BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Steven Frempong,	:	
Complainant,	:	
v.	:	Docket No. C-2025-3052754
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

AFFIDAVIT OF KYLE BAMBERSKI

I, KYLE BAMBERSKI, swear and state the following under penalty of perjury:

1. I am currently employed by Philadelphia Gas Works ("PGW") as a Supervisor in the Field Services Department.

2. I have held that position since December 2017 and have been a Supervisor in the Meter Shop since 2020.

3. The Philadelphia Gas Works ("PGW") purchases Positive Displacement Diaphragm Meters, designated as either Class A or Class B for use in residential properties.

4. Such meters are shipped from the vendor ready to install and use. While the meters come with a warranty of merchantability, for each shipment of new meters, before accepting the meter shipment, PGW tests a minimum of 10% or 10 meters (whichever is greater) to ensure they meet industry standards; this includes accuracy and leak testing.

5. Exhibit A, Acceptance Testing Procedure for New Meters, outlines this process.

6. These meters do not require scheduled maintenance and are meant to remain in place in a residential property anywhere from 18 to 20 years without issue.

7. As such, PGW does not perform any routine maintenance on its Class A residential meters that are currently installed in a customer's property, including calibration, prior to the meter reaching 20 years of service.

8. However, for a variety of reasons, a meter may be removed from a property before the expiration of its lifespan and PGW may then seek to install it in another property.

9. When this is the case, the meter will undergo testing at PGW's meter testing facilities prior to reinstallation to ensure that it is still accurate and operating at industry standards, and that it meets the company criteria for refurbishment and reinstallation.

10. The age of the meter, the presence of corrosion, and visible damage are some of the things considered by meter shop technicians when deciding if a meter meets the criteria for refurbishment and reinstallation.

11. If the meter is a candidate for refurbishment, but its accuracy tests outside of industry standards, PGW meter shop technicians will make adjustments to the meter until it again conforms with industry standards.

12. Exhibit B, the document "Meter Testing Procedure on Sonic Nozzle Provers" outlines this procedure.

13. Once the meter passes all the necessary tests in the meter testing facility, the meter is refurbished and returned to stock to be installed in another property.

14. Exhibit B has not been updated to reflect the current age/year at which meters are no longer eligible for refurbishment.

15. Currently, no meters manufactured prior to 1994 qualify for refurbishment; all such meters are retired from service after they arrive at PGW's Meter Shop.

16. Rather than update and republish Exhibit B every year, refurbishment criteria are addressed verbally in training and sometimes reiterated with notices hanging in the Meter Shop, such as the attached example, "ADIS Meter Age Cut-off."

17. PGW Meter #2356468, a Class A meter, was removed from 920 East Price Street on January 17, 2025 and tested on January 21, 2025.

18. Meter #2356468 had not undergone any calibration or adjustments as it was new when it was installed in 920 East Price Street on March 6, 2024.

19. The three (3) attached documents – Exhibit A, Acceptance Testing Procedure for New Meters; Exhibit B, Meter Testing Procedure on Sonic Nozzle Provers; Exhibit C ADIS, Meter Age Cut-off – are all the published policies and procedures relating to accuracy testing and adjustment, i.e., calibration, of meters, currently used by PGW.

20. I hereby certify, pursuant to 18 Pa.C.S. § 4904, that the foregoing statements are true and correct based upon my personal knowledge, information and belief.

I, Kyle Bamberski, (Affiant) being duly sworn (affirmed) according to law, depose and say that I am an employee or agent of Philadelphia Gas Works and have been authorized to make this affidavit on its behalf and that the facts above set forth are true and correct to the best of my knowledge, information and belief and PGW expects to be able to prove the same at any hearing hereof.

(Signature of affiant)

Sworn and subscribed before me this 11th day of 6, 2025.

Danielle Leva
(Signature of official administering oath)
(My Commission Expires)

June 6, 2026

Commonwealth of Pennsylvania - Notary Seal
Danielle Leva, Notary Public
Philadelphia County
My commission expires June 6, 2026
Commission number 1422066
Member, Pennsylvania Association of Notaries

Exhibit A

FIELD SERVICES DEPSRTMENT
METER SHOP

ACCEPTANCE TESTING PROCEDURE FOR NEW METERS

The following procedures apply to all new meters purchased.

Positive Displacement Diaphragm Meters (Class A and Class B meters)

For each shipment of meters received, a minimum of 10% or ten (10) meters which ever is greater will be tested. The tests to be conducted are as follows:

Capacity test – a Capacity test of the meter at a ½" WC pressure drop across the meter will be conducted to ensure the meter meets its rated capacity.

Hydro -Pressure test – at 1.5 times the Maximum Allowable Operating Pressure (MAOP) of the meter should be performed for an amount of (5-10) % of the meters purchased.

Accuracy test – a test of the meter accuracy shall be conducted on the sonic nozzle provers.

Verify the programming of the ERT device – the ERT device shall be checked to ensure the meter has been programmed properly and that the drive rate for the meter test hand is set correctly.

Verify bar code – the bar code number shall be checked to ensure that it matches the meter number.

Verify the meter number and ERT number data file – the meter data file shall be checked to ensure that the meter number and the ERT number match prior to the file being up loaded to BCCS.

Positive Displacement Rotary Meters

For every new meter shipment received, a minimum of 10% of meters are tested for accuracy. A meter accuracy test is performed at ten percent of the meter's rated capacity.

For every new meter shipment received, 100% percent are checked for index movement. They must put on at least one count on each index (corrected and uncorrected) and they are checked for smoothness of operation. Every meter is checked to see that the meter number and the serial number are correct, and that it is listed on the manufacturer's proof sheet. A record test card is then issued for each meter. Each meter pulsar is checked for proper operation with an oscilloscope to check for proper duration of the pulse. Then the PGW stickers are attached and a Meter Issue Record card is completed for each meter.

FIELD SERVICES DEPSRTMENT
METER SHOP

Turbine Meters

For 4", 6", and 8" Turbines

For every new meter shipment received, a minimum of 10% of meters are tested for accuracy. A meter accuracy test is performed at ten percent of the meter's rated capacity.

For every new meter shipment received, 100% percent are checked for index movement they must put on at least one count on each index and they are checked for proper lubrication and smoothness of operation. Every meter is checked to see that the meter number and the serial number are correct, and that it is listed on the manufacturer's proof sheet. A record test card is then issued for each meter. PGW stickers are attached and a Meter Issue Record card is completed for each meter.

12" Turbines

For every new meter shipment received, 100% percent are checked for index movement they must put on at least one count on each index and they are checked for proper lubrication and smoothness of operation. Every meter is checked to see if the meter number and the serial number are correct, and that it is listed on the manufacturer's proof sheet. A record test card is then issued for each meter. PGW stickers are attached and a Meter Issue Record card is completed for each meter.

Exhibit B

FIELD OPERATIONS

FIELD SERVICE DEPARTMENT

METER TESTING PROCEDURE ON SONIC NOZZLE PROVERS

I. PURPOSE

To provide step by step instructions for performing meter testing on sonic nozzle provers.

II. DEFINITIONS

ERT – Encoder Receiver Transmitter

AMR – Automated Meter Reading

ADIS – AMR Divorced in System

III. PROCEDURE

Steps to go through to perform the Meter Testing Program on Sonic Nozzle Provers:

1) Open the "Meter Testing Screen"
2) Select the Meter Model & Size
3) Enter the meter number by scanning the meter bar code. Make sure that the meter number entered does match the meter number shown in the manufacturer badge.
4) Scan the AMR or the ERT ID number.
5) Enter the Index Read from the right to the left.
6) Enter the PGW Warning Label date.
7) Select the appropriate option under "Reason Removed" as shown below:
8) 01 – Age in Service
9) 02 – City Test
10) 03 – Master Meter
11) 04 – Tampered
12) 05 – Company Test
13) 06 – Damaged
14) "Test Type" field - select #1
15) "Device type" field – select:
    a. "#1 – NOTHING", if no ERT/Index attached to the meter
    b. "#2 – ERT", if an ERT is attached to the meter
16) Press "Enter" to start the meter test.
17) Verify movement in the index dials and test dials
18) Once the Proof Open and Proof Check are completed select the appropriate "Disposition". See the Appendix for a detailed description of each "Disposition" category.
19) Then press "Enter" to save records after the test complete.

20) After saving the test, place the meter on the appropriate rack using the provided guidelines on "Disposition Category" in the Appendix.

Please be aware that the employees working on the **In-testing process** at Meter Repair Section would be strictly required to **enter their own Payroll ID number** any time that they need to login at the start of their shift. If the employee works temporary at the prover station or at the end of their shift they will need to log off prior to leaving the prover stations.

During the meter In-test process, it's imperative to enter the proper **badge year indicated on PGW Warning Label**. Also, the personnel must enter the **proper meter model /size/manufacturing to prevent any deviations of the meter testing results.**

Each meter In-tested must be placed accordingly to the rack based on the meter testing results see below. If the status of a rack with meters in the shop is unknown then it should be brought up to the supervisor's attention to determine the status of these meters.

Appendix

Disposition Category

The following modifications are made to the current "Disposition" field of the meter testing software to ensure the actual status of each meter after the In-test process.

1. **A.D.I.S** - Meters qualify for A.D.I.S if the age of the meter is 35+ , or meter number is 1652704 or less (manufacturer badge year 1986 or older) and for Rockwell meters only (manufacturer badge 1988 or older). Meters that are unable to pass the test (<98% or > 102%) and meet the A.D.I S criteria are retired from the system. For the meters that meet A.D.I.S criteria and Proof Check (%) result is less than 98% are placed to "Hold for 60 days". These meters must be A.D.I.S. (retired) after 60 days. Contact your supervisor, should you have any questions.

2. **ADJUSTED** - Meters passing the test within the accepted range (proof check % is within the range 99% to 101%) are sent through to get retrofitted and ready for stock. Meters passing the test within "98-99% or 101-102%" should be adjusted to ± 1% of "100%" for a better performance. These meters must NOT meet the ADIS criteria listed in category 1.

3. **NO INDEX** - Meter found with No ERT/Index attached to the meter. Note: Use the digit of

"1" for the missing index & ERT ID number

4. **SLOW ADJUST**- Proof Check (%) result is higher than 102% - slow meter. Meter to be placed to the **"Slow, > 102% (do not exceed 104%)"** rack. Also, these meter must NOT meet the ADIS criteria listed in categories 1 and 5 as ADIS meters are not adjusted
5. **DISREGARD**- Only to be selected for meters tested with bad information entered by mistake
6. **CEASE TO RECORD** – No moving on the index or meter won't pass gas.
7. **LEAK** - Meter body is leaking

Exhibit C

ADIS Meter Criteria:

- **American and Sprague Meters Age 1993 or older.**
- **All Rockwell Meters** coming from the field.
- Any meter that tests **FAST** are required to be listed as **FAST ADIS** regardless of age or manufacturing type. All meters that test FAST are to be retired.

Retesting Fast Meters

Any meter that tests **Fast at 95% or less** must be retested by a Specialist.