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May 2, 2023

Via Email Only

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

RE: *SBG Management Services, Inc./Simon Garden Realty Co., L.P. et al., v. Philadelphia Gas Works* Docket Nos. C-2012-2304183; C-2012-2304324; C-2015-2486618; C-2015-2486677; C-2015-2486674; C-2015-2486670; C-2015-2486664; C-2015-2486655; C-2015-2486648; C-2015-2486674

Dear Judge Vero:

On behalf of Philadelphia Gas Works ("PGW"), enclosed please find PGW's Post-Hearing Exhibit 1 which addresses the questions directed at PGW raised by Your Honor during the April 25, 2023 evidentiary hearing. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Daniel Clearfield". The signature is written in a cursive, slightly slanted style.

Daniel Clearfield, Esq.

DC/lww
Enclosure

cc: pmcneal@pa.gov
Cert. of Service w/enc.
Rosemary Chiavetta, (COS only)

CERTIFICATE OF SERVICE

I hereby certify that this date I served a copy of Philadelphia Gas Works' Post-Hearing Exhibit 1 upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

VIA EMAIL ONLY

Shawn M. Rodgers, Esquire
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Goldstein Law Partners, LLC
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Dated: May 2, 2023



Daniel Clearfield, Esq.

Counsel for Philadelphia Gas Works

1. ALJ Vero's April 25, 2023 on-the-record inquiry regarding PUC Order entered December 8, 2016, Ordering Paragraphs 4 and 5:

No records have been identified that show that PGW remitted the \$348.40 or \$218.96 determined by the Commission to be owing to SBG. However, as discussed in PGW's Remand Direct testimony at pages 7-9 in this proceeding, under the assumption that refunds were going to be made at the conclusion of this proceeding, PGW comprehensively applied the Commission ordered credits to the partial payment recalculations for Colonial Garden and Simon Garden. The Commission's ordered credits of \$348.40 and \$218.96 are therefore included in the total Partial Payment recalculation together with interest (TOTAL: \$59,648.92) as discussed in Statement No. 1-R at page 9 and Exhibits BLC 7-9.

2. ALJ Vero's April 25, 2023 on-the-record inquiry regarding PUC Order entered September 20, 2018, Ordering Paragraphs 4 to 18:

No records have been identified that show that PGW remitted the \$126.36, \$160.96, \$144.52, \$123.20, \$128.00, \$174.48, \$85.84, \$152.32, \$274.16, \$145.12, \$103.76, \$99.28, \$154.08, \$633.20, or \$77.21 determined by the Commission to be owing to SBG. However, as discussed in PGW's Remand Direct testimony at pages 7-9 in this proceeding, under the assumption that all refunds were going to be made at the conclusion of this proceeding, PGW comprehensively applied the Commission ordered credits to the partial payment recalculations for Elrea Garden, Fairmount, and Marshall Square. The Commission's ordered credits of \$126.36, \$160.96, \$144.52, \$123.20, \$128.00, \$174.48, \$85.84, \$152.32, \$274.16, \$145.12, \$103.76, \$99.28, \$154.08, \$633.20, and \$77.21 are therefore included in the total Partial Payment recalculation together with interest (TOTAL: \$59,648.92) as discussed in Statement No. 1-R at page 9 and Exhibits BLC 7-9.

3. ALJ Vero's April 25, 2023 on-the-record inquiry regarding PUC Order entered October 4, 2018, Ordering Paragraphs 5 to 6:

No records have been identified that show that PGW previously recalculated and submitted calculations to the Commission's Bureau of Technical Utility Services for review. However, as discussed in PGW's Remand Direct testimony at pages 7-9 in this proceeding, under the assumption that this recalculation and subsequent refund would be made in this proceeding, PGW has recalculated the partial payments owed to SBG starting at the statute of limitations period for the complaint as the Commission did not previously order any refund or credit to the accounts of Marchwood, Oak Lane, and Fern Rock. The entire amount of partial payment credits owed to SBG through the statute of limitations period for these accounts is therefore included in the total Partial Payment recalculation together with interest (TOTAL: \$59,648.92) as discussed in Statement No. 1-R at page 9 and Exhibits BLC 7-9.

Responses Provided By: Bernard L. Cummings

VERIFICATION

I, Bernard L. Cummings, hereby state that I am the Vice President, Customer Service and Collection of Philadelphia Gas Works. I hereby verify that the facts set forth in PGW Post-Hearing Exhibit 1 are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

May 2, 2023
Dated


