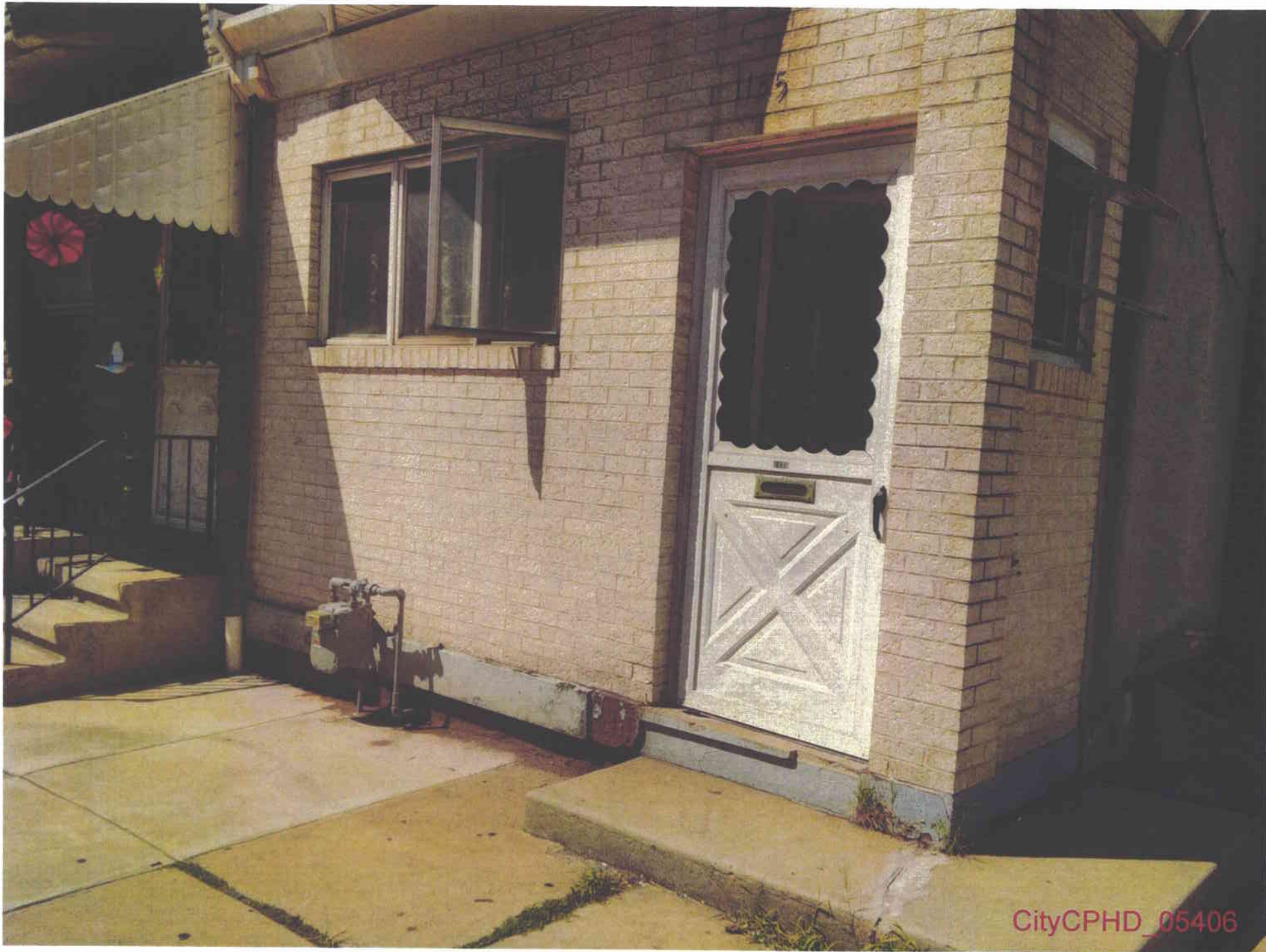
Non-Historic – Meter Under a Window

1136 Cotton St Reading _05380 _05380



Non-Historic – Meter Under a Window

1135 Cotton St Reading _05406 _05406



CityCPHD_05406

Non-Historic – Meter Under a Window

1125 Cotton St Reading _05411 _05411



CityCPHD_05411

Non-Historic – Meter Under a Window

1121 Cotton St Reading _05413 _05413



CityCPHD_05413

Non-Historic – Meter Under a Window

1259 Cotton St Reading _05434 _05434



CityCPHD_05434

Non-Historic – Meter Under a Window

1205 Cotton St Reading _05455 _05455



1207

CITYCPHD_05455

Non-Historic – Meter Under a Window

1359 Cotton St Reading _05475 _05475



CITYCPHD_05475

Non-Historic – Meter Under a Window

1343 Cotton St Reading _05484 _05484



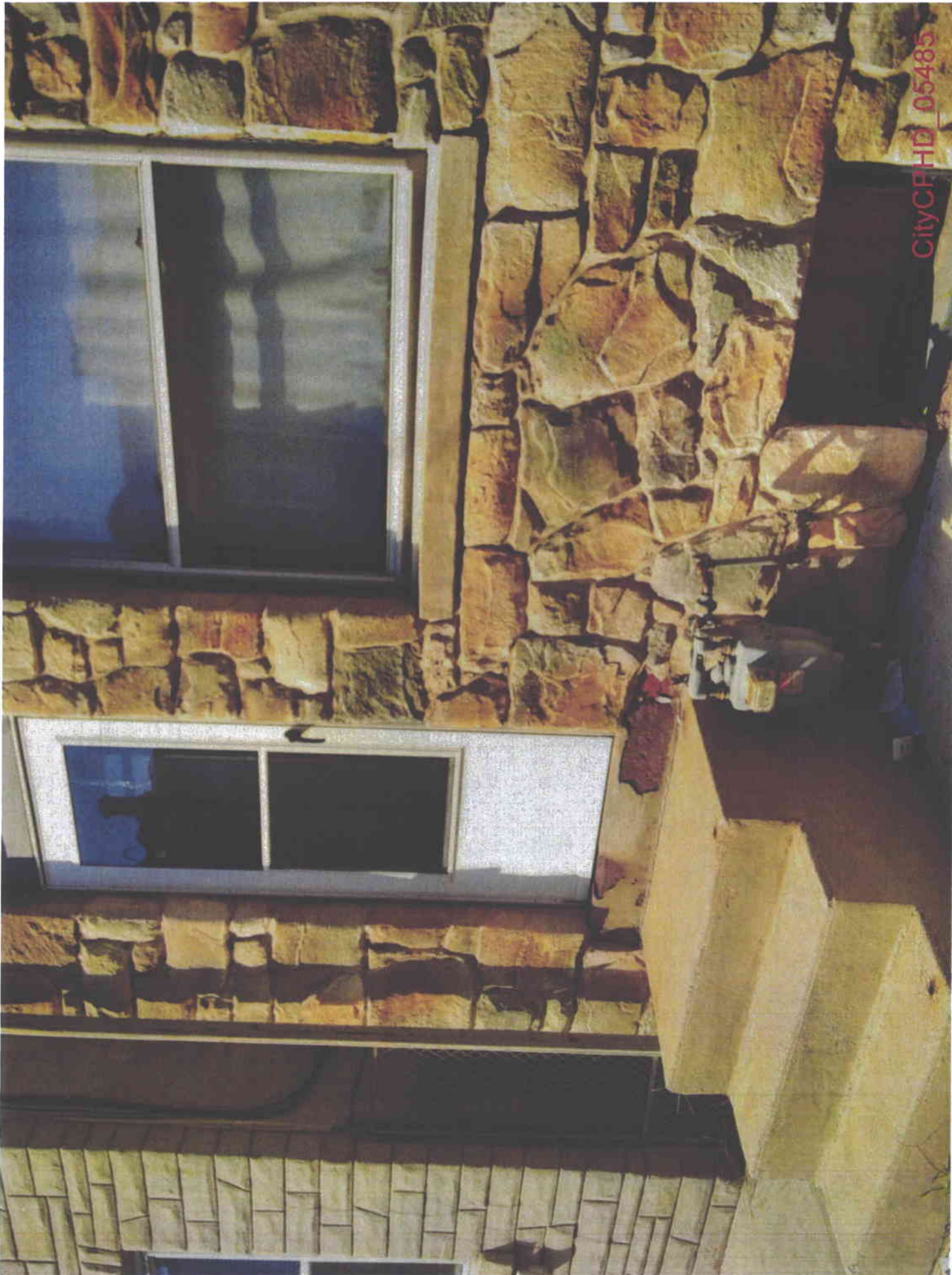
1343

1345

PHOTO ID 06484

Non-Historic – Meter Under a Window

1341 Cotton St Reading _05485 _05485



CityCFHD_05485

Non-Historic – Meter Under a Window

1333 Cotton St Reading _05489 _05490



CityCPHD_05489



CityCPHD_05490

Non-Historic – Meter Under a Window

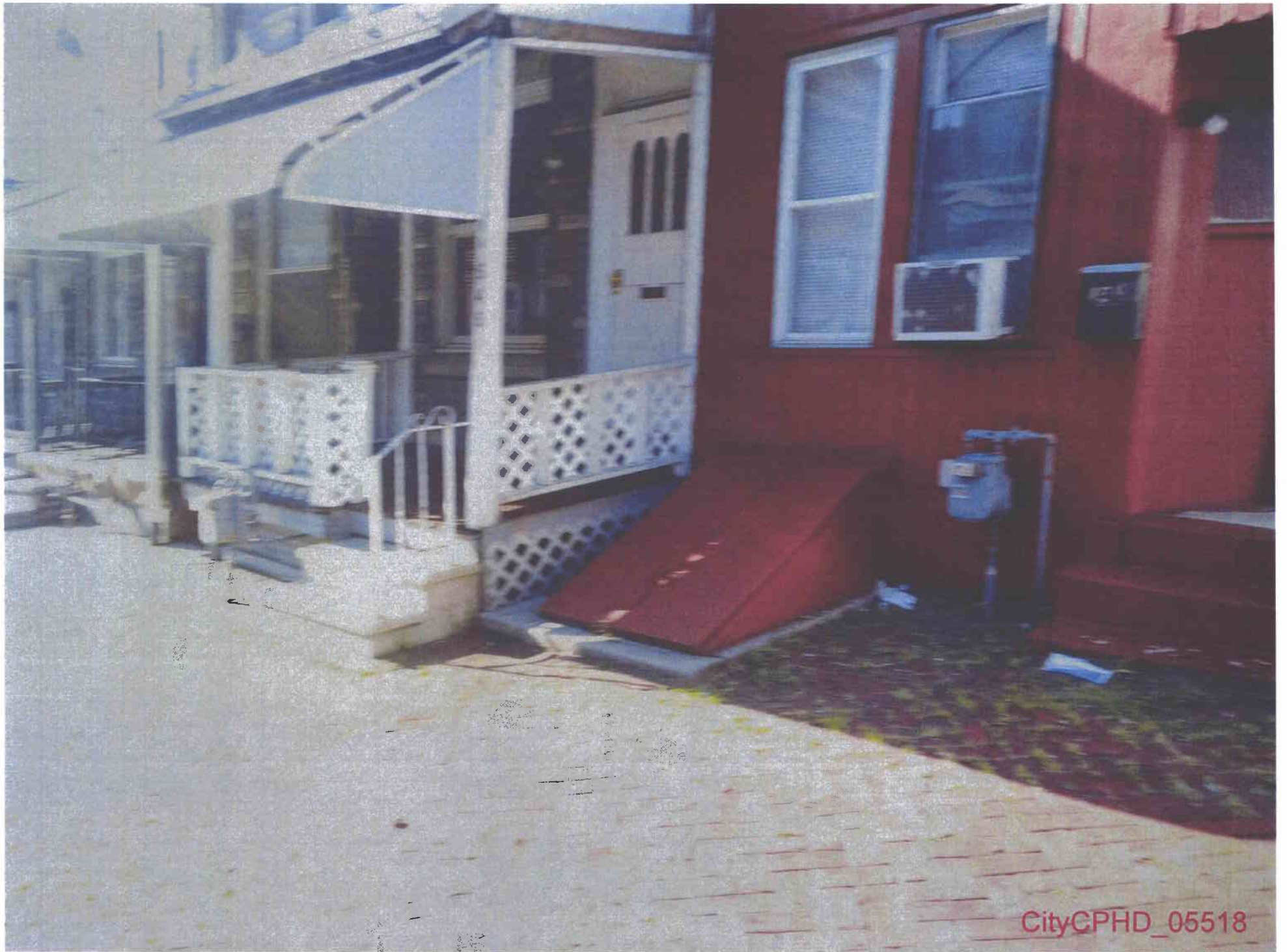
1317 Cotton St Reading _05497 _05497



CITYCPHD_05497

Non-Historic – Meter Under a Window

1547 Cotton St Reading _05518 _05518



CityCPHD_05518

Non-Historic – Meter Under a Window

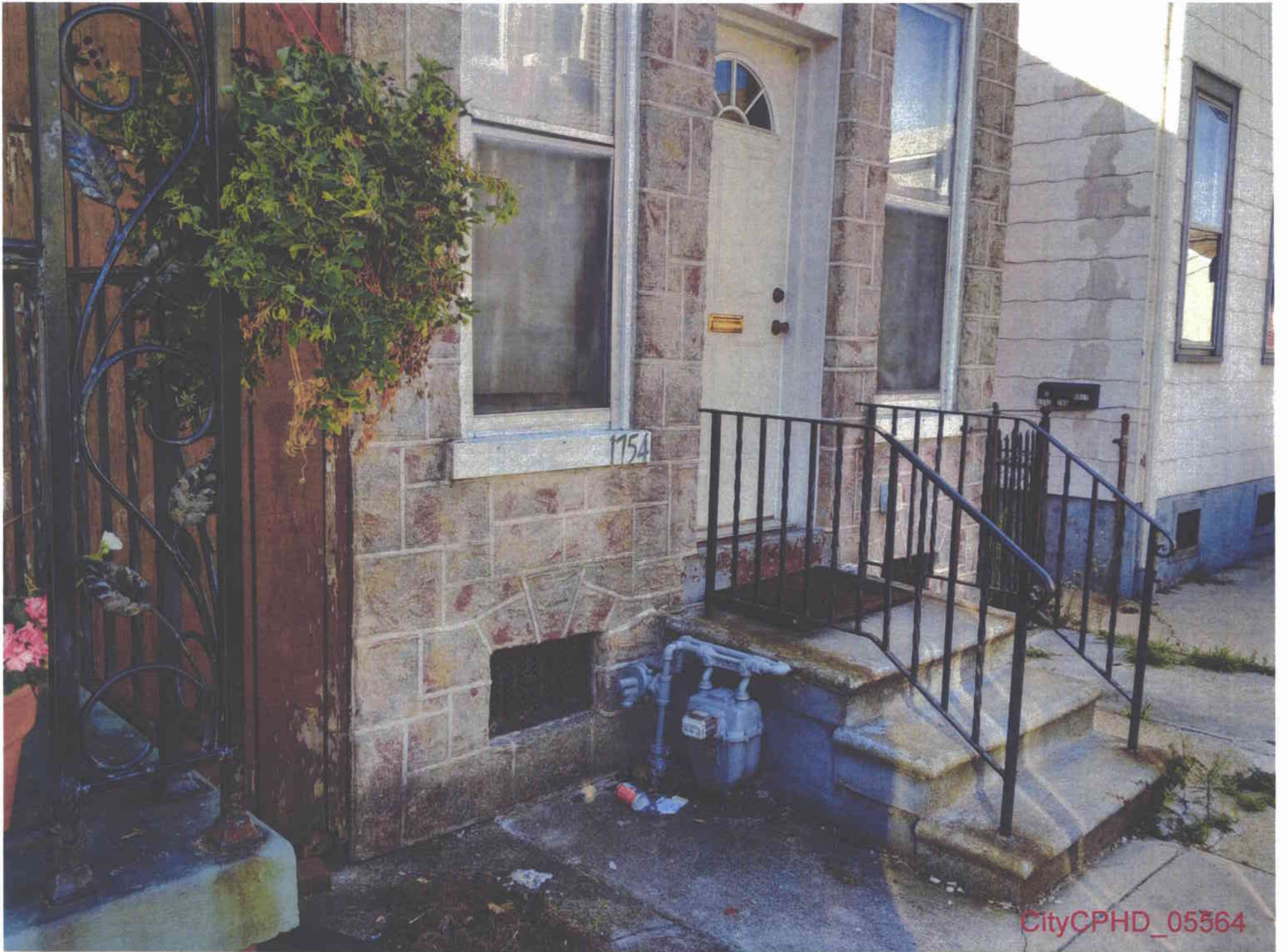
1600 Cotton St Reading _05530 _05530



CityCPHD_05530

Non-Historic – Meter Under a Window

1754 Cotton St Reading _05564 _05564



CityCPHD_05564

Non-Historic – Meter Under a Window

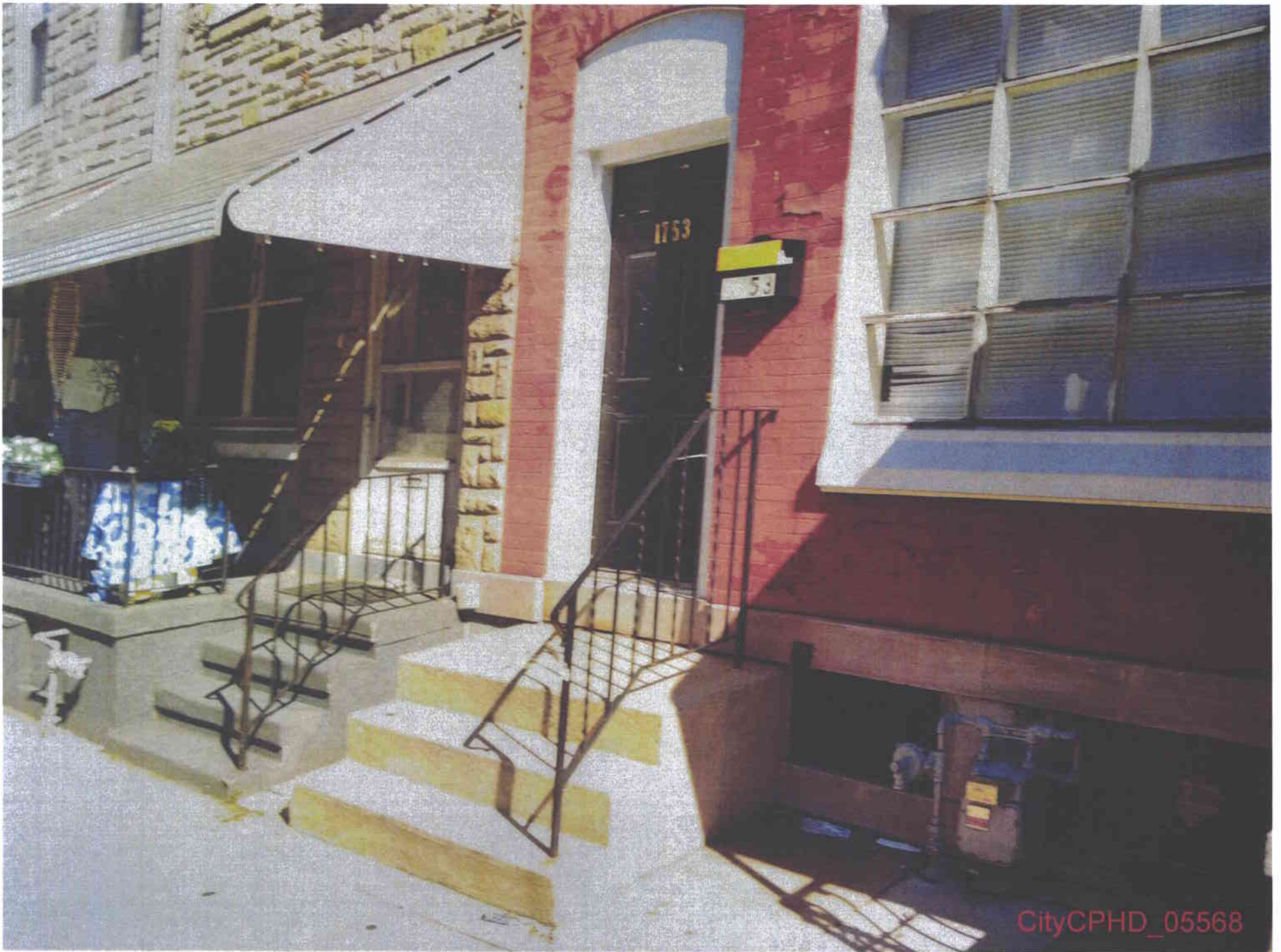
1761 Cotton St Reading _05565 _05565



CityCPHD_05565

Non-Historic – Meter Under a Window

1753 Cotton St Reading _05568 _05568



CityCPHD_05568

Non-Historic – Meter Under a Window

1825 Cotton St Reading _05585 _05585



CityCPHD_05585

Non-Historic – Meter Under a Window

1817 Cotton St Reading _05586 _05586



CityCPHD_05586

Non-Historic – Meter Under a Window

108 S 4th St Reading

_05591 _05591



NO PARKING
IN FRONT
OF THIS BUILDING

CityCPHD_05591

Non-Historic – Meter Under a Window

110 S 4th St Reading

_05592 _05592



CityCPHD_05592

Non-Historic – Meter Under a Window

116 S 4th St Reading

_05593 _05594



CityOPHD_05594

Non-Historic – Meter Under a Window

107 S 4th St Reading

_05611 _05611

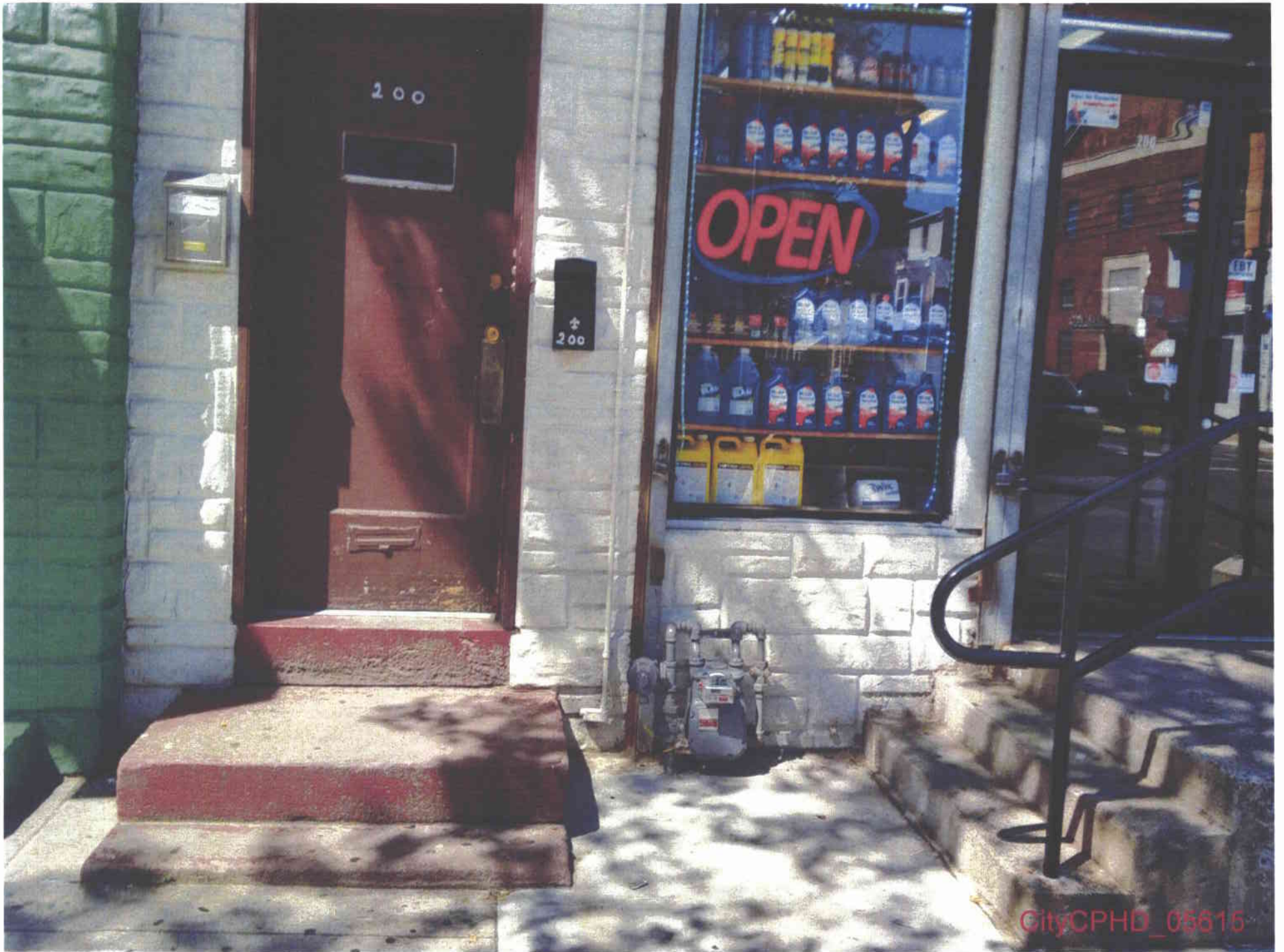


CityCPHD_05611

Non-Historic – Meter Under a Window

200 S 4th St Reading

_05615 _05615



CityCPHD_05615

Non-Historic – Meter Under a Window

202 S 4th St Reading

_05616 _05616



CityCPHD_05616

Non-Historic – Meter Under a Window

204 S 4th St Reading

__05617 _05617



CityCPHD_05617

Non-Historic – Meter Under a Window

232 S 4th St Reading

_05627 _05627



CityCPHD_05627

Non-Historic – Meter Under a Window

252 S 4th St Reading

_05636 _05636

Market

PAULINO

SANDWICHES

(610)406-5304

THANK YOU
FOR SHOPPING

SANDWICHES

OR COLD

ANY SANDWICH WITH LETTUCE & TOMATOES WILL GET
FREE A DAY'S SODA, COFFEE OR CHOCOLATE

Non-Historic – Meter Under a Window

225 S 4th St Reading

_05644 _05644



CINCPHD_05644

Non-Historic – Meter Under a Window

219 S 4th St Reading

_05648 _05648



217

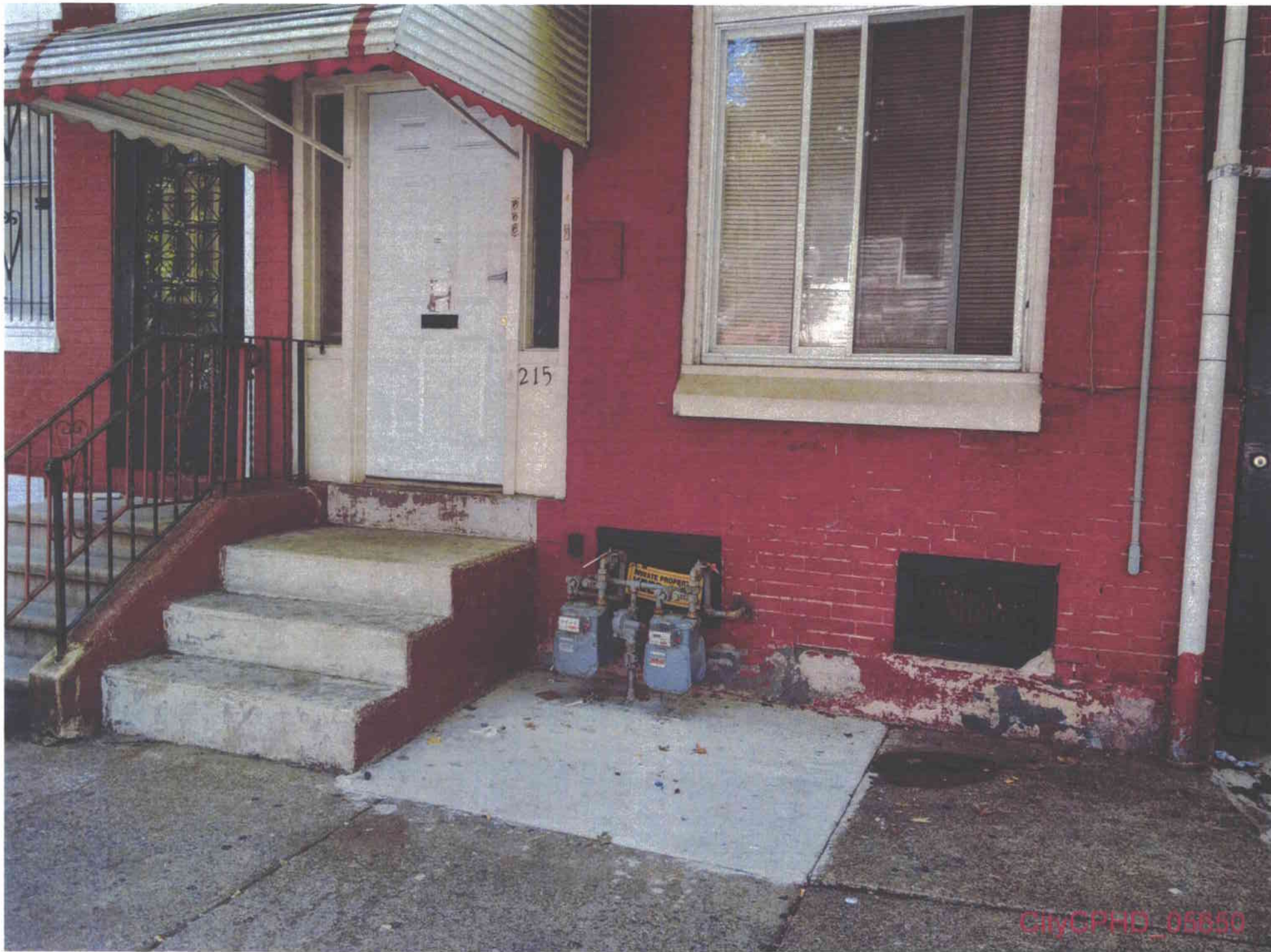
219

CityCPHD_05648

Non-Historic – Meter Under a Window

215 S 4th St Reading

_05650 _05650



CityCPHD_05650

Non-Historic – Meter Under a Window

209 S 4th St Reading

_05654 _05654



CityCPHD_05554

Non-Historic – Meter Under a Window

207 S 4th St Reading

_05655 _05655



CityCPHD_05655

Non-Historic – Meter Under a Window

343 S 4th St Reading

_05664 _05665



CityCPHD_05664



CityCPHD_05065

Non-Historic – Meter Under a Window

339 S 4th St Reading

_05667 _05667

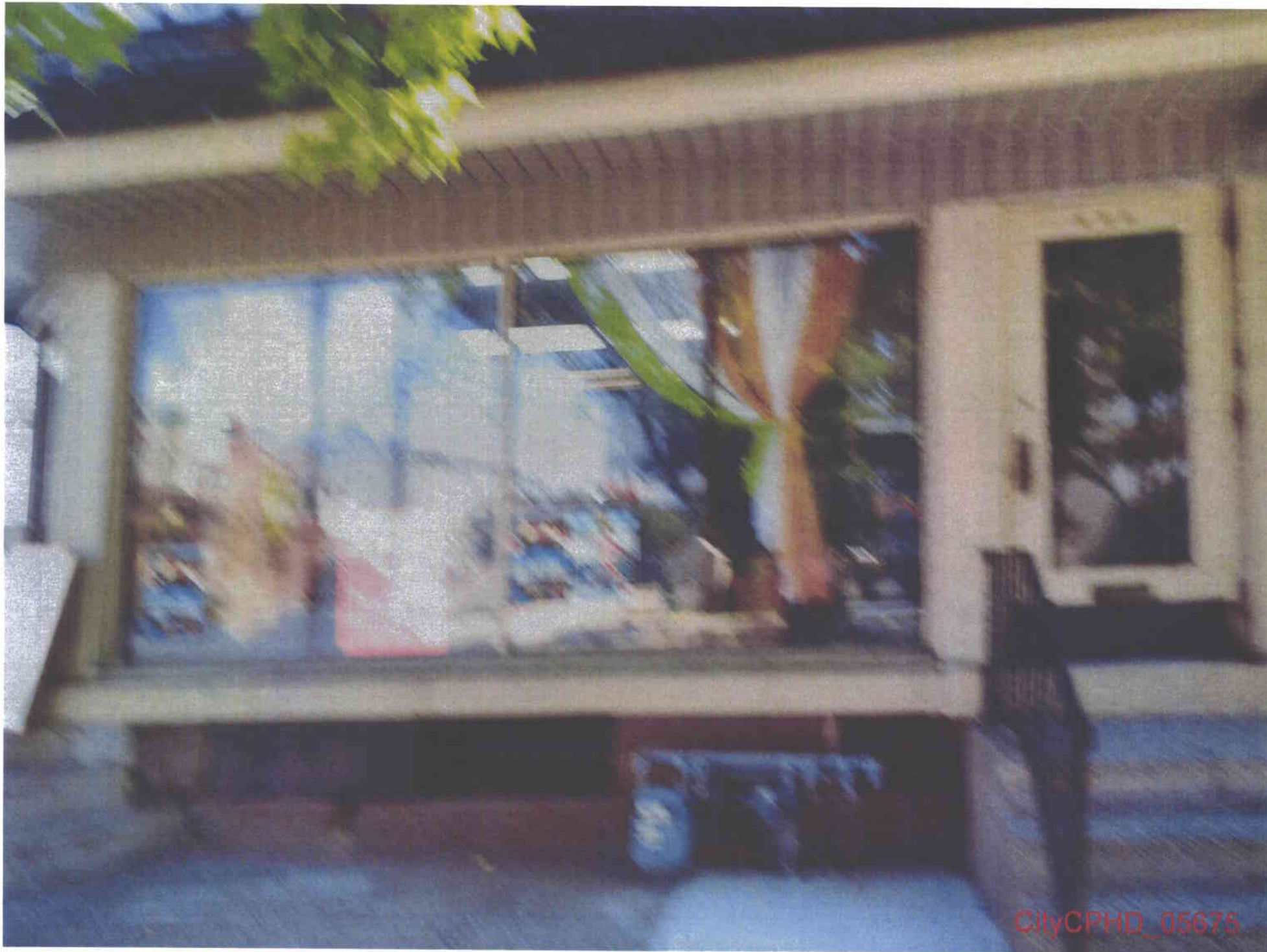


CityCPHD_05667

Non-Historic – Meter Under a Window

303 S 4th St Reading

_05675 _05675



CityCPHD_05675

Non-Historic – Meter Under a Window

409 S 4th St Reading

_05679 _05679



CITYCPHD_05679

Non-Historic – Meter Under a Window

1221 Cotton St Reading _07093 _07094



CityCPHD_07093



CITYCPHO_07094

Non-Historic – Meter Under a Window

1408 Cotton St Reading _07103 _07103



Non-Historic – Meter Under a Window

1733 Cotton St Reading _07114 _07114



CityGPHD_07114

Non-Historic – Meter Under a Window

1649 N 10th St Reading _07122 _07122



CityCPND 67422

Non-Historic – Meter Under a Window

1512 N 10th St Reading _07125 _07125



Non-Historic – Meter Under a Window

732 N 10th St Reading _07135 _07135



Non-Historic – Meter Under a Window

136 S 4th St Reading

_07147 _07147



Exhibit A-2

**Gas Meters in Violation of
52 Pa. Code § 59.18(a)(8)(v)**

Historic District – Meter Near an Air Intake

1708 Olive St Reading

_02862 _02863



CityCPHD_02862



CityCPHD_02863

Historic District – Meter Near an Air Intake

1710 Olive St Reading _02863 _02684



CityCPHD_02863



CityCPHD_02864

Historic District – Meter Near an Air Intake

731 Thorn St Reading

_02927 _02928



731

CityCPHD_02927



Historic District – Meter Near an Air Intake

823 Schuylkill Ave Reading _03447 _03449



CityCPHD_03447



CityCPHD_03448



CityCPND_03449

Historic District – Meter Near an Air Intake

523 Tulpehocken St Reading

_03686 _03687



CityCPHD_03686



CityCPHD_03687

Historic District – Meter Near an Air Intake

527 Tulpehocken St Reading

_03694 _03694



CityCPHD_03694

Historic District – Meter Near an Air Intake

1234 Alsace Rd Reading

_07052 _07052



CityCPHD_07052

Historic District – Meter Near an Air Intake

1032 Weiser St Reading _07601 _07601



CityCPHD_07601

Non-Historic – Meter Near an Air Intake

1034 N 10th St Reading _05210 _05210



CityCPHD_05210

Non-Historic – Meter Near an Air Intake

638 N 10th St Reading __05293 _05293



Exhibit A-3

**Gas Meters in Violation of
52 Pa. Code § 59.18(a)(8)(vi)**

Historic District – Meter in Contact with Soil/Corrosive Materials

1102 Hampden Blvd Reading

_02523 _02523



CityCPHD_02523

Historic District – Meter in Contact with Soil/Corrosive Materials

1516 N 15th St Reading _02628 _02629



CityCPHD_02628



Historic District – Meter in Contact with Soil/Corrosive Materials

1316 N 14th St Reading _02634 _02634



CityCPHD_02634

Historic District – Meter in Contact with Soil/Corrosive Materials

1421 Palm St Reading

_02824 _02828



CityCPHD_0282B

Historic District – Meter in Contact with Soil/Corrosive Materials

1503 Palm St Reading

_02847 _02848



Historic District – Meter in Contact with Soil/Corrosive Materials

1020 Weiser St Reading _03129 _03132

1020

CityCPHD_03129



CityCPHD_03130



CityCPHD_03131



06/06/10 05132

Historic District – Meter in Contact with Soil/Corrosive Materials

746 Gordon St Reading _03591 _03595



CityCPHD_03591



CityCPHD_03592



CityCPHD_03593



CityCPHD_03594



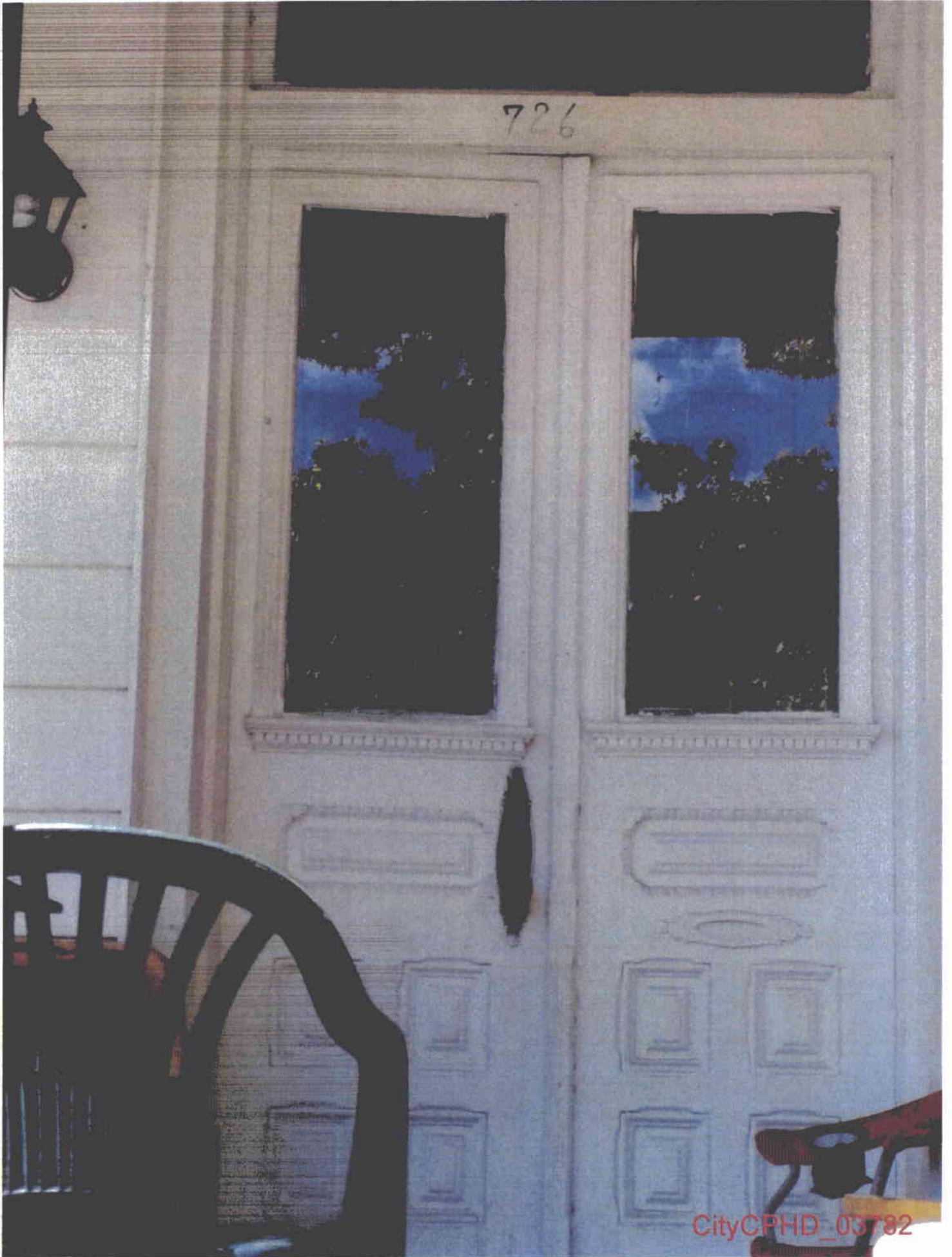
CityCPHD_03595

Historic District – Meter in Contact with Soil/Corrosive Materials

726 N 2nd St Reading

_03782 _03783

726



CityCPHD_03782



CMXGPHD_23785

Historic District – Meter in Contact with Soil/Corrosive Materials

1040 Weiser St Reading _07605 _07605

