

EXHIBIT "A"

COMPLAINANTS' SECOND SET OF INTERROGATORIES
(without attachments; attachments provided in original Motion to Compel)

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EXHIBIT "A"

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Attorney for Complainants

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SBG MANAGEMENT SERVICES, INC./
COLONIAL GARDEN REALTY, LP : DOCKET NO. C-2012-2304183
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

SBG MANAGEMENT SERVICES, INC./
FAIRMOUNT REALTY : DOCKET NO. C-2012-2304215
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

SBG MANAGEMENT SERVICES, INC./
SIMON GARDENS REALTY, LP : DOCKET NO. C-2012-2304324
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

SBG MANAGEMENT SERVICES, INC./
ELRAE GARDEN REALTY, LP : DOCKET NO. C-2012-2304167
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

SBG MANAGEMENT SERVICES, INC./
MARSHALL SQUARE REALTY, LP : DOCKET NO. C-2012-2304303
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

SBG MANAGEMENT SERVICES, INC./
MARCHWOOD REALTY : DOCKET NO. C-2012-2308454
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

SBG MANAGEMENT SERVICES, INC./
OAK LANE REALTY CO., LP : DOCKET NO. C-2012-2308462
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

SBG MANAGEMENT SERVICES, INC./
FERN ROCK REALTY : DOCKET NO. C-2012-2308465
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

SBG MANAGEMENT SERVICES, INC./
COLONIAL GARDEN REALTY, LP : DOCKET NO. C-2012-2334253
Complainant

V. :

PHILADELPHIA GAS WORKS :
Respondent

TO: RESPONDENTS
PHILADELPHIA GAS WORKS (PGW)
% MR. LAURETO FARINAS, ESQ.
SENIOR ATTORNEY, PGW
800 W. Montgomery Avenue, 4th Floor
Philadelphia, PA 19122

**COMPLAINANTS', SBG MANAGEMENT SERVICES, INC., COLONIAL GARDEN REALTY CO. (I),
COLONIAL GARDEN REALTY CO. (II), FAIRMOUNT REALTY CO., SIMON GARDENS, ELRAE
GARDEN REALTY, MARCHWOOD REALTY, FERNROCK REALTY, OAK LANE REALTY CO., L.P.,
AND MARSHALL SQUARE REALTY,
REQUESTS FOR PRODUCTION OF DOCUMENTS AND
INTERROGATORIES ADDRESSED TO RESPONDENT PHILADELPHIA GAS WORKS, SET II**

Pursuant to 52 Pa. Code Sections 5.341, 5.342 and 5.349 and the applicable Pennsylvania Rules of Civil Procedure, Colonial Garden Realty Co. (I) ("Colonial I), Colonial Garden Realty Co. (II) ("Colonial II") (the two

Colonial cases, hereafter collectively referred to as, "Colonial"), SBG Management Services, Inc. ("SBG"), Fairmount Realty Co. ("Fairmount"), Simon Gardens ("Simon"), Elrae Garden Realty ("Elrae"), Marchwood Realty ("Marchwood"), Fernrock Realty ("Fernrock"), Oak Lane Realty Co., L.P. ("Oak Lane"), and Marshall Square Realty ("Marshall") (hereafter, individually "Complainant" and collectively, "Complainants") hereby propound the following interrogatories and requests for documents upon Philadelphia Gas Works ("Respondent" or "PGW") to be answered by those officers, employees or agents of PGW as may be cognizant of the requested information and who are authorized to answer on behalf of PGW. These interrogatories and requests for documents are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete and to supply the same within the time periods required by the Pennsylvania Rules of Civil Procedure and Section 5 of Chapter 52 of the Pennsylvania Code. Complainants reserve the right to propound additional interrogatories and to request additional documents as and if additional information is required. In accordance with 52 Pa. Code Sections 5.342(d) and 5.349(d), the interrogatories are to be answered in writing under oath and documents are to be furnished and served in hand upon the undersigned within twenty (20) days after service of these Interrogatories and Requests for Production, which is the time period prescribed by the applicable statutes, for the above-referenced dockets.

These Interrogatories are addressed to you as a party to this action; your answers shall be based upon information known to you or in the possession, custody or control of you, your attorney or other representative acting on your behalf whether in preparation for litigation or otherwise. These Interrogatories must be answered completely and specifically by you in writing and must be verified. The fact that investigation is continuing or that discovery is not complete shall not be used as an excuse for failure to answer each interrogatory as completely as possible. The omission of any name, fact, or other item of information from the Answers shall be deemed a representation that such name, fact, or other item was not known to Respondent, their counsel, or other representatives at the time of service of the Answers.

Additional Instructions

1. Any references to "Respondent", "Respondents", "Respondent's" or "Respondent(s)" shall be treated as referring to Philadelphia Gas Works ("PGW") as named within this lawsuit, individually and collectively, as may be appropriate.

2. This request applies to all documents in Respondent's possession, custody or control or in the possession, custody or control of persons acting or purporting to act on your behalf, including, but not limited to, your present and former managers, officers, directors, agents, servants, contractors, employees, accountants, attorneys, investigators, indemnitors, insurers, consultants and sureties.

3. If any objection is made to any of the following interrogatories or discovery requests, the Respondent shall make any such objection and state the relevant legal basis for such objection. If any objection is made based upon a claim of privilege as to any response, Respondent shall state the legal basis for the privilege Respondent is invoking and provide a detailed privilege log to support the invocation of such privilege.

4. Each and every interrogatory and discovery request herein is deemed continuing in nature pursuant to the Pennsylvania Rules of Civil Procedure and Pennsylvania Public Utility Commission ("Commission"), and Respondents are obligated to reasonably amend and provide any updated information that renders the responses to one or more of these interrogatories and discovery requests, incomplete or inaccurate, and serve those amended responses upon the undersigned Complainants' counsel.

5. Complainants at its/their expense requests that the documents be produced and made available for this inspection at Complainants' office of counsel located at 1095 Rydal Rd., Jenkintown, PA 19046, or at such office of the Respondent as may be the location of any of the documents requested, during normal business hours, and with the least possible disruption to the ordinary course of Respondent's duties and responsibilities.

6. Complainants further requests that this inspection be permitted by Respondents immediately after Respondents' response to this request has been filed, and that Complainants' attorney be permitted to remove from Respondent's custody such documents as they may desire to copy, on the understanding that Complainants' attorneys will be responsible for such documents so long as they are in their possession, that copying will be done at Complainants' expense, and that the documents will be promptly returned after copying has been completed.

7. These interrogatories and discovery requests are intended to cover all documents in Respondent's possession, or subject to their custody and control, regardless of location. If there are no such documents, please so state. If there are such documents, please list and mark appended documents responsive to each request.

8. Each interrogatory propounded herein should be answered upon Respondent's entire knowledge from all sources and all information in Respondent's possession or otherwise available to Respondent, including information

from Respondent's officers, employees, agents, representatives or consultants and information which is known by each of them. An incomplete or evasive answer is deemed a failure to answer.

9. If any answer is qualified, Respondent shall state specifically the terms of each qualification and the reasons for it. If an interrogatory cannot be answered in full, state the part which can be answered and answer the same in full to the extent possible; state further and specifically the reason(s) why the remainder cannot be answered.

10. If any interrogatory may be answered fully by a document, the document may be attached in lieu of an answer if the document is marked to refer to the Interrogatory to which it responds.

11. For purpose of these requests, a statement is: (a) a written statement signed or otherwise adopted or approved by the person making it, or (b) stenographic, mechanical, electrical, or other recording, or a transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

12. Fully describe any documents, which are being withheld from production and the reasons why any such documents have been withheld.

13. Submit an affidavit from the responding party stating that there has been full compliance with this request.

14. Unless otherwise indicated, the time period for all requests is from the initiation of gas service for each Complainant at each Subject Property (as defined below), to the present.

15. If you object to any part of an interrogatory or request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.

16. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to an interrogatory or request for production or any part thereof, contained in a non-written communication, state the following with respect to the non-written communication:

- (i) the date thereof;
- (ii) the identity of each of the participants in the non-written communication;
- (iii) the identity of each person present during all or any part of the non-written communication;
- (iv) a description of the non-written communication which is sufficient to identify the particular communication without revealing the information for which a privilege or protection from non-disclosure is claimed;

- (v) the nature of your claim of non-discoverability (e.g. attorney-client privilege); and
- (vi) each and every fact on which you rest your claim of privilege or other protection from

disclosure, stated with sufficient specificity to permit Complainants to make a full determination as to whether your claim is valid.

17. If you claim any kind of privilege or other protection from disclosure as a ground for withholding information responsive to an interrogatory or request or any part thereof, contained in a document, set forth with respect to the document:

- (i) the date and number of pages;
- (ii) the identity of the author(s) or preparer(s);
- (iii) the identity of the addressee, if any;
- (iv) the title;
- (v) the type of tangible thing (e.g. letter, memorandum, telegram, chart, report, recording disc);
- (vi) the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);
- (vii) the identity of each person who has received the document or to whom knowledge of the

contents of the document was communicated;

- (viii) the identity of the present custodian(s);
- (ix) the nature of your claim of non-discoverability (e.g. attorney-client privilege); and
- (x) each and every fact on which you rest your claim of privilege or other protection from

disclosure, stated with sufficient specificity to permit Complainants to make a full determination as to whether your claim is valid.

18. If you claim any form of privilege or other protection from disclosure, as a ground for not answering any interrogatory or request or any part thereof, set forth:

- (i) the nature of your claim as to non-discoverability; and
- (ii) each and every fact on which you rest your claim or privilege or other protection from

disclosure, stating such facts with sufficient specificity to permit Complainants to make a full determination as to whether your claim is valid.

19. If you know of any document, communication or information but cannot give the specific information or the full information called for by a particular interrogatory or request, so state and give the best information you have on the subject and identify every person you believe to have the required information.

20. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun, and vice-versa; the masculine form of a pronoun shall be considered to include also within its meaning the feminine and neuter forms of the pronoun, and vice versa; and the use of any tense of any verb shall be considered to include also within its meaning all other tenses of the verb. In each instance, the interrogatory or request shall be construed so as to require the most inclusive answer or production.

21. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Label the written material with the number of the interrogatory to which it pertains.

22. On each Interrogatory response list the name and title of the person or persons who prepared the response or who is responsible for the information contained therein.

23. PURSUANT TO THE E-DISCOVERY REQUIREMENTS OF THE PENNSYLVANIA RULES OF CIVIL PROCEDURE 4009.1, COMPLAINANT SPECIFICALLY DEMANDS HEREIN THAT ALL DISCOVERY DOCUMENTS THAT CAN BE PRODUCED IN READABLE AND FULLY SEARCHABLE ELECTRONIC FORMAT BE PRODUCED IN THAT FORMAT. "PRINT SCREENS," PRINTOUTS, OR OTHER MANUALLY PRODUCED COPIES OF ELECTRONIC DATA ARE UNACCEPTABLE.

Definitions

As used in these Interrogatories and Requests for Production of Documents, the following terms have the meaning as set forth below:

1. The terms "**Complainant**" or "**Complainants**" means Colonial Garden Realty Co. (I) ("Colonial I), Colonial Garden Realty Co. (II) ("Colonial II") (the two Colonial cases, hereafter collectively referred to as, "Colonial"), SBG Management Services, Inc. ("SBG"), Fairmount Realty Co. ("Fairmount"), Simon Gardens ("Simon"), Elrae Garden Realty ("Elrae"), Marchwood Realty ("Marchwood"), Fernrock Realty ("Fernrock"), Oak Lane Realty Co., L.P. ("Oak Lane"), and Marshall Square Realty ("Marshall"), and any affiliate or related entity, unless the context indicates otherwise (hereafter, individually "Complainant" and all collectively, "Complainants")

2. The term **“Respondent”** or **“You”** means the Respondent, Philadelphia Gas Works, PGW, and its agents, representatives, employees, contractors, officers, directors, related parties, and/or counsel of PGW, in interest.

3. **“Address”** means the present or last known street name and number, city or town, state and zip code.

4. **“Customer Account(s)”** as used herein shall mean and include all SBG and Non-tenant accounts, customer accounts, “SA” accounts or “SA” metered accounts and numbers, former and current meters and meter numbers for which Complainants have been held legally responsible for payment of bills rendered for natural gas service by the Respondents, at the Subject Property and/or Subject Properties as defined herein, including but not limited to the “Disputed Transactions, as defined herein, and as set forth as highlighted transactions on corresponding Exhibits “A-1” (for Colonial), “A-2” (for Elrae), “A-3” (for Fairmount), “A-4” (for Fernrock), “A-5” (for Marchwood), “A-6” (for Marshall), “A-7” (for Oak Lane), and “A-8” (for Simon), (collectively, “Exhibits ‘A-1’ through ‘A-8’”), and involving such subjects such as credit determinations, deposit requirements, the accuracy of meter readings or bill amounts, interest charges imposed or whether the proper party has been properly charged for service.

5. **“Disputed Transactions”** refers to any and all disputes (including those as defined in accordance with 52 Pa. Code §56.2), questions, complaints, and/or inquiries regarding Customer Accounts and includes, but is not limited to those transactions identified on PGW’s Statement of Account and which are now identified by number as Disputed Transactions for each Subject Property in Exhibits “A-1” through “A-8” for Complainants, SBG, Colonial, Fairmount, Simon, Elrae, Marchwood, Fernrock, Oak Lane, and Marshall.

6. **“Documents”**: As used in these interrogatories and discovery requests, the term **“document”** or **“documents”**, has the same meaning and scope as in Rule 4009 of the Pennsylvania Rules of Civil Procedure and includes without limitation, and means every writing or recorded material of every type and description, of any kind, that is in the possession, control or custody of Respondent, which Respondent has knowledge, whether originals, copies or facsimiles. Such writings or recordings include, but are not limited to, collection notes, “MELITA” notes, “MELITA” records, electronic computer collection records, printouts of collection records, sample collection letters, Metro-data tapes, diskettes, computer hard drives, tape backups, Zip-type disks, magnetic media of any kind, CD-ROM, DVD, correspondence, memoranda, stenographic notes, handwritten notes, contracts, documents, rough drafts, inter-office

memoranda, memoranda for the files, letters, research materials, logs, diaries, forms, bank statements, tax returns, card files, books of account, journals, ledgers, customer statement of account records, policies and procedures manuals, accounting system meta data, invoices, diagrams, minutes, manuals, studies, publications, pamphlets, pictures, films, voice recordings, reports, public utility reports, test results, technical reports, test records data, meter records, capping meters, meter prover tests, installation test reports, surveys, minutes, statistical compilations, data processing cards, computer records, tapes, print-outs, agreements, communications, state and federal governmental hearings, reports, correspondence, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, graphs, notebooks, note charts, charts, plans, drawings, sketches, maps, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, video tape, motion picture film, digital photographs, brochures, advertisements, circular, press releases, drafts, any marginal comments appearing on any document, all other writings, books of all nature and kind whether handwritten, typed, printed, mimeographed, photocopied or otherwise reproduced, all tape recordings (whether for computer, audio, or visual replay) and all other written, printed, and recorded matter or tangible things upon which words, phrases, symbols or information of any kind are recorded, encrypted or otherwise stored.

7. A request to “**identify**” a document is a request to state the following, as applicable:
 - a. The date of the document;
 - b. The type of document;
 - c. The names and present addresses of the person or persons who prepared the document and of the signers and addressors of the document;
 - d. The name of the employer or principal whom the signers, addressors and preparers were representing;
 - e. The present location of the document;
 - f. The name and current business and home addresses of the present custodian of the original document, and any copies of it;
 - g. A summary of the contents of the document; and
 - h. If the original document is no longer in Respondent’s possession or was destroyed, state the actual or approximate date of such disposition and reason for or circumstances surrounding as well as the authorization for such disposition;

- i. With respect to any non-written communication or “oral communication”, the term “identify” or “identity” shall mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, and the topic or subject matter of the communication.

8. The term “**including**” means “including, but not limited to.”

9. “**List**”, “**describe**”, “**explain**”, “**specify**”, or “**state**” means to set forth fully, in detail, and unambiguously each and every fact of which Respondent has knowledge, which is relevant to the answer called for by the interrogatory.

10. The term “**oral communication**” means any utterance heard, whether in person, by telephone or otherwise.

11. “**Person**” or “**persons**” means a natural person, firm, proprietorship, association, corporation or any other type of organization or entity.

12. As used herein, “**relative to**,” “**relating to**,” “**relates to**” or “**relevant to**” shall mean directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon a stated subject matter.

13. The term to “**state the basis**” for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information, and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

14. “**Subject Property**” or “**Subject Properties**” as used herein shall mean and be defined as the properties owned and/or operated by the Complainants in these consolidated matters for which Respondents provide or have provided natural gas service, and as named herein, and as located at the addresses set forth herein: (1) Colonial Garden Realty Co., Complainant, in Docket No. C-2012-2304183 (“Colonial I), and in Docket No. C-2012-2334253 (“Colonial II”) is the owner of the property located at 5427 Wayne Avenue, Philadelphia, PA 19144 (the two Colonial cases, hereafter collectively referred to as, “Colonial”), (2) Fairmount Realty Co. (“Fairmount”), Complainant, Docket No. C-2012-2304215, is the owner of the property located at 650 Fairmount Avenue, Philadelphia, PA 19123 and 700 North Marshall Street, Philadelphia, PA 19123, (3) Simon Gardens (“Simon”), Complainant, Docket

No. C-2012-2304324, is the owner of property located at 6731 and 6732 Musgrave Street, Philadelphia, PA 19119, (4) Elrae Garden Realty (“Elrae”), Complainant, Docket No. C-2012-2304167, is the owner of the property located at 3608 - 3610 Spring Garden Street and 4012 - 4028 Baring Street, Philadelphia, PA 19104, (5) Marshall Square Realty (“Marshall”), Complainant, Docket No. C-2012-2304303, is the owner of property located at 844 - 845 North 6th Street, Philadelphia, PA 19123, (6) Marchwood Realty Co., L.P., Complainant, Docket No. C-2012-2308454, is the owner of the property located at 5515 Wissahickon Avenue, Philadelphia, PA 19144, (“Marchwood” or “Subject Property”); (7) Oak Lane Realty Co., L.P., Complainant, Docket No. C-2012- 2308462, is the owner of the property located at 1623 - 35 Chelton Avenue, Philadelphia, PA 19126, (“Oak Lane” or “Subject Property”); and (8) Fernrock Realty, Complainant, Docket No. C-2012-2308465 is the owner of the property located at 910 W. Godfrey Avenue, Philadelphia, PA 19141 (“Fernrock” or “Subject Property”) (hereafter, individually referred to as, “Subject Property” or collectively referred to as “Subject Properties”).

15. In construing these requests, the **plural** shall include the **singular**, the singular shall include the plural, and a **masculine, feminine or neuter pronoun** shall not exclude the other genders.

**REQUESTS FOR PRODUCTION OF DOCUMENTS AND
INTERROGATORIES, SET II**

1. For each individual person, officer, employee, agent, or other entity answering or providing any information used by Respondent to answer any Interrogatory, state the following:

- a. First, last, and middle legal name;
- b. All DBA, fake, or alias name(s) used by this person;
- c. Job title or capacity;
- d. Business address and telephone number;
- e. Home address and telephone number; and
- f. Age;

2. Identify each document referred to or consulted by Respondent in the preparation of the Answers to these Interrogatories and Discovery Requests made within this entire document.

3. For each document identified and in Respondent’s possession, or subject to their custody and control, regardless of location exists, Respondents shall produce or make available for inspection the document identified in response to the propounded interrogatory.

4. Identify all persons known to Respondent to have personal knowledge of any facts or issues involved in this lawsuit, state the following:

- a. First, last, and middle legal name;
- b. All DBAs, fake, or alias name(s) used by this person;
- c. Job title or capacity;
- d. Business address and telephone number;
- e. Home address and telephone number; and
- f. Age;

5. Identify and describe with particularity any and all documents, of any kind, that are in the possession, control or custody of Respondent, or of which Respondent has knowledge, whether originals, copies or facsimiles, regardless of their location, which are utilized to manage Complainants' Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

6. Identify and describe with particularity all training that Respondent provides or receives, in the area of debt collection activities, including but not limited to:

- a. The training content, timing, and duration;
- b. All documents and audio or visual materials used in such training; and
- c. Each person involved in providing such training.

7. Identify and describe with particularity all training that Respondent provides or receives, in the area of customer billing activities, including but not limited to:

- a. The training content, timing, and duration;
- b. All documents and audio or visual materials used in such training; and
- c. Each person involved in providing such training.

8. Identify and describe with particularity all training that Respondent provides or receives, in the area of customer dispute resolution activities, including but not limited to:

- a. The training content, timing, and duration;
- b. All documents and audio or visual materials used in such training; and
- c. Each person involved in providing such training.

9. Identify and describe all documents, manuals, instructions, checklists, memorandum, restrictions or other documentation or instructions that Respondent is given, read, reviewed, or otherwise used, regarding policies and procedures related to:

- a. The management of Customer Accounts.
- b. Customer dispute resolution techniques, methods and practices.
- c. The debt collection activities on Customer Accounts.
- d. Meter reading, meter testing practices, policies and procedures.
- e. Responding to inquiries from third parties on Customer Accounts.

10. Identify and describe with particularity all training that Respondent provides or receives, in the area of Customer Account management activities, including but not limited to:

- a. The training content, timing, and duration;
- b. All documents and audio or visual materials used in such training; and
- c. Each person involved in providing such training. Identify and describe any and all documents that describe, record, or establish Respondent's methods and techniques used to collect debts.
- d. Each person involved in providing such training. Identify and describe any and all documents that describe, record, or establish Respondent's methods and techniques used to manage or respond to customer billing disputes.

11. Identify and describe fully any and all computerized, mechanical, manual, or other system(s) that Respondent uses, maintains, or operates to record any and all mail, email, telephone, electronic data collection, electronic notation, in-person, or other forms of communications, or attempted communications, with persons or other third parties in connection with the collection of accounts, and Respondent's policies and procedures for operating such a system of records pertaining to Complainants' Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

12. Identify and describe fully any and all computerized, mechanical, manual, or other system(s) that Respondent uses, maintains, or operates to record any and all mail, email, electronic data collection, electronic notation, telephone, in-person, or other forms of communications, or attempted communications, with persons or other third parties in connection with rates charged or billed or the billing of Customer Accounts, and Respondent's policies and procedures for operating such a system of records, pertaining to Complainants' Customer Accounts, SA accounts. former and

current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

13. Identify and describe fully any and all computerized, mechanical, manual, or other system(s) that Respondent uses, maintains, or operates to record any and all mail, telephone, in-person, or other forms of communications, or attempted communications, with persons or other third parties in connection with the dispute resolution practices, and Respondent's policies and procedures for operating such a system of records.

14. Identify whether Respondent, including, any or all of the Respondent's employees, directors, officers, managers, contractors, and/or related parties, notate, manually or electronically record, or tape record, telephone calls by any means with any persons from whom they are collecting debts or alleged debts, and what steps are taken to preserve these recordings.

15. Identify whether Respondent, including, any or all of the Respondent's employees, directors, officers, managers, contractors, and/or related parties, notate, manually or electronically record, or tape record, telephone calls by any means with any persons from whom they are performing customer dispute resolution actions, and what steps are taken to preserve these recordings or notations.

16. Identify whether Respondent, including, any or all of the Respondent's employees, directors, officers, managers, contractors, and/or related parties, recorded any telephone call, manually or electronically notated, logged, discussions with Complainants and whether or not these recordings, logs or notations have been preserved, and the current location and/or disposition of these recordings or notations pertaining to Complainant's Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

17. In the form of a chronology, for each of Complainants Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8", identify and describe in detail and with particularity, the process, the origin, the events, and circumstances under which the Complainants incurred the arrearages, if any alleged due by Respondent, sufficient to warrant the imposition of municipal liens, identifying all documents relevant to, related to, or reflecting such filing or imposition of such municipal lien.

18. Identify and describe each document known to Respondent, which is related to or contains information about the debts that Respondent alleges are due and owing by Complainants and for which Respondent has sought or now

seeks to collect on, from Complainants for utility service provided by Respondent, pertaining to Complainant's Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

19. Identify, explain and describe each document known to Respondent, which is related to or contains information about billing inquiries, complaints, or disputes on or pertaining to Complainant's Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

20. Identify, describe and explain each instance of a mistake, error or event requiring a correction by Respondent for which Respondent was responsible—either for the error or the correction--pertaining to Complainants' Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8"; thereafter, identify and describe the conduct and action taken by Respondents to resolve, correct, repair or rectify the dispute, problem, or error.

21. Identify and describe in detail each mathematical method, algebraic mean, algorithm and method of calculation used by Respondent to calculate or to confirm the accuracy of Complainant's utility bills from initiation of the Customer Account in each Complainant's name to the present:

- a. Describing for each equation, the basis for and manner in which Respondents' imposed its rates and charges;
- b. The particular tariff granting authority for or referred to or used to calculate or impose such charges;
- c. How and when any charges or payments in accordance with the applicable tariffs were applied to Complainant's Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

22. Identify and describe each communication, or attempted communication, by any means, between the Respondents and the Complainants, or any other person, which was made in connection with the collection of Complainants' Customer Accounts, by stating the following:

- a. The name of the individual initiating communication;
- b. The name of the person and/or description of the person to whom the communication was directed;
- c. The date and time of the communication;
- d. The method of the communication (e.g. letter, phone call, in-person);
- e. A detailed description of the substance of the communication, (do not simply refer to collection notes);

- f. Identification of all witnesses to or participants in the communication; and,
- g. Any actions taken by any Respondent as a result of the communication.

23. Identify and describe each communication, or attempted communication, between the Respondents and the Complainants, or any other person related to this litigation, by any means, which was made in connection with the bills, billings, rates, billing disputes, billing practices/statements for Complainants' Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

- a. The name of the individual initiating communication;
- b. The name of the person and/or description of the person to whom the communication was directed;
- c. The date and time of the communication;
- d. The method of the communication (e.g. letter, phone call, in-person);
- e. A detailed description of the substance of the communication, (do not simply refer to collection notes);
- f. Identification of all witnesses to or participants in the communication; and,
- h. Any actions taken by any Respondent as a result of the communication.

24. Identify and describe each communication, or attempted communication, between the Respondent and the Complainants, or any other person, which was made in connection with the dispute resolution negotiations for Complainants' Customer Accounts, including, but limited to the Disputed Transactions, including those set forth at Exhibits "A-1" through "A-8", by stating the following:

- a. The name of the individual initiating communication;
- b. The name of the person and/or description of the person to whom the communication was directed;
- c. The date and time of the communication;
- d. The method of the communication (e.g. letter, phone call, in-person);
- e. A detailed description of the substance of the communication, (do not simply refer to collection notes);
- f. Identification of all witnesses to or participants in the communication;
- g. Any actions taken by any Respondent, or agent thereof, as a result of the communication; and
- h. Identify, describe and explain the resolution reached by the parties.

25. Identify and describe the manner and frequency in which Respondent maintains, repairs, inspects, tests, and insures accuracy of utility meters, pertaining to Complainant's Customer Accounts, SA accounts, former and current

meters located at the Subject Properties, including but not limited to, the Disputed Transactions attached hereto as Exhibits "A-1" through "A-8", and for each Customer Account and/or SA metered account number--identify and state the following:

a. The date of each meter and sub-meter test for each meter where at any or all of the Subject Properties, from time of application for service to the present.

b. Describe the nature of each test and results of each test performed.

c. The name of the person(s) conducting the test and documenting the results of each test.

d. Identify any written, electronic, notations or reports of tests performed or condition reports of meters tested (including the date of the test and report and the author of the report).

e. Identify any repaired or replaced meters.

f. Identify the date and manner of meters replaced or repaired at the Subject Property or Subject Properties, by named property address, account number, and SA accounts, if applicable, and explain the methodology used for determining the necessity for replacement and/or repair.

26. Identify and describe any writings, utility reports, correspondence, letters, memorandums, email communications, "MELITA" notes, or any other documentation Respondents sent, mailed, faxed to Complainants or the Commission related to the resolution of or pertaining to Complainant's Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8", and including but not limited to the same as located in the books and records of Respondents' Dispute Resolution Group, Customer Service Center and/or the Commercial Resource Center.

27. Identify and describe any writings, utility reports, correspondence, letters, memorandums, email communications, notes, electronic notations, or any other documentation Respondents sent, mailed, emailed, faxed to Complainants or the Commission related to the filing of an Informal Complaint with the Commission related to Complainants' customer disputes, disputed transactions, or pertaining to Complainant's Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8", and including but not limited to the same as located in the books and records of Respondents' Dispute Resolution Group, Customer Service Center and/or the Commercial Resource Center.

28. Identify, describe and explain Respondent's system of accounts, its policies and practices pertaining to maintaining and ensuring accuracy of customer financial accounts and collection accounts, identify and state the following:

a. Explain whether and how the Respondents' system of accounts is in conformity with the Uniform System of Accounts Prescribed for Natural Gas Companies by the Federal Energy Regulatory Commission.

b. The name of the accounting operating system maintained by Respondents.

c. The method for determining how payments are applied and reflected or stated on Customer Accounts.

d. State the manner in which all usage and billed charges applied to Customer Accounts as payments are received and credited.

e. Describe the manner in which Respondent determines that a Customer Account should be subject to a collection action of any kind, including a collection action to file and/or impose a municipal lien.

29. Identify, describe and explain Respondent's automated collection policies and practices.

30. Identify any policy and procedures, manuals, written memoranda, communications and other writings, internal policies, meta-data or documents that describe and explain Respondent's collection and billing practices.

31. Identify, describe and explain any manual methods of accounting, bookkeeping or other accounting practice Respondent utilized to adjust Customer Accounts.

32. Name each Respondent/PGW manager, supervisor, department head or chair, employee or related party responsible for applying Complainants' payments to the Customer Accounts and for verifying said application of Complainants' payments to the applicable Customer Accounts.

33. Identify, describe and explain the manner and methodology used in by Respondent, to calculate and apply charges for "makeup" bills for or relating to all or any Customer Accounts.

34. Identify, describe and explain the manner and methodology used by Respondent to calculate and apply charges for makeup bills for or relating to Complainant's Customer Accounts, SA accounts, former and current meters located at the Subject Properties, and including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

35. Identify, describe and explain the manner, calculations, and methodology Respondents used to calculate and apply interest charges to Complainants' Customer Accounts where liens were filed with the Philadelphia Court of Common Pleas and/or Philadelphia Municipal Court, for Complainants' Customer Accounts, SA accounts, former

and current meters located at the Subject Properties, and including but not limited to, Disputed Transactions attached hereto and set forth at Exhibits "A-1" through "A-8".

36. Identify, describe and explain the numeric interest rate used by Respondent to calculate and apply interest on late charges on Complainants' Customer Accounts, SA metered account numbers, former and current meters located at the Subject Properties, and including but not limited to, the Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

37. Identify, describe and explain the numeric interest rate used by Respondent to calculate and apply interest on outstanding municipal liens for the Customer Accounts from initiation of the Customer Account for or in each Complainant's name to the present, in particular, the accounts pertaining to Complainant's Customer Accounts, SA accounts, former and current meters located at the Subject Properties, and including but not limited to, Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

38. Identify, describe and explain the origin of, as well as the billing period and gas usage period covered by each lien filed or imposed on any and all of Complainants' Customer Accounts, SA accounts, former and current meters located at the Subject Properties, and including but not limited to, those related to the Disputed Transactions attached hereto as Exhibits "A-1" through "A-8" imposed since initiation of the Customer Account in each Complainants' name.

39. Identify, describe, and produce all documents, court orders, notices, letters, correspondence, and/or other writings Respondent sent to the Commission and to Complainants indicating that any municipal liens on file with the Court of Common Pleas and/or Municipal Court have been marked as satisfied, and for each production, provide the date and manner in which notice was given to Complainants of the same, for Complainants' Customer Accounts, SA accounts, former and current meters located at the Subject Properties, including but not limited to, the Disputed Transactions attached hereto as Exhibits "A-1" through "A-8".

40. Identify all persons and their immediate supervisor known to Respondent to have personal knowledge of any facts or issues involved in the establishment, maintenance, calculations, assumptions, algorithms, accounting practices with respect to Respondent/PGW's system of accounts as it pertains to this lawsuit, state the following:

- a. First, last, and middle legal name;
- b. All DBAs, fake, or alias name(s) used by this person;
- c. Job title or capacity;

- d. Business address and telephone number;
- e. Home address and telephone number; and
- f. Age.

41. As set forth in any responses or documents produced in response to these Interrogatories and Requests for Production of Documents and/or as used by Respondent for Respondent's specific data and record keeping, identify, explain, and describe all acronyms, abbreviations, and alphabetical and numeric codes displayed on utility bills, MELITA notes, internal correspondence, notations to Customer Accounts, Statement of Accounts, and other writings and documents of Respondent.

42. State the name, address, telephone number, title, place of employment and field of expertise of each person whom Respondent intends to call as an expert witness at a trial of this case, identifying:

- a. The subject matter on which the expert is expected to testify;
- b. The substance of the facts and opinions to which the expert is expected to testify;
- c. A summary of the grounds for each opinion the expert is expected to testify;
- d. All documents, treatises, books, studies, or other materials upon which the expert may rely for information or support of facts and opinions; and
- e. The expert's current curriculum vitae or résumé.

43. Identify by name, position, home address, home telephone number, business address, business telephone number, all witnesses that Respondent intends to call or may call to testify at trial, and provide a detailed summary of the expected testimony of each such person.

44. Identify, describe specifically and provide copies of all exhibits Respondent may introduce at the hearing or trial of this matter. In responding to this Interrogatory, also supply copies of each such exhibit and mark them as responsive to this Interrogatory.

VERIFICATION

I verify and affirm that the statements made in this foregoing document are true and correct. I understand that false statements made herein are subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.

Date: _____

Respondent/PGW