

JE-1

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TOMISHA PALMER :
Complainant :
 : F-2018-3006197
PHILADELPHIA GAS WORKS :
Respondent :

RECEIVED
2018 JUN 11 PM 3:50
SECRETARY'S BUREAU
PHILADELPHIA P.U.C.

STIPULATIONS

Tomisha Palmer and Philadelphia Gas Works stipulate to the following:

1. PGW discovered a meter bypass at 4244 N. Hicks Street in Philadelphia, on June 27, 2017.
2. PGW calculated that \$5314.23 worth of gas was used at 4244 N. Hicks Street from July 30, 2014 to June 27, 2017.
3. Tomisha Palmer was a tenant at 4244 N. Hicks Street in Philadelphia from September 26, 2012 to approximately July 2017.
4. According to the City of Philadelphia's Office of Property Assessment, 4244 N. Hicks Street has been owned by Iota Trust since December 31, 1999.
5. Tomisha Palmer had a PGW account in her name at 4244 N. Hicks Street in Philadelphia from September 26, 2012 to June 27, 2013.
6. PGW terminated Tomisha Palmer's gas service at 4244 N. Hicks St. on June 27, 2013 due to non-payment.
7. Oliver Jackson had a PGW account in his name at 4244 N. Hicks Street in Philadelphia from November 19, 2013 to July 30, 2014.
8. PGW terminated Oliver Jackson's gas service at 4244 N. Hicks St on July 30, 2014 due to non-payment.
9. Oliver Jackson was Tomisha Palmer's significant other.
10. On August 1, 2018, Tomisha Palmer informed PGW that she may be applying for service at 1763 N. Croskey Street.
11. On August 17, 2018, Tomisha Palmer requested a payment agreement on the balance that PGW requested to establish service.
12. On September 24, 2018, Tomisha Palmer visited a PGW district office and requested service at 1763 N. Croskey Street.
13. PGW demands payment of \$5314.23 to establish service in Tomisha Palmer's name at 1763 N. Croskey Street in Philadelphia.
14. The \$5314.23 that PGW demands to establish service in Tomisha Palmer's name at 1763 N. Croskey Street in Philadelphia is for the unbilled usage charges calculated by PGW

associated with the meter bypass at 4244 N. Hicks Street, which PGW discovered on June 27, 2017.

15. Tomisha Palmer has never had a PGW account at 1763 N. Croskey Street in Philadelphia.
16. PGW will not permit Tomisha Palmer to initiate service at 1763 N. Croskey Street in Philadelphia prior to receiving payment of \$5314.23.
17. PGW will not permit Tomisha Palmer to enroll in a payment arrangement for the \$5314.23 that PGW has demanded to initiate service in Tomisha Palmer's name at 1763 N. Croskey Street in Philadelphia.
18. PGW will not permit Tomisha Palmer to enroll in PGW's Customer Responsibility Program prior to receiving payment of the \$5314.23 that PGW has demanded to initiate service in Tomisha Palmer's name at 1763 N. Croskey Street in Philadelphia.
19. Since August 1, 2018, PGW has not visited the property at 1763 N. Croskey Street in Philadelphia.

Discovery Responses

1. PGW Response to Palmer I-3
2. PGW Response to Palmer I-4
3. PGW Response to Palmer I-5
4. PGW Response to Palmer I-16
5. PGW Response to Palmer I-17
6. PGW Response to Palmer I-20
7. PGW Response to Palmer I-22
8. PGW Response to Palmer I-23
9. PGW Response to Palmer I-26
10. PGW Response to Palmer I-28
11. PGW Response to Palmer II-2
12. PGW Response to Palmer II-3

Other

March 21, 2019 Interim emergency relief hearing transcript and exhibits

Tomisha Palmer v. Philadelphia Gas Works
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Tomisha Palmer's Interrogatories and
Requests for Production of Documents
Set 1

Palmer to PGW I-3

Please provide all information pertaining to Account activity during September 26, 2012 and June 27, 2017. Please include all documents pertaining to any gas usage, the amount of usage, when the usage began, and all notices sent to the Complainant about the usage occurring during this time period.

Response:

There are no Records that are responsive to this Request.

Response Provided by: Graciela Christlieb, Esq. – PGW Senior Attorney

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Tomisha Palmer's Interrogatories and
Requests for Production of Documents
Set 1

Palmer to PGW I-4

Please provide a complete copy of all Records in PGW's Meter Investigation Unit relating to the Property since September 2012 including, but not limited to, handwritten notes and phone logs.

Response:

There are no Records that are responsive to this Request.

Response Provided by: Timothy Sullivan – PGW Superintendent, Revenue Protection and Meters

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Tomisha Palmer's Interrogatories and
Requests for Production of Documents
Set 1

Palmer to PGW I-5

Please provide all Records supplied by PGW to the Commission regarding the Commission's investigation of the informal complaint filed by Complainant on September 25, 2018 regarding which the Commission issued BCS decision# 3655035 on October 15, 2018.

Response:

Please see Appendix B.

Response Provided by: Wendy Vacca – PGW Manager, Customer Disputes and Complaints

Appendix

A

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Cold Weather Survey

Premise Details

Premise Address	4244 N HICKS ST	Last Customer Class	Residential Heat Domestic
Last Customer Name	PALMER, TOMISHA	USA Start Date	09/26/2012
Service Order Type	NPSO	USA End Date	06/27/2013
Service Order Date	06/27/2013		

Survey Type

Mefits Outboard Call Customer Call In District Office

Surveyed Individual

Person Is Same As Previous Customer of Record On Order No Yes

Enter Individual's Name

Enter Current Contact Phone #

- Customer Declines To Take Survey
- Incomplete Survey - Dropped Call
- Incomplete Survey - Customer Hung Up
- Incomplete Survey - Other

Still Occupies Property? No Yes

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Appendix

B

PHILADELPHIA GAS WORKS

PUC

EGW INFORMAL Report Data

Number of Cases: 1

Created Date Time: 10/2/2018 04:16:00 PM

Attachments

Case Number File Name

3655035 PGW_Doc953562_Rev0.xlsx

File Type: EGWINFORMAL

Case Number: 3655035

Company Code: 0766

Customer

First Name: TOMISHA

Last Name: PALMER

Account Number: 365315463

Mail Address

Address 1:

Address 2:

City:

State:

Zip 5:

Zip 4:

Service Address Address 1:1763 N CROSKY STREET Address 2: City:PHILADELPHIA State:PA Zip 5:19121 Zip 4:

Family

Adults: 1

Children: 5

Family Size:

Sent to Util:

Current Bill Due Date: 2017-08-09

Budget Amount: 239.00

Total Balance: 5314.23

Account Type

Residential:

LLT:

GCI:

Case Heating Account: Y

Rate: RES

Co Investigation Prior BCS Contact: The property located at 1763 N Croskey St is listed as residential with gas heat and domestic appliances. The property is equipped with an automatic meter reading device and actual meter readings are being obtained monthly. The gas service at the property was terminated for non-payment on 06/05/2018. Applicant Tomisha Palmer, is requesting service at the address but it has been determined that she is being held responsible for the Tampered Meter Bypass discovered at 4244 N Hicks St. Company records indicate that

Ms. Palmer was a previous customer of record at 4244 N Hicks St from 09/26/2012 to 06/27/2013 when the gas service was terminated under name for non-payment. On 11/19/2013, Oliver Jackson, also known as Ms. Palmer's husband had the service restored in his name. On 07/30/2014, the gas service at 4244 N Hicks St was then terminated for non-payment at the curb under Mr. Jackson's account. On 06/27/2017, the Department of Human Services along with Ms. Palmer on the line called to report a strong odor of gas at 4244 N Hicks St. PGW promptly visited the property on a Gas Leak order Inside Order of which the gas was found on. A gas leak was detected and a stainless steel flex connector bypass going inlet to outlet was discovered. Meter number #2034935 was removed at index 3127. The gas was shut off with locking devices and also shut off outside at the curb with an expander. The appliances attached to the fuel line were a house heater with 75,000 BTU's, water heater with 36,000 BTU's and gas range with 60,000 BTU's. A post termination notice was left with Ms. Palmer. On that same day, Ms. Palmer visited a PGW office to see what she could do to have her service restored. On 06/29/2017, Ms. Palmer was held responsible for the bypass from 07/30/2014 to 06/27/2017 in the amount of \$6,571.15. The amount was based on historical usage at the property. On 07/11/2017, Ms. Palmer visited a PGW office again to see what she could do to have her service restored. Ms. Palmer was informed that she was held responsible for the theft charges. She indicated that she wanted to appeal her responsibility. She was instructed to provide proof of her living at another address; she was satisfied. On 08/01/2018, Ms. Palmer visited a PGW office to state that she may be applying for service at 1763 Croskey St. She stated that she didn't think she should be held responsible for the bypass at 4244 N Hicks. Ms. Palmer was informed that the theft charges would be needed upfront. She was satisfied. On 08/17/2018, Ms. Palmer called to see if she could be placed on a PAR for the bypass charges. She stated that she never lived at the property and that her spouse did but he passed away. She stated that she has proof that she lived somewhere else. She was referred to a PGW office. On 09/24/2018, Ms. Palmer visited a PGW office stating that she was not responsible for the debt from her deceased husband. She was advised that she would need to pay \$6,694.38 which included the bypass charges of \$6,571.15 and a reconnection fee of \$123.23. A residential credit statement was provided and the number to the PUC was given. Ms. Palmer was satisfied. On 09/25/2018, PUC Complaint BCS# 3655035 was filed.

Co Investigation After BCS Contact: Original bypass charges of \$6571.15 were cancelled and beneficially rebilled at \$5,314.23.

Customer Last Contact Date: 2018-09-24

Co Tell Cust: Ms. Palmer visited a PGW office stating that she was not responsible for the debt from her deceased husband. She was advised that she would need to pay \$6,694.38 which included the bypass charges of \$6,571.15 and a reconnection fee of \$123.23. A residential credit statement was provided and the number to the PUC was given. Ms. Palmer was satisfied.

Co Final Position To BCS: It is PGW's final position that, PGW has associated Tomisha Palmer with 4244 N Hicks Street and determined that she is responsible for the theft charges. The bypass charges have been cancelled and Ms. Palmer has been beneficially rebilled for the bypass from 07/30/2014 to 06/27/2017 in the amount of \$5,314.23. To have the service restored and placed into her name at 1763 N Croskey St, Ms. Palmer is required to first pay the bypass charges of \$5,314.23. PGW maintains payment in full when theft of service is involved. -

Prepared By
Last Name: Moore, Joyshalyn M
Phone Number:

Date: 2018-10-02
Number of Time Send: 3
Number of Time Faxed: 0

Specific Service Agreement Statement of Account SA- 6632034116

Customer Name	From Date	To Date		
TOMISHA PALMER	6/27/2017	10/2/2018		
Service/Address	Account Number	S/A Number	Meter	Rate/Class
4244 N HICKS ST PHIL, PA 191401916	365315463	6632034116	2226963	GS

STATEMENT

Transaction Date	Transaction Type	Reading	Read Code	U/G Days	CGF Usage	Average CGF/Day	Heating DDDs	Payment Type	Due Date	Transaction Amount	Current Balance	Actual Balance
6/30/2017	ESTGAS									\$6,571.15	\$6,571.15	\$6,571.15
7/17/2017	BILL	3127	R	1	0	0	0		8/9/2017	\$0.00	\$6,571.15	\$6,571.15
12/11/2017	WO									(\$6,571.15)	\$0.00	\$0.00
10/2/2018	REACT									\$6,571.15	\$6,571.15	\$6,571.15
10/2/2018	ESTGAS									(\$6,571.15)	\$0.00	\$0.00
10/2/2018	ESTGAS									\$5,314.23	\$5,314.23	\$5,314.23

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Tomisha Palmer's Interrogatories and
Requests for Production of Documents
Set 1

Palmer to PGW I-16

Please explain how PGW determined the amount of natural gas use attributable to unauthorized use, meter tampering, or gas theft at the Property.

Response:

The amount of natural gas use attributable to the theft at the Property was determined by way of the historical gas usage at the Property. Estimates based on historical usage require 12 consecutive months of service during which a ratepayer at the property is being billed monthly based on actual meter reads. PGW makes every effort to employ the 12 month period of usage closest in time to the start of the theft; however, in this case, neither the Complainant nor her partner were the customer of record for 12 consecutive months, so the usage employed was that of the ratepayer immediately preceding the Complainant.

Response Provided by: Wendy Vacca – PGW Manager, Customer Disputes and Complaints

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Set 1

Palmer to PGW I-17

Please state the payment amount PGW is now requesting from the Complainant prior to initiation of gas service at 1763 N. Croskey Street and explain how the amount was calculated.

Response:

In order to initiate gas service, the Complainant must pay \$5,314.23.

The amount was calculated using historical usage from the Property, the degree days included in the period of time the theft occurred, and the gas rates applicable over the period of time the theft occurred.

Please see Appendix F for corresponding documentation.

Response Provided by: Wendy Vacca – PGW Manager, Customer Disputes and Complaints

Appendix

F

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Degree Days Calculator

Help

Criteria

Current Year

30 Years Average

Month Day Year

Start Date:

End Date:

Degree Days

Number of Days:

Total Degree Days:



HISTORICAL USAGE FOR 1 YEAR

FROM , 9/15/2011 TO , 8/15/2012

PGW Billing History

Search Criteria

Premise: 9996094017 Address: 4244 N Hicks St/Philadelphia, Pa 19140-1916

Start Read Date: 08/15/2012

Restrict Display To USA's of Type: Show Customer's Name

Read Date	SA Type	Days	Read Code	\$ Amount	Usage	Demand	Customer
<input checked="" type="checkbox"/>	G2-GS	32	R	\$109.44	23.00 CCF	0.00	Polydor, Yolene
<input checked="" type="checkbox"/>	G2-GS	30	R	\$109.44	29.00 CCF	0.00	Polydor, Yolene
<input checked="" type="checkbox"/>	G2-GS	29	R	\$109.44	66.00 CCF	0.00	Polydor, Yolene
<input checked="" type="checkbox"/>	G2-GS	32	R	\$109.44	89.00 CCF	0.00	Polydor, Yolene
<input checked="" type="checkbox"/>	G2-GS	30	R	\$87.87	199.00 CCF	0.00	Polydor, Yolene
<input checked="" type="checkbox"/>	G2-GS	29	R	\$87.87	238.00 CCF	0.00	Polydor, Yolene
<input checked="" type="checkbox"/>	G2-GS	34	R	\$87.87	205.00 CCF	0.00	Polydor, Yolene

Total Bill Segments... Financial Details...

PGW Billing History

Search Criteria

Premise: 9996094017 Address: 4244 N Hicks St/Philadelphia, Pa 19140-1916

Start Read Date: 08/15/2012

Restrict Display To USA's of Type: Show Customer's Name

Read Date	SA Type	Days	Read Code	\$ Amount	Usage	Demand	Customer
<input checked="" type="checkbox"/>	G2-GS	32	R	\$87.87	160.00 CCF	0.00	Polydor, Yolene
<input checked="" type="checkbox"/>	G2-GS	29	R	\$87.87	49.00 CCF	0.00	Polydor, Yolene
<input checked="" type="checkbox"/>	G2-GS	31	R	\$87.87	30.00 CCF	0.00	Polydor, Yolene
<input type="checkbox"/>	G2-GS	31	R	\$87.87	27.00 CCF	0.00	Polydor, Yolene
<input type="checkbox"/>	G2-GS	30	R	\$87.87	32.00 CCF	0.00	Polydor, Yolene
<input type="checkbox"/>	G2-GS	30	R	\$87.87	40.00 CCF	0.00	Polydor, Yolene
<input type="checkbox"/>	G2-GS	32	R	\$87.87	130.00 CCF	0.00	Polydor, Yolene

Total Bill Segments... Financial Details...

PGW



PGW

Philadelphia Gas Works - Historical Usage Calculator

Total volume of gas consumed during good 12 months of historical usage (CCF):	1,246
Average volume of gas used per month based on good 12 months of historical usage (CCF):	103.833
Start Date of Theft:	7/30/2014
End Date of Theft:	6/27/2017
Total days of Theft Time Period:	1063
Total days of Theft Time Period converted into total Months:	35.433
Total volume of gas used and to be billed as "ESTGAS" in CCF:	3,679.161
Total volume of gas used and to be billed as "ESTGAS" in CCF rounded up:	3,679



Bill Segment Total	
Total Number Of Days:	366
Total \$ Amount:	1,162.29
Average Amt Per Day:	3.18
Total Usage:	1246.00
Average Usage Per Day:	3.40

1246 CCF'S FOR 1 YEAR





PGW Bill Calculation revised 9/5/2018

Beginning Read	Ending Read	Start Date (From Date)	End Date (To Date)	Number Of Days	Actual Deg Days	USA Daily Base Load	If there is no amount for the Base Load, USE the Defaulted Base Loads below for the correct Customer Class:
0	3679	7/30/2014	8/27/2017	4	12,221	0.91	
Consumption	Number Of Days	Average Consumption (ccfs per day)	20 Yr Avg Deg Day	Heating?			
3679	1063	3,460,688	13,893	Yes <input checked="" type="checkbox"/>			
Rate Class	Senior Discount	Supplier Yes/No	Territory Yes/No				
GSR	0	No	No				
Customer Charge	Commodity	Commodity Charge Credit	GCR	Gas Cost Adjustment	Distribution Charge	WNA Charges	DSIC
\$419.99	\$1,755.97	\$0.00	\$0.00	-\$13.55	\$2,837.03	\$128.98	\$187.81
Sub Total	Amount of Discount	Sub Total	State Tax	1% City Tax	Grand Total For GSR		
\$5,314.23	\$0.00	\$5,314.23	\$0.00	\$0.00	\$5,314.23		

- Cust Class 0 = 16.90
 - Cust Class 2 = 0.48
 - Cust Class 3, 4 and 5 = 0.00
 - Cust Class 6 = 2.83
 - Cust Class 8 = 6.41
 - Cust Class P = 0.60
 - Cust Class V = 0.58 above defaults for 2018-2019
- BYPASS \$5,314.23**

BASED ON HISTORICAL USAGE 3,679 CCFS

Historic Degree Days switched from 30 year average to 20 year average on 12/1/2017

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Tomisha Palmer's Interrogatories and
Requests for Production of Documents
Set 1

Palmer to PGW I-20

Please describe PGW's policy for routine maintenance and/or inspection of meters and AMR devices. Please provide all current PGW manuals, training materials and documents pertaining to the maintenance and/or inspection of meters and AMR devices.

Response:

PGW has no policy that is responsive to this request.

Response Provided by: Timothy Sullivan – PGW Superintendent, Revenue Protection and Meters

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Tomisha Palmer's Interrogatories and
Requests for Production of Documents
Set 1

Palmer to PGW I-22

Please state whether any system that PGW has in place to detect unauthorized usage, meter tampering, gas theft, or zero usage was used to detect unauthorized use, meter tampering, or gas theft at the Property. Please provide all documents that pertain to PGW's use of such a system at the Property.

Response:

No system that PGW has in place to detect unauthorized usage, meter tampering, gas theft, or zero usage was used to detect unauthorized use, meter tampering, or gas theft at the Property.

Response Provided by: Timothy Sullivan – PGW Superintendent, Revenue Protection and Meters

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Tomisha Palmer's Interrogatories and
Requests for Production of Documents
Set 1

Palmer to PGW I-23

Please describe PGW's policy and procedure for removing a meter from a property where PGW has discovered unauthorized usage, meter tampering, or theft of gas. Please provide all current PGW manuals, training materials and documents pertaining to, but not limited to, the following:

- a. How the meter is removed;
- b. Where the meter is stored upon removal from the property;
- c. How the meter is transported to PGW;
- d. Where the meter is stored upon return to PGW; and
- e. Whether recovered meters are refurbished and/or reused.

Response:

Please see Appendix G.

Response Provided by: Timothy Sullivan – PGW Superintendent, Revenue Protection and Meters

Appendix

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

	OPERATIONS POLICY AND PROCEDURE Theft Investigation Evidence Procedure	Effective: September 2012 Revised: January 2016 Page 1 of 3
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OBJECTIVE:

The purpose of this procedure is to define actions to be taken by PGW Field Operations to secure evidence to support the findings of theft of service.

SCOPE:

Field Operations Department

DEFINITION:

Unauthorized User (UU) – When PGW has physically terminated service at a property and the occupant of the property has restored service through the meter without PGW's authorization.

Tampered Meter Bypass – Any method used to interfere with the proper metering of gas at a property.

Unknown Bypass – Condition that is discovered at the premise after PGW has officially terminated gas service such as readings in the fuel line, damaged locking devices, foreign pipe dope or other evidence of gas being used at a property where the meter may or may not have been previously removed.

Company Installed Bypass – To minimize disruption of service to commercial/industrial accounts, PGW may install a bypass line with a valve that delivers gas around the meter. Tampering occurs when the company line is opened to provide service without PGW's authorization or knowledge.

METHOD OF PROCEDURE

Procedure

Unauthorized User (UU)

- When encountering a UU, the Field Service technician must clearly document the findings in the AIMS system –
 - including the meter number and index
 - When applicable, the technician must also document the occupants name, social security number and lease date (if obtained)
 - No other evidence is applicable

Tampered Meter Bypass



OPERATIONS
POLICY AND PROCEDURE
Theft Investigation
Evidence Procedure

Effective: September 2012

Revised: January 2016

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- Upon physical inspection of a meter during the course of any type of PGW related field work and discovering any kind of tampered meter including -
 - Red Caps missing or damaged
 - Screws missing or damaged
 - ERT head missing, damaged or incapacitated in any way to disrupt the proper registration of gas consumed
 - Any device such as a magnet used to disrupt the proper registration of gas consumed
 - Unknown bypass with LEL readings in the fuel line, or evidence of other unauthorized, non-PGW issued materials to divert registration of meter
 - Meter removal, unauthorized by PGW to allow for installation of an Iron pipe, flex hose or any connection device used to divert gas consumption around the meter
 - Open Company installed bypass, rod lock missing and or valve found on (Supervision must be contacted immediately)

- The following actions are taken to secure and remove the meter and or bypass from the property.
 - Immediately upon investigation the field technician must take a photo of the meter/and or bypass inside of the property or at the location where applicable and make a note in the system that a photo was taken.
 - If the occupant of the property refuses to allow photos to be taken or becomes uncooperative in any way the field tech must make a note of such in the system and document their findings in the system in as much detail as possible.
 - The field technician must forward the photo(s) to rpu.photos@pgworks.com before finalizing the order.
 - Each day Revenue Protection Unit (RPU) clerks will review the rpu.photos@pgworks.com inbox and save the photos received to the company RPU shared drive.
 - The RPU clerks will also print a hard copy of the photo(s) and place it in the corresponding bypass folder where the bypass was found.
 - After removing the meter due to an illegal hook up, the field tech must attach evidence tags (form M-6038) to everything including the meter and all piping, hoses, magnets etc. confiscated as evidence of the findings of theft. Magnets or broken Erts should be attached to the meter by some means (Electrical tape, wire etc.) so that the evidence can be stored together.

-
-
-
-
-



OPERATIONS
POLICY AND PROCEDURE
Theft Investigation
Evidence Procedure

Effective: September 2012

Revised: January 2016

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- The field tech must also complete the corresponding evidence form (form M-6039).
 - The evidence is then delivered to the Evidence Security Storage Area by the contact person.
 - When delivering evidence, Contact person or Service Technician must obtain the signature of the Materials Management Department's Custodian of the Evidence Security Storage Area or his/her designee on all copies of the "Property Receipt/Evidence Chain of Custody" Report
- If the meter is found on the floor, completely detached from the meter bar as installed by PGW
 - The meter of record must be processed through the normal Meter Removal procedures.
 - The bypass method (i.e. iron pipe, flex connector, magnet etc.) must be taken into evidence and tagged.
- Upon consideration of all of the theft indicators on a case by case basis the Revenue Protection Unit will have the meter that has been removed for theft tested through the meter shop.
 - If the meter is *suspected* of tampering, the meter should be green tagged and then sent to the meter shop for comprehensive testing and the results are documented in the system. See attached Evidence Bulletin
- The hard copy file of the bypass folders will be maintained by the Revenue Protection Unit, all relevant photos and any documentation provided by the customer for a period of four years.
- The meter and all related evidence is then stored for a period of one year
- Prior to the disposal of evidence the Materials Management Department will provide the Revenue Protection Unit with a statement of items of evidence on hand as of 1 year prior to the disposal date for recording purposes.

Attachments

Timothy Sullivan

Timothy Sullivan
Superintendent of Revenue Protection Unit
(Policy Owner)

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Set 1

Palmer to PGW I-26

Please provide complete records on the history of the meter that was removed from the property. Please include:

- a. The age of the meter;
- b. The date on which it was first placed into service (whether at the property or elsewhere);
- c. The date on which the meter was first installed at the Property (if different from the response to II-11(b));
- d. Whether PGW had, since first being placed into service through and including the date the meter was removed from the property, ever determined that the meter had been tampered with and on what date(s) PGW made this determination; and
- e. Records of any and all service performed on the meter since it was first placed into service, including but not limited to, records of any refurbishing, meter testing, ERT replacement or repair, or otherwise.

Response:

Meter No. 2034935 was approximately 14 years old when it was removed from the Property. It was purchased in 2003 and added to PGW's meter stock on August 15th of that year. It was first put into service on December 26, 2003 when it was installed in the Property. It has not been installed anywhere other than at the Property. There are no records of any service performed on this meter.

Response Provided by: Timothy Sullivan – PGW Superintendent, Revenue Protection and Meters

Find_Meter_Number

<i>Mtr_Nbr</i>	<i>DATE</i>	<i>Mtr_Index</i>	<i>Proof_Check</i>	<i>Proof_Open</i>	<i>Reason</i>
2034935	07/11/2017	3127	98.743	99.109	
2034935	07/14/2017	3127	98.966	99.31	

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Tomisha Palmer's Interrogatories and
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Set 1

Palmer to PGW I-28

Please provide any photographs of the meter that was removed from the Property on or about June 27, 2017. On each photograph, please identify the date on which the photograph was taken and identify the person who took the photograph.

Response:

There are no records that are responsive to this request.

Response Provided by: Timothy Sullivan – PGW Superintendent, Revenue Protection and Meters

**Tomisha Palmer v. Philadelphia Gas Works
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**Tomisha Palmer's Interrogatories and
Requests for Production of Documents
Set II**

Palmer to PGW II-2

Please provide a copy of all lease agreements that were submitted to PGW by a tenant or occupant at 4244 N. Hicks Street between September 26, 2012 and June 27, 2017.

Response:

There are no Records that are responsive to this request.

Response Provided by: Wendy Vacca – PGW Manager, Customer Disputes and
Complaints

Tomisha Palmer v. Philadelphia Gas Works
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*Tomisha Palmer's Interrogatories and
Requests for Production of Documents*
Set II

Palmer to PGW II-3

Please provide the results of any cold weather survey conducted by PGW at 4244 N. Hicks Street between September 26, 2012 and June 27, 2017.

Response:

Please see Appendix A.

Response Provided by: Wendy Vacca -- PGW Manager, Customer Disputes and Complaints