



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney  
Legal Department  
Direct Dial: 215-684-6164  
FAX: 215-684-6798  
graciela.christlieb@pgworks.com

September 6, 2018

**VIA FEDERAL EXPRESS**

Rosemary Chiavetta, Secretary Pennsylvania  
Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

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SEP 6 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Ines Rios v. Philadelphia Gas Works  
C-2018-3003457**

Dear Secretary Chiavetta:

Enclosed are an original and two copies of the Answer of Philadelphia Gas Works to the Community Legal Services' Motion to Compel.

This Answer has been served in accordance with the attached Certificate of Service. Please contact me with any questions or concerns.

Very truly yours,

  
Graciela Christlieb, Esquire  
Attorney for Philadelphia Gas Works

Enclosure

Cc: Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Ines Rios</b>	:	
<i>Complainant</i>	:	
v.	:	<b>Docket No. C – 2018 – 3003457</b>
	:	
<b>Philadelphia Gas Works</b>	:	
<i>Respondent</i>	:	

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SECRETARY'S BUREAU

**ANSWER OF THE PHILADELPHIA GAS WORKS  
TO THE COMPLAINANT'S MOTION TO COMPEL**

Respondent, the Philadelphia Gas Works ("PGW") hereby Answers the Motion to Compel filed by the Complainant, Ines Rios.

PGW is withdrawing, in whole, its objections, general or otherwise, to Complainant's Interrogatories and Requests for Production of Documents, Set I as PGW has already provided full and complete responses, with all information requested, in response to Complainant's Interrogatories and Requests for Production of Documents, Set I. PGW's amended Answers to Complainant's Interrogatories and Requests for Production of Documents, Set I is attached as Exhibit A; additions to PGW's Answers are in italics.

In support of this Motion, PGW hereby avers the following:

1. On July 17, 2018, the Complainant filed a Formal Complaint against PGW with the Public Utility Commission ("PUC" or "Commission") wherein she disputed PGW's determination that she had tampered with the meter in her home and engaged in theft of service.
2. On August 1, 2018, counsel for the Complainant served Complainant's Interrogatories and Requests for Production of Documents, Set I on PGW.
3. On August 16, 2018, counsel for the Complainant and counsel for the Respondent spoke over the telephone about Complainant's Interrogatories and Requests for Production of Documents, Set I.
4. During the course of the conversation, counsel for the Respondent informed counsel for the Complainant that PGW had erroneously informed the Complainant that she had been bill for unauthorized usage when the Complainant had, in fact, been billed for a tampered meter bypass and that the distinction affected PGW's ability to respond to Complainant's Interrogatories and Requests for Production of Documents, Set I. Counsel

for the parties agreed to redraft Complainant's Interrogatories and Requests for Production of Documents, Set I so that counsel for Respondent could provide the correct information.

5. On August 16, 2018, counsel for the Complainant and counsel for the Respondent engaged in an email exchange, which resulted in a corrected version of Complainant's Interrogatories and Requests for Production of Documents, Set I. A copy of the email exchange as well as the updated version of Complainant's Interrogatories and Requests for Production of Documents, Set I is attached as Exhibit B.

6. On August 20, 2018, PGW served its Answers and Objections to Complainant's Interrogatories and Requests for Production of Documents, Set I on counsel for the Complainant.

7. On August 21, 2018, counsel for the Complainant contacted counsel for the Respondent via email to inquire about some possible missing documentation. Counsel for Respondent provided the documents within approximately 2 hours of the initial email. A copy of the email exchange as well as the documentation provided is attached as Exhibit C.

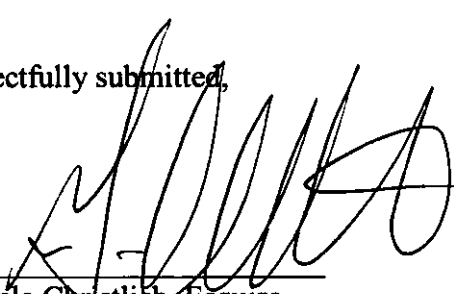
8. On August 30, 2018, counsel for the Complainant served Complainant's Motion to Compel on PGW.

9. On August 31, 2018, counsel for the Respondent contacted counsel for the Complainant via email to request an extension of time to file Respondent's Answer to Complainant's Motion to Compel. Counsel for the Complainant agreed to an extension. A copy of the email exchange is attached as Exhibit D.

**WHEREFORE**, PGW respectfully asks that the Court accept the withdrawal of PGW's objections and find that Complainant's allegations that PGW is "stonewalling" are without merit.

September 6, 2018

Respectfully submitted,



Graciela Christlieb, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
*Counsel for Respondent*

**RECEIVED**

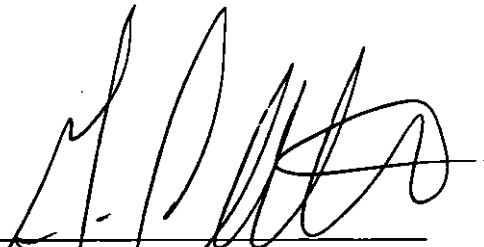
SEP 6 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**VERIFICATION**

I, Graciela Christlieb, hereby declare that I am counsel to the Philadelphia Gas Works; and that as such, I am authorized to make this verification on its behalf, that the facts set forth in the foregoing Answer are true to the best of my knowledge, information and belief, and that I expect to be able to prove these at a hearing held in this matter. I make this verification subject to the penalties of 18. Pa. C.S. §4904, pertaining to false statements to authorities.

September 6, 2018



Graciela Christlieb, Esquire

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SEP 6 2018  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Ines Rios** :

*Complainant* :

v. :

**Docket No. C – 2018 – 3003457**

:

**Philadelphia Gas Works** :

*Respondent* :

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**ANSWER OF THE PHILADELPHIA GAS WORKS  
TO THE COMPLAINANT'S MOTION TO COMPEL**

Exhibit A: PGW's amended Answers to Complainant's Interrogatories and Requests for Production of Documents, Set I is attached as Exhibit A; additions to PGW's Answers are in italics.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Ines Rios,**

*Complainant*

v.

**Docket No. C-2018-3003457**

**Philadelphia Gas Works,**

*Respondent.*

---

**ANSWERS OF RESPONDENT, PHILADELPHIA GAS WORKS, TO  
COMPLAINANT'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

Respondent, Philadelphia Gas Works ("PGW"), hereby Answers the Complainant's First Set of Interrogatories as follows:

**ANSWERS TO INTERROGATORIES**

1. Please provide records of all contacts between PGW and Complainant since January 2007, including but not limited to, a printout of contacts and credit and collections events for the Account.

**ANSWER:** See printouts of the Customer Contacts for Account for Complainant's account, notifications relating to credit and collections events, LIHEAP, and PGW's Customer Responsibility Program ("CRP"), and a letter from PGW's Dispute Resolution Unit ("DRU") produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "A".

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.

2. Please state the Company procedures for handling customers when PGW alleges a tampered meter bypass. Please provide all current PGW manuals, training materials and documents including but not limited to copies of notices and other documents provided to the customer, and procedures for terminating service. Please include materials that address meter bypass and any other alleged tampering with or vandalizing the meter.

**ANSWER:** When PGW finds evidence of a tampered meter bypass at a property, the PGW employee will document the evidence by photographing the meter and calling in a theft report. The PGW employee will also shut off the gas at the property, ensuring that the property is left safe, and will remove the meter. The PGW employee will leave a Post Termination Notice at the property. The Revenue Protection Unit will post reconnection terms on the customer's account; the terms will include the amount of the bypass charges.

See also materials produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "B".

**Source:** Timothy Sullivan, Superintendent, Revenue Protection and Meters; Documents produced in response to Complainant's First Set of Requests for Production of Documents.

3. With respect to gas meter # 01593949 and any other meters PGW has a record of at the Property, please provide all Records regarding the installation, service, inspection, repair, certification and removal of that meter, including:

- a. The dates on which each such installation, service, inspection, repair, certification and removal was performed, and
- b. the identity and position title of each PGW worker performing such installation, service, inspection, repair, certification or removal.

**ANSWER:** See PGW Records that document the testing, installation, history, and removal of Meter #01593949, produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "C". *The title of the servicepersons named in the Records performing the work is "Serviceperson."*

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.

4. Please provide all Records regarding any investigation performed by PGW of gas usage, meter functioning and gas service issues at the Property since January 2007.

**ANSWER:** See PGW Records, produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "D".

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.

5. Please provide all information, documents and records that pertain to how the Company determined that a tampered meter bypass existed or any other theft, if any, occurred at the Property.

**ANSWER:** See PGW Records, produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "E" as well as Appendices "C" and "D".

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.

6. Please provide all Records regarding the determination that a tampered meter bypass existed or any other theft, if any, occurred at the Property.

**ANSWER:** See PGW Records, produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendices "C", "D", and "E".

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.

7. Please provide all Records, including all policies, procedures, memoranda and manuals with respect to identifying properties where a tampered meter bypass is believed to exist.

**ANSWER:** See PGW Records, produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "B".

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.

8. Please describe how the Company estimated usage for the Property during the period when tampered meter bypass is alleged to have taken place.

**ANSWER:** PGW estimated the usage based on the historical usage at the property. When there are 12 consecutive months of usage closely preceding the period of time during which a tampered meter bypass existed at the property, PGW uses that historical usage at the property in question as the basis for the estimated usage for the period of time during which a tampered meter bypass existed at the property.

**Source:** Tiffany Jones; Senior Customer Review Unit Officer.

9. Please provide all Records regarding the estimate of usage for the Property during the period when tampered meter bypass is alleged to have taken place.

**ANSWER:** See PGW Records, produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "F".

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.

10. Please state the total amount that the Company claims Complainant currently owes to the Company. Please itemize the different segments of this amount, by indicating, without limitation:

- a. That portion of the total amount representing gas service for which the Company alleges that the Complainant has not paid, by year, and

- b. that portion of the total amount representing other fees charged by PGW, such as late fees, reconnection fees and deposits.

**ANSWER:** See PGW Records, produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "G".

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.

11. Please provide a complete copy of all Records in the Meter Investigation Unit relating to the Property since the installation of gas meter #01593949 including, but not limited to, handwritten notes and phone logs.

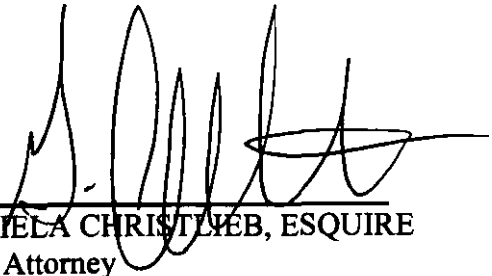
**ANSWER:** PGW currently has no records that are responsive to this request. PGW will supplement this answer should records that are responsive become available.

**Source:** Graciela Christlieb; Senior Attorney.

12. Please provide all information, documents, and records of Complainants' participation in PGW's Customer Responsibility Program since January 2007, including but not limited to determinations of eligibility or ineligibility and determinations of Complainants' asked to pay amount under CRP.

**ANSWER:** See PGW Record of Complainant's CRP Agreement, produced in response to Complainant's First Set of Requests for Production of Documents, attached hereto as Appendix "H" as well as Appendices "A" and "H". *Copies of the CRP applications submitted by the Complainant are in the process of being retrieved from off-site storage and will be produced when available.*

**Source:** Documents produced in response to Complainant's First Set of Requests for Production of Documents.



BY: GRACIELA CHRISTLIEB, ESQUIRE  
Senior Attorney  
Philadelphia Gas Works  
800 W. Montgomery Ave.  
Philadelphia, PA 19122  
Telephone: (215) 684-6164  
Facsimile: (215) 684-6798  
[graciela.christlieb@pgworks.com](mailto:graciela.christlieb@pgworks.com)  
*Attorney for Respondent,  
Philadelphia Gas Works*

**RECEIVED**

SEP 6 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Ines Rios</b>	:	
<i>Complainant</i>	:	
v.	:	<b>Docket No. C – 2018 – 3003457</b>
	:	
<b>Philadelphia Gas Works</b>	:	
<i>Respondent</i>	:	

**ANSWER OF THE PHILADELPHIA GAS WORKS  
TO THE COMPLAINANT’S MOTION TO COMPEL**

Exhibit B: Email exchange, which resulted in a corrected version of Complainant’s Interrogatories and Requests for Production of Documents, Set I as well as a copy of the updated version of Complainant’s Interrogatories and Requests for Production of Documents, Set I.

## Christlieb, Graciela C

---

**From:** Christlieb, Graciela C  
**Sent:** Thursday, August 16, 2018 3:14 PM  
**To:** 'Joline Price'  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Got it. Thanks!



Graciela Christlieb | Senior Attorney | Legal Department  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6164 | Fax: (215) 684-6798  
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---

**From:** Joline Price [mailto:JPrice@clsphila.org]  
**Sent:** Thursday, August 16, 2018 2:57 PM  
**To:** Christlieb, Graciela C  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Grace,

See attached – one comment and two small additions – in my understanding, PGW is only alleging a tampered meter bypass and no other theft, but I wanted the questions to be inclusive so that if PGW is alleging a different type of theft that information would be provided as well.

Let me know if you have questions.

Thanks,  
Joline

---

**From:** Christlieb, Graciela C [mailto:Graciela.Christlieb@pgworks.com]  
**Sent:** Thursday, August 16, 2018 2:48 PM  
**To:** Joline Price <JPrice@clsphila.org>  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Good afternoon,

I've attached the redlined Interrogatories, which should better reflect Ms. Rios' situation (not unauthorized usage). Please let me know if the changes are acceptable.

Thanks!



Graciela Christlieb | Senior Attorney | Legal Department  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6164 | Fax: (215) 684-6798

**From:** Joline Price [<mailto:JPrice@clsphila.org>]  
**Sent:** Thursday, August 16, 2018 12:16 PM  
**To:** Christlieb, Graciela C  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Yes, that works for me. I'll speak to you then!

Joline

---

**From:** Christlieb, Graciela C [<mailto:Graciela.Christlieb@pgworks.com>]  
**Sent:** Thursday, August 16, 2018 11:43 AM  
**To:** Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)>  
**Subject:** Re: Formal Complaint of Ines Rios v. PGW

Hello. Is it okay if we do 2:00 instead of 1:30?

Sent from my iPhone

On Aug 13, 2018, at 2:44 PM, Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)> wrote:

Yes, that should work! Can you call me at 215-981-3756?

Thanks,  
Joline

<image002.png>

**Joline Price**  
*Pronouns: she/her/hers*  
Staff Attorney  
Energy Unit  
1424 Chestnut Street  
Philadelphia, PA 19102  
Tele: (215) 981-3756  
Fax: (267) 765-6481  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[www.clsphila.org](http://www.clsphila.org)  
<image003.png> <image004.png>

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**From:** Christlieb, Graciela C [<mailto:Graciela.Christlieb@pgworks.com>]

**Sent:** Monday, August 13, 2018 2:05 PM

**To:** Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)>

**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Joline,

Does Thursday at 1:30 work for you?

Regards,

Grace

<image005.png>

Graciela Christlieb | Senior Attorney | Legal Department

**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122

Phone: (215) 684-6164 | Fax: (215) 684-6798

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---

**From:** Joline Price [<mailto:JPrice@clsphila.org>]

**Sent:** Monday, August 13, 2018 12:53 PM

**To:** Christlieb, Graciela C

**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Grace,

Thank you. I am free on Thursday after 11:30 am and Friday before 10:30am and after 1pm.

Let me know what works best for you.

Best,

Joline

---

**From:** Christlieb, Graciela C [<mailto:Graciela.Christlieb@pgworks.com>]

**Sent:** Monday, August 13, 2018 12:48 PM

**To:** Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)>

**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Good morning,

Attached please find PGW's Answer. I have also put a paper copy in the mail. Is there a time later this week (Thursday or Friday) when you would be free for a telephone call to talk about some of the Interrogatories?

Thanks,

Grace

<image005.png>

Graciela Christlieb | Senior Attorney | Legal Department

**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122

Phone: (215) 684-6164 | Fax: (215) 684-6798

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---

**From:** Joline Price [<mailto:JPrice@clsphila.org>]

**Sent:** Tuesday, July 17, 2018 2:58 PM

**To:** Christlieb, Graciela C  
**Subject:** FW: Formal Complaint of Ines Rios v. PGW

Counsel:

My apologies, I spelled your email incorrectly in my previous email.

Sincerely,  
Joline

---

**From:** Joline Price  
**Sent:** Tuesday, July 17, 2018 2:55 PM  
**To:** [laureto.farinas@pgworks.com](mailto:laureto.farinas@pgworks.com); [graceila.christlieb@pgworks.com](mailto:graceila.christlieb@pgworks.com)  
**Cc:** Robert Ballenger <[RBallenger@clsphila.org](mailto:RBallenger@clsphila.org)>  
**Subject:** Formal Complaint of Ines Rios v. PGW

Good afternoon counsel,

I am attaching the Formal Complaint of Ines Rios (Account No. 883351521), which was e-filed today with the Commission. I have also sent a hard copy to your offices.

Please let me know if you have any questions. I can be reached at (215) 981-3756 if you wish to discuss this matter.

Sincerely,  
Joline Price

Counsel for Ines Rios

<image002.png>

**Joline Price**  
*Pronouns: she/her/hers*  
Staff Attorney  
Energy Unit  
1424 Chestnut Street  
Philadelphia, PA 19102  
Tele: (215) 981-3756  
Fax: (267) 765-6481  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[www.clsphila.org](http://www.clsphila.org)  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Ines Rios</b>	:	
	:	
<b>Complainant</b>	:	
	:	
<b>v.</b>	:	<b>Docket No. C-2018-3003457</b>
	:	
<b>PHILADELPHIA GAS WORKS</b>	:	
	:	
<b>Respondent</b>	:	

**Ines Rios' Interrogatories and Requests for Production of Documents  
SET I**

Pursuant to 52 Pa. Code §§5.341, 5.349, Complainant Ines Rios, through counsel Community Legal Services, Inc., hereby propounds the following Interrogatories and Requests for Production of Documents to Philadelphia Gas Works (hereinafter "PGW") to be answered by those officers, employees or agents as may be cognizant of the requested facts and/or documents and who are authorized to answer on behalf of the Company. *The due date for response to the Interrogatories is twenty (20) days from the date of service.*

The following instructions apply to these interrogatories:

1. These interrogatories shall be deemed to be continuing. PGW is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to PGW after the answers hereto are served.
2. The answer should first restate the question asked and also identify the name and position of the individual who provided the answer.
3. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession,

control, or custody of PGW or may be reasonably ascertained thereby. The term "PGW" or "Company" as used herein includes PGW, its attorneys, agents, employees, or other representatives.

4. As used in these discovery requests, the following terms shall have the meanings provided below, unless the context clearly requires otherwise:

- a. "Account" means the PGW gas account of Ines Rios and all charges attributed to such Account, at 2912 Ella Street ("the Property").
- b. "Commission" means the Pennsylvania Public Utility Commission, including, without limitation, the Commission's Bureau of Consumer Services and the natural persons providing services as investigators thereto.
- c. "Complainant" means Ines Rios
- d. "Document" or "workpaper" means and includes, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires, surveys, drawings, graphs, charts and photographs and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written

comments concerning the foregoing, in whatever form stored or contained in or on whatever medium including computerized memory or magnetic media.

- e. "Property" means that certain dwelling located at 2912 Ella Street, Philadelphia.
- f. "Record" means any and all documents or workpapers in the possession, custody or control of, or which may be reasonably ascertained or acquired by, the Company.

**Ines Rios v. Philadelphia Gas Works**

**Docket No. C-2018-3003457**

**Ines Rios's Interrogatories and Request for Production of Documents  
Set I**

I-1. Please provide records of all contacts between PGW and Complainant since January 2007, including but not limited to, a printout of contacts and credit and collections events for the Account.

I-2. Please state the Company procedures for handling customers when PGW alleges a tampered meter bypass, use of gas without authorization. ~~Please provide all current PGW manuals, training materials and documents including but not limited to copies of notices and other documents provided to the customer, and procedures for terminating service.~~ Please include materials that address meter bypass and any meter disconnection, or other alleged tampering with or vandalizing the meter.

**Comment [JP1]:** This sentence should stay in. The other changes in this Interrogatory are acceptable.

I-3. With respect to gas meter # 01593949 and any other meters PGW has a record of at the Property, please provide all Records regarding the installation, service, inspection, repair, certification and removal of that meter, including:

- a. the dates on which each such installation, service, inspection, repair, certification and removal was performed and
- b. the identity and position title of each PGW worker performing such installation, service, inspection, repair, certification or removal.

- I-4. Please provide all Records regarding any investigation performed by PGW of gas usage, meter functioning and gas service issues at the Property since January 2007.
- I-5. Please provide all information, documents and records that pertain to how the Company determined that a tampered meter bypass existed or any other theft, if any, occurred~~unauthorized usage was taking place~~ at the Property.
- I-6. Please provide all Records regarding the determination that a tampered meter bypass existed or any other theft, if any, occurred~~unauthorized usage was taking place~~ at the Property.
- I-7. Please provide all Records, including all policies, procedures, memoranda and manuals with respect to identifying properties where a tampered meter bypass is believed to exist~~unauthorized usage is alleged to have taken place~~.
- I-8. Please describe how the Company estimated usage for the Property during the period when tampered meter bypass~~unauthorized usage~~ is alleged to have taken place.
- I-9. Please provide all Records regarding the estimate of usage for the Property during the period when tampered meter bypass~~unauthorized usage~~ is alleged to have taken place.
- I-10. Please state the total amount that the Company claims Complainant currently owes to the Company. Please itemize the different segments of this amount, by indicating, without limitation:

- a. That portion of the total amount representing gas service for which the Company alleges that the Complainant has not paid, by year, and
  - b. That portion of the total amount representing other fees charged by PGW, such as late fees, reconnection fees and deposits.
- I-11. Please provide a complete copy of all Records in the Meter Investigation Unit relating to the Property since the installation of gas meter #01593949 including, but not limited to, handwritten notes and phone logs.
- I-12. Please provide all information, documents, and records of Complainants' participation in PGW's Customer Responsibility Program since January 2007, including but not limited to determinations of eligibility or ineligibility and determinations of Complainants' asked to pay amount under CRP.

Respectfully submitted,

---

Joline Price, Esquire  
Robert Ballenger, Esquire  
Attorney for Complainant  
COMMUNITY LEGAL SERVICES, INC.  
1424 Chestnut Street  
215-981-3756

August 1, 2018

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INES RIOS	:	
Complainant	:	
v.	:	Docket No. C-2018-3003457
	:	
PHILADELPHIA GAS WORKS	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day, served a copy of Ines Rios's Interrogatories and Request for Production of Documents - Set I upon the participant, listed below, in accordance with the requirements of 52 Pa.Code §1.54 (relating to service by a participant).

By e-mail and first-class mail:  
Laureto A. Farinas, Esquire  
Philadelphia Gas Works  
Legal Department  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
[Laureto.Farinas@pgworks.com](mailto:Laureto.Farinas@pgworks.com)  
[graciela.christlieb@pgworks.com](mailto:graciela.christlieb@pgworks.com)

Dated July 24, 2018.

\_\_\_\_\_  
Joline Price, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Ines Rios** :  
*Complainant* :  
v. : **Docket No. C – 2018 – 3003457**  
:  
**Philadelphia Gas Works** :  
*Respondent* :

**ANSWER OF THE PHILADELPHIA GAS WORKS  
TO THE COMPLAINANT’S MOTION TO COMPEL**

Exhibit C: Email exchange wherein counsel for the Complainant contacted counsel for the Respondent to inquire about some possible missing documentation as well as a copy of the documentation provided.

## Christlieb, Graciela C

---

**From:** Christlieb, Graciela C  
**Sent:** Tuesday, August 21, 2018 4:02 PM  
**To:** 'Joline Price'  
**Subject:** RE: Answers and Objections to Interrogatories  
**Attachments:** Rios Meter Reads.PDF

Good afternoon,

I have attached the print out of the meter reads for the duration of Ms. Rios' service to complete the print outs that were already sent with Appendix E (I assume these will be part of Appendix E as well).

Regards,  
Grace



Graciela Christlieb | Senior Attorney | Legal Department  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6164 | Fax: (215) 684-6798  
Follow us on [Facebook](#) [Twitter](#) and [YouTube](#)

---

**From:** Joline Price [mailto:JPrice@clsphila.org]  
**Sent:** Tuesday, August 21, 2018 1:53 PM  
**To:** Christlieb, Graciela C  
**Subject:** RE: Answers and Objections to Interrogatories

Good afternoon Grace:

Thank you. I am in the process of reviewing these responses and have a quick question about what appears to be missing information in Appendix E. Appendix E includes meter read lists for 7/7/2006 – 7/9/2007; 8/7/2007 – 9/4/2008; 5/6/2009 – 6/4/2010 and 5/4/2017 -4/3/2018, but not for 10/2008 – 4/2009 or 7/2010 - 4/2017.

It seems like it was probably just an oversight - are you able to provide those printouts to me as a supplemental response (or whatever format makes the most sense)?

Thanks,  
Joline

---

**From:** Christlieb, Graciela C [mailto:Graciela.Christlieb@pgworks.com]  
**Sent:** Monday, August 20, 2018 6:11 PM  
**To:** Joline Price <JPrice@clsphila.org>  
**Subject:** Answers and Objections to Interrogatories

Joline,

Attached please find our answers and documentation. Per our conversation, I have left #11 open to being supplemented, though I am pretty sure MIU hasn't had anything to do with this meter yet. Also, re: #12, I am still

working on getting the CRP Applications out of storage; I will keep you posted on which ones we have and how quickly we can get them back from the storage facility.

Let me know if you need paper copies of anything.

Regards,  
Grace



Graciela Christlieb | Senior Attorney | Legal Department  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6164 | Fax: (215) 684-6798  
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---

**From:** Joline Price [<mailto:JPrice@clsphila.org>]  
**Sent:** Thursday, August 16, 2018 2:57 PM  
**To:** Christlieb, Graciela C  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Grace,

See attached – one comment and two small additions – in my understanding, PGW is only alleging a tampered meter bypass and no other theft, but I wanted the questions to be inclusive so that if PGW is alleging a different type of theft that information would be provided as well.

Let me know if you have questions.

Thanks,  
Joline

---

**From:** Christlieb, Graciela C [<mailto:Graciela.Christlieb@pgworks.com>]  
**Sent:** Thursday, August 16, 2018 2:48 PM  
**To:** Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)>  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Good afternoon,

I've attached the redlined Interrogatories, which should better reflect Ms. Rios' situation (not unauthorized usage). Please let me know if the changes are acceptable.

Thanks!



Graciela Christlieb | Senior Attorney | Legal Department  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6164 | Fax: (215) 684-6798  
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---

**From:** Joline Price [<mailto:JPrice@clsphila.org>]  
**Sent:** Thursday, August 16, 2018 12:16 PM

**To:** Christlieb, Graciela C  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Yes, that works for me. I'll speak to you then!

Joline

---

**From:** Christlieb, Graciela C [<mailto:Graciela.Christlieb@pgworks.com>]  
**Sent:** Thursday, August 16, 2018 11:43 AM  
**To:** Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)>  
**Subject:** Re: Formal Complaint of Ines Rios v. PGW

Hello. Is it okay if we do 2:00 instead of 1:30?

Sent from my iPhone

On Aug 13, 2018, at 2:44 PM, Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)> wrote:

Yes, that should work! Can you call me at 215-981-3756?

Thanks,  
Joline

<image002.png>

**Joline Price**  
*Pronouns: she/her/hers*  
Staff Attorney  
Energy Unit  
1424 Chestnut Street  
Philadelphia, PA 19102  
Tele: (215) 981-3756  
Fax: (267) 765-6481  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[www.clsphila.org](http://www.clsphila.org)  
<image003.png> <image004.png>

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---

**From:** Christlieb, Graciela C [<mailto:Graciela.Christlieb@pgworks.com>]  
**Sent:** Monday, August 13, 2018 2:05 PM  
**To:** Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)>  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Joline,

Does Thursday at 1:30 work for you?

Regards,  
Grace  
<image005.png>

Graciela Christlieb | Senior Attorney | Legal Department  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6164 | Fax: (215) 684-6798  
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---

**From:** Joline Price [<mailto:JPrice@clsphila.org>]  
**Sent:** Monday, August 13, 2018 12:53 PM  
**To:** Christlieb, Graciela C  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Grace,

Thank you. I am free on Thursday after 11:30 am and Friday before 10:30am and after 1pm.

Let me know what works best for you.

Best,  
Joline

---

**From:** Christlieb, Graciela C [<mailto:Graciela.Christlieb@pgworks.com>]  
**Sent:** Monday, August 13, 2018 12:48 PM  
**To:** Joline Price <[JPrice@clsphila.org](mailto:JPrice@clsphila.org)>  
**Subject:** RE: Formal Complaint of Ines Rios v. PGW

Good morning,

Attached please find PGW's Answer. I have also put a paper copy in the mail. Is there a time later this week (Thursday or Friday) when you would be free for a telephone call to talk about some of the Interrogatories?

Thanks,  
Grace

<image005.png>

Graciela Christlieb | Senior Attorney | Legal Department  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6164 | Fax: (215) 684-6798  
Follow us on [Facebook](#) [Twitter](#) and [YouTube](#)

---

**From:** Joline Price [<mailto:JPrice@clsphila.org>]  
**Sent:** Tuesday, July 17, 2018 2:58 PM  
**To:** Christlieb, Graciela C  
**Subject:** FW: Formal Complaint of Ines Rios v. PGW

Counsel:

My apologies, I spelled your email incorrectly in my previous email.

Sincerely,  
Joline

---

**From:** Joline Price  
**Sent:** Tuesday, July 17, 2018 2:55 PM  
**To:** [laureto.farinas@pgworks.com](mailto:laureto.farinas@pgworks.com); [graceila.christlieb@pgworks.com](mailto:graceila.christlieb@pgworks.com)  
**Cc:** Robert Ballenger <[RBallenger@clsphila.org](mailto:RBallenger@clsphila.org)>  
**Subject:** Formal Complaint of Ines Rios v. PGW

Good afternoon counsel,

I am attaching the Formal Complaint of Ines Rios (Account No. 883351521), which was e-filed today with the Commission. I have also sent a hard copy to your offices.

Please let me know if you have any questions. I can be reached at (215) 981-3756 if you wish to discuss this matter.

Sincerely,  
Joline Price

Counsel for Ines Rios

<image002.png>

**Joline Price**  
*Pronouns: she/her/hers*  
Staff Attorney  
Energy Unit  
1424 Chestnut Street  
Philadelphia, PA 19102  
Tele: (215) 981-3756  
Fax: (267) 765-6481  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[www.clsphila.org](http://www.clsphila.org)  
<image003.png> <image004.png>

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Address	2912 ELLA ST	SSN	***-**-3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521	Work	
Customer Name	RIOS, INES	Sr. Cit. Discount		Mobile	
USA Rate		Customer's Age	64	Car	
Mailing Address	2912 ELLA ST, PHILA, PA 19134	Meter Status	Alert No Meter	SP Status	Connected
Alert		Service Status	ACTIVE	Curb Box?	58 On SNH 02r WWC
		Theft Indicator		Expander	<input type="checkbox"/>
Last Contact (Present)		Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138 , with a result of Completed , with activities of ( N.J.U.		Last Contact (Present)	
		Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138 , with a result of Completed , with activities of ( N.J.U.			

Customer Based	<input checked="" type="checkbox"/> Premise Based	Premise Alert	CWIP	Add Meter Read
<input checked="" type="checkbox"/> Meter Reads	Service	Prev Cust	Contacts	Leases
	AIMS Orders	BCCS Orders	Meter Info	PLP
	Landlord Info	Survey	LCP	BRT
	Premise Bts			

Date	Meter Number	Reads	Type	Code	Source	Error?	Tempor Count	Name	Account #
4/3/2018 3:16 PM	1593949	8637	Normal	Regular	Turn Off			RIOS, INES	883351521
4/3/2018 3:10 PM	1593949	8637	Remove	Regular	Service Order			RIOS, INES	883351521
4/3/2018 3:02 PM	1593949	8637	Normal	Regular	Service Order			RIOS, INES	883351521
3/7/2018 4:57 AM	1593949	8573	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
2/6/2018 12:30 PM	1593949	8443	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
1/8/2018 12:05 PM	1593949	8306	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
12/5/2017 12:15 PM	1593949	8088	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
11/2/2017 1:05 PM	1593949	7959	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
10/4/2017 12:03 PM	1593949	7925	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
9/5/2017 12:38 PM	1593949	7910	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
8/3/2017 12:37 PM	1593949	7892	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
7/5/2017 6:00 AM	1593949	7877	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
6/5/2017 12:26 PM	1593949	7859	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521
5/4/2017 1:18 PM	1593949	7825	Normal	Regular	AMR Read		2.0	RIOS, INES	883351521

Close

Address	2912 ELLA ST	SSN	3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521	Work	
Customer Name	RIDOS, INES	Sr. Cit. Discount		Mobile	
USA Rate		Customer's Age	64	Car	
Mailing Address	2912 ELLA ST, PHILA, PA 19134	Meter Status	Alert No Meter	SP Status	Connected
Alert		Service Status	ACTIVE	Carb Box?	SR On SNH Q2R WWC
		Theft Indicator		Expander	<input type="checkbox"/>
Update					
Last Contact (Premise)	Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9385138, with a result of Completed, with activities of ( M.I.U.		Last Contact (Premise) Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9385138, with a result of Completed, with activities of ( M.I.U.		

Customer Based	Premise Based	Premise Alert	CWP	Add Meter Read									
Meter Reads	Service	Prov Cust	Contacts	Leaks	AIMS Orders	BCCS Orders	Meter Info	PLP	Landlord Info	Survey	LCP	BRT	Premise Btl

Date	Meter Number	Reads	Type	Code	Source	Error	Temperature	Name	Account
5/4/2017 1:18 PM	1593949	7825	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
4/5/2017 1:07 PM	1593949	7781	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
3/7/2017 12:52 PM	1593949	7673	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
2/6/2017 12:28 PM	1593949	7573	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
1/6/2017 7:07 AM	1593949	7441	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
12/5/2016 7:03 AM	1593949	7302	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
11/2/2016 7:08 AM	1593949	7212	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
10/4/2016 7:01 AM	1593949	7170	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
9/2/2016 7:01 AM	1593949	7154	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
8/3/2016 12:00 PM	1593949	7140	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
7/5/2016 7:33 AM	1593949	7124	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
6/3/2016 6:55 AM	1593949	7107	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
5/4/2016 10:38 AM	1593949	7079	Normal	Regular	AMR Read		20	RIDOS, INES	883351521
4/5/2016 12:37 PM	1593949	7028	Normal	Regular	AMR Read		20	RIDOS, INES	883351521

Close

Address	2912 ELLA ST	SSN	*** 3961	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521	Work	
Customer Name	RIOS, INES	Sr. Cit. Discount		Mobile	
USA Rate		Customer's Age	64	Car	
Mailing Address	2912 ELLA ST, PHILA, PA 19134	Meter Status	Alert No Meter	SP Status	Connected
Alert		Service Status	ACTIVE	Curb Box?	SR On SNH 028 WWC
		Theft Indicator		Expander	<input type="checkbox"/>
				Update	<input type="button" value="Update"/>
Last Contact (Premise)	Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of ( M.I.U.		Last Contact (Premise) Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of ( M.I.U.		

Customer Based	<input type="checkbox"/> Premise Based	<input type="checkbox"/> Premise Alert	<input type="checkbox"/> CWP		<input type="checkbox"/> Add Meter Read								
<input checked="" type="checkbox"/> Meter Reads	Service	Prev Cust	Contacts	Leaks	AIMS Orders	BCCS Orders	Meter Info	PLP	Landlord Info	Survey	LCP	BRT	Premise Bldg
Date	Meter Number	Reads	Type	Code	Source	Error?	Temp	Count	Name	Account			
4/5/2016 12:37 PM	1593949	7028	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
3/4/2016 11:40 AM	1593949	6952	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
2/4/2016 7:00 AM	1593949	6825	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
1/6/2016 12:33 PM	1593949	6697	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
12/3/2015 6:53 AM	1593949	6589	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
11/3/2015 6:51 AM	1593949	6513	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
10/9/2015 6:47 AM	1593949	6471	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
9/3/2015 6:01 AM	1593949	6449	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
8/5/2015 7:10 AM	1593949	6435	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
7/6/2015 7:06 AM	1593949	6421	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
6/4/2015 12:28 PM	1593949	6404	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
5/5/2015 10:47 AM	1593949	6388	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
4/5/2015 6:46 AM	1593949	6348	Normal	Regular	AMR Read			20	RIOS, INES	883351521			
3/5/2015 8:28 AM	1593949	6252	Normal	Regular	AMR Read			20	RIOS, INES	883351521			



Address	2912 ELLA ST	SSN	3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521	Work	
Customer Name	RIOS, INES	Sr. Cit. Discount		Mobile	
USA Rate		Customer's Age	64	Car	
Mailing Address	2912 ELLA ST, PHILA, PA 19134	Meter Status	Alert No Meter	SP Status	Connected
Alert		Service Status	ACTIVE	Curb Box?	Sh On SNH 02r WWC
		Theft Indicator		Expand	<input type="checkbox"/> Update

Last Contact (Premises) Last Contact (Person)  
 Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of (N.I.U.)

Customer Based	Premise Based	Premise Alert	CWP	Add Meter Read									
Meter Reads	Service	Prev Cust	Contacts	Leads	AMS Orders	BCCS Orders	Meter Info	PLP	Landed Info	Survey	LCP	BRT	Premise Bills

Date	Meter Number	Reads	Type	Code	Source	Error?	Amper Count	Name	Account ID
2/9/2014 3:49 AM	1583949	5367	Normal	Regular	AMR Read		20	RIOS, INES	883351521
1/6/2014 3:56 AM	1583949	5193	Normal	Regular	AMR Read		20	RIOS, INES	883351521
8/17/2006 4:06 PM	1583949	9667	Normal	Regular	Turn On			RIOS, INES	883351521
12/4/2013 3:57 AM	1583949	5061	Normal	Regular	AMR Read		20	RIOS, INES	883351521
11/4/2013 4:02 AM	1583949	4968	Normal	Regular	AMR Read		20	RIOS, INES	883351521
10/4/2013 3:52 AM	1583949	4930	Normal	Regular	AMR Read		20	RIOS, INES	883351521
9/5/2013 3:56 AM	1583949	4920	Normal	Regular	AMR Read		20	RIOS, INES	883351521
8/9/2013 3:44 AM	1583949	4909	Normal	Regular	AMR Read		20	RIOS, INES	883351521
7/5/2013 7:17 AM	1583949	4899	Normal	Regular	AMR Read		20	RIOS, INES	883351521
6/5/2013 3:43 AM	1583949	4887	Normal	Regular	AMR Read		20	RIOS, INES	883351521
5/6/2013 3:37 AM	1583949	4873	Normal	Regular	AMR Read		20	RIOS, INES	883351521
4/5/2013 3:44 AM	1583949	4824	Normal	Regular	AMR Read		20	RIOS, INES	883351521
3/7/2013 3:38 AM	1583949	4733	Normal	Regular	AMR Read		20	RIOS, INES	883351521
2/6/2013 1:59 AM	1583949	4626	Normal	Regular	AMR Read		20	RIOS, INES	883351521

Close

Address	2912 ELLA ST	SSN	3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521	Work	
Customer Name	RIOS, INES	Sr. Cit. Discount		Mobile	
USA Rate		Customer's Age	64	Car	
Mailing Address	2912 ELLA ST, PHILA, PA 19134	Meter Status	Alert No Meter	SP Status	Connected
Alert		Service Status	ACTIVE	Curb Box?	SI On SNH 02B WWC
		Theft Indicator		Expander	<input type="checkbox"/>
				Update	<input type="button" value="Update"/>

Last Contact (Premise) Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of (M.I.U.)

Customer Based	<input type="checkbox"/> Premise Based	<input type="checkbox"/> Premise Alert	<input type="checkbox"/> CWP	<input type="checkbox"/> Add Meter Read									
<input type="checkbox"/> Meter Reads	Service	Prev Cust	Contacts	Links	AMS Orders	BCCS Orders	Meter Info	PLP	Landlord Info	Survey	LCP	BRT	Premise Bills

Date	Meter Number	Reads	Type	Code	Source	Error?	Temper Count	Name	Account #
2/6/2013 1:59 AM	1593949	4626	Normal	Regular	AMR Read		20	RIOS, INES	883351521
1/8/2013 3:41 AM	1593949	4496	Normal	Regular	AMR Read		20	RIOS, INES	883351521
12/6/2012 4:53 AM	1593949	4343	Normal	Regular	AMR Read		20	RIOS, INES	883351521
11/5/2012 4:56 AM	1593949	4228	Normal	Regular	AMR Read		20	RIOS, INES	883351521
10/5/2012 3:35 AM	1593949	4191	Normal	Regular	AMR Read		20	RIOS, INES	883351521
9/6/2012 3:35 AM	1593949	4183	Normal	Regular	AMR Read		20	RIOS, INES	883351521
8/6/2012 4:57 AM	1593949	4172	Normal	Regular	AMR Read		20	RIOS, INES	883351521
7/6/2012 3:35 AM	1593949	4163	Normal	Regular	AMR Read		20	RIOS, INES	883351521
6/6/2012 3:32 AM	1593949	4151	Normal	Regular	AMR Read		20	RIOS, INES	883351521
5/7/2012 3:32 AM	1593949	4137	Normal	Regular	AMR Read		20	RIOS, INES	883351521
4/5/2012 4:55 AM	1593949	4100	Normal	Regular	AMR Read		20	RIOS, INES	883351521
3/7/2012 4:57 AM	1593949	4055	Normal	Regular	AMR Read		20	RIOS, INES	883351521
2/6/2012 4:51 AM	1593949	3938	Normal	Regular	AMR Read		20	RIOS, INES	883351521
1/5/2012 3:28 AM	1593949	3789	Normal	Regular	AMR Read		20	RIOS, INES	883351521

Close

Address	2912 ELLA ST	SSN	---	3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521		Work	
Customer Name	RIOS, INES	Sr. Cit. Discount			Mobile	
USA Rate		Customer's Age	64		Car	
Mailing Address	2912 ELLA ST, PHILA, PA 19134	Meter Status	Alert	No Meter	SP Status	Connected
Alert		Service Status	ACTIVE		Curb Box?	SR On SNH 02r WWC
		Theft Indicator			Expander	<input type="checkbox"/>
					Update	<input type="button" value="Update"/>
Last Contact (Premise)	Date: 08/16/2018. Created By: LGOODE. Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of ( M.I.U.		Last Contact (Premise)		Date: 08/16/2018. Created By: LGOODE. Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of ( M.I.U.	

Customer Based	<input type="checkbox"/> Premise Based	Premise Alert		CMIP	Add Meter Read								
<input type="checkbox"/> Meter Reads	Service	Prev Cust	Contacts	Lookup	AMS Orders	BCCS Orders	Meter Info	PLP	Landlord Info	Survey	LCP	BRT	Premise Bills
Date	Meter Number	Reads	Type	Code	Source	Error?	Temper Count	Name	Account ID				
06/2012 4:51 AM	1593949	3938	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
1/5/2012 3:28 AM	1593949	3789	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
12/5/2011 4:57 AM	1593949	3653	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
11/3/2011 4:51 AM	1593949	3586	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
10/5/2011 3:25 AM	1593949	3551	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
9/6/2011 3:37 AM	1593949	3539	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
8/4/2011 3:18 AM	1593949	3527	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
7/6/2011 3:24 AM	1593949	3518	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
6/6/2011 3:16 AM	1593949	3507	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
5/5/2011 3:15 AM	1593949	3492	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
4/5/2011 5:21 AM	1593949	3445	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
3/8/2011 4:49 AM	1593949	3350	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
2/4/2011 3:22 AM	1593949	3228	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
1/6/2011 3:12 AM	1593949	3060	Normal	Regular	AMR Read		20	RIOS, INES	883351521				

Close

Address	2912 ELLA ST	SSN	---	3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521		Work	--
Customer Name	RIOS, INES	Sr. Cit. Discount			Mobile	--
USA Rate		Customer's Age	64		Car	--
Mailing Address	2912 ELLA ST, PHILA, PA 19134	Meter Status	Alert No Meter		SP Status	Connected
Alert		Service Status	ACTIVE		Curb Box?	SR On SNH OR WWC
		Theft Indicator			Expander	<input type="checkbox"/> Update

**Last Contact (Premise)**  
 Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of (M.I.U.)

**Last Contact (Parade)**  
 Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of (M.I.U.)

Customer Based	Premise Based	Premise Alert	CWP	Add Meter Read									
Meter Reads	Service	Prev Cust	Contacts	Lease	AMS Orders	BCCS Orders	Meter Info	PLP	Landlord Info	Survey	LCP	BRT	Premise Bills

Date	Meter Number	Reads	Type	Code	Source	Error?	Temp Count	Name	Account ID
1/6/2011 3:12 AM	1593949	3060	Normal	Regular	AMR Read		20	RIOS, INES	883351521
12/3/2010 4:53 AM	1593949	2839	Normal	Regular	AMR Read		20	RIOS, INES	883351521
11/3/2010 3:17 AM	1593949	2727	Normal	Regular	AMR Read		20	RIOS, INES	883351521
10/5/2010 8:54 AM	1593949	2578	Normal	Regular	AMR Read		20	RIOS, INES	883351521
9/3/2010 3:15 AM	1593949	2664	Normal	Regular	AMR Read		20	RIOS, INES	883351521
8/4/2010 3:13 AM	1593949	2654	Normal	Regular	AMR Read		20	RIOS, INES	883351521
7/6/2010 3:14 AM	1593949	2645	Normal	Regular	AMR Read		20	RIOS, INES	883351521
6/4/2010 3:15 AM	1593949	2633	Normal	Regular	AMR Read		20	RIOS, INES	883351521
5/5/2010 3:17 AM	1593949	2511	Normal	Regular	AMR Read		20	RIOS, INES	883351521
4/6/2010 3:16 AM	1593949	2576	Normal	Regular	AMR Read		20	RIOS, INES	883351521
3/5/2010 9:23 AM	1593949	2507	Normal	Regular	AMR Read		20	RIOS, INES	883351521
2/4/2010 3:22 AM	1593949	2319	Normal	Regular	AMR Read		20	RIOS, INES	883351521
1/6/2010 3:25 AM	1593949	2156	Normal	Regular	AMR Read		20	RIOS, INES	883351521
12/4/2009 3:13 AM	1593949	1969	Normal	Regular	AMR Read		10	RIOS, INES	883351521

Close

Address	2512 ELLA ST	SSN	3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521	Work	
Customer Name	RIOS, INES	Sr. Cit. Discount		Mobile	
USA Rate		Customer's Age	64	Car	
Mailing Address	2512 ELLA ST, PHILA, PA 19134	Meter Status	Alert No Meter	SP Status	Connected
Alert		Service Status	ACTIVE	Curb Box?	SR (In SNH (Q) WWC
		Theft Indicator		Expand	<input type="checkbox"/>
Last Contact (Premise)		Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of (M.I.U.)		Last Contact (Person)	
		Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of (M.I.U.)			

Customer Based	<input checked="" type="checkbox"/> Premise Based	Premise Alert		CvIP	Add Meter Read								
<input checked="" type="checkbox"/> Meter Reads	Service	Prev Cust	Contacts	Leads	AIMS Orders	BCCS Orders	Meter Info	PLP	Landlord Info	Survey	LCP	BRT	Premise Bills

Date	Time	Meter Number	Reads	Type	Code	Source	Error	Temper Count	Name	Account #
12/4/2009	3:13 AM	1593949	1969	Normal	Regular	AMR Read		10	RIOS, INES	883351521
11/3/2009	4:22 AM	1593949	1887	Normal	Regular	AMR Read		10	RIOS, INES	883351521
10/5/2009	1:06 AM	1593949	1842	Normal	Regular	AMR Read		10	RIOS, INES	883351521
9/3/2009	3:21 AM	1593949	1828	Normal	Regular	AMR Read		10	RIOS, INES	883351521
8/5/2009	3:19 AM	1593949	1818	Normal	Regular	AMR Read		10	RIOS, INES	883351521
7/7/2009	3:19 AM	1593949	1807	Normal	Regular	AMR Read		10	RIOS, INES	883351521
6/5/2009	3:19 AM	1593949	1792	Normal	Regular	AMR Read		10	RIOS, INES	883351521
5/6/2009	3:18 AM	1593949	1774	Normal	Regular	AMR Read		10	RIOS, INES	883351521
4/6/2009	3:24 AM	1593949	1720	Normal	Regular	AMR Read		10	RIOS, INES	883351521
3/6/2009	2:05 AM	1593949	1614	Normal	Regular	AMR Read		10	RIOS, INES	883351521
2/5/2009	6:08 AM	1593949	1457	Normal	Regular	AMR Read		10	RIOS, INES	883351521
1/7/2009	12:29 AM	1593949	1265	Normal	Regular	AMR Read		10	RIOS, INES	883351521
12/5/2008	12:21 AM	1593949	1098	Normal	Regular	AMR Read		10	RIOS, INES	883351521
11/3/2008	3:28 AM	1593949	889	Normal	Regular	AMR Read		10	RIOS, INES	883351521

Address	2912 ELLA ST	SSN	3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521	Work	
Customer Name	RIOS, INES	Sr. Cit. Discount		Mobile	
USA Rate		Customer's Age	64	Car	
Mailing Address	2912 ELLA ST, PHILA, PA 19134	Meter Status	Alert No Meter	SP Status	Connected
Alert		Service Status	ACTIVE	Corb Box?	5R On SNH 03R WWC
		Theft Indicator		Expander	<input type="checkbox"/> Update
Last Contact (Premise)	Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138 , with a result of Completed , with activities of ( M.I.U.			Last Contact (Person)	
	Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138 , with a result of Completed , with activities of ( M.I.U.				

Customer Based	↳ Premise Based	Premise Alert	CWP	Add Meter Read									
↳ Meter Reads	Service	Prev Cust	Contacts	Leads	AMS Orders	BOCS Orders	Meter Info	PLP	Landlord Info	Survey	LCP	BRT	Premise Bills
Date	Meter Number	Reads	Type	Code	Source	Error	Temp Count	Name	Account ID				
11/3/2008 3:28 AM	1583949	989	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
10/3/2008 3:08 AM	1583949	945	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
9/4/2008 3:04 AM	1583949	933	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
8/5/2008 3:05 AM	1583949	922	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
7/7/2008 12:15 PM	1583949	911	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
6/5/2008 3:08 AM	1583949	898	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
5/6/2008 7:53 AM	1583949	870	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
4/7/2008 3:12 AM	1583949	838	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
3/6/2008 4:31 AM	1583949	714	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
2/6/2008 3:26 AM	1583949	559	Normal	Regular	AMR Read		10	RIOS, INES	883351521				
1/8/2008 4:49 AM	1583949	548	Normal	Regular	AMR Read			RIOS, INES	883351521				
12/6/2007 3:26 AM	1583949	400	Normal	Regular	AMR Read		30	RIOS, INES	883351521				
11/5/2007 4:22 AM	1583949	253	Normal	Regular	AMR Read		20	RIOS, INES	883351521				
10/5/2007 4:40 AM	1583949	203	Normal	Regular	AMR Read		20	RIOS, INES	883351521				

Close

Address	2912 ELLA ST	SSN	3861	Home Phone	267-444-7138
Zip Code	19134-2820	Account	883351521	Work	
Customer Name	RIOS, INES	Sr. Cit. Discount		Mobile	
USA Rate		Customer's Age	64	Car	
Mailing Address	2912 ELLA ST. PHILA, PA 19134	Meter Status	Alert No Meter	SP Status	Connected
Alert		Service Status	ACTIVE	Carb Box?	SR 0n SNH 02n WWC
		Theft Indicator		Expand	<input type="checkbox"/> Update

Last Contact (Premise) Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of ( M.I.U. )  
 Last Contact (Premise) Date: 08/16/2018, Created By: LGOODE, Comments: Lamont Goode was here on a Unbilled Usage Tip order with Order # 9985138, with a result of Completed, with activities of ( M.I.U. )

Customer Based	<input checked="" type="checkbox"/> Premise Based	Premise Alert	CWP	Add Meter Read									
<input checked="" type="checkbox"/> Meter Reads	Service	Prev Cust	Contacts	Leads	AINS Orders	BCCS Orders	Meter Info	PLP	Landlord Info	Survey	LCP	BRT	Premise Bils

Date	Time	Meter Number	Reads	Type	Code	Source	Error	Tramper Count	Name	Account ID
10/5/2007	4:40 AM	1593949	203	Normal	Regular	AMR Read		20	RIOS, INES	883351521
9/6/2007	4:54 AM	1593949	177	Normal	Regular	AMR Read		10	RIOS, INES	883351521
8/7/2007	3:43 PM	1593949	153	Normal	Regular	AMR Read		10	RIOS, INES	883351521
7/9/2007	12:48 PM	1593949	128	Normal	Regular	AMR Read		10	RIOS, INES	883351521
6/7/2007	4:46 AM	1593949	109	Normal	Regular	AMR Read			RIOS, INES	883351521
5/8/2007	9:40 AM	1593949	99	Normal	Regular	AMR Read		30	RIOS, INES	883351521
4/9/2007	9:43 AM	1593949	45	Normal	Regular	AMR Read		30	RIOS, INES	883351521
3/8/2007	12:48 AM	1593949	6	Normal	Regular	AMR Read		20	RIOS, INES	883351521
2/7/2007	3:17 AM	1593949	9946	Normal	Regular	AMR Read		10	RIOS, INES	883351521
1/9/2007	3:15 AM	1593949	9874	Normal	Regular	AMR Read		30	RIOS, INES	883351521
12/6/2006	3:20 AM	1593949	9807	Normal	Regular	AMR Read			RIOS, INES	883351521
11/3/2006	3:28 AM	1593949	9742	Normal	Regular	AMR Read			RIOS, INES	883351521
10/5/2006	10:32 AM	1593949	9696	Normal	Regular	AMR Read			RIOS, INES	883351521
9/6/2006	11:24 AM	1593949	9678	Normal	Regular	AMR Read			RIOS, INES	883351521

Close

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Ines Rios</b>	:	
<i>Complainant</i>	:	
<b>v.</b>	:	<b>Docket No. C – 2018 – 3003457</b>
	:	
<b>Philadelphia Gas Works</b>	:	
<i>Respondent</i>	:	

**ANSWER OF THE PHILADELPHIA GAS WORKS  
TO THE COMPLAINANT’S MOTION TO COMPEL**

Exhibit D: Email exchange wherein counsel for the Complainant agreed to an extension of time for PGW to file its Answer to Complainant’s Motion to Compel.

## Christlieb, Graciela C

---

**From:** Joline Price <JPrice@clsphila.org>  
**Sent:** Friday, August 31, 2018 4:07 PM  
**To:** Christlieb, Graciela C  
**Cc:** Robert Ballenger  
**Subject:** Re: Motion to Compel PGW to Answer Complainant Ines Rios' Interrogatories and Requests for Production of Documents, Set I

Hi Grace,

Yes, an extension of time to next Thursday is fine with me.

Thanks,  
Joline

[Get Outlook for iOS](#)

---

**From:** Christlieb, Graciela C <[graciela.christlieb@pgworks.com](mailto:graciela.christlieb@pgworks.com)>  
**Sent:** Friday, August 31, 2018 1:54 PM  
**Subject:** RE: Motion to Compel PGW to Answer Complainant Ines Rios' Interrogatories and Requests for Production of Documents, Set I  
**To:** Joline Price <[jprice@clsphila.org](mailto:jprice@clsphila.org)>  
**Cc:** Robert Ballenger <[rballenger@clsphila.org](mailto:rballenger@clsphila.org)>

Good afternoon Joline,

I have been out of town since Wednesday night and will not be back in the office until Tuesday. Would you be willing to agree to an extension of time for PGW's response to your motion until Thursday the 6<sup>th</sup>? I have read through your motion to compel. Despite the objections contained in my answers, the interrogatories and requests for documents were answered fully, which is why there were no separate objections filed earlier. Just to double check, I have sent out emails asking if there is anything else that can be added to what we have already provided to more fully answer your requests. My concern is that that, because this is a holiday weekend, I will not have responses in time to be able to file a reply to your motion by Tuesday. I already have people working on getting the CRP applications back from our off-site storage provider and have confirmed that MIU has nothing that is responsive to your requests as the meter has been preserved and not tested.

Regards,  
Grace

---

**From:** Joline Price [<mailto:JPrice@clsphila.org>]  
**Sent:** Thursday, August 30, 2018 4:45 PM  
**To:** Christlieb, Graciela C  
**Cc:** Robert Ballenger  
**Subject:** Motion to Compel PGW to Answer Complainant Ines Rios' Interrogatories and Requests for Production of Documents, Set I

Good Afternoon Grace,

Please find attached a Motion to Compel on behalf of Ines Rios in C-2018-3003457 in responses to the objections raised by PGW in its Answers and Objections to Set I Interrogatories. This motion was filed this afternoon with the Commission.

Please let me know if you have any questions or concerns or would like to discuss.

All the best,  
Joline Price



**Joline Price**  
*Pronouns: she/her/hers*  
Staff Attorney  
Energy Unit  
1424 Chestnut Street  
Philadelphia, PA 19102  
Tele: (215) 981-3756  
Fax: (267) 765-6481  
[jprice@clsphila.org](mailto:jprice@clsphila.org)  
[www.clsphila.org](http://www.clsphila.org)



This e-mail, sent by Joline Price, Esq., is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this e-mail in error, please destroy it and notify us immediately.

**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 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

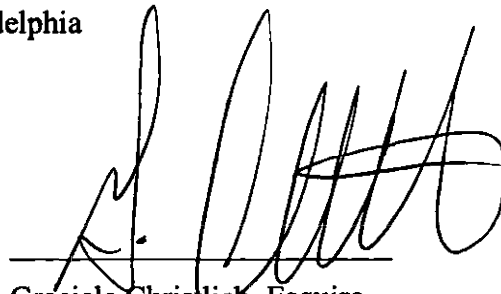
Service List:

For Complainant:

Ines Rios  
2912 Ella Street  
Philadelphia, PA 19134

Joline R. Price, Esquire  
Community Legal Services of Philadelphia  
1424 Chestnut Street  
Philadelphia, PA 19102  
*Counsel for Complainant*

September 6, 2018



Graciela Christlieb, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
*Counsel for Respondent*

**RECEIVED**

SEP 6 2018

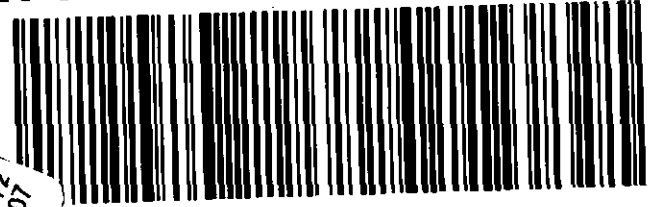
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

FedEx  
TRK# 8130 1923 6772  
0215

FRI - 07 SEP AA  
STANDARD OVERNIGHT

17106  
PA-US  
MDT

EN MDTA



38106 06SEP18 MUVA 546C1/F78C/0C8A

RT 205  
FZ 229  
6 16:00  
B 6772  
09.07

0029  
0152

FedEx Express  
Package US Airbill

FedEx Tracking Number 8130

72

Form ID No 0215

MUR3

Recipient's Copy

1 From  
Date 9/6/18  
Sender's Name Gracida Chrothub Phone 215 684-6264  
Company PHILADELPHIA GAS WORKS  
Address 800 W MONTGOMERY AVE  
City PHILADELPHIA State PA ZIP 19122-2898

4 Express Package Service

\* To most locations.

Packages up to 150 lbs.  
For packages over 150 lbs., see the  
FedEx Express Freight US Airbill.

Next Business Day

2 or 3 Business Days

- FedEx First Overnight  
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- FedEx Priority Overnight  
Next business morning. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.
- FedEx Standard Overnight  
Next business afternoon. Saturday Delivery NOT available.

- FedEx 2Day A.M.  
Second business morning. Saturday Delivery NOT available.
- FedEx 2Day  
Second business afternoon. Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
- FedEx Express Saver  
Third business day. Saturday Delivery NOT available.

5 Packaging \* Declared value limit \$500.

- FedEx Envelope\*
- FedEx Pak\*
- FedEx Box
- FedEx Tube
- Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

- Saturday Delivery  
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- No Signature Required  
Package may be left without obtaining a signature for delivery.
- Direct Signature  
Someone at recipient's address may sign for delivery.
- Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?  
One box must be checked.  
 No  Yes  
Yes: See attached Shipper's Declaration. Yes: Shipper's Declaration not required.  Dry Ice  
Dry Ice: 3 UN 1845  
Restrictions apply for dangerous goods — see the current FedEx Service Guide.  Cargo Aircraft Only

7 Payment Bill to:

- Sender's Acct. No. in Section 1 will be billed.  Recipient  Third Party  Credit Card  Cash/Check

Total Packages Total Weight  
1 10 lbs.  
Credit Card Auth.

Your liability is limited to USD\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

fedex.com 1.800.GoFedEx 1.800.463.3339

2 Your Internal Billing Reference  
3 To Recipient's Name Rosemary Chiavetta Phone 717 772-7777  
Company PVC  
Address 4100 North Street  
We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room  
Address Corner with Keystone Bldg  
Use this line for the HOLD location address or for continuation of your shipping address.  
City Harrisburg State PA ZIP 17105-3265

Hold Weekday  
FedEx location address  
REQUIRED. NOT available for  
FedEx First Overnight.

Hold Saturday  
FedEx location address  
REQUIRED. Available ONLY for  
FedEx Priority Overnight and  
FedEx 2Day to select locations.

0130362735



8130 1923 6772

611