

Cynthia T. Ortiz
7702 Hartel Avenue
Philadelphia, PA 19152
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March 1, 2018

VIA CERTIFIED MAIL AND EFILE
Graciela Christlieb, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

RE: CYNTHIA ORTIZ V. PGW
F-2017-2639274

Dear Ms. Christlieb:

Enclosed please find Plaintiff's Request for Production of Documents Addressed to Respondent PGW. Please answer same within the time allowed by the Rules of Civil Procedure.

Thank you.

Very truly yours,

CYNTHIA T. ORTIZ
PLAINTIFF - PRO SE

CO/

Enclosure

CC: Administrative Law Judge Angela T. Jones
Pennsylvania Public Utility Commission
801 Market Street, 4th Floor, Suite 4063
Philadelphia, PA 19107

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CYNTHIA ORTIZ :
V. : F-2017-2639274
PHILADELPHIA GAS WORKS :

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS
TO RESPONDENT PHILADELPHIA GAS WORKS

Plaintiff Cynthia Ortiz requests that Respondent Philadelphia Gas Works (hereinafter referred to as PGW) provide the following:

1. Name, address and telephone of manufacturer of gas meter that was in place in 2000 and prior to the replacement of the PGW gas meter in 2017.
2. The make, model and serial number of the PGW gas meter that was in place in 2000 and prior to the replacement of the gas meter in 2017.
3. Original installation date of the PGW gas meter that was in place in 2000 and prior to the installation of the new PGW meter in 2017.
4. Information on how many meters were replaced at 7702 Hartel Avenue, Philadelphia, PA 19152 since plaintiff's parents purchased the property in 1971.
5. The names, addresses and telephone numbers of the manufacturers of any PGW meters that were placed at plaintiff's property since 1971.
6. The make, model and serial numbers of any PGW gas meters that were placed at the plaintiff's property since 1971.
7. Any and all notices from PGW from 1971 to present for the property at 7702 Hartel Avenue, Philadelphia, PA 19152 regarding low readings on the PGW gas meter that was in place.
8. The Name, address and telephone of the manufacturer of new PGW gas meter that was installed in 2017.

9. Make, model and serial number of the of the new PGW gas meter that was installed in 2017 (this meter was installed in the dark because the house has no electricity in that area of the basement).

10. All bills from PGW to 7702 Hartel Avenue, Philadelphia, PA 19152 since January 2000.

11. All PGW account numbers pertaining to plaintiff at 7702 Hartel Avenue, Philadelphia, PA 19152 from 2000 to present.

12. A list of the payments made by any PGW account holder at 7702 Hartel Avenue, Philadelphia to PGW from 2000 to present.

13. A list of the number of PGW customers or information pertaining to any PGW customer's meter from 2000 to present in Philadelphia who also had or may have had the same make, model and serial number gas meter as plaintiff had in 2000 until the replacement of the new meter in 2017 that was reading incorrectly.

14. A list of instances that occurred regarding low readings from old PGW gas meters that were replaced in households from 2000 to 2017 and any action taken against these instances wherein residents were made to pay for for the low readings of PGW meters.

15. A list of instances, including but not limited to, the dates that PGW gas customers' meters have been replaced in the Lexington Park, 19152 zip code since 1971 wherein customers were made to pay for low readings due to PGW defective or low reading meters.

16. A list of other cases against PGW by consumers who were appealing PGW's bill regarding low reading defective gas meters since 2000.

By: /s/ Cynthia T. Ortiz
Cynthia T. Ortiz
Plaintiff, Pro se

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CYNTHIA ORTIZ :
V. : F-2017-2639274
PHILADELPHIA GAS WORKS :

CERTIFICATE OF SERVICE

Plaintiff, Cynthia Ortiz attests that she has provided a copy of the Plaintiff's Request for Production of Documents to Respondent Philadelphia Gas Works on March 1, 2018 via electronic filing and U.S. mail upon the following:

Graciela Christlieb, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

Administrative Law Judge Angela T. Jones
Pennsylvania Public Utility Commission
801 Market Street, 4th Floor, Suite 4063
Philadelphia, PA 19107

By: /s/ Cynthia T. Ortiz
Cynthia T. Ortiz
Plaintiff, Pro se