

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Deree J. Norman

v.

Philadelphia Gas Works (PGW)

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:
:
:
:

C-2018-2640719

**COMPLAINANT DERE J. NORMAN'S MOTION TO MODIFY TIME FOR
SERVICE OF ANSWERS OR OBJECTIONS TO WRITTEN INTERROGATORIES**

Pursuant to 52 Pa §5.342(d) Dere J Norman (Complainant) respectfully moves this Honorable Commission to modify PGW's (Respondent) time to serve answers or objections to Complainant's additional discovery request. Complainant incorporates herein by reference, the attached Memorandum of Law in Support of Complainant's Motion to Modify Time for Service of Answers or Objections to Interrogatories and Production of Documents.

Date: September 24, 2018

Respectfully Submitted,

By: /s/ Dere J. Norman
Deree J. Norman

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Deree J. Norman	:	
	:	
v.	:	C-2018-2640719
	:	
Philadelphia Gas Works (PGW)	:	

**COMPLAINANT DERE J. NORMAN’S MEMORANDUM OF LAW IN SUPPORT
OF COMPLAINANT’S MOTION TO MODIFY TIME FOR SERVICE OF
ANSWERS OR OBJECTIONS TO WRITTEN INTERROGATORIES**

Pursuant to 52 Pa §5.342(d) Dere J Norman (Complainant) respectfully moves this Honorable Commission to modify PGW’s (Respondent) time to serve answers or objections to Complainant’s additional discovery request.

I. Matter Before the Court

Modification of time to serve answers or objections to interrogatories and production of documents.

II. Statement of Question Involved

Should this Honorable Commission modify Respondents’ time to serve answers or objections to Complainant’s continued Interrogatories and Production of Documents.

Sugested Answer: Yes

III. Statement of Facts

After filing a BCS complain, an initial hearing was scheduled for March 28, 2018. On March 21, 2018 Complainant properly requested a continuance due to medical issues. Despite PGW’s acknowledgement of Complainant’s medical

issues and acceptance of Medical Certification, Respondent objected to the continuance.

The Honorable Eranda Vero verbally required that Complainant produces additional proof from his physician as to his medical condition.

On April 2, 2018 the hearing was rescheduled for May 9, 2018. On April 5, 2018 the May 9, 2018 hearing was rescheduled for May 18, 2018

The hearing commenced on May 18, 2018 at which time both sides agreed to the testing of Complainant's meter which was scheduled for June 6, 2018. In addition, Complainant agreed to pay \$731.00, a recalculated charge for usage from June 25, 2015 to the most current billing period. Complainant also agreed to pay approximately \$25.00 per month for ongoing charges.

On June 6, 2018 PGW failed to honor the mutually agreed upon appointment to exchange Complainant's Meter for testing. Complainant immediately contacted Judge Vero's chambers at (215) 560-2105 to inform her of the breach of agreement. Complainant was assured by the individual who took the call that Judge Vero would be notified of the breach. No response and or correspondence was ever received from Judge Vero on the matter of the breach. **(Exhibit 1)**

On June 7, 2018 Complainant attempted to contact PGW's attorney by phone with hopes of rescheduling for June 8, 2018. However, Mr. Farinas was unavailable by phone yet never responded to the message left by Complainant. *(See: Exhibit 1)*

On July 16, 2018 Complainant attempted to contact PGW's attorney by phone with hopes of rescheduling. However, Mr. Farinas was unavailable by phone yet never responded to the message left by Complainant. **(Exhibit 2)**

On August 17, 2018 Complainant attempted to contact PGW's attorney by phone with hopes of rescheduling. However, Mr. Farinas was unavailable by phone yet never responded to the message left by Complainant. **(Exhibit 3)**

On September 10, 2018 Complainant received an e-mail with the sender being Farinas, Vero with a subject line of Deree Norman vs PGW. The content of the e-mail contains a series of ex parte communications since July 30, 2018 between Judge Vero and the Attorney for the Respondent Laureto Farinas. **(Exhibit 4)**

On September 11, 2018 Complainant received a new hearing notice via the PUC electronic system.

On September 24, 2018, Complainant sent an e-mail to Laureto Farinas, Attorney for the Respondent, **(Exhibit 5)** asking if he would mutually agree to submitting Answers or Objections to Complainant's ongoing discovery request within fifteen (15) days, specifically by October 9, 2015 in light of the upcoming hearing. **(Exhibit 6)** This Motion is being filed due to the lack of response from Respondent.

IV. Legal Argument

52 Pa §5.342(d) gives this Honorable Commission the authority to modify the time extended to the Respondent to submit and or serve answers or objections to Complainant's ongoing discovery request. Given the fact that Respondent informed this Commission (in a previous hearing held on May 18, 2018) that research was needed on the capabilities of Complainant's meter due to Complainant's averments as well as the subject matter of the discovery in question, Respondents' should have retrieved this information which should now be readily available. Therefore, the request to modify creates no undue burden on Respondent and should be deemed reasonable and well within the scope of the matter before this Commission.

V. Conclusion

WHEREFORE, for the forgoing reason, Complainant Deree J. Norman respectfully request that this Honorable Commission Grant the Complainant's Motion and require the Respondents' to serve Answers or Objections to his discovery request by October 9, 2018.

Date: September 24, 2018

Respectfully Submitted,

By: /s/ Deree J. Norman
Deree J. Norman
5367 Thomas Ave
Philadelphia, PA 19143
(267) 304-2162
dereenorman@yahoo.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Deree J. Norman	:	
	:	
v.	:	C-2018-2640719
	:	
Philadelphia Gas Works (PGW)	:	

AFFIDAVIT OF SERVICES

I, Deree J. Norman, do hereby certify that on this 24th day of September 2018 I served a true and correct copy of the Motion to Modify Time for Service of Answers or Objections to Interrogatories and Production of Documents in the above manner on the following via the PUC’s electronic filing system.

ERANDA VERO
ADMINISTRATIVE LAW JUDGE
801 MARKET STREET, SUITE 4063
PHILADELPHIA, PA 19107

LAURETO FARINAS
PHILADELPHIA GAS WORKS
4TH FLR. 800 W MONTGOMERY AVE
PHILADELPHIA PA 19122

EXHIBIT 1

BILLING (/BILLING/SUMMARY.HTML)	USAGE (/USAGE/USAGEOVERVIEW.HTML)	PLAN (/PLANS.HTML)	PHONE (/MYPHONE/MYPHONEDetails.HTML)	SHOP (/PURCHASE/SHOP)
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Jun. 05 - Jul. 04, 2018



Deree, (267) 304-2162

Voice Messaging Data T-Mobile purchases Third-party purchases

All Charged Filter

Total use: 1104 minutes

Total charges: \$0.00

Date & Time (Pacific)	Destination	Number	Min	Type	Charge
06/15/18, 2:28 PM	Incoming	(267) 304-2625	1	--	--
06/15/18, 1:16 PM	Incoming	(267) 668-1702	1	--	--
06/15/18, 7:52 AM	Incoming	(609) 500-5322	2	--	--
06/14/18, 9:27 PM	Incoming	(609) 500-5322	33	--	--
06/14/18, 7:44 PM	to MOUNTHOLLY/NJ	(609) 500-5322	2	--	--
06/13/18, 9:49 PM	Incoming	(609) 500-5322	26	--	--
06/13/18, 7:27 PM	Incoming	(267) 304-0906	1	--	--
06/13/18, 3:08 PM	Incoming	(609) 500-5322	18	--	--
06/13/18, 2:18 PM	Incoming	(323) 983-8998	4	--	--
06/13/18, 2:11 PM	Incoming	(323) 203-0126	1	--	--
06/13/18, 12:25 PM	Incoming	(267) 432-1423	8	T-Mobile to T-Mobile	--
06/12/18, 4:20 PM	Incoming	(800) 406-1177	1	--	--
06/12/18, 12:53 PM	Incoming	(609) 500-5322	18	--	--
06/12/18, 10:24 AM	Incoming	(215) 662-3202	4	--	--
06/11/18, 4:08 PM	to PHILA/PA	(215) 934-3500	5	--	--
06/11/18, 3:58 PM	Incoming	(215) 934-3500	1	--	--
06/11/18, 1:06 PM	Incoming	(215) 776-3361	1	--	--
06/09/18, 8:30 PM	Incoming	(267) 432-1423	2	T-Mobile to T-Mobile	--
06/09/18, 2:45 PM	to PHILA/PA	(215) 748-1000	1	--	--
06/09/18, 12:47 PM	VM Retrieval	123	4	Voicemail	--
06/08/18, 7:23 PM	Incoming	(484) 661-3506	1	T-Mobile to T-Mobile	--

06/08/18, 7:18 PM	to PHILA/PA	(215) 222-1900	3	--	--
06/08/18, 6:55 PM	to PHILA/PA	(267) 770-5444	1	--	--
06/08/18, 5:48 PM	to PHILA/PA	(215) 222-1900	2	--	--
06/08/18, 4:57 PM	Incoming	(800) 406-1177	2	--	--
06/08/18, 4:34 PM	Incoming	(267) 308-1634	1	--	--
06/08/18, 3:34 PM	Incoming	(215) 615-5864	1	--	--
06/08/18, 2:44 PM	Incoming	(610) 992-3920	1	--	--
06/08/18, 1:20 PM	Incoming	(609) 500-5322	12	--	--
06/08/18, 11:37 AM	Incoming	(856) 397-6726	1	--	--
06/08/18, 10:53 AM	Incoming	(610) 992-3920	1	--	--
06/08/18, 10:14 AM	Incoming	(267) 308-1014	1	--	--
06/07/18, 6:31 PM	Incoming	(609) 500-5322	10	--	--
06/07/18, 5:37 PM	Incoming	(267) 307-1737	1	T-Mobile to T-Mobile	--
06/07/18, 4:11 PM	Incoming	(610) 803-1180	3	--	--
06/07/18, 3:12 PM	Incoming	(301) 821-5431	5	T-Mobile to T-Mobile	--
06/07/18, 2:50 PM	Incoming	(609) 500-5322	14	--	--
06/07/18, 1:07 PM	Incoming	(609) 500-5322	1	--	--
06/07/18, 12:35 PM	Incoming	(267) 307-1235	1	--	--
06/07/18, 12:04 PM	Incoming	(323) 203-0126	1	--	--
06/07/18, 11:35 AM	to PHILA/PA	(215) 684-6982	1	--	--
06/07/18, 11:29 AM	Incoming	(610) 992-3920	6	--	--
06/06/18, 7:46 PM	VM Retrieval	123	5	Voicemail	--
06/06/18, 5:19 PM	Incoming	(267) 406-8079	1	--	--
06/06/18, 3:29 PM	Incoming	(267) 306-1529	1	--	--
06/06/18, 1:36 PM	to PHILA/PA	(215) 560-2105	4	--	--
06/06/18, 11:30 AM	Incoming	(814) 889-1602	1	--	--
06/05/18, 8:33 PM	to PHILA/PA	(267) 432-1423	1	T-Mobile to T-Mobile	--
06/05/18, 7:35 PM	Incoming	(443) 668-2098	24	--	--
06/05/18, 11:40 AM	Incoming	(609) 500-5322	17	--	--

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Jul. 05 - Aug. 04, 2018



Deree, (267) 304-2162

Voice Messaging Data T-Mobile purchases Third-party purchases

All Charged Filter

Total use: 1925 minutes

Total charges: \$0.00

Date & Time (Pacific)	Destination	Number	Min	Type	Charge
07/17/18, 11:17 AM	Incoming	(267) 500-2117	1	--	--
07/17/18, 9:51 AM	Incoming	(267) 317-0951	1	--	--
07/16/18, 10:05 PM	Incoming	(609) 500-5322	4	--	--
07/16/18, 5:33 PM	Incoming	(267) 500-2117	1	--	--
07/16/18, 2:32 PM	Incoming	(267) 500-2117	1	--	--
07/16/18, 12:46 PM	to PHILA/PA	(215) 684-6982	1	--	--
07/16/18, 12:38 PM	Incoming	(267) 306-9647	1	--	--
07/16/18, 9:14 AM	Incoming	(484) 416-8698	1	--	--
07/15/18, 6:52 PM	to MOUNTHOLLY/NJ	(609) 500-5322	1	--	--
07/14/18, 3:27 PM	Incoming	(609) 500-5322	61	--	--
07/14/18, 1:34 PM	Incoming	(215) 748-1000	1	--	--
07/14/18, 12:57 PM	to PHILA/PA	(215) 662-4000	5	--	--
07/14/18, 12:55 PM	to PHILA/PA	(215) 662-3202	1	--	--
07/14/18, 12:48 PM	to PHILA/PA	(215) 748-1000	2	--	--
07/14/18, 12:46 PM	to PHILA/PA	(267) 432-1423	2	T-Mobile to T-Mobile	--
07/14/18, 12:33 PM	to PHILA/PA	(267) 432-1423	12	T-Mobile to T-Mobile	--
07/14/18, 11:33 AM	VM Retrieval	123	1	Voicemail	--
07/13/18, 9:00 PM	Incoming	(213) 212-4544	1	--	--
07/13/18, 8:58 PM	Incoming	(267) 500-2117	1	--	--
07/13/18, 5:55 PM	Incoming	(469) 643-2654	1	--	--
07/13/18, 4:58 PM	Incoming	(443) 668-2098	15	--	--

07/13/18, 4:29 PM	Incoming	(267) 432-1423	3	T-Mobile to T-Mobile	--
07/13/18, 4:06 PM	Incoming	(267) 313-1606	1	--	--
07/13/18, 2:29 PM	Incoming	(609) 500-5322	71	--	--
07/13/18, 11:41 AM	Incoming	(267) 313-1141	1	--	--
07/13/18, 8:42 AM	Incoming	(609) 500-5322	2	--	--
07/13/18, 7:42 AM	Incoming	(267) 207-8205	2	--	--
07/12/18, 1:17 PM	to PHILA/PA	(267) 432-1423	3	T-Mobile to T-Mobile	--
07/12/18, 12:56 PM	Incoming	(267) 432-1423	17	T-Mobile to T-Mobile	--
07/11/18, 12:15 PM	1-877 #	(877) 383-4802	181	--	--
07/11/18, 9:26 AM	Incoming	(952) 562-0573	1	--	--
07/10/18, 6:01 PM	Incoming	(267) 310-1801	1	--	--
07/10/18, 4:56 PM	Incoming	(267) 440-7327	1	--	--
07/10/18, 4:06 PM	Incoming	(267) 440-7327	1	--	--
07/10/18, 1:43 PM	Incoming	(267) 310-1343	1	--	--
07/10/18, 10:21 AM	VM Retrieval	123	1	Voicemail	--
07/09/18, 7:00 PM	Incoming	(801) 252-4671	1	--	--
07/09/18, 5:56 PM	Incoming	(267) 440-7327	1	--	--
07/09/18, 4:30 PM	Incoming	(267) 699-7825	1	--	--
07/09/18, 3:49 PM	Incoming	(267) 440-7327	1	--	--
07/09/18, 2:30 PM	to PHILA/PA	(215) 819-1800	1	--	--
07/09/18, 2:30 PM	to LANGHORNE/PA	(267) 819-1800	1	--	--
07/09/18, 11:30 AM	Incoming	(267) 699-7802	1	--	--
07/09/18, 9:56 AM	Incoming	(215) 709-6003	1	--	--
07/09/18, 9:15 AM	Incoming	(800) 260-8793	1	--	--
07/08/18, 3:34 PM	Incoming	(267) 432-1423	4	T-Mobile to T-Mobile	--
07/07/18, 8:39 PM	Incoming	(267) 252-9967	2	--	--
07/07/18, 8:27 PM	to PHILA/PA	(267) 252-9967	13	--	--
07/07/18, 4:54 PM	Incoming	(800) 260-8793	1	--	--
07/07/18, 3:31 PM	Incoming	(609) 500-5322	60	--	--

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EXHIBIT 3

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Aug. 05 - Sep. 04, 2018



Deree, (267) 304-2162

Voice Messaging Data T-Mobile purchases Third-party purchases

All Charged Filter

Total use: 1705 minutes

Total charges: \$0.00

Date & Time (Pacific)	Destination	Number	Min	Type	Charge
08/18/18, 6:56 PM	Incoming	(240) 682-4162	3	--	--
08/18/18, 6:50 PM	Incoming	(240) 682-4162	2	--	--
08/18/18, 6:48 PM	to WALDORF/MD	(240) 682-4162	2	--	--
08/18/18, 4:54 PM	Incoming	(609) 500-5322	2	--	--
08/18/18, 2:26 PM	to MOUNTHOLLY/NJ	(609) 500-5322	1	--	--
08/17/18, 7:26 PM	Incoming	(301) 821-5431	4	T-Mobile to T-Mobile	--
08/17/18, 5:57 PM	Incoming	(267) 668-1728	1	--	--
08/17/18, 5:54 PM	Incoming	(267) 293-8831	1	--	--
08/17/18, 4:56 PM	to CATONSVL/MD	(443) 668-2098	1	--	--
08/17/18, 4:53 PM	to PHILA/PA	(215) 684-6982	1	--	--
08/17/18, 3:45 PM	Incoming	(443) 668-2098	2	--	--
08/17/18, 2:54 PM	Incoming	(267) 361-1615	1	--	--
08/17/18, 11:44 AM	to CATONSVL/MD	(443) 668-2097	1	--	--
08/17/18, 11:32 AM	Incoming	(443) 668-2097	2	--	--
08/17/18, 11:23 AM	Incoming	(443) 668-2097	1	--	--
08/17/18, 11:06 AM	Incoming	(267) 877-6055	1	--	--
08/17/18, 10:59 AM	Incoming	(267) 317-1059	1	--	--
08/17/18, 10:45 AM	Incoming	(267) 317-1045	1	--	--
08/17/18, 9:46 AM	Incoming	(267) 317-0946	1	--	--
08/17/18, 8:09 AM	Incoming	(443) 668-2098	2	--	--
08/17/18, 12:19 AM	to SANANTONIO/TX	(210) 775-0596	1	--	--

08/16/18, 8:31 PM	Incoming	(301) 821-5431	7	T-Mobile to T-Mobile	--
08/16/18, 7:29 PM	to PHILA/PA	(215) 748-5098	1	--	--
08/16/18, 7:27 PM	to PHILA/PA	(215) 222-1900	1	--	--
08/16/18, 7:13 PM	1-844 #	(844) 738-3446	3	--	--
08/16/18, 4:45 PM	Incoming	(267) 877-2359	1	--	--
08/16/18, 4:45 PM	to PHILA/PA	(267) 877-2359	4	--	--
08/16/18, 3:12 PM	Incoming	(267) 366-6519	1	--	--
08/16/18, 1:05 PM	Incoming	(979) 227-3754	1	--	--
08/16/18, 12:06 PM	Incoming	(215) 278-8716	1	--	--
08/16/18, 12:05 PM	Incoming	(267) 366-6551	1	--	--
08/16/18, 11:06 AM	Incoming	(800) 406-1177	1	--	--
08/15/18, 7:20 PM	Incoming	(609) 500-5322	4	--	--
08/15/18, 4:17 PM	Incoming	(267) 315-1617	1	--	--
08/15/18, 4:07 PM	Incoming	(267) 361-1633	1	--	--
08/15/18, 2:30 PM	Incoming	(609) 500-5322	10	--	--
08/15/18, 12:42 PM	Incoming	(267) 315-1242	1	--	--
08/15/18, 11:25 AM	Incoming	(609) 500-5322	27	--	--
08/15/18, 10:03 AM	Incoming	(267) 703-1875	1	--	--
08/15/18, 8:44 AM	Incoming	(301) 821-5431	3	T-Mobile to T-Mobile	--
08/14/18, 8:10 PM	Incoming	(312) 312-7175	2	--	--
08/14/18, 4:01 PM	to RICHMOND/VA	(804) 355-6700	4	--	--
08/14/18, 3:54 PM	Incoming	(267) 385-3800	2	--	--
08/14/18, 2:41 PM	to UPPERDARBY/PA	(610) 626-3590	3	--	--
08/14/18, 2:38 PM	to RICHMOND/VA	(804) 355-6700	3	--	--
08/14/18, 1:50 PM	to PHILA/PA	(267) 432-1423	6	T-Mobile to T-Mobile	--
08/14/18, 1:41 PM	Incoming	(267) 778-6542	1	--	--
08/14/18, 1:14 PM	to UPPERDARBY/PA	(610) 626-3590	1	--	--
08/14/18, 1:12 PM	to RICHMOND/VA	(804) 355-6700	1	--	--
08/14/18, 11:50 AM	Incoming	(267) 828-4811	1	--	--

[SUPPORT \(HTTP://SUPPORT.T-MOBILE.COM/WELCOME.HTML\)](http://support.t-mobile.com/welcome.html)

[CONTACT US \(/CONTACT-US.HTML\)](/contact-us.html)

[STORE LOCATOR \(HTTP://WWW.T-MOBILE.COM/STORE-LOCATOR.HTML\)](http://www.t-mobile.com/store-locator.html)

[COVERAGE \(HTTPS://WWW.T-MOBILE.COM/COVERAGE/LTE-COMPARISON-MAP\)](https://www.t-mobile.com/coverage/lte-comparison-map)

[T-MOBILE.COM \(HTTP://WWW.T-MOBILE.COM\)](http://www.t-mobile.com)

TERMS & POLICIES

[About T-Mobile USA \(https://www.t-mobile.com/about-us\)](https://www.t-mobile.com/about-us)

[Terms & Conditions \(https://www.t-mobile.com/Templates/Popup.aspx?](https://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_TermsAndConditions&print=true)

[PAsset=Ftr_Ftr_TermsAndConditions&print=true\)](https://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_TermsAndConditions&print=true)

[Privacy Policy \(https://www.t-](https://www.t-mobile.com/company/website/privacypolicy.aspx)

[mobile.com/company/website/privacypolicy.aspx\)](https://www.t-mobile.com/company/website/privacypolicy.aspx)

[Return Policy \(https://www.t-mobile.com/Templates/Popup.aspx?](https://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_ReturnPolicy&print=true)

[PAsset=Ftr_Ftr_ReturnPolicy&print=true\)](https://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_ReturnPolicy&print=true)

[Terms of Use \(https://www.t-mobile.com/responsibility/consumer-](https://www.t-mobile.com/responsibility/consumer-info/policies/terms-of-use)
[info/policies/terms-of-use\)](https://www.t-mobile.com/responsibility/consumer-info/policies/terms-of-use)

[Privacy Resources \(https://www.t-mobile.com/responsibility/privacy\)](https://www.t-mobile.com/responsibility/privacy)

[LOG OUT](#)

EXHIBIT 4

Compose

Inbox 208

- Unread
- Starred
- Drafts 82
- Sent
- Archive
- Spam
- Trash

Update time zone

- Archive Move Delete Spam Sort
- Earlier in September
- Expedia trav... you made it! we're helping you skip the n... Sep 12
 - administrator... "Docketing Statement Received (Civil)" filing ... Sep 11
 - administrator... "Docketing Statement (Civil)" filing WSPRED0... Sep 11
 - eServe@pa.gov PA PUC eServe Notice Dear Deree J. Norman,... Sep 11
 - Farinas,, Vero, RE: Deree J. Norman v. PGW Docket No. ... 2 Sep 10
 - Expedia Fare ... Nicely done, Deree Norman! We're pulling... Sep



Subject: RE: Deree J. Norman v. PGW Docket No. C-2018-2640719

From: Laureto.Farinas@pgworks.com
To: evero@pa.gov
Cc: Jessica.Glace@pgworks.com; dereenorman@yahoo.com
Date: Monday, September 10, 2018, 4:26:19 PM EDT

Judge Vero:

PGW was unable to exchange the meter at the Complainant's residence on June 6, 2018. On June 19, 2018, PGW representative Jessica Glace, Senior CRU Officer, contacted Mr. Norman to reschedule the meter exchange. Mr. Norman refused to reschedule. On August 7, 2018, I sent a letter via FedEx to Mr. Norman to contact us concerning the completion of the meter test and invited Mr. Norman to contact me regarding the settlement the matter as the amount that he has paid can be deemed to be an initial payment of new payment arrangement. To date he has not responded.

PGW requests that you schedule a Further hearing for a final disposition of this matter.

Thank you,

Laureto Farinas

From: Vero, Eranda [mailto:evero@pa.gov]
Sent: Friday, September 07, 2018 4:55 PM
To: Farinas, Laureto A
Subject: RE: Deree J. Norman v. PGW Docket No. C-2018-2640719

Mr. Farinas,

I need a new update on this case as soon as possible.

ALJ Vero

From: Farinas, Laureto A <Laureto.Farinas@pgworks.com>
Sent: Monday, July 30, 2018 4:11 PM
To: Vero, Eranda <evero@pa.gov>
Subject: RE: Deree J. Norman v. PGW Docket No. C-2018-2640719

Dear Judge Vero

I thought that I was responding to your questions about the Solomon Case. In that case we will file a Certificate of Satisfaction by tomorrow.

As for the Norman case, we will not file a Certificate of Satisfaction but rather provide you with an update. I am informed that the meter exchange had not been completed and that PGW had attempted to re-schedule. I will have more information by tomorrow.

Thank you.

Laureto Farinas

From: Vero, Eranda [<mailto:evero@pa.gov>]
Sent: Monday, July 30, 2018 3:55 PM
To: Farinas, Laureto A
Subject: RE: Deree J. Norman v. PGW Docket No. C-2018-2640719

A C.S. for Deree J. Norman's case???? Are you sure?

From: Farinas, Laureto A <Laureto.Farinas@pgworks.com>
Sent: Monday, July 30, 2018 3:53 PM
To: Vero, Eranda <evero@pa.gov>
Subject: RE: Deree J. Norman v. PGW Docket No. C-2018-2640719

Good afternoon Judge Vero

Yes, PGW will file a Certificate of Satisfaction by tomorrow.

Thank you,

Laureto Farinas

From: Vero, Eranda [<mailto:evero@pa.gov>]
Sent: Monday, July 30, 2018 3:52 PM
To: Farinas, Laureto A
Subject: FW: Deree J. Norman v. PGW Docket No. C-2018-2640719
Importance: High

Good afternoon Mr. Farinas,

What is the status of this case? Can I go ahead and schedule the hearing in this matter?

ALJ Vero

EXHIBIT 5

EXHIBIT 6

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Deree J. Norman	:	
	:	
v.	:	C-2018-2640719
	:	
Philadelphia Gas Works (PGW)	:	

**COMPLAINANT DERE J. NORMAN'S CONTINUATION OF
INTERROGATORIES AND REQUEST FOR THE PRODUCTION OF ALL
DOCUMENTS DIRECTED TO RESPONDENT PHILADELPHIA GAS WORKS**

Deree J. Norman (Complainant) hereby makes demand that the Respondent Philadelphia Gas Works (PGW) answer the following Interrogatories pursuant to the 52 Pa. Code §5.342(d). Complainant also requested that Respondent produce the originals or clear, readable copies of the below listed documents and/or items. These documents and/or items will be examined and/or photocopied. The below listed request are to be produced at the home of Complainant, respectfully at 5367 Thomas Ave, Philadelphia, PA 19143 or sent electronically by e-mail to dereenorman@yahoo.com on or before October 9, 2018. Such request is continuing up to and at the time of the hearing.

DEFINITIONS

- A. "You" or "your" refers to the respondent PGW herein and to all other persons acting or purporting to act on behalf of PGW, including partners, agents, subcontractors, and employees.
- B. "Communications" shall mean all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, correspondence, notes, telegrams, telexes, advertisements, facsimiles, e-mail, or other forms of verbal and/or communicative intercourse.
- C. "Documents" shall mean all written or graphic matter of every kind or description, however, produced or reproduced, whether draft or final, original or reproduction

signed or unsigned, and regardless of whether approved, signed, sent, received, redrafted, or executed, including but not limited to: written communications, letters, correspondence, facsimiles, e-mail, memoranda, minutes, notes, films, recordings, of any type, transcripts, contracts, agreements, purchase or sales orders, memoranda of telephone conversations of personal conversations, diaries, desk calendars, interoffice communications, reports, studies, bills, receipts, checks, checkbooks, invoices, requisitions or material similar to any of the foregoing however denominated, by whomever prepared, and to whomever addressed, which are in your possession, custody or control or to which you have had or can obtain access.

- D.** "Person(s)" means an individual, corporation, partnership, subcontractor, expert, trust, associations, company, organization, or any form of a business or commercial entity.
- E.** "Identify" when used with respect to an individual means to state (1) their name; (2) business affiliation; (3) official title and/or position; and (4) their last known residential and or business address.
- F.** "Identify" when used with respect to a document, means to state (1) the type of document (e.g. letter, memorandum, hand-written note, facsimile, e-mail); (2) its date of origin or creation; (3) its author and addressee; (4) its last known custodian or locations; and (5) a brief description of its subject matter and size. In lieu of identifying any document(s), you may attach a copy of it to your answer, indicating the question to which it is responsive.
- G.** "Identify" when used with respect to a company or other business entity means to state, (1) the company's legal name, any former names, and the name under which it trades or does business (2) the address of its principal place of business; and (3) the identity of its chief executive officer.
- H.** "Identify" when used with respect to a procedure, process or software means to state, (1) who created it (2) who owns it (3) what data is entered into it (4) how the data is entered (5) how the data is collected (6) step by step "flow chart of process"
- I.** "Relate to" means consist of, refer to, reflect, or be in any way logically connected with the matter discussed.
- J.** For purposes of the Rule, a statement includes:

- (1) A written statement signed or otherwise adopted or approved by the person making it, or
- (2) A stenographic, mechanical, electronic, video graphic or other recording, or a transcript thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

INSTRUCTIONS

- I.** Answer each of the following discovery requests separately and fully in writing pursuant to 18 Pa. C.S. § 4904.
- II.** Include all information within your knowledge, the knowledge of your attorneys, any past or present staff, and any investigators or experts employed by you or your attorneys.
- III.** These discovery requests are continuing, and you must amend your responses if you know of new information or evidence.
- IV.** If your response is an objection, response shall conform to 52 Pa. Code §5.342(c)
- V.** If an original is requested but is not available (or is objected to), and a copy or duplicate is available (or not objected to), provide the copy.
- VI.** If a document, requested was in your custody or was known to you, but is no longer available, provide a description of the document, including the contents, and set forth how the document left your possession.
- VII.** If after due diligence in investigating and researching a discovery request, you cannot respond fully, answer to the best of your knowledge and explain your inability to give a complete answer.
- VIII.** In response to requests for discovery about communications, dealings, or events, set forth the place and/or medium (such as by phone), identify the nature of the communication or event, and identify all parties who were present or involved.

- IX.** If any response to a request for the production of documents involves in excess of 250 pages, please confer with me about reducing the scope of the request or providing the documents in electronic form (e.g. pdf.)

Continuation of Interrogatories and the Production of Documents

1. Produce the work order issued by PGW requesting the changing of Complainant's gas meter for testing that was mutually agreed to and scheduled for June 6, 2018 between 8:30 a.m. and 1:30 p.m.
2. Identify whether the work order was placed in a queue for the next available technician or if assignment of the work order was dispatched to a specific technician.
3. Identify the technician that the work order referenced in paragraph one (1) was assigned to either by queue or dispatcher.
4. Identify methods of which technicians are in communication with PGW's base station, dispatcher and or main office.
5. Produce a detailed explanation as to why PGW failed to honor the mutually agreed upon appointment to change Complainant's meter for testing.
6. Produce a detailed explanation as to why Complainant was not contacted by PGW on or before the next business day after PGW's failure to comply with the mutually agreed upon appointment to change Complainant's meter for testing.
7. Produce a detailed explanation as to why PGW did not contact Complainant for approximately two weeks.
8. Produce a detailed explanation as to why Complainant received no response to messages left for Laureto Farinas at (215) 684-6982 on June 6, 2018, July 18, 2018 and August 16, 2018.
9. Identify the (i.e. name/code number/designation number etc.) of the underground facility and or pipeline that services Complainant's residence at 5367 Thomas Ave.
10. Identify the minimum and maximum pressure sustainable by the underground facility and or pipeline that services Complainant's residence at 5367 Thomas Ave.
11. Produce the daily operating pressure reports for the underground facility and or pipeline that services Complainant's residence at 5367 Thomas Ave for the period (June 22, 2015 through September 21, 2018)

12. Identify the current components of the natural gas mixture (Quality of Gas) used by PGW that services Complainant's residence at 5367 Thomas Ave.
13. Identify any and or all variations and or changes to the natural gas mixture used by PGW that services Complainant's residence at 5367 Thomas Ave for the period (June 22, 2015 through September 21, 2018)
14. Identify if Complainant's current meter uses a dual valve or a multi valve system.
15. Identify if Complainant's current meter uses a type of pantograph mechanism.
16. Identify Complainant's current meters minimum and maximum capabilities.

This request is deemed to be continuing insofar as if any of the above is secured *subsequent* to the date herein for the production of same, said documents, photographs, statements, reports, etc., are to be provided to the Complainant's home, at 5367 Thomas Ave, Philadelphia, PA 19143 or e-mail at dereenorman@yahoo.com immediately.

Laureto Farinas, Esquire
Attorney for:
Respondent PGW
800 W. Montgomery Ave.
Philadelphia, PA 19122
Phone (215) 684-6982
Laureto.Farinas@pgworks.com

I _____, subject to the penalties of 18 Pa C.S.A. §4904, relating to unsworn falsification to authorities, state the attached answers and/or documents are submitted in response to the foregoing Interrogatories and/or Requests for Production of Documents and that to the best of my knowledge, information and belief they are true and complete.

Signature

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Deree J. Norman

v.

PGW

:
:
:
:
:

C-2018-2640719

AFFIDAVIT OF SERVICES

I, Deree J. Norman, do hereby certify that on this 24th day of September 2018 I served a true and correct copy of the Continued Request for Interrogatories and the Production of Documents in the above manner on the following via e-mail.

LAURETO FARINAS
PHILADELPHIA GAS WORKS
4TH FLR.
800 W MONTGOMERY AVE
PHILADELPHIA PA 19122
Laureto.Farinas@pgworks.com

Subject: C-2018-2640719

From: dereenorman@yahoo.com

To: laureto.farinas@pgworks.com

Date: Monday, September 24, 2018, 11:00:49 AM EDT

Dear Mr. Farinas,

In light of our upcoming hearing on October 12, 2018 I would ask that you agree to submit responses to additional discovery (Interrogatories and Production of Documents) by October 9, 2018 in an effort to eliminate any further delays to this process.

Attached please find the aforementioned request.

Please let me know of your position to my request before the close of business today.

Thank you.

Deree J. Norman



Continuation of Interrogatories and the Production of Documents.pdf
166.1kB

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Deree J. Norman	:	
Complainant	:	
v.	:	No. C-2018-2640719
	:	
Philadelphia Gas Works	:	
Respondent	:	

VERIFICATION

I, Deree J. Norman, hereby declare that the facts set forth in the foregoing Motion to Modify Time to Serve Answers or Objections to Interrogatories and Request for Production of Documents are true to the best of my knowledge, information and belief. I make this verification subject to the penalties of 18 Pa. C.S. §4904 pertaining to false statements to authorities.


Deree J. Norman