

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**THEREFORE,**

**IT IS ORDERED:**

- 1) Respondent will submit full and complete answers to Complainant’s continued discovery request: Interrogatories and Requests for Production of Documents Nos. 1 through 16 in compliance with PGW’s continued obligation to Complainant’s original discovery request; Interrogatories Nos. 1, 2, 3, 4, 5 & 6 and Requests for Production of Documents Nos. 3, 4, 7, 9, 11, 12, 13, 15, 16 ,17, 18, 19, 20, 21, 22, 23, & 24
- 2) Respondent shall pay Complainant cost in the amount of \$1,500.00 incurred as a result of **(a)** Respondents’ failing to honor a mutually agreed upon scheduled meter test, **(b)** Respondents’ failure to comply with the continuation of discovery request, **(c)** Complainant’s repeated attempts to reschedule the meter test with PGW, **(d)** both drafting and presenting this Motion as well as **(e)** Respondent’s willful, calculated and malicious attempts to conceal and or misrepresent facts related to this matter. Said payment shall be made within five (5) days by check or money order, payable to Deree J. Norman and delivered to Deree J. Norman at 5367 Thomas Ave, Philadelphia, PA 19143.

Date \_\_\_\_\_

/s/ \_\_\_\_\_  
Eranda Vero  
Administrative Law Judge

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Complainant’s Motion To Compel and Sanction Respondent**

Pursuant to 52 Pa. Code §5.342(g) and §5.371(a)(1) Deree J. Norman (Complainant) hereby moves this Honorable Commission to Compel and Sanction Philadelphia Gas Works (PGW or Respondent) for failure to honor a mutually agreed upon appointment to test Complainant’s meter, failure to submit full and complete answers to ongoing Interrogatories and Request for Production of Documents and the submission of Objections based on false and or misrepresented information.

Complainant incorporates herein by reference, the attached Memorandum of Law in Support of Complainant’s Motion to Compel and Sanction Respondent for failure to honor a mutually agreed upon appointment to test Complainant’s meter, failure to submit full and complete answers to ongoing Interrogatories and Request for Production of Documents and the submission of Objections based on false and or misrepresented information.

Date: October 10, 2018

Respectfully Submitted,

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Memorandum of Law in Support of Complainant’s Motion To Compel  
and Sanction Respondent**

Pursuant to 52 Pa. Code §5.342(g) and §5.371(a)(1) Deree J. Norman (Complainant) hereby moves this Honorable Commission to Compel and Sanction Philadelphia Gas Works (PGW or Respondent) for failure to honor a mutually agreed upon appointment to test Complainant’s meter, failure to submit full and complete answers to ongoing Interrogatories and Request for Production of Documents and the submission of Objections based on false and or misrepresented information.

**I. INTRODUCTION**

In the above captioned matter before this Honorable Commission, the Respondent has willfully failed to attend a mutually agreed upon scheduled meter testing. Respondent has also failed to honor their obligation to produce on going discovery. In addition, Respondent has submitted false and or misrepresentations in the form of ex parte e-mails with Administrative Law Judge Erand Vero and Objections to ongoing discovery request.

**II. HISTORY**

On April 16, 2018, Complainant served Respondent with written Interrogatories and Requests for Production of Documents. On April 25, 2018, Respondent submitted timely Objections to some of Complainant’s discovery request. **(Exhibit 1)**

On April 25, 2018 Respondent filed Objections to Complainant's written Interrogatories and Requests for Production of Documents. *(See Exhibit 2 – Appendix 1)*

On May 4, 2018, Complainant filed a timely Motion to Compel Discovery Responses to his Interrogatories and Requests for Production of Documents in relation to Respondent's Objections. **(Exhibit 2)**

On May 7, 2018 Respondent filed a timely yet incomplete and vague response to Complainant's Interrogatories and Request for Production of Documents of which no Objection was imposed. **(Exhibit 3)**

On May 9, 2018 Administrative Law Judge Eranda Vero entered an Order in relation to Respondent's Objections which required the submission of Answers to Complainant's Interrogatories and Request for Production of Documents by May 14, 2018. **(Exhibit 4)**

On May 16, 2018 Respondents' filed untimely Answers to Complainant's Interrogatories and Request for Production of Documents. **(Exhibit 5)**

On May 18, 2018 a hearing was held on the above captioned mater. The mater was continued to allow the following:

1. Respondent requested time to research the capabilities of the Complainant's meter.
2. Respondent requested a testing of Complainant's meter.
  - a. both parties mutually agreed to a date and a timeframe for the meter test Respondent requested. <sup>1</sup>

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

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<sup>1</sup> The meter test, which consisted of exchanging the current meter with a new meter, was scheduled for June 6, 2018 between the hours of 8:00 AM and 1:30 PM.

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 6)**

On June 6, 2018 Complainant was present for the appointment and remained at the property well after 1:30 PM.

On June 7, 2018 Complainant attempted to contact PGW's attorney by phone at (215) 684-6982 with hopes of rescheduling for June 8, 2018. However, Mr. Farinas was unavailable yet never responded to the message left by Complainant. *(See: Exhibit 6)*

On June 19, 2018, approximately after two weeks had elapsed, Respondent saw it fit to contact Complainant. Respondents' were previously informed by Complainant's physician of his medical challenges and or limitations (respiratory issues). In addition, Respondents' were provided with documented evidence that the electricity at Complainant's home was turned off. During the latter part of June and the month of July the City of Philadelphia experienced server heatwaves. Respondent did not offer a specific time or date to reschedule the appointment and given the fact that Complainant simply could not be at the Property under those weather conditions without a specific time or date, no date was set for the testing of Complainant's meter.

On July 16, 2018 Complainant attempted to contact PGW's attorney by phone at (215) 684-6982 with hopes of rescheduling. However, Mr. Farinas was unavailable yet never responded to the message left by Complainant. **(Exhibit 7)**

On August 17, 2018 Complainant attempted to contact PGW's attorney by phone at (215) 684-6982 with hopes of rescheduling. However, Mr. Farinas was unavailable yet never responded to the message left by Complainant. **(Exhibit 8)**

On September 10, 2018, Complainant was blindsided as he learned of Respondents' Counsels ex parte email exchange with Judge Vero that began on July 30, 2018. The e-mails clearly show Respondent, by and through Counsel, knowingly misrepresented PGW's failure to attend the mutually agreed upon scheduled meter testing.

On September 11, 2018, to Complainant's dismay, Judge Vero scheduled a new hearing for October 12, 2018.

On September 24, 2018 Complainant's submitted a continuation of his original discovery request (**Exhibit 9**), in effort to obtain the results of the research Respondent notified this Commission it required to attain specifics on the capabilities of Complainant's meter. The results of Respondent's research on the capabilities and or limitations of Complainant's meter should have been forwarded to Complainant as soon as they were received by Respondent's Counsel. However, no such action has occurred.

### **III. REASONS TO COMPEL ANSWERS TO ONGOING INTERROGATORIES AND PRODUCTION OF DOCUMENTS**

#### **A. Respondents' Answers Are Insufficient**

Complainant submitted his original discovery request for Interrogatories and the Production of Documents to Respondent on April 16, 2018, at which time Complainant clearly concluded his request as follows: ***"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."*** (See: Exhibit 1 - Production of Documents no. 18) Moreover, Respondents' failed to comply with Judge Vero May 9, 2018 Order and submit timely Answers to Complainant's request for Interrogatories and the Production of Documents.

Therefore, Respondents' should be required to Answer any and or all discovery request.

## **B. Respondents' Objections Are Insufficient**

Respondents' submitted objections to Complainant's continuation of his original discovery request citing 52 Pa. Code §5.331(b). However, Respondents' failed to recognize their obligation, established in Complainant's original discovery request. Respondent also ignored, failed to acknowledge and refused to respond to Complainant's good faith effort to a mutually agreed upon time frame to submit answers to the discovery request. **(Exhibit 10)** also (*See: 52 Pa. Code §5.342(d)*) which states "*Time periods may be modified .....by agreement of the parties.*"

Therefore, Respondents' should be barred from any and or all Objections to discovery request and hereafter Ordered to submit full and complete Answers to any and or all discovery request.

## **IV. REASONS TO SANCTION**

Respondent and Counsel for Respondent should be sanctioned for the following:

1. Respondent was intentionally absence from the mutually agreed upon appointment to test Complainant's meter.
  - a. Respondent, by and through Counsel, failed to properly inform this Commission that PGW did not arrive at Complainant's residence on June 6, 2018 at any time.
  - b. Respondent failed to contact Complainant in a reasonable time after PGW missed the scheduled appointment.
2. Respondent, by and through Counsel, knowingly and willfully refused to respond to Complainant's attempts to reschedule the appointment which PGW disregarded.
3. Respondent, by and through Counsel, knowingly and willfully misrepresented facts during ex parte e-mail communications with Judge Vero related to this mater.
  - a. Counsel falsely stated that Complainant refused to reschedule.
  - b. Counsel falsely stated he sent information to Complainant via FedEx.
4. Respondent failed to comply with Judge Vero's May 9, 2018 Order.

5. Respondent, by and through Counsel, knowingly and willfully misrepresented facts in his submission of Objections that were also submitted to this Commission.
  - a. Counsel falsely stated that the mater before this Commission made no mention of a billing dispute.
    - i. At a previous hearing in this matter held on May 18, 2018 Administrative Law Judge Erand Vero clearly established that Complainant's complaint include a billing dispute as well as a request for a reasonable payment arrangement.
  - b. Counsel falsely stated that piping that precedes the meter at Complainant's service address and or components of the meter have no relation to measurement of gas used by Complainant.
    - i. Counsels' position is unintelligible, in light of the fact that natural gas passes through, the preceding pipes and meter in question, at different densities, temperatures and pressures, the preceding pipes and components of the meter clearly effect the measurement of the gas that passes through them.
  - c. Counsel falsely stated that pressure in the pipeline also has no relation to measurement.
    - i. (See: (IV)(5)(b)(i) above.
6. Respondent, by and through Counsel, failed to supply any information on research and or results of research they informed this Commission was needed which was the basis for the continuance.

## **V. CONCLUSION**

Respondent, by and through Counsel, failed to comply with an Order of this Commission. Therefore, Respondent has no standing to object or submit insufficient answers to Interrogatories and Production of Documents. In addition, Respondent has knowingly omitted and or refuse to provide any information in regard to the research of Complainant's meter that they requested additional time for. Moreover, Respondent willfully did not attend

the appointment that was mutually agreed upon for the testing of Complainant's meter on June 6, 2018.

WHEREFORE Complainant moves this Honorable Commission to enter an Order in the form attached hereto.

October 10, 2018

Respectfully submitted,

/s/Deree J. Norman

Deree J. Norman

5367 Thomas Ave

Philadelphia, Pa 19143

(267) 304-2162

[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**AFFIDAVIT OF SERVICES**

I, Deree J. Norman, do hereby certify that on this 10<sup>th</sup> day of October 2018 I served a true and correct copy of the Motion and Memorandum of Law in Support of Complainant’s Motion to Compel and Sanction Respondent for failure to honor a mutually agreed upon appointment to test Complainant’s meter, failure to submit full and complete answers to ongoing Interrogatories and Request for Production of Documents and the submission of Objections based on false and or misrepresented information in the above captioned 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**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMPLAINANT DERE J. NORMAN'S 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 documents and/or items 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](mailto:dereenorman@yahoo.com) on or before twenty (20) days from the date of service herein. 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.)

## **INTERROGATORIES**

1. Identify the person(s) that heads the department and/or section and/or is responsible for the operation and/or production and/or distribution of PGW's bills and/or billings statements who will be available to testify at the May 18, 2018 hearing.
2. Identify the department that is responsible for the calculation and analyzation of payment plan options available to customers who are indigent and/or in current and/or recent litigation and/or in arrears and/or in default.
3. Identify the complete criteria and/or process required for the calculation and analyzation of payment plan options available customers who are indigent and/or in current and/or recent litigation and/or in arrears and/or in default.
4. Identify the person(s) that heads the department and/or section and/or is responsible for the calculation and analyzation of payment plan options available to customers who are indigent and/or in current and/or recent litigation and/or in arrears and/or in default who will be available to testify at the May 18, 2018 hearing.
5. Identify the software used by the billing department and/or the billing system.
6. Identify the operating system used by the billing department and/or the billing system.
7. Identify the department that is responsible for the operation and/or production and/or distribution of PGW's medical certifications.
8. Identify the person(s) that heads the department and/or section and/or is responsible for the operation and/or production and/or distribution of PGW's medical certifications who will be available to testify at the May 18, 2018 hearing.
9. Identify the make and model of any and/or all fax machines used by PGW to distribute medical certification to Physicians between August 1, 2017 and August 31, 2017.
10. Identify the specific fax machine used to distribute a medical certification to Complainant's Physician between August 1, 2017 and August 31, 2017.
11. Identify the specific person(s) that communicated with the Complainant in relation to a medical certification sent by mail and/or faxed to Complainant's Physician between August 1, 2017 and August 31, 2017.
12. Identify the specific person(s) that distributed a medical certification to Complainant's Physician by fax between August 1, 2017 and August 31, 2017.

## **REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Produce a copy of the medical certification form which PGW sent to Complainant's Physician.
2. Produce the fax confirmation report which shows PGW's alleged distribution of a medical certification to Complainant's Physician.
3. Produce any and/or all documents bearing Complainant's signature related to payment agreements and/or arrangements.
4. Produce any and/or all documents expected to be introduced as evidence in the above captioned matter.
5. Produce any and/or all diagnostic and/or error reports generated by PGW's billing system from August 1, 2017 through August 31, 2017.
6. Produce all statements, logs and communications of any and all witnesses including any and all statements of Complainant and Respondent, including taped recordings, whether transcribed or not, as well as all written statements.
7. Produce any and/or all documents and/or communications containing the name, home and business address and qualifications of all persons who have been retained or specially employed by Respondent in anticipation of litigation or preparation for the hearing in this matter and who are not expected to be called as witnesses at trial or as to whom no such decision has yet been made, and attach any documents or communications received from said person(s). If there are no documents or communications, then the name of said person(s) as well as their home and business addresses should be provided.
8. Produce any and/or all documents, records, or communications of or prepared by an investigator acquired and/or employed because of their investigation(s), including but not limited to telephone calls, correspondence, facsimiles, e-mail, billing, inspections, notes, observations, interviews, statements and/or findings.
9. Produce the name, home and business address, background and qualifications of any and all persons in the employ of Respondent who in anticipation and/or preparation of litigation, is expected to be called as a witness at trial.
10. Produce any and/or all documents and communications containing the name and home and business addresses of all individuals contacted as potential witnesses.
11. Produce all reports, communications, and/or documents prepared by any experts who will testify at hearing in this matter.

12. Produce a digital copy of any and/or all recorded communication between Complainant and PGW and/or any of PGW representatives.
13. Produce a transcript of any and/or all recorded communication between Complainant and PGW and/or any of PGW representatives.
14. Produce a copy of any and/or all transcripts from any and/or all hearings held before the PUC or any other Judicial body between Complainant and PGW in the last 5 years.
15. Produce all reports, manuals, textbooks, policy sheets or other documents, or communications which any said expert, potential expert, witness or potential witness has consulted or reviewed as a result or in preparation of this litigation or will consult or review.
16. Produce copies of a curriculum vitae of any and or all experts who will testify at trial.
17. Produce all documents and communications substantiating any defense to the Complainant's cause of action.
18. Produce all copies of internal memoranda, inter-office memos, facsimiles, e-mail or other documents or communications regarding this case, made by the PGW and/or any agent and/or employee of PGW.
19. Produce the name and address of the senior executive of PGW's law department.
20. Produce any and or all documents of any nature whatsoever which refer in any way to the situation described in the Complaint and/or the facts or circumstances leading up to and following said complaint.
21. Produce any and all documents or other tangible materials of any nature whatsoever which you plan to have marked for identification at trial, introduce into evidence at trial, or about which you plan to question a witness at trial.
22. Produce any and/or all documents or communications of any nature whatsoever which relate, refer or pertain to the Complainant, any other party to this action, the situation, situation site and or any instrumentality involved in the situation described in the Complaint.
23. Produce all documents and/or communications relating to any facts on the basis of which it is asserted that the conduct of the Complainant contributed to the happenings of the alleged occurrences or to the cost and or usage associated allegedly as a result.
24. Produce any and all documents of any nature whatsoever referred to in Respondent's Answers to Complainant's Interrogatories.

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](mailto: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](mailto: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.

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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 16<sup>th</sup> day of April 2018 I served a true and correct copy of the Request for Interrogatories and the Production of Documents in the above manner on the following via e-mail.

LAURETO FARINAS  
PHILADELPHIA GAS WORKS  
4<sup>TH</sup> FLR.  
800 W MONTGOMERY AVE  
PHILADELPHIA PA 19122  
[Laureto.Farinas@pgworks.com](mailto:Laureto.Farinas@pgworks.com)

# **EXHIBIT 2**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Complainant’s Motion To Overrule Respondent’s Objections And Compel Respondent To Respond To Complainant’s Written Discovery Requests**

Pursuant to 52 Pa. Code §5.342(g) Complainant hereby moves this Honorable Commission to Overrule Respondent’s Objections to Interrogatories and Request for Production of Documents and Compel Respondent to submit specific and accurate answers and documents to Complainant’s Interrogatories and Request for Production of Documents.

Complainant incorporates herein by reference, the attached Memorandum of Law in Support of Complainant’s Motion to Overrule Respondent’s Objections to Interrogatories and Request for Production of Documents and Compel Respondent to submit specific and accurate answers and documents to Complainant’s Interrogatories and Request for Production of Documents

Date: May 4, 2018

Respectfully Submitted,

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**Memorandum of Law in Support of Complainant’s Motion To Overrule Respondent’s  
Objections And Compel Respondent To Respond To Complainant’s Written Discovery  
Requests**

Pursuant to 52 Pa. Code §5.342(g) Complainant hereby moves this Honorable Commission to Overrule Respondent’s Objections to Interrogatories and Request for Production of Documents and Compel Respondent to submit specific and accurate answers and documents to Complainant’s Interrogatories and Request for Production of Documents.

Moreover, the scope of the matter before this Honorable Commission is a review of the payment arrangement established by the BCS Informal Complaint Decision No. 3557990. However, the factual integrity of the information in relation to the Complainant’s account submitted by PGW during the BCS investigation is fraudulent and needs to be quantified.

Therefore, the questions before this Honorable Commission are as follows:

**Q:** Did PGW fail to acknowledge Complainant’s Medical Certification previous submitted in 2014 when Complainant was approved for SSI Disability?

Suggested answer: **Yes**

**Q:** Did PGW fail to supply, by mail and or fax, Complainant and or Complainant’s Physician with a new Medical Certification form to be completed and returned as per his request?

Suggested answer: **Yes**

**Q:** Did PGW comply with current rules and attempt to establish a payment arrangement with Complainant before the BCS Informal Complaint was filed?

Suggested answer: **No**

**Q:** Did PGW submit fraudulent billing information in its recapitulation of Complainant's account? <sup>1</sup>

Suggested answer: **Yes**

**Q:** Did BCS, in its decision, base the payment arrangement on fraudulent, fabricated and or unsupportable information submitted by PGW?

Suggested answer: **Yes**

## **PGW's Objections Should be Overruled**

### **I. Definitions – Respondent's Objections to Definitions Should Be Overruled**

#### ***PGW's Objection to Definitions***

*PGW objects to the Discovery Definitions: "Identify" as included in E and H. in these definitions of the "Identify" are burdensome and beyond the scope of this matter.*

*The Definition "E" "Identify" requires a response giving the home address of any PGW employees mentioned in a Discovery Response. This request for information is beyond the scope of this proceeding. The home addresses of PGW employees are irrelevant to the disposition of this matter. Only the PGW headquarters address is relevant in this regard.*

*The Definition "H" "Identify" requires information that is beyond the scope of this proceeding which is the review of decision granting a payment arrangement given the*

*Commission's Bureau of Consumer Services ("BCS"). "Identity" under Definition "H" requires: 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 char of process'." This information is beyond the scope of proceeding to review a BCS payment arrangement.*

Respondents' have clearly misrepresented the factual content of the Definitions listed in Complainant's written discovery Request for Interrogatories and Production of Documents.

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<sup>1</sup> The accuracy of the bills issued to Complainant by PGW needs to be quantified to establish the basis for any payment arrangement issued by the BCS.

1. "Definition "E" "Identify".
  - i. **Complainant:** *"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.*
  - ii. **Respondent** *"Identify" requires a response giving the home address of any PGW employees mentioned in a Discovery Request.*
2. "Definition "H" "Identify"
  - i. **Complainant:** *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"*
  - ii. **Respondent:** *Definition "H" "Identify" requires information that is beyond the scope of this proceeding which is the review of decision granting a payment arrangement given the Commission's Bureau of Consumer Services ("BCS")*

Respondent's objection to these definitions is mere subterfuge and a continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers.

Wherefore Respondent's Objections to Definitions should be Overruled and Respondent should be Compelled to Respond to Complainant's written discovery request.

## **II. Instructions - Respondent's Objections to Instructions Should Be Overruled**

### ***PGW's Objection to Instructions:***

*PGW objects to Instruction I which states, "Answer each of the following discovery requests separately and fully in writing pursuant to 18 Pa. C.S. §4904."*

*The Commission's Procedural Rules at 52 Pa. Code §3.21 et seq. govern the discovery in this proceeding. PGW is not bound to provide discovery responses that comply with 18 Pa. C.S. 54904.*

Respondents assertion that PGW is not bound by 18 Pa. C.S. §4904 when responding to written Interrogatories and the Production of Documents is inherently unintelligible.

3. 52 Pa. Code §5.342(a)(6) requires all answers or objections to written interrogatories by a party be in compliance with 52 Pa. Code §1.36.
4. 52 Pa. Code §1.36 “Verifications” states: Applications, petitions, formal complaints, motions and answers thereto containing an averment of fact not appearing of record in the action or containing a denial of fact must be personally verified by a party thereto or by an authorized officer or other authorized employee of the party if a corporation or association. Verification means a signed written statement of fact supported by oath or affirmation or made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).
5. It should also be established that 52 Pa. Code §3.21 et seq. does not govern the discovery in this proceeding as stated by Respondent PGW in its Objection to Complainant’s written Interrogatories and Request for Production of Documents.

Wherefore Respondents Objections to Complainant’s Instructions should be Overruled and Respondent should be Compelled to Respond to Complainant’s Written Discovery Request and verify said response in accordance with 18 Pa. C.S. §4904.

**III. Interrogatory’s No. 7 and No. 8, No. 9, No. 10, No. 11 and No. 12 - Respondent’s Objections to Interrogatories Nos 7, 8, 9, 10, 11 and 12 Should Be Overruled**

***PGW’s Objection to Interrogatory’s No. 7 and No. 8:***

*PGW objects to Interrogatory No. 7 which states,*

7. *Identify the department that is responsible for the operation and/or production and/or distribution of PGW's medical certifications.*

*PGW objects on the grounds that the topic of Medical Certifications is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment*

*arrangement. There are no allegations of the denial of a Medical Certification or any other allegations related to a Medical Certification.*

*PGW objects to Interrogatory No. 8 which states,*

- 8. Identify the person(s) that heads the department and/or section and/or is responsible for the operation and/or production and/or distribution of PGW's medical certifications who will be available to testify at the March 28, 2018 hearing.*

*PGW objects on the grounds that the topic of Medical Certifications is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of the denial of a Medical Certification or any other allegations related to a Medical Certification.*

6. Respondent's objection to Interrogatory No. 7 is mere subterfuge and a continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to identify the department that plays an intricate part in determining a customer's medical status and of which is responsible for the operation and/or production and/or distribution of PGW's medical certification qualifications. Omitting this information is tantamount to fraud.
7. Respondent's objection to Interrogatory No. 8 is mere subterfuge and a continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to provide and/or identify the person(s) that heads the department and/or section and/or is responsible for the operation and/or production and/or distribution of PGW's medical certifications who will be available to testify at the May 18, 2018 hearing.

***PGW's Objection to Interrogatory's No. 9, No. 10, No. 11 and No. 12:***

*PGW objects to Interrogatory Nos. 9, 10, 11 and 12 which state,*

- 9. Identify the make and model of any and/or all fax machines used by PGW to distribute medical certification to Physicians between August 1, 2017 and August 31, 2017.*
- 10. Identify the specific fax machine used to distribute a medical certification to Complainant's Physician between August 1, 2017 and August 31, 2017.*
- 11. Identify the specific person(s) that communicated with the Complainant in relation to a medical certification sent by mail and/or faxed to Complainant's Physician between August 1, 2017 and August 31, 2017.*
- 12. Identify the specific person(s) that distributed a medical certification to Complainant's Physician by fax between August 1, 2017 and August 31, 2017.*

*PGW objects to Interrogatory Nos. 9, 10, 11 and 12 on the grounds that the topic of Medical Certifications is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of the denial of a Medical Certification or any other allegations related to a Medical Certification fax machine or document mishap.*

- 8.** Complainant's was instructed that his previous Medical Certification was invalid while his request for a new form was misappropriated as that a PGW representative informed Complainant that one would be sent to his Physician via fax. Complainant provided PGW with all of the Physician's relevant information. However, a fax was never sent. Respondent's objection to Interrogatory No. 9 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to identify the make and model of any and/or all fax machines allegedly used by PGW to distribute medical certification to Complainant's Physicians in August of 2017.
- 9.** Respondent's objection to Interrogatory No. 10 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to identify the

specific fax machine allegedly used by PGW to distribute a medical certification to Complainant's Physician in August of 2017.

10. Respondent's objection to Interrogatory No. 11 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to identify the specific person(s) that communicated with the Complainant in relation to a medical certification allegedly sent by mail and/or faxed to Complainant's Physician in August of 2017.
11. Respondent's objection to Interrogatory No. 12 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to identify the specific person(s) that allegedly distributed a medical certification to Complainant's Physician by fax in August of 2017.
  - a. PGW's refusal to acknowledge Complainant's previous medical certification as well as their refusal to comply with Complainant's request for a new medical certification form to be faxed to his Physician, puts PGW in a position to terminate Complainant's gas service and ignore any ongoing billing discrepancies.

Wherefore Respondent's Objections to Complainant's Interrogatories No. 7, No. 8, No. 9, No. 10, No. 11 and No. 12 should be Overruled and Respondent should be Compelled to Respond to Interrogatories No. 7, No. 8, No. 9, No. 10, No. 11 and No. 12 with specificity and accuracy.

**IV. Production of Documents (POD) No. 1 and No. 2 - Respondent's Objections to POD Nos 1 and 2 Should Be Overruled**

***PGW's Objections to Request for Production of Documents Nos 1 and 2***

*PGW objects to Requests for Production of Documents Nos. 1 and 2 which state,*

1. *Produce a copy of the medical certification form which PGW sent to Complainant's Physician.*

2. *Produce the fax confirmation report which shows PGW's alleged distribution of a medical certification to Complainant's Physician*

*PGW objects to Requests for Production of Documents Nos. 1 and 2 on the grounds that the topic of Medical Certifications is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of the denial of a Medical Certification or any other allegations related to a Medical Certification fax machine or document mishap.*

12. Respondent's objection to POD No. 1 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to Produce a copy of the medical certification Complainant requested be sent to Complainant's Physician.
13. Respondent's objection to POD No. 2 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to produce the fax confirmation report which shows PGW's alleged distribution of a medical certification to Complainant's Physician.

Wherefore Respondents Objections to Complainant's Production of Documents No. 1, and No. 2 should be Overruled, and Respondent should be Compelled to Comply Production of Documents No. 1, and No. 2 and Respond with specificity and accuracy to Complainant's Written Discovery Request.

**V. Production of Documents (POD) No. 5 Respondent's Objections to POD No. 5 Should Be Overruled**

***PGW's Objection to Request for Production of Documents No. 5***

*PGW objects to Requests for Production of Documents No. 5 which states,*

5. *Produce any and/or all diagnostic and/or error reports generated by PGW's billing system from August 1, 2017 through August 31, 2017.*

*PGW objects to Requests for Production of Documents No. 5 on the grounds that is overbroad. It will require an unreasonable investigation and it is beyond the scope of this*

*proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of billing or billing system error related to the Complainant's account for gas services or error in the BCS decision which provided a payment arrangement based upon the Complainant's income*

**14.** Computerized operational systems, such as PGW's billing system, can generate diagnostic reports to show errors in intervals of seconds, minutes, hours, days, months and so on. In fact it's part of PGW protocol to run said diagnostics to ensure that their system is operating inside the guild lines established by PUC rules. Respondent's objection to POD No. 5 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate it customers. If an error report was generated in August of 2017 no extensive or burdensome research or investigation would be required to retrieve it. Moreover, Complainant's request is well within the scope of a payment arrangement as that the basis of any arrangement would be the unpaid bills in question. Respondent failed to produce any and/or all diagnostic and/or error reports generated by PGW's billing system from August 1, 2017 through August 31, 2017 thereby concealing any information as to the inaccurately of bills issued.

**VI. Production of Documents (POD) No. 6 Respondent's Objections to POD No. 6 Should Be Overruled**

***PGW's Objection to Requests for Production of Documents No. 6***

*PGW objects to Requests for Production of Documents No. 6 which states,*

*6. Produce all statements, logs and communications of any and all witnesses including any and all statements of Complainant and Respondent, including taped recordings, whether transcribed or not, as well as all written statements.*

*PGW objects to Requests for Production of Documents No. 6 on the grounds that is overbroad, it will require an unreasonable investigation and it is beyond the scope of this*

*proceeding. The request seeks all statements logs and communications of all PGW witnesses, including those with the Complainant. On its face this request seeks information related to work done by the PGW witness that has nothing to do with the Complainant, his PGW account or this complaint.*

*PGW will provide in due course the "Contacts for Account" of the Complainant's account that will show the action and communication of PGW and the Complainant relating to the Complainant's account.*

**15.** Any and or all material related to Complainant's account would be identifiable by Complainant's account number and stored electronically and or by hard copy as such. Therefore, all information related to Complainant's account should be readily available and or accessible at any time and would impose no burdensome investigation to retrieve it. Complainant's request is in fact very specific and therefore not overbroad. Respondent's objection to POD No. 6 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate it customers. Respondent failed to produce all statements, logs and communications of any and all witnesses including any and all statements of Complainant and Respondent, including taped recordings, whether transcribed or not, as well as all written statements.

Wherefore Respondents Objections to Complainant's Production of Documents No. 6 should be Overruled, and Respondent should be Compelled to Comply Production of Documents No. 6 and Respond with specificity and accuracy to Complainant's Written Discovery Request.

**VII. Production of Documents (POD) No. 8 Respondent's Objections to POD No. 8 Should Be Overruled**

***PGW's Objection to Requests for Production of Documents No. 8***

*PGW objects to Requests for Production of Documents No. 8 which states,*

*8. Produce any and/or all documents, records, or communications of or prepared by an investigator acquired and/or employed because of their investigation(s), including but not limited to telephone calls, correspondence, facsimiles, e-mail, billing, inspections, notes, observations, interviews, statements and/or findings.*

*PGW objects to Requests for Production of Documents No. 8 that is seeks an Investigative Report that contains privileged information protected by the Attorney Client Privilege and 52 Pa. Code 55.323. The PGW investigative report contains the mental impressions, conclusions or opinions of the PGW investigator communicating with PGW counsel relating to the merits of the matter, which are considered outside of discovery pursuant to 52 Pa. Code 55.323.*

*PGW will provide in due course the "Contacts for Account" of the Complainant's account that will show the action of PGW and the Complainant relating to the Complainant's account.*

**16. Attorney-client privilege does not apply to every communication with an attorney.**

For the privilege to exist, the communication must be to, from, or with an attorney, and intended to be confidential. In addition, the communication must be for the purpose of requesting or receiving legal advice.

There were no attorneys involved with the issuance of Complainant's bills or evaluation of Complainant's medical status, nor was an attorney involved in the BCS investigation of information PGW supplied prior to the BCS decision. Respondent's objection to POD No. 8 is mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to Produce any and/or all documents, records, or communications of or prepared by an investigator acquired and/or employed because of their investigation(s), including but not limited to telephone calls, correspondence, facsimiles, e-mail, billing, inspections, notes, observations, interviews, statements and/or findings

Wherefore Respondents Objections to Complainant's Production of Documents No. 8 should be Overruled, and Respondent should be Compelled to Comply Production of Documents No. 8 and Respond with specificity and accuracy to Complainant's Written Discovery Request.

**VIII. Production of Documents (POD) No. 14 - Respondent's Objections to POD No. 14 Should Be Overruled**

***PGW's Objection to Requests for Production of Documents No. 14***

*PGW objects to Requests for Production of Documents No. 14 which states,*

*14. Produce a copy of any and/or all transcripts from any and/or all hearings held before the PUC or any other judicial body between Complainant and PGW in the last 5 years.*

*PGW objects to Requests for Production of Documents No. 14 in that it requires PGW to produce a copy of transcripts from hearings on matters between Complainant and PGW in previous disputes, which is in violation of the terms of PGW's purchase transcript from the court reporting agency. The request refers to the transcript of a hearing held on Thursday, September 24, 2015 before the Commission's Administrative Law Judge Dennis J. Buckley in the matter of Deree Normal v. Philadelphia Gas Works, Docket No. C-2015-2489503, comprised of 97 pages. Copying and distribution of the transcript is a violation of the purchasing policy of the Commonwealth Reporting Company, Inc.*

*The Complainant may purchase a copy directly from Commonwealth Reporting Company, Inc. by calling 717-761-7150. The cost is \$285. Alternatively, the Complainant may request a review of the transcript at the Commission's offices*

**17.** No legal agreement and or terms between PGW and the Commonwealth Reporting Company, Inc. exist that would give PGW the authority to deny a properly filed request for the production of documents in a legal proceeding. PGW's attempt to conceal and or suppress information that would unfavorably contradict their most recent falsifications is tantamount to fraud. Respondent's objection to POD No. 14 is

mere subterfuge and continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondent failed to Produce a copy of any and/or all transcripts from any and/or all hearings held before the PUC or any other Judicial body between Complainant and PGW in the last 5 years

Wherefore Respondent's Objections to Complainant's Production of Documents No. 14 should be Overruled, and Respondent should be Compelled to Comply Production of Documents No. 14 and Respond with specificity and accuracy to Complainant's Written Discovery Request.

**IX. Production of Documents (POD) No. 17 and No. 18 - Respondent's Objections to POD No. 17 and No. 18 Should Be Overruled**

***PGW's Objections to Requests for Production of Documents Nos. 17 and 18***

*PGW objects to Requests for Production of Documents Nos. 17 and 18 which state,*

*17. Produce all documents and communications substantiating any defense to the Complaint's cause of action.*

*18. Produce all copies of internal memoranda, inter-office memos, facsimiles, email or other documents or communications regarding this case, made by the PGW and/or any agent and/or employee of PGW.*

*PGW objects to Requests for Production of Documents Nos. 17 and 18 to the extent that it seeks information that is privileged information protected by the Attorney Client Privilege and 52 Pa. Code 55.323. The PGW investigative report and similar inter-office communications contain the mental impressions, conclusions or opinions of the PGW investigator communicating with PGW counsel relating to the merits of the matter, which are considered outside of discovery pursuant to 52 Pa. Code 55.323.*

*PGW will provide in due course the "Contacts for Account" of the Complainant's account that will show the action of PGW and the Complainant relating to the Complainant's account.*

18. PGW appears to suggest that an answer to a complaint is not part of a defense and is somehow privileged. Respondent's objection to POD No. 17 is mere subterfuge and a continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondents failed to Produce all documents and communications substantiating any defense to the Complainant's cause of action.

19. Attorney-client privilege protects most communications between clients and their lawyers. But, according to the crime-fraud exception to the privilege, a client's communication to his or her attorney isn't privileged if he or she made it with the intention of committing or covering up a crime or fraud. Respondent's objection to POD No. 18 is mere subterfuge and a continuance of the unethical and fraudulent business practices exercised by PGW in an ongoing effort to control and manipulate its customers. Respondents failed to Produce all copies of internal memoranda, inter-office memos, facsimiles, e-mail or other documents or communications regarding this case, made by the PGW and/or any agent and/or employee of PGW.

Wherefore Respondents Objections to Complainant's Production of Documents No. 17, and No. 18 should be Overruled, and Respondent should be Compelled to Comply with Production of Documents No. 17, and No. 18 and Respond with specificity and accuracy to Complainant's Written Discovery Request.

May 4, 2018

Respectfully submitted,

/s/Deree J. Norman  
Deree J. Norman  
5367 Thomas Ave  
Philadelphia, Pa 19143  
(267) 304-2162  
[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**AFFIDAVIT OF SERVICES**

I, Deree J. Norman, do hereby certify that on this 4<sup>th</sup> day of May 2018 I served a true and correct copy of the Motion and Memorandum of Law in Support of Complainant’s Motion to Overruled Respondent’s Objections to Interrogatories and Request for Production of Documents and Compel Respondent to submit specific and accurate answers and documents to Complainant’s Interrogatories and Request for 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

# APPENDIX 1



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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Danielle Leva, Paralegal  
Legal Department  
Direct Dial: 215-684-6862  
FAX: 215-684-6798  
E-mail: [danielle.leva@pgworks.com](mailto:danielle.leva@pgworks.com)

April 25, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Deree J. Norman v. PGW, Docket No. C – 2018 – 2640719**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.342, the Philadelphia Gas Works ("PGW") hereby objects to the Complainant's requests for production of documents.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,

  
Danielle Leva

Enclosure

cc: Deree J. Norman  
Administrative Law Judge Eranda Vero  
Wendy Vacca (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Deree J. Norman,</b>	:	
Complainant	:	
v.	:	<b>Docket No. C – 2018 – 2640719</b>
	:	
<b>Philadelphia Gas Works,</b>	:	
Respondent	:	

**Philadelphia Gas Works’  
Objections to the Complainants’ Discovery Requests:  
Interrogatories and Requests for Production of Documents**

Pursuant to 52 Pa. Code §5.342(d)(1), the Philadelphia Gas Works (“PGW”) hereby objects timely to the following Interrogatories and Requests for Production of Documents (“Discovery”) of the Complainant, Deree J. Norman, addressed to PGW, that the Complainant served upon PGW in the above captioned matter on April 16, 2018 by email, a copy of which is attached hereto as Appendix “A,” and is incorporated by reference as if fully set forth.

As explained below and to the extent that the Complainant’s Discovery fails to conform to the Commission’s rules governing Discovery at 52 Pa. Code §5.321, *et seq.*, PGW objects to the Discovery.

**PGW’s Objections**

1. **Definitions**

PGW objects to the Discovery Definitions: “Identify” as included in E and H. in these definitions of the “Identify” are burdensome and beyond the scope of this matter. The Definition “E” “Identify” requires a response giving the home address of any PGW employees mentioned in a Discovery Response. This request for information is beyond the scope of this proceeding. The home addresses of PGW employees are irrelevant to the disposition of this matter. Only the PGW headquarters address is relevant in this regard.

The Definition “H” “Identify” requires information that is beyond the scope of this proceeding which is the review of decision granting a payment arrangement given the

Commission's Bureau of Consumer Services ("BCS"). "Identity" under Definition "H" requires:

"...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 char of process". This information is beyond the scope of proceeding to review a BCS payment arrangement.

PGW's objections should be sustained.

2. Objection to Instructions:

PGW objects to Instruction I which states, "Answer each of the following discovery requests separately and fully in writing pursuant to 18 Pa. C.S. §4904."

The Commission's Procedural Rules at 52 Pa. Code §3.21 *et seq.* govern the discovery in this proceeding. PGW is not bound to provide discovery responses that comply with 18 Pa. C.S. §4904.

3. Objection to Interrogatory No. 7

PGW objects to Interrogatory No. 7 which states,

7. Identify the department that is responsible for the operation and/or production and/or distribution of PGW's medical certifications.

PGW objects on the grounds that the topic of Medical Certifications is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of the denial of a Medical Certification or any other allegations related to a Medical Certification.

PGW's objection to Interrogatory No. 7 should be sustained.

PGW objects to Interrogatory No. 8 which states,

8. Identify the person(s) that heads the department and/or section and/or is responsible for the operation and/or production and/or distribution of PGW's medical certifications who will be available to testify at the March 28, 2018 hearing.

PGW objects on the grounds that the topic of Medical Certifications is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of the denial of a Medical Certification or any other allegations related to a Medical Certification.

PGW's objection to Interrogatory No. 8 should be sustained.

PGW objects to Interrogatory Nos. 9, 10, 11 and 12 which state,

9. Identify the make and model of any and/or all fax machines used by PGW to distribute medical certification to Physicians between August 1, 2017 and August 31, 2017.

10. Identify the specific fax machine used to distribute a medical certification to Complainant's Physician between August 1, 2017 and August 31, 2017.

11. Identify the specific person(s) that communicated with the Complainant in relation to a medical certification sent by mail and/or faxed to Complainant's Physician between August 1, 2017 and August 31, 2017.

12. Identify the specific person(s) that distributed a medical certification to Complainant's Physician by fax between August 1, 2017 and August 31, 2017.

PGW objects to Interrogatory Nos. 9, 10, 11 and 12 on the grounds that the topic of Medical Certifications is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of the denial of a Medical Certification or any other allegations related to a Medical Certification fax machine or document mishap.

PGW's objections to Interrogatory Nos. 9, 10, 11 and 12 should be sustained.

4. Objections to Requests for Production of Documents Nos. 1 and 2

PGW objects to Requests for Production of Documents Nos. 1 and 2 which state,

1. Produce a copy of the medical certification form which PGW sent to Complainant's Physician.
2. Produce the fax confirmation report which shows PGW's alleged distribution of a medical certification to Complainant's Physician

PGW objects to Requests for Production of Documents Nos. 1 and 2 on the grounds that the topic of Medical Certifications is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of the denial of a Medical Certification or any other allegations related to a Medical Certification fax machine or document mishap.

PGW's objections to Requests for Productions of Documents Nos. 1 and 2 should be sustained.

5. Objection to Requests for Production of Documents No. 5

PGW objects to Requests for Production of Documents No. 5 which states,

5. Produce any and/or all diagnostic and/or error reports generated by PGW's billing system from August 1, 2017 through August 31, 2017.

PGW objects to Requests for Production of Documents No. 5 on the grounds that is overbroad. It will require an unreasonable investigation and it is beyond the scope of this proceeding. The Complaint is simply a request for an affordable payment arrangement. There are no allegations of billing or billing system error related to the Complainant's account for gas services or error in the BCS decision which provided a payment arrangement based upon the Complainant's income.

PGW's objections to Request for Production of Documents No. 5 should be sustained.

6. Objection to Requests for Production of Documents No. 6

PGW objects to Requests for Production of Documents No. 6 which states,

6. Produce all statements, logs and communications of any and all witnesses including any and all statements of Complainant and Respondent, including taped recordings, whether transcribed or not, as well as all written statements.

PGW objects to Requests for Production of Documents No. 6 on the grounds that is overbroad, it will require an unreasonable investigation and it is beyond the scope of this proceeding. The request seeks all statements logs and communications of all PGW witnesses, including those with the Complainant. On its face this request seeks information related to work done by the PGW witness that has nothing to do with the Complainant, his PGW account or this complaint.

PGW will provide in due course the "Contacts for Account" of the Complainant's account that will show the action and communication of PGW and the Complainant relating to the Complainant's account.

PGW's objections to Request for Production of Documents No. 6 should be sustained as the Request for Production of Documents No. 6 is overbroad.

7. Objection to Requests for Production of Documents No. 8

PGW objects to Requests for Production of Documents No. 8 which states,

8. Produce any and/or all documents, records, or communications of or prepared by an investigator acquired and/or employed because of their investigation(s), including but not limited to telephone calls, correspondence, facsimiles, e-mail, billing, inspections, notes, observations, interviews, statements and/or findings.

PGW objects to Requests for Production of Documents No. 8 that is seeks an Investigative Report that contains privileged information protected by the Attorney Client Privilege and 52 Pa. Code §5.323. The PGW investigative report contains the mental impressions, conclusions or opinions of the PGW investigator communicating with PGW

counsel relating to the merits of the matter, which are considered outside of discovery pursuant to 52 Pa. Code §5.323.

PGW will provide in due course the "Contacts for Account" of the Complainant's account that will show the action of PGW and the Complainant relating to the Complainant's account.

PGW's objections to Request for Production of Documents No. 8 should be sustained.

8. Objection to Requests for Production of Documents No. 14

PGW objects to Requests for Production of Documents No. 14 which states,

14. Produce a copy of any and/or all transcripts from any and/or all hearings held before the PUC or any other judicial body between Complainant and PGW in the last 5 years.

PGW objects to Requests for Production of Documents No. 14 in that it requires PGW to produce a copy of transcripts from hearings on matters between Complainant and PGW in previous disputes, which is in violation of the terms of PGW's purchase transcript from the court reporting agency. The request refers to the transcript of a hearing held on Thursday, September 24, 2015 before the Commission's Administrative Law Judge Dennis J. Buckley in the matter of *Deree Normal v. Philadelphia Gas Works*, Docket No. C-2015-2489503, comprised of 97 pages. Copying and distribution of the transcript is a violation of the purchasing policy of the Commonwealth Reporting Company, Inc.

The Complainant may purchase a copy directly from Commonwealth Reporting Company, Inc. by calling 717-761-7150. The cost is \$285. Alternatively, the Complainant may request a review of the transcript at the Commission's offices.

PGW's objections to Request for Production of Documents No. 14 should be sustained.

9. Objections to Requests for Production of Documents Nos. 17 and 18

PGW objects to Requests for Production of Documents Nos. 17 and 18 which state,

17. Produce all documents and communications substantiating any defense to the Complainant's cause of action.

18. Produce all copies of internal memoranda, inter-office memos, facsimiles, email or other documents or communications regarding this case, made by the PGW and/or any agent and/or employee of PGW.

PGW objects to Requests for Production of Documents Nos. 17 and 18 to the extent that it seeks information that is privileged information protected by the Attorney Client Privilege and 52 Pa. Code §5.323. The PGW investigative report and similar inter-office communications contain the mental impressions, conclusions or opinions of the PGW investigator communicating with PGW counsel relating to the merits of the matter, which are considered outside of discovery pursuant to 52 Pa. Code §5.323.

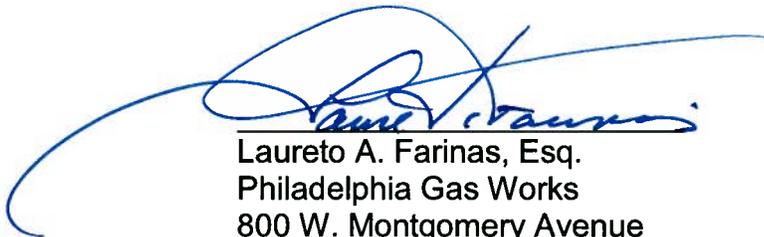
PGW will provide in due course the "Contacts for Account" of the Complainant's account that will show the action of PGW and the Complainant relating to the Complainant's account.

PGW's objections to Request for Production of Documents Nos. 17 and 18 should be sustained.

**WHEREFORE**, for the reasons stated above, PGW respectfully requests that the Commission issue an order sustaining PGW's objections to the Complainant's Discovery.

April 25, 2018

Respectfully submitted,



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

# **APPENDIX A**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Deree J. Norman

v.

Philadelphia Gas Works (PGW)

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C-2018-2640719

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**COMPLAINANT DERE E J. NORMAN'S 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 documents and/or items 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](mailto:dereenorman@yahoo.com) on or before twenty (20) days from the date of service herein. 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.)

## **INTERROGATORIES**

1. Identify the person(s) that heads the department and/or section and/or is responsible for the operation and/or production and/or distribution of PGW's bills and/or billings statements who will be available to testify at the May 18, 2018 hearing.
2. Identify the department that is responsible for the calculation and analyzation of payment plan options available to customers who are indigent and/or in current and/or recent litigation and/or in arrears and/or in default.
3. Identify the complete criteria and/or process required for the calculation and analyzation of payment plan options available customers who are indigent and/or in current and/or recent litigation and/or in arrears and/or in default.
4. Identify the person(s) that heads the department and/or section and/or is responsible for the calculation and analyzation of payment plan options available to customers who are indigent and/or in current and/or recent litigation and/or in arrears and/or in default who will be available to testify at the May 18, 2018 hearing.
5. Identify the software used by the billing department and/or the billing system.
6. Identify the operating system used by the billing department and/or the billing system.
7. Identify the department that is responsible for the operation and/or production and/or distribution of PGW's medical certifications.
8. Identify the person(s) that heads the department and/or section and/or is responsible for the operation and/or production and/or distribution of PGW's medical certifications who will be available to testify at the May 18, 2018 hearing.
9. Identify the make and model of any and/or all fax machines used by PGW to distribute medical certification to Physicians between August 1, 2017 and August 31, 2017.
10. Identify the specific fax machine used to distribute a medical certification to Complainant's Physician between August 1, 2017 and August 31, 2017.
11. Identify the specific person(s) that communicated with the Complainant in relation to a medical certification sent by mail and/or faxed to Complainant's Physician between August 1, 2017 and August 31, 2017.
12. Identify the specific person(s) that distributed a medical certification to Complainant's Physician by fax between August 1, 2017 and August 31, 2017.

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Produce a copy of the medical certification form which PGW sent to Complainant's Physician.
2. Produce the fax confirmation report which shows PGW's alleged distribution of a medical certification to Complainant's Physician.
3. Produce any and/or all documents bearing Complainant's signature related to payment agreements and/or arrangements.
4. Produce any and/or all documents expected to be introduced as evidence in the above captioned matter.
5. Produce any and/or all diagnostic and/or error reports generated by PGW's billing system from August 1, 2017 through August 31, 2017.
6. Produce all statements, logs and communications of any and all witnesses including any and all statements of Complainant and Respondent, including taped recordings, whether transcribed or not, as well as all written statements.
7. Produce any and/or all documents and/or communications containing the name, home and business address and qualifications of all persons who have been retained or specially employed by Respondent in anticipation of litigation or preparation for the hearing in this matter and who are not expected to be called as witnesses at trial or as to whom no such decision has yet been made, and attach any documents or communications received from said person(s). If there are no documents or communications, then the name of said person(s) as well as their home and business addresses should be provided.
8. Produce any and/or all documents, records, or communications of or prepared by an investigator acquired and/or employed because of their investigation(s), including but not limited to telephone calls, correspondence, facsimiles, e-mail, billing, inspections, notes, observations, interviews, statements and/or findings.
9. Produce the name, home and business address, background and qualifications of any and all persons in the employ of Respondent who in anticipation and/or preparation of litigation, is expected to be called as a witness at trial.
10. Produce any and/or all documents and communications containing the name and home and business addresses of all individuals contacted as potential witnesses.
11. Produce all reports, communications, and/or documents prepared by any experts who will testify at hearing in this matter.

12. Produce a digital copy of any and/or all recorded communication between Complainant and PGW and/or any of PGW representatives.
13. Produce a transcript of any and/or all recorded communication between Complainant and PGW and/or any of PGW representatives.
14. Produce a copy of any and/or all transcripts from any and/or all hearings held before the PUC or any other Judicial body between Complainant and PGW in the last 5 years.
15. Produce all reports, manuals, textbooks, policy sheets or other documents, or communications which any said expert, potential expert, witness or potential witness has consulted or reviewed as a result or in preparation of this litigation or will consult or review.
16. Produce copies of a curriculum vitae of any and or all experts who will testify at trial.
17. Produce all documents and communications substantiating any defense to the Complainant's cause of action.
18. Produce all copies of internal memoranda, inter-office memos, facsimiles, e-mail or other documents or communications regarding this case, made by the PGW and/or any agent and/or employee of PGW.
19. Produce the name and address of the senior executive of PGW's law department.
20. Produce any and or all documents of any nature whatsoever which refer in any way to the situation described in the Complaint and/or the facts or circumstances leading up to and following said complaint.
21. Produce any and all documents or other tangible materials of any nature whatsoever which you plan to have marked for identification at trial, introduce into evidence at trial, or about which you plan to question a witness at trial.
22. Produce any and/or all documents or communications of any nature whatsoever which relate, refer or pertain to the Complainant, any other party to this action, the situation, situation site and or any instrumentality involved in the situation described in the Complaint.
23. Produce all documents and/or communications relating to any facts on the basis of which it is asserted that the conduct of the Complainant contributed to the happenings of the alleged occurrences or to the cost and or usage associated allegedly as a result.
24. Produce any and all documents of any nature whatsoever referred to in Respondent's Answers to Complainant's Interrogatories.

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](mailto: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](mailto: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

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C-2018-2640719

**AFFIDAVIT OF SERVICES**

I, Deree J. Norman, do hereby certify that on this 16<sup>th</sup> day of April 2018 I served a true and correct copy of the Request for Interrogatories and the Production of Documents in the above manner on the following via e-mail.

LAURETO FARINAS  
PHILADELPHIA GAS WORKS  
4<sup>TH</sup> FLR.  
800 W MONTGOMERY AVE  
PHILADELPHIA PA 19122  
[Laureto.Farinas@pgworks.com](mailto:Laureto.Farinas@pgworks.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Deree J. Norman,</b>	:	
Complainant	:	
v.	:	<b>Docket No. C – 2018 – 2640719</b>
	:	
<b>Philadelphia Gas Works,</b>	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT, **PHILADELPHIA GAS WORKS' OBJECTION TO THE COMPLAINANTS' INTERROGATORIES NOS. 7, 8, 9, 10, 11 AND 12 AND REQUESTS FOR PRODUCTION OF DOCUMENTS NOS. 1, 2, 5, 6, 8, 14, 17 and 18** UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §§1.54 and 5.342(c) (RELATING TO SERVICE BY A PARTICIPANT).

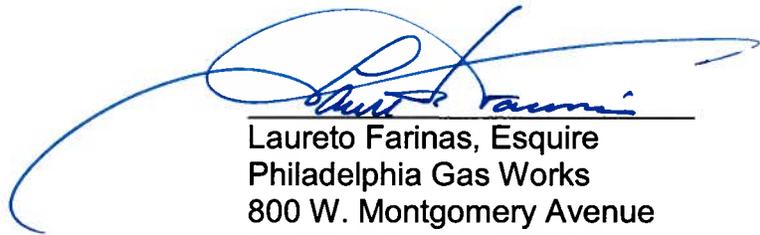
**Service List**

For Complainant:

Mr. Deree J. Norman  
5367 Thomas Avenue  
Philadelphia, PA 19143

and by email:  
[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)

April 25, 2018



Laureto Farinas, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982

# **EXHIBIT 3**

Subject: Deree J. Norman v. PGW, C-2018-2640719

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From: Danielle.Leva@pgworks.com

To: dereenorman@yahoo.com

Cc: Laureto.Farinas@pgworks.com

Date: Monday, May 7, 2018, 4:39:34 PM EDT

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Mr. Norman,

Please find attached the Philadelphia Gas Works' responses to the Answer to Interrogatories Nos. 1, 2, 3, 4, 5 and 6 and Requests for Production of Documents Nos. 3, 4, 7, 9, 11, 12, 13, 15, 16 ,17, 18, 19, 20,21, 22, 23, and 24.

Thank you.



NORMAN.PDF

2.5MB



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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Danielle Leva, Paralegal  
Legal Department  
Direct Dial: 215-684-6862  
FAX: 215-684-6798  
E-mail: danielle.leva@pgworks.com

May 7, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Deree J. Norman v. PGW, Docket No. C – 2018 – 2640719**

Dear Secretary Chiavetta:

Please find attached Philadelphia Gas Works' response to the Answer to Interrogatories Nos. 1, 2, 3, 4, 5 and 6 and Requests for Production of Documents Nos. 3, 4, 7, 9, 11, 12, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, and 24, which were completed by Jessica Glace, Customer Review Officer.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,

  
Danielle Leva

Enclosure

cc: Deree J. Norman  
Wendy Vacca (PGW Mail)

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**INTERROGATORIES**

1. Identify the person(s) that heads the department and/or section and/or is responsible for the operation and/or production and/or distribution of PGW's bills and/or billings statements who will be available to testify at the May 18, 2018 hearing.

**RESPONSE:**

None of the persons who head the departments and sections and who are responsible for the operation and production and distribution of PGW's bills and billings statements are available to testify at the May 18, 2018 hearing.

The person available to testify at the hearing of this matter is Jessica Glace, Senior Customer Review Officer – PGW. She is trained and equipped to explain the billing system and the calculation and distribution of bills as well as the criteria for giving payment arrangements on PGW accounts.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***

**Docket No. C-2018-2640719**

**Deree J. Norman's**

**Interrogatories and Requests for Production of Documents**

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2. Identify the department that is responsible for the calculation and analyzation of payment plan options available to customers who are indigent and/or in arrears and/or in default.

**RESPONSE:**

The PGW Customer Services Department

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**3.** Identify the complete criteria and/or process required for the calculation and analyzation of payment plan options available customers who are indigent and/or in arrears and/or in default.

**RESPONSE:**

The following is the criteria and/or process required for the calculation and analyzation of payment plan options available customers who are indigent and/or in arrears and/or in default:

The Responsible Utility Customer Protection Act, 66 Pa.C.S. §1401 *et seq.* (the Act or Chapter 14), applies to complaints alleging inability to pay and requesting a Commission-issued payment arrangement. This law provides strict guidelines that the Commission must follow in handling customer complaints.

Regarding the length of payment arrangements, the Pennsylvania Public Utility Code provides the following:

**(b) Length of payment arrangements.**--The length of time for a customer to resolve an unpaid balance on an account that is subject to a payment arrangement that is investigated by the commission and is entered into by a public utility and a customer shall not extend beyond:

- (1) Five years for customers with a gross monthly household income level not exceeding 150% of the Federal poverty level.
- (2) Three years for customers with a gross monthly household income level exceeding 150% and not more than 250% of the Federal poverty level.
- (3) One year for customers with a gross monthly household income level exceeding 250% of the Federal poverty level and not more than 300% of the Federal poverty level.
- (4) Six months for customers with a gross monthly household income level exceeding 300% of the Federal poverty level.

66 Pa.C.S. § 1405(b).

Additionally, §1405(d) provides that "...[a]bsent a change in income, the commission shall not establish or order a public utility to establish a second or subsequent payment arrangement if a customer has defaulted on a previous payment arrangement established by a commission order or decision."  
66 Pa.C.S. §1405(d).

A change in income is defined as "[a] decrease in household income of 20% or more if the customer's household income level exceeds 200% of the Federal poverty level or a decrease in household income of 10% or more if the customer's income level is 200% or less of the Federal poverty level."  
66 Pa.C.S. §1403.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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4. Identify the person(s) that heads the department and/or section and/or is responsible for the calculation and analyzation of payment plan options available to customers who are indigent and/or in arrears and/or in default who will be available to testify at the May 18, 2018 hearing.

**RESPONSE:**

None of the persons who head the departments and/or sections and who are responsible for the calculation and analyzation of payment plan options available to customers who are indigent, in arrears or in default will be available to testify at the May 18, 2018 hearing.

The person available to testify at the hearing of this matter is Jessica Glace, Senior Customer Review Officer – PGW. She is trained and equipped to explain the calculation and analyzation of payment plan options available to customers who are indigent, in arrears or in default.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**5. Identify the software used by the billing department and/or the billing system.**

**RESPONSE:**

The software used for PGW's billing system is the Billing Collection and Customer Service system, also known as the "BCCS."

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**6. Identify the operating system used by the billing department and/or the billing system.**

**RESPONSE:**

The operating system used by PGW's department and billing system is the Billing Collections and Customer Service system, also known as the "BCCS."

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**3.** Produce any and/or all documents barring Complainant's signature related to payment agreements and/or arrangements.

**RESPONSE:**

There is no document that bars (prevents) the Complainant from executing an agreement for a payment arrangement where it is appropriate.

PGW understands that the Discovery request seeks documents that the Complainant executed in order to enter into the four payment arrangements that he has had on his PGW account.

When PGW offers a customer a payment arrangement, the terms of the payment arrangement are communicated orally, either by telephone or in person. PGW looks to that customer's oral consent. If given, the PGW employee notes that consent was given on the account records when entering the payment arrangement into PGW's billing system. No signature is required.

When the Commission's Bureau of Consumer Services ("BCS") gives a customer a payment arrangement, it comes in the form of a decision on that customer's formal complaint. No signature is required. If the customer accepts the payment arrangement, the customer simply complies when it begins in the PGW bill. If the customer does not consent to the BCS issued payment arrangement, the customer must timely appeal the BCS decision in order to avoid the implementation of the BCS issued payment arrangement.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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4. Produce any and/or all documents expected to be introduced as evidence in the above captioned matter.

**RESPONSE:**

By letter dated March 21, 2018, PGW sent to the presiding Administrative Law Judge and served the Complainant with PGW's proposed exhibits that may potentially be used in the hearing of this matter. The Complainant has these documents.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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7. Produce any and/or all documents and/or communications containing the name, home and business address and qualifications of all persons who have been retained or specially employed by Respondent in anticipation of litigation or preparation for the hearing in this matter and who are not expected to be called as witnesses at trial or as to whom no such decision has yet been made, and attach any documents or communications received from said person(s). If there are no documents or communications, then the name of said person(s) as well as their home and business addresses should be provided.

**RESPONSE:**

As this case is a simple formal complaint regarding a request for affordable payment arrangements, the only person PGW anticipates calling as a witness is Jessica Glace, Senior Customer Review Officer – PGW.

She is able to explain the billing system and the calculation and distribution of bills as well as the criteria for giving payment arrangements on PGW accounts. She is a PGW employee. Her business address is 800 W. Montgomery Avenue, Philadelphia, Pennsylvania 19122. There are no specific documents related to her engagement to be a witness in this matter.

Also, see PGW's response to Request for Production of Documents No. 4.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**9.** Produce the name, home and business address, background and qualifications of any and all persons in the employ of Respondent who in anticipation and/or preparation of litigation, is expected to be called as a witness at trial.

**RESPONSE:**

As this case is a simple formal complaint regarding a request for affordable payment arrangements, the only person who PGW anticipates calling as a witness is Jessica Glace, Senior Customer Review Officer – PGW. She is able to explain the billing system and the calculation and distribution of bills as well as the criteria for giving payment arrangements on PGW accounts. She is a PGW employee. Her address is 800 W. Montgomery Avenue, Philadelphia, Pennsylvania 19122.

As a Senior Customer Review Officer, Ms. Glace represents PGW in informal complaints and at formal complaint hearings before the Pennsylvania Public Utility Commission. She performs all related duties of a CRU Review Officer, monitors work flow of CRU Review Officers and Jr. Review Officers to assure timely resolution of customer complaints filed with the Bureau of Consumer Services (BCS) through Pennsylvania Public Utility Commission.

She oversees the daily activities of all officers and support staff, so as to assure full compliance of all applicable regulations. She reviews officer reports addressed to the BCS and assist the Manager as assigned in all areas. Approves and authorizes Special Allowances on customer accounts. She motivates team members to assure professional and courteous Of Consumer Services, which are deemed to be in the best interest of the company and its customers.

Under the direction of the Manager of CRU the incumbent must be able to creatively and analytically review work performed by Review Officer and Jr. Review Officers alike in their timely response to inquiries received from a myriad of sources, including but not limited to, Bureau of Consumer Services for the Pennsylvania Public Utilities Commission, Senior Executives of the Philadelphia Gas Works, Philadelphia Facilities Management Corporation, the Philadelphia Gas Commission, the and their Legislative Law Judges, other government and legislative bodies.

She is generally knowledgeable of operating agreements between the City of Philadelphia and the Philadelphia Facilities Management Corporation, the Gas Service Tariffs and Customer Service Regulations in addition to chapter 56 of the Pennsylvania Public Utility Commission.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**11.** Produce all reports, communications, and/or documents prepared by any experts who will testify at hearing in this matter.

**RESPONSE:**

As this case is a simple formal complaint regarding a request for affordable payment arrangements, PGW has engaged no "experts" within the meaning of "Expert Witness" as referred to at 52 Pa.Code §5.324.

The only person who PGW anticipates calling as a witness is Jessica Glace, Senior Customer Review Officer – PGW. She is able to explain the billing system and the calculation and distribution of bills as well as the criteria for giving payment arrangements on PGW accounts under the Pennsylvania Public Utility Code.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**12.** Produce a digital copy of any and/or all recorded communication between Complainant and PGW and/or any of PGW representatives.

**RESPONSE:**

See the attached. PGW has not retained recordings of customer's telephone calls to PGW beyond 1 year. The Complainant called three times within the past year on August 29, 2017. PGW is currently attempting to locate the recordings.

In the normal course of its business PGW maintains business records of all contacts made between the customer and PGW representatives. The PGW representatives are trained and are responsible to make notations of contact on to a customer's account at or near the time the contact occurs. We offer this document in lieu of the recordings. This is called the "Contacts for Account" record. It is attached.

Attachment: Contacts for Account

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

Contacts for Account: Norman, Deree J				
Account...		0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History <input checked="" type="checkbox"/> Full Comments
Date	Type	Comment	Person	Fo
01/24/2018	LHP N	Customer potentially eligible for LIHEAP. Mailed cover letter and LIHEAP application. For reference, copy of cover letter is stored in Online Bill.	Norman, Deree J	
01/12/2018	CRU	>>> CRU >>> Investigative Report sent to Legal Dept. for Formal Complaint >>>	Norman, Deree J	
01/06/2018	SER V	Humam Ali was here on a Relight Appliances order with Order # 9373822 , with a result of Completed Found Gas ON , Left Gas ON , with activities of ( Meter and Connections - Relight , Turn On ) , with comments of "issued hazad tag no electric in property had to vented running generator in basement "	Norman, Deree J	
01/06/2018	SER V	Relight Appliances, Order Sent As Unassigned To Dispatcher Relight Appliances	Norman, Deree J	
01/02/2018	CRU	PUC Formal Complaint Docket # C2018-2640719 filed on 1/2/2018 12:00:00 AM.	Norman, Deree J	
01/02/2018	CRU	_CRU_ - Received notification that the customer filed a Formal Complaint - Docket #C-2018-2640719. -	Norman, Deree J	
12/20/2017	LHP N	Customer potentially eligible for LIHEAP. Mailed cover letter and LIHEAP application. For reference, copy of cover letter is stored in Online Bill.	Norman, Deree J	
11/06/2017	GRT 2	Universal Services identified COP as potentially eligible for LIHEAP. Use LHPA (English) or SLHP (Spanish) customer contact type to mail application.	Norman, Deree J	
09/26/2017	NNA	Account Id:2116347424 Person Id:9000934738 Number in Household: 2 Monthly Household Income: \$ 1500.00 Arrangement Type:P Level of Payment:0 Monthly Payment :\$121.00Created by: CCINEGU	Norman, Deree J	
09/26/2017	CRU	Received Closing/Decision from BUREAU OF CONSUMER SERVICE of PUC/BCS regarding BCS# 3557990 on 9/25/2017 12:00:00 AM. The BCS stated the following: LEVEL 1, BB 81.00 + 40.00 = 121.00 BEGINNING NOVEMBER 2017. WAIVE LPCS. and . Customer must pay: plus 40.00 for a total of 121.00 beginning with NOVEMBER 2017 BILL DUE DATE	Norman, Deree J	
09/25/2017	CRU	Response sent to BCS on 9/25/2017 2:50:24 PM for BCS Case Number 3557990. It is FGW's final position that The customer provided BCS with income of \$1,500 with 2 in the household. The forecasted budget of \$81 is being provided to the PUC to obtain a PUC par.	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J

Account... 0021 1634 7424 Norman, Deree J  Transaction History  Full Comments

Date	Type	Comment	Person	Fo
09/25/2017	CRU	Response sent to BCS on 9/25/2017 2:50:24 PM for BCS Case Number 3557990. It is PGW's final position that The customer provided BCS with income of \$1,500 with 2 in the household. The forecasted budget of \$81 is being provided to the PUC to obtain a PUC par. Report sent. Waiting for decision..	Norman, Deree J	
08/31/2017	COLL	GAS IS ON MEDICAL -1- HOLD FROM 08/31/17 TO 09/30/17 BALANCE OF THE BILL IS \$ 2347.65 RECEIVED 08/31/17	Norman, Deree J	
08/30/2017	CRU	_CRU_ On 08/29/2017 the customer filed BCS # 3557990. FSD dispatch was notified of the case and the collector has been sent alert on the account. The shut off is canceled.	Norman, Deree J	
08/30/2017	SER	AIMS Order#: 9050502 Cancelled -PUC COMPL	Norman, Deree J	
08/30/2017	CRU	PUC Complaint BCS# 3557990 filed on 8/29/2017 12:00:00 AM (CRU 787-1250) regarding ON - PAR NEEDED (# 61), by Deree Norman. # of Adults in Household: 2. # and Ages of Children in Household: 0. Gross Income: GMI 1 1500.00 STUDENT 0	Norman, Deree J	
08/29/2017	COLL	Faxed medical ok results	Norman, Deree J	
08/29/2017	COLL	Cor called provided gmi: 1500.00 hh: 2 level: 1.. CRP: 155.00 cure: 1047.00 PAR: 176.00 Catch up: 1254.00... adv both things needed for each option.. c/s	Norman, Deree J	
08/29/2017	COLL	COR called provided Dr. Erin Dancy F: 2156140044 P: 2153495200 COR is patient..	Norman, Deree J	
08/29/2017	COLL	cor called in wanting to get on PAR Cor is on PAR with a catch up amount of 1254.00 Cor has a 5691 on account from july 31st in the amount of 2196.81 has not made a payment on the account since 12/8/2014 which he paid 79.00 Cor stated he would call back with medical information for a 30 day hold.	Norman, Deree J	
08/29/2017	SER V	Joseph Cartagena was here on a 96 C & C Field Shut Off order with Order # 9046620 , with a result of Completed , with activities of ( Field Collections - NPSO Incomplete ) , with comments of "Phoned customer affairs. Customer has been placed on a medical preliminary hold."	Norman, Deree J	
08/29/2017	COLL	cor called for pari have collector on sight nothing can be done at this moment	Norman, Deree J	
08/29/2017	SER	Joseph Cartagena was here on a 96 C & C Field Shut Off	Norman, Deree J	

Change Customer Contact Launch Related Transaction

Contacts for Account: Norman, Deree J

Account... 0021 1634 7424 Norman, Deree J

Transaction History

Full Comments

Date	Type	Comment	Person	Fo
08/29/2017	COLL	cor called for par i have collector on sight nothing can be done at this moment	Norman, Deree J	
08/01/2017	SERV	Joseph Borelli was here on a 96 C & C Field Shut Off order with Order # 8964828 . with a result of Completed with activities of ( Field Collections - NPSO CGI) , with comments of "could not locate curb valve"	Norman, Deree J	
07/14/2017	CRU	PUC Formal Complaint Docket # C2015-2489503 was completed by receiving a final decision on 7/13/2017 12:00:00 AM.	Norman, Deree J	
07/14/2017	CRU	__CRU__ — Received Opinion & Order for Docket #C-2015-2489503 — Complaint dismissed & closed. — Also contacted FSD to cancel collector due to the customer should have had a PUC hold which expired.	Norman, Deree J	
07/14/2017	SERV	AIMS Order#: 8917255 Cancelled -HOLD	Norman, Deree J	
02/10/2017	LHP	Sent LIHEAP app and postage-paid, return envelope to customer. Urge customer to complete application and mail it to the LIHEAP office, using the enclosed envelope.	Norman, Deree J	
11/22/2016	LHP	Customer potentially eligible for LIHEAP. Mailed cover letter and LIHEAP application. For reference, copy of cover letter is stored in Online Bill.	Norman, Deree J	
11/01/2016	GRT	UNIV SERV identified COR potentially eligible for LIHEAP. Use LHPA (English) or SLHP (Spanish) cust cont type to mail appl.	Norman, Deree J	
07/22/2016	CRU	__CRU__ — Received Initial Decision for DOCKET# C-2015-2489503. The complaint has not met his burden of proof. Case is dismissed. WAITING FOR FINAL ORDERS. —	Norman, Deree J	
11/02/2015	GRT	UNIV SERV Identified COR potentially eligible for LIHEAP. Use LHPA(English) or SLHP(Spanish) cust cont type to mail appl	Norman, Deree J	
09/24/2015	CRU	*CRU* ATTENDED TELEPHONIC HEARING WITH CUSTOMER DEREENORMAN, PGW LAWYER LAURETO FARINAS, AND ALJ DENNIS J. BUCKLEY FOR DOCKET C-2015-2489503. ~~~~~AWAITING FINAL DECISION	Norman, Deree J	
09/18/2015	CRU	CONT: he would have accumulated an estimated additional amount of \$1147.54. Also informed the customer of CSE fee...	Norman, Deree J	

Change Customer Contact Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...		0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History <input checked="" type="checkbox"/> Full Comments
Date	Type	Comment	Person	Fo
09/18/2015	CRU	CONT: he would have accumulated an estimated additional amount of \$1147.54. Also informed the customer of CRP forgiveness received in a total amount of \$1893.51 and LIHEAP grant payments which enabled him to have zero dollar bills during the time. Customer states he is not satisfied at this time and case is still pending.	Norman, Deree J	
09/18/2015	CRU	*CRU* spoke with Mr. Norman after he was transfered from CRU hotline. Informed customer of bill printing error. Also informed customer the he was billed on a month to month basis based on his meter readings which he can see on page 2 or 3 of bills from the time period he is disputing when he was on CRP 6/18/10 to 3/1/13. Also informed the customer that based on a bill calc, he benefited from being on CRP and it was actually beneficial to him as if he had not been on it.	Norman, Deree J	
09/18/2015	CRU	_CRU_ customer called CRU hotline to speak with officer handling case, received the OK to have the call transferred.	Norman, Deree J	
09/16/2015	CRU	*CRU* contacted by phone MR. Norman for possible settlement of case after review of account and billing, left voicemail	Norman, Deree J	
09/16/2015	CRU	*CRU* received telephone contact from Mr. Norman stating he was returning my call. Informed the customer that the issue of his complaint with bill dates overlapping were being investigated, as well as if CRP was beneficial.	Norman, Deree J	
09/16/2015	CRU	_CRU_ customer called CRU hotline to speak with officer handling case, received the OK to have the call transferred.	Norman, Deree J	
09/15/2015	CRU	*CRU* sent customer please contact letter	Norman, Deree J	
09/15/2015	CRU	*CRU* received email response back from customer who stated he received no phone call or voicemail. Informed the customer the number of 267.257.5108 states his name and a voicemail was left at 10:55am. I also attempted to contact the customer at 1:15pm today 9/15/15 and again no answer and a voicemail was left. I emailed the customer back for a separate number of contact if there is one.	Norman, Deree J	
09/15/2015	CRU	*CRU* sent customer email re email provided to CRU	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	
			<input checked="" type="checkbox"/> Full Comments	
Date	Type	Comment	Person	Fo
09/15/2015	CRU	*CRU* received email response back from customer who stated he received no phone call or voicemail. Informed the customer the number of 267.257.5108 states his name and a voicemail was left at 10:55am. I also attempted to contact the customer at 1:15pm today 9/15/15 and again no answer and a voicemail was left. I emailed the customer back for a separate number of contact if there is one.	Norman, Deree J	
09/15/2015	CRU	*CRU* sent customer email to email provided to PUC complaint: dereenorman@yahoo.com	Norman, Deree J	
09/15/2015	CRU	*CRU* contacted customer of record at 267.257.5108. left voicemail to return call.	Norman, Deree J	
07/24/2015	DML T	Opt-out solicitation mailer sent with monthly bill (located as last page of bill archive).		
07/02/2015	CRU	*CRU* Emailed formal draft to legal.	Norman, Deree J	
06/29/2015	CRU	PUC Formal Docket # C-2015-2489503 filed on 6/25/2015 12:00:00 AM	Norman, Deree J	
06/18/2015	1099	ccor called and stated that he filed a complaint with the puc ask for case number stated that he did not have one made aware that puc has not placed any contact or hold on account c/s	Norman, Deree J	
06/18/2015	SER V	Jerry Desimone III was here on a 96 C & C Field Shut Off order with Order # 6864103 , with a result of Completed , with activities of ( Field Collections - NPSO CGI ) , with comments of "broken valve - cust refused access - stated he has a complaint filed with puc"	Norman, Deree J	
04/27/2015	SER V	Deon Williams was here on a 96 C & C Field Shut Off order with Order # 6702932 , with a result of Completed , with activities of ( Field Collections - NPSO CGI ) , with comments of "cgi. found cb valve top broken off, look at last pgw visits. need to be replaced."	Norman, Deree J	
05/09/2014	NNA	Account Id:2116347424 Person Id:9000934738 Number in Household: 1 Monthly Household Income: \$ 1425.00 Arrangement Type:R Level of Payment:1 Monthly Payment :\$38.00Created by: CCINEGU	Norman, Deree J	
05/09/2014	PCP A	Catch Up amount of \$ 152.00 was paid in full. This Re-instated the Negotiated PAR for 53 remaining months	Norman, Deree J	
05/09/2014	COLL	cor called to get back on PAR need \$152 upfront said	Norman, Deree J	

Change Customer Contact

Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	<input checked="" type="checkbox"/> Full Comments
Date	Type	Comment	Person	Fo
05/09/2014	COLL	cor called to get back on PAR need \$152 upfront said will make payment cor sat	Norman, Deree J	
05/06/2014	SER V	Thomas Gares Jr was here on a 96 C & C Field Shut Off order with Order # 5737127 , with a result of Completed , with activities of ( Field Collections - NPSO CGI ) , with comments of "top of the valve was ripped off refer to distribution"	Norman, Deree J	
04/11/2014	BILL	Customer called for MP hold. customer will call back with doctor's name and fax number. Customer was satisfied.	Norman, Deree J	
03/21/2014	GRT 2	UNIV. SERV. Identified customer as potentially eligible for LIHEAP. LIHEAP application was mailed.	Norman, Deree J	
11/06/2013	GRT 2	COR identified as potentially eligible for LIHEAP. Refer to the 2014 LIHEAP talking points to provide Grant info to cust	Norman, Deree J	
10/01/2013	PAY	c/c to get on par// cor sat	Norman, Deree J	
10/01/2013	NNA	Account Id:2116347424 Person Id:9000934738 Number in Household: 1 Monthly Household Income: \$ 1425.00 Arrangement Type:S Level of Payment:1 Monthly Payment :\$36.00Created by: CCINEGU	Norman, Deree J	
09/20/2013	COLL	NPAR added on 9/16/2013 but left in Pending Status in error...no customer contact on account on 9/16/2013....deleted pending NPAR.	Norman, Deree J	
09/16/2013	NNA	Account Id:2116347424 Person Id:9000934738 Number in Household: 1 Monthly Household Income: \$ 1465.00 Arrangement Type:S Level of Payment:2 Monthly Payment :\$43.00Created by: CCINEGU	Norman, Deree J	
09/06/2013	SER V	Kimberly Cowan was here on a 93 C & C Field Notice order with Order # 5100151 , with a result of Completed , with activities of ( Field Collections - Collection Notice Delivered )	Norman, Deree J	
07/10/2013	SER V	Michael Trainor was here on a 96 C & C Field Shut Off order with Order # 4919518 , with a result of Completed , with activities of ( Field Collections - NPSO CGI ) , with comments of "broke valve trying to shut off"	Norman, Deree J	
06/14/2013	SER V	Eric Hudson was here on a 93 C & C Field Notice order with Order # 4843156 , with a result of Completed , with activities of ( Field Collections - Collection Notice Delivered )	Norman, Deree J	
10/04/2013	GRT	Defunded...no LIHEAP...	Norman, Deree J	

Change Customer Contact

Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	<input checked="" type="checkbox"/> Full Comments
Date	Type	Comment	Person	Fo
06/14/2013	SER V	Eric Hudson was here on a 93 C & C Field Notice order with Order # 4843156 , with a result of Completed , with activities of ( Field Collections - Collection Notice Delivered )	Norman, Deree J	
12/04/2012	GRT 2	Refunded unused portion of FY11 LIHEAP grant to state, as required by Department of Public Welfare regulation. Regulation states that LIHEAP grant may be used in the year that it is received and the year following. Sent customer a letter explaining the refund and enclosed a LIHEAP application for this year, encouraging them to apply again.	Norman, Deree J	
10/05/2012	GRT 2	Customer identified as potentially eligible for LIHEAP. Please refer to the 2013 LIHEAP talking points to provide information to the customer about the grant.	Norman, Deree J	
03/17/2012	CRP	returned crp appneed proof of income ,everyday living expenses, copy of lease ot mort and any help from state	Norman, Deree J	
02/18/2012	CRP	return crp applicaiton no income	Norman, Deree J	
02/07/2012	BILL	cor in wpdo to recert for crp cor did not have current proof of income exp to cor will need proof of income for past 30 days, ss cards and id. sat	Norman, Deree J	
02/07/2012	BILL	cor in wpdo for crp do not	Norman, Deree J	
10/28/2011	GRT 2	UNIVERSAL SERVICES IDENTIFIED CUSTOMER AS POTENTIALLY ELIGIBLE FOR LIHEAP	Norman, Deree J	
09/10/2011	SER V	Michael Fredericks was here on a Gas Leak Inside order with Order # 3325835 , with a result of Completed Found Gas ON , Left Gas ON , with activities of ( General - Appliance Leak ) , with comments of "water in basement left awh off instrcust refer to plumber"	Norman, Deree J	
09/10/2011	TO	cor smells gas near awh	Norman, Deree J	
08/29/2011	SER V	Joseph Lamelza was here on a Gas Leak Inside order with Order # 3299512 , with a result of Completed Found Gas ON , Left Gas ON , with activities of ( General - Appliance Leak ) , with comments of "found leak on HH, disconnected and capped, issued haz tag, made all checks. instructed cor, left OK"	Norman, Deree J	
08/29/2011	TO	norman smells gas in his basemnt, read script 2158341891;	Norman, Deree J	
09/27/2010	GRT 2	SENT LETTER TO CUSTOMER TO PROVIDE INFORMATION ABOUT REPAIR MAILING OF	Norman, Deree J	

Change Customer Contact

Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account..	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	<input checked="" type="checkbox"/> Full Comments
Date	Type	Comment	Person	Fo
09/27/2010	GRT 2	SENT LETTER TO CUSTOMER TO PROVIDE INFORMATION ABOUT DPW'S MAILING OF PRE-PRINTED APPLICATIONS FOR LIHEAP.	Norman, Deree J	
06/16/2010	CRP	cor must cure crp to get back on crp	Norman, Deree J	
06/16/2010	BILL	Called cor back / needs 242.24 and get back on crp by going in office/cor did alot of name calling/	Norman, Deree J	
06/16/2010	INC	Number in Household: 1, Household Monthly Income: \$200.00	Norman, Deree J	
06/16/2010	COLL	...cont - he started to get upset and kept asking who the director of liheap is - i tried to tell him that the state is who allocates the LIHEAP funds and that he will have to wait until next year and apply again to rec funds. He began to scream and yell and would not allow me to speak - req. a supervisor but would not allow me to write up for a supervisor, wanted to hold, I transferred him into P. Dean's voicemail.	Norman, Deree J	
06/16/2010	COLL	COR called to see if he has any CRP arrears needed to be paid -- needs cure amount of 242.24 to get back on CRP which would need to be paid upon application of CRP. He then wanted to know what happened with his liheap money - told him he didn't rec any and asked him if he rec'd an approval letter he stated no i told him if he didn't rec an approval letter he was not approved and unfortunately the program is now closed and he will not be able to rec funds until next year....	Norman, Deree J	
06/07/2010	CRU	BCS # 2684659 case dismissed on 6/7/2010 12:00:00 AM. Resolution: CUSTOMER NEEDS TO REAPPLY FOR CRP AND PAY MISSED CRP PAYMENTS IN ADDRESSING THE CUSTOMER'S ALLEGATIONS: HER ACCUMULATED BALANCE HAS BEEN OVER \$2,000 SINCE AUGUST 2005 SHE HASNOT FILED A HIGH BILL DISPUTE WITH THE COMPANY WILL SEND CAPREAPPLY LETTER ADVISING OF ALL THE ABOVE INFORMATION CASE CLOSED	Norman, Deree J	
05/26/2010	CRU	Response sent to BCS on 5/26/2010 7:41:54 AM for Case # 2684659. It is PGW's final position that PGW requests that the customer's complaint be dismissed	Norman, Deree J	

Change Customer Contact

Launch Related Transaction

Contacts for Account: Norman, Deree J

Account... 0021 1634 7424 Norman, Deree J

Transaction History

Full Comments

Date	Type	Comment	Person	Fo
09/25/2017	CRU	Response sent to BCS on 9/25/2017 2:50:24 PM for BCS Case Number 3557990. It is PGW's final position that The customer provided BCS with income of \$1,500 with 2 in the household. The forecasted budget of \$81 is being provided to the PUC to obtain a PUC par. Report sent. Waiting for decision..	Norman, Deree J	
08/31/2017	COLL	GAS IS ON MEDICAL -1- HOLD FROM 08/31/17 TO 09/30/17 BALANCE OF THE BILL IS \$ 2347.65 RECEIVED 08/31/17	Norman, Deree J	
08/30/2017	CRU	_CRU_ On 08/29/2017 the customer filed BCS # 3557990. FSD dispatch was notified of the case and the collector has been sent alert on the account. The shut off is canceled.	Norman, Deree J	
08/30/2017	SER	AIMS Order#: 9050502 Cancelled -PUC COMPL	Norman, Deree J	
08/30/2017	CRU	PUC Complaint BCS# 3557990 filed on 8/29/2017 12:00:00 AM (CRU 787-1250) regarding ON - PAR NEEDED (# 61), by Deree Norman. # of Adults in Household: 2. # and Ages of Children in Household: 0. Gross Income: GMI 1 1500.00 STUDENT 0	Norman, Deree J	
08/29/2017	COLL	Faxed medical ok results	Norman, Deree J	
08/29/2017	COLL	Cor called provided gmi: 1500.00 hh: 2 level: 1.. CRP: 155.00 cure: 1047.00 PAR: 176.00 Catch up: 1254.00... adv both things needed for each option.. c/s	Norman, Deree J	
08/29/2017	COLL	COR called provided Dr. Erin Dancy F: 2156140044 P: 2153495200 COR is patient..	Norman, Deree J	
08/29/2017	COLL	cor called in wanting to get on PAR Cor is on PAR with a catch up amount of 1254.00 Cor has a 5691 on account from July 31st in the amount of 2196.81 has not made a payment on the account since 12/8/2014 which he paid 79.00 Cor stated he would call back with medical information for a 30 day hold.	Norman, Deree J	
08/29/2017	SER V	Joseph Cartagena was here on a 96 C & C Field Shut Off order with Order # 9046620, with a result of Completed, with activities of ( Field Collections - NPSO Incomplete ), with comments of "Phoned customer affairs. Customer has been placed on a medical preliminary hold."	Norman, Deree J	
08/29/2017	COLL	cor called for par i have collector on sight nothing can be done at this moment	Norman, Deree J	
08/29/2017	SER	Joseph Cartagena was here on a 96 C & C Field Shut Off	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J

Account... 0021 1634 7424 Norman, Deree J

Transaction History  Full Comments

Date	Type	Comment	Person	Fo
08/29/2017	COLL	cor called for par i have collector on sight nothing can be done at this moment	Norman, Deree J	
08/01/2017	SERV	Joseph Borelli was here on a 96 C & C Field Shut Off order with Order # 8964828 , with a result of Completed with activities of ( Field Collections - NPSO CGI ) , with comments of "could not locate curb valve"	Norman, Deree J	
07/14/2017	CRU	PUC Formal Complaint Docket # C2015-2489503 was completed by receiving a final decision on 7/13/2017 12:00:00 AM.	Norman, Deree J	
07/14/2017	CRU	__CRU__ — Received Opinion & Order for Docket #C-2015-2489503 — Complaint dismissed & closed. — Also contacted FSD to cancel collector due to the customer should have had a PUC hold which expired. —	Norman, Deree J	
07/14/2017	SERV	AIMS Order#: 8917255 Cancelled -HOLD	Norman, Deree J	
02/10/2017	LHP	Sent LIHEAP app and postage-paid, return envelope to customer. Urge customer to complete application and mail it to the LIHEAP office, using the enclosed envelope.	Norman, Deree J	
11/22/2016	LHP	Customer potentially eligible for LIHEAP. Mailed cover letter and LIHEAP application. For reference, copy of cover letter is stored in Online Bill.	Norman, Deree J	
11/01/2016	GRT	UNIV SERV identified COR potentially eligible for LIHEAP. Use LHPA (English) or SLHP (Spanish) cust cont type to mail appl.	Norman, Deree J	
07/22/2016	CRU	__CRU__ — Received Initial Decision for DOCKET# C-2015-2489503. The complaint has not met his burden of proof. Case is dismissed. WAITING FOR FINAL ORDERS. —	Norman, Deree J	
11/02/2015	GRT	UNIV SERV Identified COR potentially eligible for LIHEAP. Use LHPA(English) or SLHP(Spanish) cust cont type to mail appl	Norman, Deree J	
09/24/2015	CRU	*CRU* ATTENDED TELEPHONIC HEARING WITH CUSTOMER DEREENORMAN, PGW LAWYER LAURETO FARINAS, AND ALJ DENNIS J. BUCKLEY FOR DOCKET C-2015-2489503. ~~~~~AWAITING FINAL DECISION	Norman, Deree J	
09/18/2015	CRU	CONT: he would have accumulated an estimated additional amount of \$1147.54. Also informed the customer of SEPA...	Norman, Deree J	

Change Customer Contact Launch Related Transaction

Contacts for Account: Norman, Deree J

Account... 0021 1634 7424 Norman, Deree J

Transaction History

Full Comments

Date	Type	Comment	Person	Fo
09/18/2015	CRU	CONT: he would have accumulated an estimated additional amount of \$1147.54. Also informed the customer of CRP forgiveness received in a total amount of \$1893.51 and LIHEAP grant payments which enabled him to have zero dollar bills during the time. Customer states he is not satisfied at this time and case is still pending.	Norman, Deree J	
09/18/2015	CRU	*CRU* spoke with Mr. Norman after he was transferred from CRU hotline. Informed customer of bill printing error. Also informed customer the he was billed on a month to month basis based on his meter readings which he can see on page 2 or 3 of bit lls from the time period he is disputing when he was on CRP 6/18/10 to 3/1/13. Also informed the customer that based on a bill calc, he benefited from being on CRP and it was actually beneficial to him as if he had not been on it.	Norman, Deree J	
09/18/2015	CRU	_CRU_ customer called CRU hotline to speak with officer handling case, received the OK to have the call transferred.	Norman, Deree J	
09/16/2015	CRU	*CRU* contacted by phone MR. Norman for possible settlement of case after review of account and billing , left voicemail	Norman, Deree J	
09/16/2015	CRU	*CRU* received telephone contact from Mr. Norman stating he was returning my call. Informed the customer that the issue of his complaint with bill dates overlapping were being investigated, as well as if CRP was beneficial.	Norman, Deree J	
09/16/2015	CRU	_CRU_ customer called CRU hotline to speak with officer handling case, received the OK to have the call transferred.	Norman, Deree J	
09/15/2015	CRU	*CRU* sent customer please contact letter	Norman, Deree J	
09/15/2015	CRU	*CRU* received email response back from customer who stated he received no phone call or voicemail. Informed the customer the number of 267 257 5108 states his name and a voicemail was left at 10 55am. I also attempted to contact the customer at 1 15pm today 9/15/15 and again no answer and a voicemail was left. I emailed the customer back for a separate number of contact if there is one.	Norman, Deree J	
09/15/2015	CRU	*CRU* sent customer email to email provided to DUC	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	<input checked="" type="checkbox"/> Full Comments
Date	Type	Comment	Person	Fo
09/15/2015	CRU	*CRU* received email response back from customer who stated he received no phone call or voicemail. Informed the customer the number of 267.257.5108 states his name and a voicemail was left at 10:55am. I also attempted to contact the customer at 1:15pm today 9/15/15 and again no answer and a voicemail was left. I emailed the customer back for a separate number of contact if there is one.	Norman, Deree J	
09/15/2015	CRU	*CRU* sent customer email to email provided to PUC complaint: dereenorman@yahoo.com	Norman, Deree J	
09/15/2015	CRU	*CRU* contacted customer of record at 267.257.5108. left voicemail to return call.	Norman, Deree J	
07/24/2015	DML T	Opt-out solicitation mailer sent with monthly bill (located as last page of bill archive).		
07/02/2015	CRU	*CRU* Emailed formal draft to legal.	Norman, Deree J	
06/29/2015	CRU	PUC Formal Docket # C-2015-2489503 filed on 6/25/2015 12:00:00 AM	Norman, Deree J	
06/18/2015	1099	ccor called and stated that he filed a complaint with the puc ask for case number stated that he did not have one made aware that puc has not placed any contact or hold on account c/s	Norman, Deree J	
06/18/2015	SER V	Jerry Desimone III was here on a 96 C & C Field Shut Off order with Order # 6864103 , with a result of Completed , with activities of ( Field Collections - NPSO CGI ) , with comments of "broken valve - cust refused access - stated he has a complaint filed with puc"	Norman, Deree J	
04/27/2015	SER V	Deon Williams was here on a 96 C & C Field Shut Off order with Order # 6702932 . with a result of Completed , with activities of ( Field Collections - NPSO CGI ) , with comments of "cgi, found cb valve top broken off, look at last pgw visits. need to be replaced."	Norman, Deree J	
05/09/2014	NNA	Account Id:2116347424 Person Id:9000934738 Number in Household: 1 Monthly Household Income: \$ 1425.00 Arrangement Type:R Level of Payment:1 Monthly Payment :\$38.00Created by: CCINEGU	Norman, Deree J	
05/09/2014	PCP A	Catch Up amount of \$ 152.00 was paid in full. This Re-instated the Negotiated PAR for 53 remaining months	Norman, Deree J	
05/09/2014	COLL	ccor called to get back on PAR need \$152 upfront said	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	
			<input checked="" type="checkbox"/> Full Comments	
Date	Type	Comment	Person	Fo
05/09/2014	PCP A	Catch Up amount of \$ 152.00 was paid in full. This Re-instated the Negotiated PAR for 53 remaining months	Norman, Deree J	
05/09/2014	COLL	cor called to get back on PAR need \$152 upfront said will make payment cor sat	Norman, Deree J	
05/06/2014	SER V	Thomas Gares Jr was here on a 96 C & C Field Shut Off order with Order # 5737127 , with a result of Completed , with activities of ( Field Collections - NPSO CGI ) , with comments of "top of the valve was ripped off refer to distribution"	Norman, Deree J	
04/11/2014	BILL	Customer called for MP hold, customer will call back with doctor's name and fax number. Customer was satisfied.	Norman, Deree J	
03/21/2014	GRT 2	UNIV. SERV. Identified customer as potentially eligible for LIHEAP. LIHEAP application was mailed.	Norman, Deree J	
11/06/2013	GRT 2	COR identified as potentially eligible for LIHEAP. Refer to the 2014 LIHEAP talking points to provide Grant info to cust	Norman, Deree J	
10/01/2013	PAY	c/c to get on par// cor sat	Norman, Deree J	
10/01/2013	NNA	Account Id:2116347424 Person Id:9000934738 Number in Household: 1 Monthly Household Income: \$ 1425.00 Arrangement Type:S Level of Payment:1 Monthly Payment :\$36.00Created by: CCINEGU	Norman, Deree J	
09/20/2013	COL2	NPAR added on 9/16/2013 but left in Pending Status in error...no customer contact on account on 9/16/2013...deleted pending NPAR.	Norman, Deree J	
09/16/2013	NNA	Account Id:2116347424 Person Id:9000934738 Number in Household: 1 Monthly Household Income: \$ 1465.00 Arrangement Type:S Level of Payment:2 Monthly Payment :\$43.00Created by: CCINEGU	Norman, Deree J	
09/06/2013	SER V	Kimberly Cowan was here on a 93 C & C Field Notice order with Order # 5100151 , with a result of Completed , with activities of ( Field Collections - Collection Notice Delivered )	Norman, Deree J	
07/10/2013	SER V	Michael Trainor was here on a 96 C & C Field Shut Off order with Order # 4919518 , with a result of Completed , with activities of ( Field Collections - NPSO CGI ) , with comments of "broke valve trying to shut off"	Norman, Deree J	
06/14/2013	SER	Eric Hudson was here on a 93 C & C Field Notice order with Order # 4919518 , with a result of Completed , with	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	<input checked="" type="checkbox"/> Full Comments
Date	Type	Comment	Person	Fo
06/14/2013	SER V	Eric Hudson was here on a 93 C & C Field Notice order with Order # 4843156 , with a result of Completed , with activities of ( Field Collections - Collection Notice Delivered )	Norman, Deree J	
12/04/2012	GRT 2	Refunded unused portion of FY11 LIHEAP grant to state, as required by Department of Public Welfare regulation. Regulation states that LIHEAP grant may be used in the year that it is received and the year following. Sent customer a letter explaining the refund and enclosed a LIHEAP application for this year, encouraging them to apply again.	Norman, Deree J	
10/05/2012	GRT 2	Customer identified as potentially eligible for LIHEAP. Please refer to the 2013 LIHEAP talking points to provide information to the customer about the grant.	Norman, Deree J	
03/17/2012	CRP	returned crp appneed proof of income , everyday living expenses, copy of lease ot mort and any help from state	Norman, Deree J	
02/18/2012	CRP	return crp applicaiton no income	Norman, Deree J	
02/07/2012	BILL	cor in wpdo to recert for crp cor did not have current proof of income exp to cor will need proof of income for past 30 days, ss cards and id. sat	Norman, Deree J	
02/07/2012	BILL	cor in wpdo for crp do not	Norman, Deree J	
10/28/2011	GRT 2	UNIVERSAL SERVICES IDENTIFIED CUSTOMER AS POTENTIALLY ELIGIBLE FOR LIHEAP	Norman, Deree J	
09/10/2011	SER V	Michael Fredericks was here on a Gas Leak Inside order with Order # 3325835 , with a result of Completed Found Gas ON , Left Gas ON , with activities of ( General - Appliance Leak ) , with comments of "water in basement left awh off instrcust refer to plumber"	Norman, Deree J	
09/10/2011	TO	cor smells gas near awh	Norman, Deree J	
08/29/2011	SER V	Joseph Lamelza was here on a Gas Leak Inside order with Order # 3299512 , with a result of Completed Found Gas ON , Left Gas ON , with activities of ( General - Appliance Leak ) , with comments of "found leak on HH, disconnected and capped, issued haz tag, made all checks. instructed cor, left OK"	Norman, Deree J	
08/29/2011	TO	norman smells gas in his basemnt, read script 2158341891;	Norman, Deree J	
09/27/2010	GRT 2	SENT LETTER TO CUSTOMER TO PROVIDE INFORMATION ABOUT REPAIR MAINTENANCE	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...		0021 1634 7424	Norman, Deree J	
		<input type="checkbox"/> Transaction History		
		<input checked="" type="checkbox"/> Full Comments		
Date	Type	Comment	Person	Fo
09/27/2010	GRT 2	SENT LETTER TO CUSTOMER TO PROVIDE INFORMATION ABOUT DPW'S MAILING OF PRE-PRINTED APPLICATIONS FOR LIHEAP.	Norman, Deree J	
06/16/2010	CRP	cor must cure crp to get back on crp	Norman, Deree J	
06/16/2010	BILL	Called cor back / needs 242.24 and get back on crp by going in office/cor did alot of name calling/	Norman, Deree J	
06/16/2010	INC	Number in Household: 1. Household Monthly Income: \$200.00	Norman, Deree J	
06/16/2010	COLL	...cont - he started to get upset and kept asking who the director of liheap is - i tried to tell him that the state is who allocates the LIHEAP funds and that he will have to wait until next year and apply again to rec funds. He began to scream and yell and would not allow me to speak - req. a supervisor but would not allow me to write up for a supervisor, wanted to hold, I transferred him into P. Dean's voicemail.	Norman, Deree J	
06/16/2010	COLL	COR called to see if he has any CRP arrears needed to be paid -- needs cure amount of 242.24 to get back on CRP which would need to be paid upon application of CRP. He then wanted to know what happened with his liheap money - told him he didn't rec any and asked him if he rec'd an approval letter he stated no i told him if he didn't rec an approval letter he was not approved and unfortunately the program is now closed and he will not be able to rec funds until next year....	Norman, Deree J	
06/07/2010	CRU	BCS # 2684659 case dismissed on 6/7/2010 12:00:00 AM. Resolution: CUSTOMER NEEDS TO REAPPLY FOR CRP AND PAY MISSED CRP PAYMENTS IN ADDRESSING THE CUSTOMER'S ALLEGATIONS: HER ACCUMULATED BALANCE HAS BEEN OVER \$2,000 SINCE AUGUST 2005 SHE HASNOT FILED A HIGH BILL DISPUTE WITH THE COMPANY WILL SEND CAPREAPPLY LETTER ADVISING OF ALL THE ABOVE INFORMATION CASE CLOSED	Norman, Deree J	
05/26/2010	CRU	Response sent to BCS on 5/26/2010 7:41:54 AM for Case # 2684659. It is PGW's final position that PGW requests that the customer's complaint be dismissed	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J

Account... 0021 1634 7424 Norman, Deree J

Transaction History

Full Comments

Date	Type	Comment	Person	Fo
05/26/2010	CRU	Response sent to BCS on 5/26/2010 7:41:54 AM for Case # 2684659. It is PGW's final position that PGW requests that the customer's complaint be dismissed in accordance with Pennsylvania law chapter 14, 1405 (c) Customer assistance program rates shall be timely paid and shall not be the subject of payment agreements negotiated or approved by the commission.  Records show that on 10/29/08, customer entered into a beneficial CRP agreement at 8% CRP \$30.28/month (25.28 + 5). A	Norman, Deree J	
05/26/2010	CRU	t that time the account balance was \$2448.56. On 12/21/09 the CRP agreement was suspended because customer failed to recertify. At that time the account balance was \$2148.96, of which \$60.56 represented customer's CRP catch-up amount.  In regards to the complaint, PGW has no record of customer being informed that \$2000 is required to avoid service termination. PGW has no record of issuing bills for \$0. Since the suspension of customer's CRP agreement in December 2009,	Norman, Deree J	
05/26/2010	CRU	all bills generated have been for over \$2000 (current charges + past due balance). Review of the attached Nexus, usage analysis indicates that the account uses an average of 0.5 cubic feet of gas per heating degree day. PGW records show that the property has a house heater (possibly inoperable), water heater, and range. PGW has no record of customer filing an internal high bill dispute. Please note that the last customer payment posted 7 months ago, on 10/5/09 in the amo	Norman, Deree J	
05/26/2010	CRU	unt of \$100. The high balance can be attributed to and accumulation of unpaid utility bills and late payment charges. There is no income/occupancy information provided in the complaint. On 5/26/10 PGW mailed a CRP application to the property.  It is PGW's final position that the bills and AMR	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J

Account... 0021 1634 7424 Norman, Deree J

Transaction History  Full Comments

Date	Type	Comment	Person	Fo
05/26/2010	CRU	<p>unt of \$100. The high balance can be attributed to and accumulation of unpaid utility bills and late payment charges. There is no income/occupancy information provided in the complaint. On 5/26/10 PGW mailed a CRP application to the property.</p> <p>It is PGW's final position that the bills and AMR readings are correct as rendered. To establish a Budget/par, customer needs to pay catch-up amount of \$242.24 due by 6/17/10. Then, beginning with the July 2010 bill due date pay</p>	Norman, Deree J	
05/26/2010	CRU	<p>BB (currently 34) + 38 = \$72/month for up to 60 months. Customer may be eligible for CRP. To re-apply customer needs to pay CRP catch-up amount \$242.24 due by 6/17/10 and provide household proof of income and social security cards via mail or office visit. If the customer still questions the accuracy of the meter, the meter can be tested for a \$10.00 fee. Please submit request and payment to:            City Special Meter Test            P.O. Box 37019            Philadelphia, PA 19122.            * Response s</p>	Norman, Deree J	
05/26/2010	CRU	ent. waiting on PUC decision *	Norman, Deree J	
05/26/2010	CRP		Norman, Deree J	
05/18/2010	CRU	<p>PUC Complaint BCS# 2684659 filed on 5/18/2010 12:00:00 AM (CRU 787-1250) regarding CAP DISPUTE (#67), by same # of Adults in Household: 0. # and Ages of Children in Household: 0 / . Gross Income:</p>	Norman, Deree J	
04/29/2009	CRP	<p>COR called stating he was approved for LIHEAP.....explained needs to still pay past due amt on bill due to LIHEAP not being applied to balance.....also informed that he could use medical</p>	Norman, Deree J	
11/03/2008	CRU	<p>BCS # 2465809 case dismissed on 11/1/2008 12:00:00 AM. Resolution:CLOSED NO DECISION... LETTER SENT... FUTURE SERVICE WITHOUT ACTION</p>	Norman, Deree J	

Change Customer Contact Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...		0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History <input checked="" type="checkbox"/> Full Comments
Date	Type	Comment	Person	Fo
11/03/2008	CRU	BCS # 2465809 case dismissed on 11/1/2008 12:00:00 AM. Resolution:CLOSED NO DECISION.... LETTER SENT ... DISMISSED WITHOUT ACTION .... INELIGIBLE FOR PUC ASSISTANCE CU WAS CRP ENROLLED WITH ARREARS AT TIME OF TERMINATION... CU MADE PAYMENTAND SVC RESTORED 10.31.08.... CU REENROLLED IN CRP AT VALID AND BENEFICIAL RATE... CRP B 30.28 BB 51.00 ARREARS OF \$2228.33..... NO FURTHER ACTION ALLOWED....	Norman, Deree J	
10/31/2008	SER V	Kenneth Huggins was here on a B.P.T.O. order with Order # 1516786 , with a result of Completed Found Gas OFF, Left Gas ON , with activities of ( Meter and Connections - Turn On ) , with comments of "complete bpto. hh inop. left co card with cust. all checks made left ok"	Norman, Deree J	
10/31/2008	SER 0	cor called to see when serviceman will be out to turn on gas. advised customer that we are running behind schedule but serviceman is still coming out	Norman, Deree J	
10/30/2008	CRU	Response sent to BCS on 10/30/2008 3:16:03 PM for Case # 2465809. It is PGW's final position that According to PGW records, on 10/30/08, the customer made a payment in the amount of 220.23 and was issued a BPTO for 10/31/08. The customer was also recertified for CRP in the amount of 30.28/mo. It is PGW's position that the customer remain on CRP because it is the most affordable agreement for the customer.	Norman, Deree J	
10/29/2008	CRU	PUC Complaint BCS# 2465809 filed on 10/29/2008 12:00:00 AM (CRU 787-1250) regarding OFF - SERVICE IS TERMINATED/SUSPENDED - PAR NEEDED (# 82), by DERE E J NORMAN # of Adults in Household: 1. # and Ages of Children in Household: 1 / 17. Gross Income: 316 DPA	Norman, Deree J	
10/29/2008	MET	B.P.T.O., 10/31/2008, 1200 - 1600 pato and crp	Norman, Deree J	
10/29/2008	COLL	cor called again about service informed him to call PUC he was given same terms of last CSR cor was given no# to PUC C/satisfied	Norman, Deree J	
10/29/2008	COLL	Returned calls to CSR regarding gas call back	Norman, Deree J	

Change Customer Contact

Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	
			<input checked="" type="checkbox"/> Full Comments	
Date	Type	Comment	Person	Fo
10/29/2008	COLL	cor called again about service informed him to call PUC he was given same terms of last CSR cor was given no# to PUC C/satisfied	Norman, Deree J	
10/28/2008	COLL	Returned call to COR per supervisor callback. Informed COR that he would need \$220.23 for reconnect - \$97 (1/24 of balance) + \$123.23. COR refuses to pay reconnect stating rep told him he would be okay when he told rep that he could not pay until 10/31. Informed him that he is still subject to reconn fee. COR want to file complaint, gave number to PUC. COR not satisfied, hung up.	Norman, Deree J	
10/28/2008	MISC	spoke with COR...he requested Fortiz, I emailed her customers info..	Norman, Deree J	
10/28/2008	SERV	restoration charges before services can be turn-on. Informed him that I will have my supervisor get in contact with him. Gave customer information to Ms. Morgan. Customer would need to pay \$123.23 recon fee and 1/24 of balance on account. a total of \$220.23.	Norman, Deree J	
10/28/2008	SERV	Spoke to Mr. Norman, claims he was told by representative he spoke to on 10/20/08 that he would be okay if payment is made on 10/31/08.. Now, he claims that pgw went out to shut off his services. According to him, the reason why he contacted us was to avoid having services shut off. Would like to have someone out today because he contacted us and informed us of his situation. Informed him that services can't be restore today. Advised him that he would need to pay	Norman, Deree J	
10/28/2008	SERV	cor calling in regards to his gas service being turned off...informed him that he had a shut off notice dated for 10/22...cor states that he called and told us he will that he will pay on 10/31...informed him that calling didn't stop shut off because no hold was put on account...no medical condition...cor became irrate...tried to give terms...very upset requested supervisor..transferred call	Norman, Deree J	
10/20/2008	COLL	customer does not have money to make payment. customer does not have medical either.....melita	Norman, Deree J	
09/25/2008	COLL	melita call records	Norman, Deree J	

Change Customer Contact

Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	
			<input checked="" type="checkbox"/> Full Comments	
Date	Type	Comment	Person	Fo
10/20/2008	COLL	customer does not have money to make payment. customer does not have medical either.....melita	Norman, Deree J	
08/25/2008	COLL	melita call.. cor rude	Norman, Deree J	
08/22/2008	CRP	COR IN WPDO TO RECERT CRP COR SATISFIED.	Norman, Deree J	
08/22/2008	COLL	MELITA: ANSWERING MACHINE	Norman, Deree J	
06/03/2008	L&J	cor cld again representing himself(see acct 0007-5373-3945 Bernard Shearlds stated this person was his father)....cor rec'd a lien letter in the name of Bernard Shearlds ...was told by sr rep for cor to disregard lien letter....after conveying this to cor he stated he knew Mr Shearlds & would give the letter to him....cor was satisfied w/cll	Norman, Deree J	
09/26/2007	BILL	segmt error:///generated a current bill.	Norman, Deree J	
08/22/2007	MET R	B.P.T.O., 08/25/2007, 1200 - 1600 MR NORMAN IN WPDO ON WED 08/22/2007 TO RESTORE GAS. PAID THE RECONNECTION AND CURE AMOUNT AND WILL ENTER CRP WHEN GAS IS ON	Norman, Deree J	
08/22/2007	BILL	MR DERE NORMAN IN WPDO ON WED 08/22/2007 FOR RESTORATION OF SERVICE. WENT OVER BILLING AND PAST DUE AMOUNT WITH MR NORMAN AS WELL AS PRINTING OUT BILLS FOR HIM. EVEN PRONTED OUT SHUT OFF NOTICE IN WHICH HE INSISTED TYHAT HE DID NOT RECEIVE ON. TRIED TO GET CUSTOMER THE CREDIT DENIAL STATEMENT AND HE LEFT. MAILING A COPY OF STATEMENT TO HIM WILL NEED CURE AMOUNT OF \$ 428.28 AND \$123.23 RECONNECTION TOTAL \$ 551.51 AND PROOF OF INCOME AND SOCIAL SECURITY CARD FOR	Norman, Deree J	
08/22/2007	BILL	mr norman called to see why gas was s/off ... recieved s/off for 7/30/07... cust says never recieved..informed that cor was responsible for past due amt on acct.. said could not afford to pay crp let alone past due.. was explaining bill to cor when cor hung up	Norman, Deree J	
08/22/2007	COLL	collector sent - called for bal.	Norman, Deree J	
06/06/2007	BILL	mr norman in w.p.d.o for recert explained defaulted amt c.o.r satisfied	Norman, Deree J	
03/08/2007	GRT	flagged acct for crisis 300.00 cust income is 18056.00 a	Norman, Deree J	

Change Customer Contact

Launch Related Transaction

Contacts for Account: Norman, Deree J

Account... 0021 1634 7424 Norman, Deree J

Transaction History

Full Comments

Date	Type	Comment	Person	Fo
03/08/2007	GRT 1	flagged acct for crisis 300.00 cust income is 18056.00 a yr 2 people	Norman, Deree J	
03/05/2007	BILL	Gave info about Crisis	Norman, Deree J	
01/22/2007	CRP	explain to the cust that when he has poroof of his new income we change amount he wis aware he is in default	Norman, Deree J	
07/11/2006	BILL	crp entered	Norman, Deree J	
07/10/2006	CRP	instr. cus to bring proof of income ss card for 2 people to appl. for crp \$1280.00 cus compl. about bill from 2003, 2004 stating bills where to high expl. after mtr test bill were correct gave # to puc	Norman, Deree J	
07/05/2006	COLL	melita...adv cor of past due bal.	Norman, Deree J	
06/22/2006	COLL	melita.....adv cor of past due bal.	Norman, Deree J	
04/28/2006	BILL	Transfer high bill to gas	Norman, Deree J	
04/27/2006	BILL	BEL—cannot xfer credit hbdis.	Norman, Deree J	
04/07/2006	BILL	I call & talk to COR yesterday he said that the complain was concerning the previous PGW gas meter that was change on 08/05/2005 mail DRU letter explaining that per review of account & all AMR read the bill is correct also that the test results for meter #1542478 determine that the meter passed	Norman, Deree J	04/28/2
04/04/2006	COLL	cor checking on turn on. still in system for today. told cor rep may be a little off schedule. order still in .	Norman, Deree J	
04/04/2006	HB1	cancelled PAR to issue HB dispute	Norman, Deree J	
04/04/2006	MET R	B.P.T.O., 04/04/2006, 1200 - 1600 cust paid \$232.23 for service restoration	Norman, Deree J	
04/04/2006	SER 0	cust in wpdo...is in to have his service restored...cust has info indicating that he is eligible for CRP but this is a rate 1 acct..... entered PAR for \$109 down and \$74 + usage.....cust paying \$232.23 to have service restored- Breakdown-\$123.23 + 1/24th of balance(\$109)...customer disputes bill amount...iss'd BPTO for 4/4/06	Norman, Deree J	
03/24/2006	COLL	melita.....number temporarily out of service	Norman, Deree J	
08/10/2005	BILL	METER TEST COMPLETED FOR 5367 THOMAS AVE ( # 1542478 - 3736 ) BY F.S.D. TECH. ROLAND LEESON 8/9/05. METER WAS WORKING PROPERLY. OPEN TEST 99.8 AND CKECK TEST 99.1. METER WAS WORKING JUST FINE AND BILL IS CORRECT.	Norman, Deree J	

Change Customer Contact Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...	0021 1634 7424	Norman, Deree J	<input type="checkbox"/> Transaction History	
			<input checked="" type="checkbox"/> Full Comments	
Date	Type	Comment	Person	Fo
08/10/2005	BILL	METER TEST COMPLETED FOR 5367 THOMAS AVE. (# 1542478 - 3736 ) BY F.S.D. TECH. ROLAND LEESON 8/9/05, METER WAS WORKING PROPERLY. OPEN TEST 99.8 AND CKECK TEST 99.1. METER WAS WORKING JUST FINE AND BILL IS CORRECT!	Norman, Deree J	
08/08/2005	MISC	MIU INVEST. TOM SEKLECKI MEET F.S.D. AT 5367 THOMAS AVE. ON 8/5/05, F.S.D. TECH. EXCHANGED METER # 1542478 REMOVED AT INDEX 3736 AND INST. METER # 1726428 AT INDEX 3972. WILL TAKE METER TO METER SHOP FOR TEST!	Norman, Deree J	
08/04/2005	THF T	CUSTOMER IS DISPUTING USAGE ON METER MIU IS GOING OUT 8/5/05 TO REMOVED THE METER AND HAVE IT TESTED.A NEW METER WILL BE SET AND LEFT ON. I PLACE A 30 DAY HOLD ON THE ACCOUNT	Norman, Deree J	
08/03/2005	THF	MIU HERE ON 7/29/05--CGI LEFT DIG CARD	Norman, Deree J	
08/02/2005	THF T	CHECK WITH COLLECTION OFFICE FOUND COLLECTOR WORK ORDER GAS WAS SHUT OFF AT CURB BY COLLECTOR 7287 WITH 190 CODE.MIG TEAM WHELAN AND TORRES FOUND GAS ON AT CURB. BOX FOUND IN GRASS.READ METER AT 3734 INDEX SAME READ WITH READ ONE.AMR IS WORKING OK.MIG TEAM LEFT GAS ON MIU OFFICE WILL BILL COR TO NEW INDEX .WILL GIVE REG COLLECTION TERMS.MIG TEAM FOUND H.H.TO BE NOT IN WORKING ORDER .GAS RANGE AND AWH FOUND OK MAY HAVE USE RANGE FOR HEAT LAST WINTER.	Norman, Deree J	
08/02/2005	THF T	GOT A CALL FROM MR NORMAN RECEIVE URGENT NOTICE WANTS MIU TO GET TO PROPERTY IN ONE HOUR.WANTS TO SPOKE TO MY SUPERVISOR. AFTER CHECKING ACCOUT SEND MIG TO CHECK CURB BOX. ON 7/1/05 PROP. WAS CGI UNBLE TO LOCATE CURB BOX.	Norman, Deree J	
07/26/2005	THF T	ON THE STREET WITH MIU SAFETY CHECK VAC- USAGE LISTNING 07/29/05	Norman, Deree J	
07/19/2005	THF T	MIU HERE ON 7/6/05--CAN'T LOCATE CURB BOX LEFT DIG CARD	Norman, Deree J	

Change Customer Contact    Launch Related Transaction

Contacts for Account: Norman, Deree J				
Account...		0021 1634 7424	Norman, Deree J	
		<input type="checkbox"/> Transaction History		
		<input checked="" type="checkbox"/> Full Comments		
Date	Type	Comment	Person	For
	T	USAGE LISTNING 07/29/05		
07/19/2005	THF	MIU HERE ON 7/6/05--CAN'T LOCATE CURB BOX. LEFT DIG CARD	Norman, Deree J	
07/05/2005	THF	ON STREET WITH MIU ON 7/6/05 V/L	Norman, Deree J	
07/01/2005	THF	6/27/05 CGI UNBLE TO LOCATE CURB BOX LEFT DIG CARD	Norman, Deree J	
06/29/2005	THF	MIU WAS HERE. SPOKE TO CUST.ON PHONE CLAIMS WAS NEVER SHUT OFF CLAIMS METER DEFECTIVE WONT LET US IN TO SHUT OFF GAS RECOMMENDED A STATE TEST.////	Norman, Deree J	
06/28/2005	THF	ON STREET WITH MIU 6/29/05	Norman, Deree J	
06/28/2005	MET R	267-978-7698 Deree Norman called in after receiving a MIU/ Urgent notice. refer to J.Fuller + Miu dept. Customer claims using Gas for the past 2 years AWH only, also claims paid for PLP, because H/H 436. informed Deree Norman Someone from Miu will contact. claims gas is on.	Norman, Deree J	
06/24/2005	THF	ON STREET WITH MIU ON 6/27/05 V/L	Norman, Deree J	
06/20/2005	THF	MIG TEAM WL AND LF CGI ON 6-17-05	Norman, Deree J	
06/16/2005	THF	ON STREET WITH MIU ON 6/17/05	Norman, Deree J	
06/08/2005	THF	on street w\miuon 6-15-05\saftey chk-5367 thomas\vac usage sheet	Norman, Deree J	
04/11/2005	COLL	melita.... cor services were terminated	Norman, Deree J	
04/06/2005	COLL	melita call left message	Norman, Deree J	
03/24/2005	COLL	MELITA - COR IS DISPUTING BILL...COR WILL CALL PUC	Norman, Deree J	
02/02/2005	COLL	melita...cust is disputing the bill	Norman, Deree J	
10/05/2004	THF	on 10-2-04fsd rep steve waters pr# 9696 found gas on at 5367 thomas av\s.o. at index 3431 on mtr 1542478\charge norman deree\mtr w\ not removed\gas w\shut off w\pilfer proof lock	Norman, Deree J	
10/04/2004	COL2	customer in and got the gas on and paid to get gas on and made an agmt 2people \$ 2500.00 \$300.00 mtg.\$300.00 food,\$ 125.00 electric.\$94.00 water, and \$650.00 child care \$ 45.00 plus budget	Norman, Deree J	
10/04/2004	BILL	charging deposit and will need to know who should be charged turn on owner but need to verify with ed to change to current tenant's name. will call back	Norman, Deree J	

Change Customer Contact

Launch Related Transaction

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***

**Docket No. C-2018-2640719**

**Deree J. Norman's**

**Interrogatories and Requests for Production of Documents**

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**13.** Produce a transcript of any and/or all recorded communication between Complainant and PGW and/or any of PGW representatives.

**RESPONSE:**

PGW has no transcript of recorded communications between the Complainant and PGW or PGW Representatives.

See PGW's response to Request for Production of Documents No. 12

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**15.** Produce all reports, manuals, textbooks, policy sheets or other documents, or communications which any said expert, potential expert, witness or potential witness has consulted or reviewed as a result or in preparation of this litigation or will consult or review.

**RESPONSE:**

PGW does not anticipate calling an expert witness.

See PGW's response to Interrogatories and Requests for Production of Documents:

Interrogatory Nos. 1, 3 and 4

Request for Production of Documents Nos. 3, 4, 12 and 13

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
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**16.** Produce copies of the curriculum vitae of any and or all experts who will testify at trial.

**RESPONSE:**

See PGW's Response to Request for Production of Documents No. 11.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**17.** Produce all documents and communications substantiating any defense to the Complainant's cause of action.

**RESPONSE:**

See PGW's Response to Request for Production of Documents Nos. 4 and 12

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**19. Produce the name and address of the senior executive of PGW's law department.**

Raquel Guzman, Vice President, Legal & Gen Counsel  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, Pennsylvania 19122

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works*  
Docket No. C-2018-2640719  
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Interrogatories and Requests for Production of Documents**

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**20.** Produce any and or all documents of any nature whatsoever which refer in any way to the situation described in the Complaint and/or the facts or circumstances leading up to and following said complaint.

**RESPONSE:**

See PGW's response to Interrogatories and Requests for Production of Documents:

Interrogatory Nos. 3

Request for Production of Documents Nos. 3, 4, 12 and 13

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**21.** Produce any and all documents or other tangible materials of any nature whatsoever which you plan to have marked for identification at trial, introduce into evidence at trial, or about which you plan to question a witness at trial.

**RESPONSE:**

See PGW's response to Requests for Production of Documents No. 4

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**22.** Produce any and/or all documents or communications of any nature whatsoever which relate, refer or pertain to the Complainant, any other party to this action, the situation, situation site and or any instrumentality involved in the situation described in the Complaint.

**RESPONSE:**

See PGW's response to Request for Production of Documents Nos. 4, 12 and 21.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**23.** Produce all documents and/or communications relating to any facts on the basis of which it is asserted that the conduct of the Complainant contributed to the happenings of the alleged occurrences or to the cost and or usage associated allegedly as a result.

**RESPONSE:**

See PGW's response to Request for Production of Documents Nos. 4, 12, 21 and 22.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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**24.** Produce any and all documents of any nature whatsoever referred to in Respondent's Answers to Complainant's Interrogatories.

**RESPONSE:**

All documents referred to in the Interrogatories and Request for Production of Documents have been provided or are already in the Complainant's possession with the exception of PGW's Response to Interrogatory No. 3 which provides the citations to the Pennsylvania Public Utility Code, a public record.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

Before the  
Pennsylvania Public Utility Commission

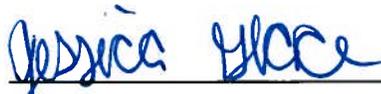
*Deree J. Norman v. Philadelphia Gas Works*  
Docket No. C-2018-2640719  
Deree J. Norman's  
Interrogatories and Requests for Production of Documents

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**VERIFICATION**

I, JESSICA GLACE, hereby declare that I am Senior Customer Review Officer at the Philadelphia Gas Works. I am authorized to make this verification on its behalf. The facts set forth in the foregoing **Answer to Interrogatories Nos. 1, 2, 3, 4, 5 and 6 and Requests for Production of Documents Nos. 3, 4, 7, 9, 11, 12, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23 and 24** are true and correct to the best of my knowledge, information and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

May 4, 2018



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**JESSICA GLACE,**  
Customer Review Officer  
Philadelphia Gas Works

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Deree Norman,</b>	:	
<b>Complainant</b>	:	
	:	
<b>v.</b>	:	<b>Docket No. C - 2018 - 2640719</b>
	:	
<b>Philadelphia Gas Works,</b>	:	
<b>Respondent</b>	:	

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT, PHILADELPHIA GAS WORKS' RESPONSE TO THE ANSWER TO INTERROGATORIES NOS. 1, 2, 3, 4, 5, AND 6 AND REQUESTS FOR PRODUCTION OF DOCUMENTS NOS. 3, 4, 7, 9, 11, 12, 13,15, 16 ,17, 18, 19, 20,21, 22, 23, and 24 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:

Mr. Deree J. Norman  
5367 Thomas Avenue  
Philadelphia, PA 19143

and by email:  
dereenorman@yahoo.com

May 7, 2018



Laureto Farinas, Esquire  
Attorney I.D. 50415  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982

# **EXHIBIT 4**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**ORDER RE MOTION TO COMPEL DISCOVERY**

On April 16, 2018, Deree J. Norman (Mr. Norman or Complainant) served Philadelphia Gas Works (PGW or Respondent) with written Interrogatories and Requests for Production of Documents. On April 25, 2018, PGW submitted timely Objections to Mr. Norman’s discovery request.

On May 4, 2018, Mr. Norman filed a timely Motion to Compel Discovery Responses to his interrogatories and requests for production of documents.

The Commission’s regulations permit a broad scope of discovery. The Rules of Administrative Practice and Procedure at 52 Pa. Code §5.321 provide that:

[A] participant may obtain discovery regarding any matter, not privileged, **which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of another party or participant** . . . It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

52 Pa. Code §5.321 (Emphasis added).

Specific limitations on the scope of discovery are found at 52 Pa. Code § 5.361(a), which prohibits discovery which is sought in bad faith, would cause unreasonable burden or expense, relates to privileged material or would require the making of an unreasonable investigation by the answering party.

**Definition E**

In the present case, PGW objects to discovery Definition E to the extent that it requires a response providing the home address of any PGW employees mentioned in a discovery response. PGW argues that the home addresses of PGW employees are irrelevant to the disposition of this matter and that only the PGW headquarters address is relevant in this regard. After carefully considering both parties' positions, I agree with PGW that the home addresses of current PGW employees are irrelevant. However, PGW must produce the last known address of any PGW employees mentioned in a discovery response, who are no longer employed with the Respondent.

**Definition H**

PGW objects to discovery Definition H on the grounds that it requires information that is beyond the scope of this proceeding.

Upon review of Mr. Norman's formal Complaint at Docket No. C-2018-2640719, I find that it is essentially a request for an affordable payment arrangement with allegations that there are incorrect changes in Complainant's gas bills. I shall overrule PGW's objection to Definition H and order the Respondent to comply with this definition in its answers to Mr. Norman's discovery request.

**Instruction I**

PGW objects to Instruction I which states, "Answer each of the following discovery requests separately and fully in writing pursuant to 18 Pa.C.S. § 4904." PGW argues that its is not bound to provide discovery responses that comply with 18 Pa.C.S. § 4904.

I agree with PGW. The Commission's Procedural Rules at 52 Pa. Code § 5.321 *et seq.* govern the discovery in this proceeding. Consequently, PGW's objection to Instruction I is sustained.

### **Interrogatory ## 7, 8, 9, 10, 11, and 12**

PGW objects to Interrogatory ## 7, 8, 9, 10, 11, and 12 on the grounds that they request information concerning Medical Certifications. PGW argues that the topic of Medical Certification is beyond the scope of this proceeding.

Upon review of Mr. Norman's present Complaint, I find that PGW's observation is correct. As I mentioned above, Mr. Norman's present Complaint against PGW consists of a request for an affordable payment arrangement and the claim that there are incorrect changes in Complainant's gas bills. In particular, the incorrect charges claim consists entirely of the following averments:

Complainant's electric service was terminated on August 21, 2017 and remains off to date, therefore Complainant is unable to utilize all gas appliances that have electric pilots and/or ignitions (Home heater, water heater and stove. However, Complainant's bill is an exact mirror of the previous years bill during the same period when he could use his appliances.

Complaint, ¶ 4. There is nothing in Mr. Norman's Complaint that suggests that the subject matter of the pending action involves Medical Certifications. Consequently, PGW's objections to Interrogatory ## 7, 8, 9, 10, 11, and 12 are sustained.

### **Request for Production of Documents # 6**

PGW objects to Request for Production of Documents # 6 on the grounds that it is overbroad, it will require an unreasonable investigation, and it is beyond the scope of the proceedings. Request for Production of Documents # 6 seeks all statements, logs, and communications of all PGW witnesses, including those with the Complainant. PGW argues that

on its face this request seeks information related to work done by PGW witnesses that has nothing to do with Mr. Norman, his PGW account or his Complaint.

I find that a literal reading of the Request supports PGW's objection. Therefore, I shall limit the scope of the request as follows:

- 1) The Request for Production of Documents # 6 shall cover the period December 27, 2015 (two years prior to the filing of the Complaint) to May 8, 2018.
- 2) The Request for Production of Documents # 6 shall cover only the statements, logs, and communications of all PGW employees, among each other or with Mr. Norman, concerning Mr. Norman's existing payment arrangement or request for new payment arrangements, as well as all the statements, logs, and communications of all PGW employees, among each other or with Mr. Norman, concerning the accuracy of Mr. Norman's gas bills during the period of time December 27, 2018 to May 8, 2018.

### **Request for Production of Documents # 8**

PGW objects to Request for Production of Documents # 8 on the grounds that it seeks an Investigative Report that contains privileged information protected by the Attorney-Client Privilege and 52 Pa. Code §5.323.

The Commission's Rules of Administrative Practice and Procedure at 52 Pa. Code §5.323

A party may obtain discovery of any matter discoverable under § 5.321(b) (relating to scope) even though prepared in anticipation of litigation or hearing by or for another party or by or for that other party's representative, including his attorney, consultant, surety, indemnitor, insurer or agent. The discovery may not include disclosure of the mental impressions of a party's attorney or his conclusions, opinions, memoranda, notes, summaries, legal research or legal theories. With respect to the representative of a party other than the party's attorney, discovery may not include disclosure of his mental impressions, conclusions or opinions

respecting the value or merit of a claim or defense or respecting strategy, tactics or preliminary or draft versions of written testimony or exhibits, whether or not final versions of the testimony or exhibits are offered into evidence.

52 Pa. Code § 5.323 (Emphasis added).

PGW shall comply with Complainant's Request for Production of Documents # 8 only to the extent that it does not seek disclosure of the mental impressions, conclusions, opinions, memoranda, notes, summaries, legal research or legal theories of a PGW attorney or representative concerning the present Complaint.

#### **Request for Production of Documents # 14**

PGW objects to Request for Production of Documents # 14, which asks PGW to produce a copy of a transcript from hearings on matters between Complainant and PGW in previous disputes. PGW explains that copying and distributing copies of the transcript is in violation of the terms of PGW's purchase of the transcript from the court reporting agency. In its Objections, PGW provides the Complainant with the contact information for the court reporting agency that prepared the document in question.

PGW's objection to Request for Production of Documents # 14 is sustained.

#### **Request for Production of Documents ## 17 and 18**

PGW objects to Request for Production of Documents ## 17 and 18 to the extent that they seek information that privileged information protected by the Attorney-Client Privilege and 52 Pa. Code §5.323.

Consistent with my ruling on PGW objection to Request for Production of Documents # 8, PGW objections to Request for Production of Documents ## 17 and 18 are sustained.

THEREFORE,

IT IS ORDERED:

1. That Philadelphia Gas Works' Objections to Deree J. Norman's Interrogatories and Requests for Production of Documents are granted, in part, and denied, in part, consistent with the discussion above.
  
2. That Philadelphia Gas Works shall submit answers to Deree J. Norman's Interrogatories and Requests for Production of Documents in compliance with this Order, by no later than Monday, May 14, 2018.

Date: May 9, 2018

\_\_\_\_\_  
/s/  
Eranda Vero  
Administrative Law Judge

**C-2018-2640719 DERE E J NORMAN v. PHILADELPHIA GAS WORKS**

**SERVICE LIST**

DEREE J NORMAN  
5367 THOMAS AVENUE  
PHILADELPHIA PA 19143  
**267.257.5108**

LAURETO FARINAS ESQUIRE  
PHILADELPHIA GAS WORKS  
4TH FLOOR  
800 W MONTGOMERY AVENUE  
PHILADELPHIA PA 19122  
**215.684.6982**  
*Accepts eService*

# **EXHIBIT 5**



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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Danielle Leva, Paralegal  
Legal Department  
Direct Dial: 215-684-6862  
FAX: 215-684-6798  
E-mail: danielle.leva@pgworks.com

May 16, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Deree J. Norman v. PGW, Docket No. C – 2018 – 2640719**

Dear Secretary Chiavetta:

Please find attached Philadelphia Gas Works' response to the Answer to Interrogatories Nos. 3, 5 and 6 and Requests for Production of Documents Nos. 6, 8, 10, 12 and 18, which were completed by Jessica Glace, Customer Review Officer.

PGW has obtained the recordings of three separate customer telephone calls that you made to PGW made in August 2017 on the same day (August 29, 2017) inquiring about payment arrangements. Please contact Laureto Farinas at 215-684-6982 to best accomplish the review/production of these telephonic recordings.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,

  
Danielle Leva

Enclosure

cc: Deree J. Norman  
Wendy Vacca (PGW Mail)

**Before the  
Pennsylvania Public Utility Commission**

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3. Identify the complete criteria and/or process required for the calculation and analyzation of payment plan options available customers who are indigent and/or in arrears and/or in default.

**RESPONSE: (Supplemented 5/14/2018)**

The following is the criteria and/or process required for the calculation and analyzation of payment plan options available customers who are indigent and/or in arrears and/or in default:

In this process the Customer is questioned to assess household income and where appropriate, proof of income is required. From the criteria outlined below PGW determines which options are best suited for customer.

The Responsible Utility Customer Protection Act, 66 Pa.C.S. §1401 *et seq.* (the Act or Chapter 14), applies to complaints alleging inability to pay and requesting a Commission-issued payment arrangement. This law provides strict guidelines that the Commission must follow in handling customer complaints.

Regarding the length of payment arrangements, the Pennsylvania Public Utility Code provides the following:

**(b) Length of payment arrangements.**--The length of time for a customer to resolve an unpaid balance on an account that is subject to a payment arrangement that is investigated by the commission and is entered into by a public utility and a customer shall not extend beyond:

- (1) Five years for customers with a gross monthly household income level not exceeding 150% of the Federal poverty level.
- (2) Three years for customers with a gross monthly household income level exceeding 150% and not more than 250% of the Federal poverty level.
- (3) One year for customers with a gross monthly household income level exceeding 250% of the Federal poverty level and not more than 300% of the Federal poverty level.
- (4) Six months for customers with a gross monthly household income level exceeding 300% of the Federal poverty level.

66 Pa.C.S. § 1405(b).

Additionally, §1405(d) provides that "...[a]bsent a change in income, the commission shall not establish or order a public utility to establish a second or subsequent payment arrangement if a customer has defaulted on a previous payment arrangement established by a commission order or decision."  
66 Pa.C.S. §1405(d).

A change in income is defined as "[a] decrease in household income of 20% or more if the customer's household income level exceeds 200% of the Federal poverty level or a decrease in household income of 10% or more if the customer's income level is 200% or less of the Federal poverty level."  
66 Pa.C.S. §1403.

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works*  
Docket No. C-2018-2640719  
Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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5. Identify the software used by the billing department and/or the billing system.

**RESPONSE: (Supplemented 5/14/2018)**

The software used for PGW's billing system is the Billing Collection and Customer Service system, also known as the "BCCS."

PGW owns the BCCS. Authorized employees provide the information that is put into it. Data is collected from several parts of PGW including but not limited to the automatic meter reading system, payment data and other assessments as authorized.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

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6. Identify the operating system used by the billing department and/or the billing system.

**RESPONSE:** (Supplemented 5/14/2018)

The operating system used by PGW's department and billing system is the Billing Collections and Customer Service system, also known as the "BCCS."  
See PGW's Response to Interrogatory No. 5

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works*  
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6. Produce all statements, logs and communications of any and all witnesses including any and all statements of Complainant and Respondent, including taped recordings, whether transcribed or not, as well as all written statements.

**RESPONSE:**

PGW has submitted the document "Contacts for Account" which contains the bulk of information requested in Request for Production of Documents No. 6. Pursuant to the Order Re Motion to Compel Discovery, dated May 9, 2018, PGW includes scheduling and other emails included in the request.

PGW has obtained the recordings of three separate customer telephone calls that the Complainant made to PGW made in August 2017 on the same day inquiring about payment arrangements. PGW has contacted the Complainant to best accomplish the review/production of these telephonic recordings.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

## Farinas, Laureto A

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**From:** Vacca, Wendy  
**Sent:** Wednesday, March 21, 2018 10:23 AM  
**To:** Farinas, Laureto A; Christlieb, Graciela C; Leva, Danielle  
**Subject:** 2018 Formal Hearing Schedule.xls  
**Attachments:** 2018 Formal Hearing Schedule.xls

Good morning,

Please see attached formal hearing schedule for April for the CRU Officer assigned to each case.

Thanks,



Wendy Vacca | Manager of Customer Disputes and Complaints | Regulatory Compliance  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6815 | Fax: (215) 684-6770  
Follow us on [Facebook](#) [Twitter](#) and [YouTube](#)

## Farinas, Laureto A

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**From:** Vacca, Wendy  
**Sent:** Wednesday, February 21, 2018 11:37 AM  
**To:** Farinas, Laureto A; Christlieb, Graciela C; Leva, Danielle  
**Subject:** 2018 Formal Hearing Schedule.xls  
**Attachments:** 2018 Formal Hearing Schedule.xls

Hello All,

Please see attached March hearing schedule for the CRU Officer assigned each case.

Thanks,



Wendy Vacca | Manager of Customer Disputes and Complaints | Regulatory Compliance  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6815 | Fax: (215) 684-6770  
Follow us on [Facebook](#) [Twitter](#) and [YouTube](#)

## Farinas, Laureto A

---

**From:** Jackson, Tyra  
**Sent:** Monday, April 09, 2018 9:31 AM  
**To:** Farinas, Laureto A  
**Subject:** Accepted: Deree J. Norman C-2018-2640719

## Farinas, Laureto A

---

**From:** Jackson, Tyra  
**Sent:** Monday, April 09, 2018 9:32 AM  
**To:** Farinas, Laureto A  
**Subject:** Accepted: Deree J. Norman C-2018-2640719

## Farinas, Laureto A

---

**From:** Bernard, Patricia A.  
**Sent:** Thursday, April 05, 2018 3:24 PM  
**To:** Farinas, Laureto A  
**Subject:** RE: Deree J. Norman C-2018-2640719

Ok, I will tell Jess.

---

**From:** Farinas, Laureto A  
**Sent:** Thursday, April 05, 2018 3:23 PM  
**To:** Bernard, Patricia A.  
**Subject:** RE: Deree J. Norman C-2018-2640719

Ok I have to name the person when we answer the Interrogatories. Let me know.

Thanks

Laureto

-----Original Appointment-----

**From:** Bernard, Patricia A.  
**Sent:** Thursday, April 05, 2018 3:21 PM  
**To:** Farinas, Laureto A  
**Subject:** Declined: Deree J. Norman C-2018-2640719  
**When:** Friday, May 18, 2018 10:00 AM-1:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** 801 Market Street, ALJ Vero (LAF)

This is my Friday off. They will give it to someone else.

Sorry

## Farinas, Laureto A

---

**From:** Bernard, Patricia A.  
**Sent:** Thursday, April 05, 2018 3:21 PM  
**To:** Farinas, Laureto A  
**Subject:** Declined: Deree J. Norman C-2018-2640719

This is my Friday off. They will give it to someone else.

Sorry

## Farinas, Laureto A

---

**From:** PGW Legal Dep Out-of-Office  
**Sent:** Thursday, April 05, 2018 2:34 PM  
**To:** Farinas, Laureto A  
**Subject:** Tentative:Deree J. Norman C-2018-2640719

## Farinas, Laureto A

---

**From:** PGW Legal Dep Out-of-Office  
**Sent:** Thursday, April 05, 2018 1:58 PM  
**To:** Farinas, Laureto A  
**Subject:** Tentative:Deree J. Norman C-2018-2640719

## Farinas, Laureto A

---

**From:** Leva, Danielle  
**Sent:** Thursday, April 05, 2018 1:58 PM  
**To:** Farinas, Laureto A  
**Subject:** Accepted: Deree J. Norman C-2018-2640719

**Farinas, Laureto A**

---

**From:** Devlin, Dana Marie  
**Sent:** Friday, February 02, 2018 11:28 AM  
**To:** Farinas, Laureto A  
**Subject:** Automatic reply: Deree J. Norman C-2018-2640719

*I am out of the office and will return on Monday, February 5, 2018. Please contact Raquel Guzman (215) 684-6630 should you need immediately assistance. Thanks and have a great weekend!*

## Farinas, Laureto A

---

**From:** Leva, Danielle  
**Sent:** Friday, February 02, 2018 11:28 AM  
**To:** Farinas, Laureto A  
**Subject:** Accepted: Deree J. Norman C-2018-2640719

## Farinas, Laureto A

---

**From:** Leva, Danielle  
**Sent:** Friday, February 02, 2018 11:28 AM  
**To:** Farinas, Laureto A  
**Subject:** Accepted: Deree J. Norman C-2018-2640719

**Farinas, Laureto A**

---

**From:** Leva, Danielle  
**Sent:** Wednesday, May 09, 2018 4:43 PM  
**To:** dereenorman@yahoo.com  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719  
**Attachments:** Scanned.PDF

Mr. Norman,

Please find attached PGW's Answer to the Motion to Overrule PGW's Objections and Compel PGW to Respond to the Written Discovery Requests.

Thank you.

## Farinas, Laureto A

---

**From:** Leva, Danielle  
**Sent:** Wednesday, May 09, 2018 4:38 PM  
**To:** evero@pa.gov  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719  
**Attachments:** Scanned.PDF

Mr. Norman,

Please find attached PGW's Answer to the Motion to Overrule PGW's Objections and Compel PGW to Respond to the Written Discovery Requests.

Thank you.

**Farinas, Laureto A**

---

**From:** Leva, Danielle  
**Sent:** Monday, May 07, 2018 4:39 PM  
**To:** dereenorman@yahoo.com  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719  
**Attachments:** NORMAN.PDF

Mr. Norman,

Please find attached the Philadelphia Gas Works' responses to the Answer to Interrogatories Nos. 1, 2, 3, 4, 5 and 6 and Requests for Production of Documents Nos. 3, 4, 7, 9, 11, 12, 13, 15, 16 ,17, 18, 19, 20,21, 22, 23, and 24.

Thank you.

**Farinas, Laureto A**

---

**From:** Leva, Danielle  
**Sent:** Wednesday, April 25, 2018 2:48 PM  
**To:** evero@pa.gov  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719  
**Attachments:** NORMAN.PDF

Judge Vero:

Please find attached Philadelphia Gas Works' objection to the Interrogatories and Requests for Production of Documents in the above mentioned case.

Thank you.

**Farinas, Laureto A**

---

**From:** Leva, Danielle  
**Sent:** Wednesday, April 25, 2018 2:48 PM  
**To:** 'dereenorman@yahoo.com'  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719  
**Attachments:** NORMAN.PDF

Dear Mr. Norman,

Please find attached Philadelphia Gas Works' objection to the Interrogatories and Requests for Production of Documents in the above mentioned case.

Thank you.

**Farinas, Laureto A**

---

**From:** Leva, Danielle  
**Sent:** Wednesday, March 21, 2018 2:59 PM  
**To:** dereenorman@yahoo.com  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719  
**Attachments:** Scanned.PDF

Mr. Norman,

Please find attached documents that PGW may introduce into evidence at the hearing in this matter.

Thank you

## Farinas, Laureto A

---

**From:** Bernard, Patricia A.  
**Sent:** Wednesday, March 21, 2018 1:37 PM  
**To:** Farinas, Laureto A  
**Subject:** RE: Deree J. Norman v. PGW, C-2018-2640719

Yes, I agree.

-----Original Message-----

**From:** Farinas, Laureto A  
**Sent:** Wednesday, March 21, 2018 12:13 PM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Deree J. Norman v. PGW, C-2018-2640719

cc

-----Original Message-----

**From:** Leva, Danielle  
**Sent:** Monday, March 19, 2018 4:07 PM  
**To:** [dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719

Dear Mr. Norman,

Please find attached Philadelphia Gas Works' objection to the Interrogatories and Requests for Production of Documents in the above mentioned case.

Thank you.

**Farinas, Laureto A**

---

**From:** Bernard, Patricia A.  
**Sent:** Wednesday, March 21, 2018 12:14 PM  
**To:** Farinas, Laureto A  
**Subject:** RE: Deree J. Norman v. PGW, C-2018-2640719

:)

-----Original Message-----

**From:** Farinas, Laureto A  
**Sent:** Wednesday, March 21, 2018 12:13 PM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Deree J. Norman v. PGW, C-2018-2640719

cc

-----Original Message-----

**From:** Leva, Danielle  
**Sent:** Monday, March 19, 2018 4:07 PM  
**To:** [dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719

Dear Mr. Norman,

Please find attached Philadelphia Gas Works' objection to the Interrogatories and Requests for Production of Documents in the above mentioned case.

Thank you.

## Farinas, Laureto A

---

**From:** Bernard, Patricia A.  
**Sent:** Wednesday, March 21, 2018 12:05 PM  
**To:** Farinas, Laureto A  
**Subject:** RE: Deree J. Norman v. PGW, C-2018-2640719

Did he reply?

-----Original Message-----

**From:** Farinas, Laureto A  
**Sent:** Wednesday, March 21, 2018 10:17 AM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Deree J. Norman v. PGW, C-2018-2640719

cc

-----Original Message-----

**From:** Farinas, Laureto A  
**Sent:** Wednesday, March 21, 2018 10:15 AM  
**To:** 'Deree Norman'  
**Cc:** Leva, Danielle  
**Subject:** RE: Deree J. Norman v. PGW, C-2018-2640719

Dear Mr. Norman,

I have just completed this response.

For the following reasons, I hesitate to forward my "do not object" to ALJ Vero.

Is your medical condition such that you will still be in the hospital on the hearing date, March 28, 2018 one week from today? If not, is your medical condition such that you will be unable to participate in the hearing, even by telephone?

Since your complaint is simply about a payment arrangement that you, "...can actually and logically sustain." I invite you do have a discussion with PGW about a payment arrangement that you can afford.

On September 25, 2017, the Commission's Bureau of Consumer Services ("BCS") provided you with payment arrangement based upon the income information you provided (\$121 per month). This is \$81 (PGW EZ-Way budget) plus \$40 toward your outstanding balance, which was, at that time, \$2,345.05. What is the amount and length of time that you request from the Commission to pay your outstanding PGW balance? As of February 27, 2018, your most recent PGW bill, your outstanding balance is \$2,553.43. In order persuade the Commission that you should have any kind of payment arrangement, you must show that you've made a good faith effort to pay your utility bill. According to our records for your account, since December 2014 you only submitted two payments to PGW for gas service. You paid \$79 on December 8, 2014 then you paid \$30 on September 2017. This is not evidence of your making any good faith effort to pay for gas service.

On Monday, March 19, 2018 I emailed to you my objections to your formal discovery request. On March 15, 2018 invited you to discuss with me an informal exchange of discovery information that is relevant to your complaint regarding a payment arrangement. You did not return my call.

From the substance of your discovery, your request for a continuance today and the extremely poor payment history of your account, it would seem that you seek only to delay the hearing and final disposition of this matter to further avoid payment and termination of your gas service.

Unless you can provide more proof that your medical condition will prevent you from participation in the hearing, I must object to your request.

Nevertheless, I repeat my invitation to discuss why the BCS payment arrangement of \$121 per month is not actually and logically sustainable to you.

Thank you,

LAURETO A. FARINAS  
SENIOR ATTORNEY | LEGAL  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122-2806  
215-684-6982 Email: [laureto.farinas@pgworks.com](mailto:laureto.farinas@pgworks.com)

-----Original Message-----

From: Deree Norman [<mailto:dereenorman@yahoo.com>]  
Sent: Wednesday, March 21, 2018 10:07 AM  
To: Leva, Danielle  
Cc: Farinas, Laureto A  
Subject: Re: Deree J. Norman v. PGW, C-2018-2640719

Good morning, I sent the following message to Mr. Laurel but have gotten no response. Could you or he please respond.

Thank you

Dear Mr. Laureto:

Due to an unforeseen medical matter, I may have to be admitted into the hospital. I intend to ask the Judge for a continuance and/or a change of date for our upcoming hearing. Can you please let me know if you have any objections to me making this request.

Thank you

Sincerely,

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

-----  
On Mon, 3/19/18, Leva, Danielle <[Danielle.Leva@pgworks.com](mailto:Danielle.Leva@pgworks.com)> wrote:

Subject: Deree J. Norman v. PGW, C-2018-2640719

To: "[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)" <[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)>

Cc: "Farinas, Laureto A" <[Laureto.Farinas@pgworks.com](mailto:Laureto.Farinas@pgworks.com)>

Date: Monday, March 19, 2018, 4:06 PM

Dear Mr. Norman,

Please find attached Philadelphia Gas Works' objection to the Interrogatories and Requests for Production of Documents in the above mentioned case.

Thank you.

## Farinas, Laureto A

---

**From:** Deree Norman <dereenorman@yahoo.com>  
**Sent:** Wednesday, March 21, 2018 10:07 AM  
**To:** Leva, Danielle  
**Cc:** Farinas, Laureto A  
**Subject:** Re: Deree J. Norman v. PGW, C-2018-2640719

Good morning, I sent the following message to Mr. Laurel but have gotten no response. Could you or he please respond.

Thank you

Dear Mr. Laureto:

Due to an unforeseen medical matter, I may have to be admitted into the hospital. I intend to ask the Judge for a continuance and/or a change of date for our upcoming hearing. Can you please let me know if you have any objections to me making this request.

Thank you

Sincerely,

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

-----  
On Mon, 3/19/18, Leva, Danielle <[Danielle.Leva@pgworks.com](mailto:Danielle.Leva@pgworks.com)> wrote:

Subject: Deree J. Norman v. PGW, C-2018-2640719  
To: "[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)" <[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)>  
Cc: "Farinas, Laureto A" <[Laureto.Farinas@pgworks.com](mailto:Laureto.Farinas@pgworks.com)>  
Date: Monday, March 19, 2018, 4:06 PM

Dear Mr. Norman,

Please find attached Philadelphia Gas Works' objection to the Interrogatories and Requests for Production of Documents in the above mentioned case.

Thank you.

**Farinas, Laureto A**

---

**From:** Leva, Danielle  
**Sent:** Monday, March 19, 2018 4:07 PM  
**To:** dereenorman@yahoo.com  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719  
**Attachments:** NORMAN.PDF

Dear Mr. Norman,

Please find attached Philadelphia Gas Works' objection to the Interrogatories and Requests for Production of Documents in the above mentioned case.

Thank you.

**Farinas, Laureto A**

---

**From:** Leva, Danielle  
**Sent:** Monday, March 19, 2018 4:07 PM  
**To:** evero@pa.gov  
**Cc:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, C-2018-2640719  
**Attachments:** NORMAN.PDF

Judge Vero:

Please find attached Philadelphia Gas Works' objection to the Interrogatories and Requests for Production of Documents in the above mentioned case.

Thank you.

## Farinas, Laureto A

---

**From:** Bernard, Patricia A.  
**Sent:** Tuesday, March 27, 2018 2:18 PM  
**To:** Farinas, Laureto A  
**Subject:** RE: Deree J. Norman v. PGW, Docket No. C-2018-2640719

I see. Thanks.

---

**From:** Farinas, Laureto A  
**Sent:** Tuesday, March 27, 2018 2:14 PM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Deree J. Norman v. PGW, Docket No. C-2018-2640719

She denied his request at first, then he filed the attached letter.  
See ALJ Vero's email of 9:49 am below.  
She will reschedule.

---

**From:** Farinas, Laureto A  
**Sent:** Tuesday, March 27, 2018 10:01 AM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Deree J. Norman v. PGW, Docket No. C-2018-2640719

Hi Patti,

Hearing continued. (See below and attached)  
I think she denied his request at first, then he filed the attached letter.

I will draft responses to discovery questions that we have not objected to. These are not technically due until April 2, 2018.

Mr. Norman has 10 days from the filing of Objections to file a Motion to Compel (March 29, 2018) or my objections will be sustained.

Thanks,

Laureto

---

**From:** Vero, Eranda [<mailto:evero@pa.gov>]  
**Sent:** Tuesday, March 27, 2018 9:49 AM  
**To:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, Docket No. C-2018-2640719

Good morning Mr. Farinas,  
Attached to this e-mail please find a facsimile that Mr. Norman sent us when we pressed him for additional information regarding his health.

In view of this information, I shall go ahead and reschedule tomorrow's hearing. Please ignore the Order that was issued yesterday on this topic.

ALJ Vero

**From:** [368@noreply.gov](mailto:368@noreply.gov) <[368@noreply.gov](mailto:368@noreply.gov)>

**Sent:** Tuesday, March 27, 2018 9:38 AM

**To:** Vero, Eranda <[evero@pa.gov](mailto:evero@pa.gov)>

**Subject:** Message from KM\_368

## Farinas, Laureto A

---

**From:** Bernard, Patricia A.  
**Sent:** Tuesday, March 27, 2018 10:36 AM  
**To:** Farinas, Laureto A  
**Subject:** RE: Deree J. Norman v. PGW, Docket No. C-2018-2640719

Thank you ☺

---

**From:** Farinas, Laureto A  
**Sent:** Tuesday, March 27, 2018 10:00 AM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Deree J. Norman v. PGW, Docket No. C-2018-2640719

Hi Patti,

Hearing continued. (See below and attached)  
I think she denied his request at first, then he filed the attached letter.

I will draft responses to discovery questions that we have not objected to. These are not technically due until April 2, 2018.

Mr. Norman has 10 days from the filing of Objections to file a Motion to Compel (March 29, 2018) or my objections will be sustained.

Thanks,

Laureto

---

**From:** Vero, Eranda [<mailto:evero@pa.gov>]  
**Sent:** Tuesday, March 27, 2018 9:49 AM  
**To:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, Docket No. C-2018-2640719

Good morning Mr. Farinas,  
Attached to this e-mail please find a facsimile that Mr. Norman sent us when we pressed him for additional information regarding his health.

In view of this information, I shall go ahead and reschedule tomorrow's hearing. Please ignore the Order that was issued yesterday on this topic.

ALJ Vero

**From:** [368@noreply.gov](mailto:368@noreply.gov) <[368@noreply.gov](mailto:368@noreply.gov)>  
**Sent:** Tuesday, March 27, 2018 9:38 AM  
**To:** Vero, Eranda <[evero@pa.gov](mailto:evero@pa.gov)>  
**Subject:** Message from KM\_368

## Farinas, Laureto A

---

**From:** Vero, Eranda <evero@pa.gov>  
**Sent:** Tuesday, March 27, 2018 9:49 AM  
**To:** Farinas, Laureto A  
**Subject:** Deree J. Norman v. PGW, Docket No. C-2018-2640719  
**Attachments:** SKM\_36818032709370.pdf

Good morning Mr. Farinas,

Attached to this e-mail please find a facsimile that Mr. Norman sent us when we pressed him for additional information regarding his health.

In view of this information, I shall go ahead and reschedule tomorrow's hearing. Please ignore the Order that was issued yesterday on this topic.

ALJ Vero

**From:** [368@noreply.gov](mailto:368@noreply.gov) <[368@noreply.gov](mailto:368@noreply.gov)>  
**Sent:** Tuesday, March 27, 2018 9:38 AM  
**To:** Vero, Eranda <evero@pa.gov>  
**Subject:** Message from KM\_368

## Farinas, Laureto A

---

**From:** Vero, Eranda <evero@pa.gov>  
**Sent:** Friday, March 23, 2018 5:00 PM  
**To:** Farinas, Laureto A  
**Cc:** Leva, Danielle  
**Subject:** Deree J. Norman v. PGW, Docket No. C-2018-2640719  
**Attachments:** getDocument.pdf

Good afternoon Mr. Farinas,

I have received Mr. Norman's request for continuance. See Attachment. What is PGW's response to it?

*Eranda Vero  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107*

## Farinas, Laureto A

---

**From:** Leva, Danielle  
**Sent:** Tuesday, March 13, 2018 2:47 PM  
**To:** Farinas, Laureto A  
**Subject:** Deree Norman SOA  
**Attachments:** fvevmcahtem.xlsx



Danielle Leva | Paralegal | Legal  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6862 | Fax: (215) 684-6798  
Follow us on [Facebook](#) [Twitter](#) and [YouTube](#)

## Farinas, Laureto A

---

**From:** Bernard, Patricia A.  
**Sent:** Thursday, March 15, 2018 9:24 AM  
**To:** Farinas, Laureto A  
**Subject:** RE: Norman v PGW C-2018-2640719

Hi Laureto,

I just came back into the office today. Do you need me to look at this right away? If so, let me know and I will. Otherwise, I will complete some pressing informal cases I have and then look at this. Please let me know.

Thanks,  
Patti

---

**From:** Farinas, Laureto A  
**Sent:** Tuesday, March 13, 2018 10:58 AM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Norman v PGW C-2018-2640719

Hi Patti,

Please find attached a copy of Mr. Norman's Discovery in the above referenced matter for your review for which there is a hearing scheduled for March 28, 2018.

These are flawed for several reasons. Some of the reasons are:

Even though the Discovery is dated as having been served on March 9, 2018. There were no documents attached to Mr. Norman's email to me dated March 9, 2018.

Mr. Norman's email delivered at 5:49 p.m. yesterday, March 12, 2018 was the first time that these were served upon PGW with Notification to ALJ Vero. Therefore, I considered as being served today, March 13, 2018.

Objections are due 10 days after service and Responses (to those not objected to) are due 20 days after service. Even if this Discovery was correctly served on March 9, 2018, the Responses would not be due until one day after the hearing, March 29, 2018.

Several (if not many) of these are objectionable. Even the ones that are arguably within the scope of this matter may be answered with "NONE" or "Patricia Bernard"

Please review and lets discuss.

Thanks

Laureto

---

**From:** Deree Norman [<mailto:dereenorman@yahoo.com>]  
**Sent:** Monday, March 12, 2018 5:50 PM  
**To:** Farinas, Laureto A  
**Subject:** Norman v PGW C-2018-2640719

## Farinas, Laureto A

---

**From:** Deree Norman <dereenorman@yahoo.com>  
**Sent:** Monday, March 12, 2018 5:50 PM  
**To:** Farinas, Laureto A  
**Subject:** Norman v PGW C-2018-2640719  
**Attachments:** Interrogatories and Production.pdf

## Farinas, Laureto A

---

**From:** Deree Norman <dereenorman@yahoo.com>  
**Sent:** Monday, March 12, 2018 5:49 PM  
**To:** Farinas, Laureto A  
**Subject:** Norman v PGW C-2018-2640719  
**Attachments:** Interrogatories and Production.pdf

**Farinas, Laureto A**

---

**From:** Deree Norman <dereenorman@yahoo.com>  
**Sent:** Friday, March 09, 2018 12:43 PM  
**To:** Farinas, Laureto A  
**Subject:** Norman v PGW C-2018-2640719

Mr. Farinas

Attached please find my request for Interrogatories and Production of Documents.

Thank you

Deree J. Norma

**Farinas, Laureto A**

---

**From:** Deree Norman <dereenorman@yahoo.com>  
**Sent:** Monday, April 16, 2018 12:33 PM  
**To:** Farinas, Laureto A  
**Subject:** Norman v PGW No. C-2018-2640719  
**Attachments:** Revised Interrogatories and Production.pdf

Mr. Farinas,

Attached please find my request for Interrogatories and Production of Documents.

Thank you

Deree J. Norman

**Farinas, Laureto A**

---

**From:** Bernard, Patricia A.  
**Sent:** Wednesday, March 21, 2018 9:00 AM  
**To:** Farinas, Laureto A  
**Subject:** RE: Norman v. PGW C-2018-2640719

Ok, great.

---

**From:** Farinas, Laureto A  
**Sent:** Wednesday, March 21, 2018 8:59 AM  
**To:** Bernard, Patricia A.  
**Subject:** RE: Norman v. PGW C-2018-2640719

You can send them up. I think that he is just stalling. I want to speak with him. I might object...  
His complaint is really just about a PAR

---

**From:** Bernard, Patricia A.  
**Sent:** Wednesday, March 21, 2018 8:57 AM  
**To:** Farinas, Laureto A  
**Subject:** RE: Norman v. PGW C-2018-2640719

Good morning,

I was just working on his exhibits. Should I hold off? Or just do them anyway?

---

**From:** Farinas, Laureto A  
**Sent:** Wednesday, March 21, 2018 8:56 AM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Norman v. PGW C-2018-2640719

FYI

---

**From:** Deree Norman [<mailto:dereenorman@yahoo.com>]  
**Sent:** Tuesday, March 20, 2018 9:05 PM  
**To:** Farinas, Laureto A  
**Subject:** Norman v. PGW C-2018-2640719

Dear Mr. Laureto:

Due to an unforeseen medical matter, I may have to be admitted into the hospital. I intend to ask the Judge for a continuance and/or a change of date for our upcoming hearing. Can you please let me know if you have any objections to me making this request.

Thank you

Sincerely,

/s/ Deree J. Norman  
Deree J. Norman

5367 Thomas Ave  
Philadelphia, PA 19143  
(267) 304-2162  
[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)

**Farinas, Laureto A**

---

**From:** Bernard, Patricia A.  
**Sent:** Wednesday, March 21, 2018 8:57 AM  
**To:** Farinas, Laureto A  
**Subject:** RE: Norman v. PGW C-2018-2640719

Good morning,

I was just working on his exhibits. Should I hold off? Or just do them anyway?

---

**From:** Farinas, Laureto A  
**Sent:** Wednesday, March 21, 2018 8:56 AM  
**To:** Bernard, Patricia A.  
**Subject:** FW: Norman v. PGW C-2018-2640719

FYI

---

**From:** Deree Norman [<mailto:dereenorman@yahoo.com>]  
**Sent:** Tuesday, March 20, 2018 9:05 PM  
**To:** Farinas, Laureto A  
**Subject:** Norman v. PGW C-2018-2640719

Dear Mr. Laureto:

Due to an unforeseen medical matter, I may have to be admitted into the hospital. I intend to ask the Judge for a continuance and/or a change of date for our upcoming hearing. Can you please let me know if you have any objections to me making this request.

Thank you

Sincerely,

/s/ Deree J. Norman

Deree J. Norman

5367 Thomas Ave

Philadelphia, PA 19143

(267) 304-2162

[dereenorman@yahoo.com](mailto:dereenorman@yahoo.com)

**Farinas, Laureto A**

---

**From:** Deree Norman <dereenorman@yahoo.com>  
**Sent:** Tuesday, March 20, 2018 9:05 PM  
**To:** Farinas, Laureto A  
**Subject:** Norman v. PGW C-2018-2640719

Dear Mr. Laureto:

Due to an unforeseen medical matter, I may have to be admitted into the hospital. I intend to ask the Judge for a continuance and/or a change of date for our upcoming hearing. Can you please let me know if you have any objections to me making this request.

Thank you

Sincerely,

/s/ Deree J. Norman

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

**Farinas, Laureto A**

---

**From:** eServe@pa.gov  
**Sent:** Thursday, May 10, 2018 2:42 PM  
**To:** Farinas, Laureto A  
**Subject:** PA PUC eServe Notice

**Importance:** High

Dear LAURETO FARINAS,

A(n) **Order** has been served in this proceeding. This document is docketed as **C-2018-2640719**. You may view this document at

**C-2018-2640719 Deree J Norman v PGW (Order re Motion to Compel) Vero.docx**

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*

## Farinas, Laureto A

---

**From:** eServe@pa.gov  
**Sent:** Tuesday, March 27, 2018 12:04 PM  
**To:** Farinas, Laureto A  
**Subject:** PA PUC eServe Notice

**Importance:** High

Dear LAURETO FARINAS,

A(n) **Order** has been served in this proceeding. This document is docketed as **C-2018-2640719**. You may view this document at

**C-2018-2640719 Deree J Norman v PGW (Order re continuance) Vero.docx**

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*

## Farinas, Laureto A

---

**From:** eServe@pa.gov  
**Sent:** Friday, March 09, 2018 2:02 PM  
**To:** Farinas, Laureto A  
**Subject:** PA PUC eServe Notice

**Importance:** High

Dear LAURETO FARINAS,

A(n) **PreHearing Order** has been served in this proceeding. This document is docketed as **C-2018-2640719**. You may view this document at **C-2018-2640719 Deree J Norman v PGW PHO VERO.docx**

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*

**Farinas, Laureto A**

---

**From:** Leva, Danielle  
**Sent:** Tuesday, January 02, 2018 2:14 PM  
**To:** Glace, Jessica J.; Jackson, Tyra; Jones, Tiffany; Vacca, Wendy  
**Cc:** Farinas, Laureto A  
**Subject:** FW: PA PUC eServe Notice  
**Attachments:** C-2018-2640719.pdf  
  
**Importance:** High

---

**From:** Farinas, Laureto A  
**Sent:** Tuesday, January 02, 2018 11:20 AM  
**To:** Leva, Danielle  
**Subject:** FW: PA PUC eServe Notice  
**Importance:** High

---

**From:** [eServe@pa.gov](mailto:eServe@pa.gov)  
**Sent:** Tuesday, January 2, 2018 11:20:34 AM (UTC-05:00) Eastern Time (US & Canada)  
**To:** Farinas, Laureto A  
**Subject:** PA PUC eServe Notice

Dear LAURETO FARINAS,

A(n) **Formal Complaint** has been served in this proceeding. This document is docketed as **C-2018-2640719**. You may view this document at **Deree J Norman vs Philadelphia Gas Works**

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*

**Farinas, Laureto A**

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**From:** eServe@pa.gov  
**Sent:** Tuesday, January 02, 2018 11:21 AM  
**To:** Farinas, Laureto A  
**Subject:** PA PUC eServe Notice

**Importance:** High

Dear LAURETO FARINAS,

A(n) **Formal Complaint** has been served in this proceeding. This document is docketed as **C-2018-2640719**. You may view this document at **Deree J Norman vs Philadelphia Gas Works**

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*

## Farinas, Laureto A

---

**From:** Glace, Jessica J.  
**Sent:** Tuesday, May 08, 2018 9:03 AM  
**To:** Farinas, Laureto A  
**Subject:** FW: Request to pull calls  
**Attachments:** Uniqua Knight IR\_200155832250170829.wav; Bryan Roop IR\_200155710450170829.wav; Gilda Jackson IR\_200155297850170829.wav



Jessica Glace | Senior Customer Review Officer | Customer Review Unit  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6492 | Fax: (215) 684-6770  
Follow us on [Facebook](#) [Twitter](#) and [YouTube](#)

---

**From:** Starnes, Karen P  
**Sent:** Tuesday, May 08, 2018 9:02 AM  
**To:** Glace, Jessica J.  
**Cc:** Vacca, Wendy; Jones, Tiffany  
**Subject:** RE: Request to pull calls

Good morning Jessica,

Per your request, attached are the 3 calls for Deree Norman on 8/29/17.

Thank you,



Karen P. Starnes | Manager, Quality Assurance | Customer Affairs  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 235-4614 | Fax: (215) 684-6679  
Follow us on [Facebook](#) [Twitter](#) and [YouTube](#)

---

**From:** Glace, Jessica J.  
**Sent:** Monday, May 07, 2018 4:10 PM  
**To:** Starnes, Karen P  
**Cc:** Vacca, Wendy; Jones, Tiffany  
**Subject:** Request to pull calls

Re:  
Deree Norman  
5367 Thomas Ave  
0021-1634-7424  
267-304-2162

Good Afternoon,

May I please have the recordings of the three calls that were made on 08/29/2017?

Thank you,



Jessica Glace | Senior Customer Review Officer | Customer Review Unit  
**Philadelphia Gas Works** | 800 W. Montgomery Ave | Philadelphia, PA 19122  
Phone: (215) 684-6492 | Fax: (215) 684-6770  
Follow us on [Facebook](#) [Twitter](#) and [YouTube](#)

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

---

**8.** Produce any and/or all documents, records, or communications of or prepared by an investigator acquired and/or employed because of their investigation(s), including but not limited to telephone calls, correspondence, facsimiles, e-mail, billing, inspections, notes, observations, interviews, statements and/or findings.

**RESPONSE:**

See the attached "Utility Report" submitted to the BCS by PGW for the Complainant's informal complaint.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

# PHILADELPHIA GAS WORKS

## PUC

### EGW PAR Report Data

**Number of Cases:** 1

**Created Date Time:** 9/25/2017 02:50:23 PM

#### Attachments

##### Case Number File Name

**File Type:** EGWPAR

**Case Number:** 3557990

**Company Code:** 0766

#### Customer

**First Name:** DERE E

**Last Name:** NORMAN

**Account Number:** 2116347424

#### Mail Address

**Address 1:**

**Address 2:**

**City:**

**State:**

**Zip 5:**

**Zip 4:**

#### Service Address

**Address 1:** 5367 THOMAS AVENUE

**Address 2:**

**City:** PHILADELPHIA

**State:** PA

**Zip 5:** 19143

**Zip 4:**

#### Family

**Adults:** 2

**Children:** 0

**Family Size:**

**Sent to Util:**

**Contract Account Number:**

**Current Bill Due Date:** 2017-10-17

**Budget Amount:** 81.00

**Total Balance:** 2345.05

**CAP Payment Amount:**

**OtherInfo:**

**Account Type**

**Residential:**

**LLT:**

**GCI:**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works*  
Docket No. C-2018-2640719  
Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

---

**10.** Produce any and/or all documents and communications containing the name and home and business addresses of all individuals contacted as potential witnesses.

**RESPONSE:**

See PGW's response to Request for Production of Documents No. 9.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***

**Docket No. C-2018-2640719**

**Deree J. Norman's**

**Interrogatories and Requests for Production of Documents**

---

**12.** Produce a digital copy of any and/or all recorded communication between Complainant and PGW and/or any of PGW representatives.

**RESPONSE:** (Supplemented May 14, 2018)

PGW has not retained recordings of customer's telephone calls to PGW beyond 1 year. The Complainant called three times within the past year on August 29, 2017. PGW is currently attempting to locate the recordings.

In the normal course of its business PGW maintains business records of all contacts made between the customer and PGW representatives. The PGW representatives are trained and are responsible to make notations of contact on to a customer's account at or near the time the contact occurs. We offer this document in lieu of the recordings. This is called the "Contacts for Account" record. It is attached.

PGW has obtained the recordings of three separate customer telephone calls that the Complainant made to PGW made in August 2017 on the same day inquiring about payment arrangements. PGW has contacted the Complainant to best accomplish the review/production of these telephonic recordings.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

**Before the  
Pennsylvania Public Utility Commission**

***Deree J. Norman v. Philadelphia Gas Works***  
**Docket No. C-2018-2640719**

**Deree J. Norman's  
Interrogatories and Requests for Production of Documents**

---

**18.** Produce all copies of internal memoranda, inter-office memos, facsimiles, e-mail or other documents or communications regarding this case, made by the PGW and/or any agent and/or employee of PGW.

**RESPONSE:** (Supplemented May 14, 2018)

See PGW Response to Request for Production of Documents No. 6.

**This response was prepared by Jessica Glace, Senior Customer Review Officer – PGW.**

Before the  
Pennsylvania Public Utility Commission

*Deree J. Norman v. Philadelphia Gas Works*

Docket No. C-2018-2640719

Deree J. Norman's

Interrogatories and Requests for Production of Documents

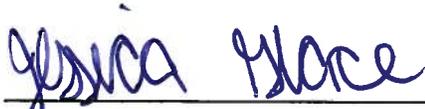
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VERIFICATION

I, JESSICA GLACE, hereby declare that I am Senior Customer Review Officer at the Philadelphia Gas Works. I am authorized to make this verification on its behalf.

The facts set forth in the foregoing **Answer to Interrogatories Nos. 5 and 6** and **Requests for Production of Documents Nos. 6, 8, 10, 12 and 18** are true and correct to the best of my knowledge, information and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

May 16, 2018



---

**JESSICA GLACE,**  
Customer Review Officer  
Philadelphia Gas Works

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Deree Norman,</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>Docket No. C - 2018 - 2640719</b>
	:	
<b>Philadelphia Gas Works,</b>	:	
<b>Respondent</b>	:	

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT, PHILADELPHIA GAS WORKS' RESPONSE TO THE ANSWER TO INTERROGATORIES NOS. 5, AND 6 AND REQUESTS FOR PRODUCTION OF DOCUMENTS NOS. 6, 8, 10, 12 and 18 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:

Mr. Deree J. Norman  
5367 Thomas Avenue  
Philadelphia, PA 19143

and by email:  
dereenorman@yahoo.com

May 16, 2018



Laureto Farinas, Esquire  
Attorney I.D. 50415  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982

# **EXHIBIT 6**

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	--	--

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

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

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

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

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

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

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**LOG OUT**

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[PAsset=Ftr\\_Ftr\\_Copyright&print=true](http://www.t-mobile.com/Templates/Popup.aspx?PAsset=Ftr_Ftr_Copyright&print=true),922,'width=568,height=400,screenX=568,screenY=400,left=50,top=50,toolbar=no,location=no,menubar=no,status=no,resizable,scrollbars)

# **EXHIBIT 7**

BILLING (/BILLING/SUMMARY.HTML)	USAGE (/USAGE/USAGEOVERVIEW.HTML)	PLAN (/PLANS.HTML)	PHONE (/MYPHONE/MYPHONEDetails.HTML)	SHOP (/PURCHASE/SHOP)
------------------------------------	--------------------------------------	--------------------	-----------------------------------------	-----------------------

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 8**

BILLING (/BILLING/SUMMARY.HTML)	USAGE (/USAGE/USAGEOVERVIEW.HTML)	PLAN (/PLANS.HTML)	PHONE (/MYPHONE/MYPHONEDetails.HTML)	SHOP (/PURCHASE/SHOP)
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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	--	--

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# **EXHIBIT 9**

**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](mailto: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](mailto: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](mailto: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.

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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 24<sup>th</sup> 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  
4<sup>TH</sup> FLR.  
800 W MONTGOMERY AVE  
PHILADELPHIA PA 19122  
[Laureto.Farinas@pgworks.com](mailto:Laureto.Farinas@pgworks.com)

# **EXHIBIT 10**

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 Overrule Respondent's Objections to Interrogatories and Request for Production of Documents and Compel Respondent to submit specific and accurate answers and documents to Complainant's 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