

SBG Management Services, Inc.

P.O. Box 549 ♦ Abington, PA 19001

☎ Phone 215.938.6665

Fax 215.938.7613

VIA FIRST CLASS MAIL/OVERNIGHT MAIL

October 9, 2013

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: SBG Management Services, Inc. et al, v. Philadelphia Gas Works (PGW); Docket No. C-2012-2308465; Docket No. C-2012-2304183; Docket No. C-2012-2304215; Docket No. C-2012-2304167; Docket No. C-2012-2304303; Docket No. C-2012-2334253; Docket No. C-2012-2308462; Docket No. C-2012-2308465; and Docket No. C-2012-2308454.

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is an original and three copies of the Certificate of Service for Discovery requests for Interrogatories and Requests for Production of Documents, that have been served upon the Respondent and all active parties, in the above-referenced matters, as of today's date.

If you have any questions or concerns, please contact me on 215-260-4562 or via email at fboone@sbgmanagement.com. Thank you in advance for your time and consideration.

Sincerely yours,



Francine Thornton Boone, Esquire
Counsel for Complainants

RECEIVED

OCT 09 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

cc:

Laureto Farinas, Senior Attorney, Philadelphia Gas Works
Phil Pulley (for Complainants)
Kathy Treadwell (for Complainants)

Francine Thornton Boone, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
(215) 260 - 4562
fax: (215) 938 - 7613
email: fboone@sbgmanagement.com
Attorney I.D. No. 45118

Attorney for Complainants

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OCT 09 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

| | | |
|---|---|---------------------------|
| SBG MANAGEMENT SERVICES, INC./ COLONIAL GARDEN REALTY, LP Complainant | : | DOCKET NO. C-2012-2304183 |
| V. | : | |
| PHILADELPHIA GAS WORKS Respondent | : | |
| SBG MANAGEMENT SERVICES, INC./ FAIRMOUNT REALTY Complainant | : | DOCKET NO. C-2012-2304215 |
| V. | : | |
| PHILADELPHIA GAS WORKS Respondent | : | |
| SBG MANAGEMENT SERVICES, INC./ SIMON GARDENS REALTY, LP Complainant | : | DOCKET NO. C-2012-2304324 |
| V. | : | |
| PHILADELPHIA GAS WORKS Respondent | : | |
| SBG MANAGEMENT SERVICES, INC./ ELRAE GARDEN REALTY, LP Complainant | : | DOCKET NO. C-2012-2304167 |
| 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./ : DOCKET NO. C-2012-2308454
MARCHWOOD REALTY :
Complainant

V. :
PHILADELPHIA GAS WORKS :
Respondent

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

V. :
PHILADELPHIA GAS WORKS :
Respondent

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

V. :
PHILADELPHIA GAS WORKS :
Respondent

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

V. :
PHILADELPHIA GAS WORKS :
Respondent

CERTIFICATE OF SERVICE

I, FRANCINE THORNTON BOONE, ESQUIRE, do hereby certify that I have served the foregoing Discovery Requests: Interrogatories and Requests for Production of Documents for Complainants in the above-referenced matter, via first class, U.S. mail and/or by hand-delivery on this day to all the parties as listed below:


Philadelphia Gas Works (PGW)
% Mr. Laureto Farinas, Esquire
Senior Counsel
800 W. Montgomery Avenue, 4th Floor
Philadelphia, PA 19122

For Respondent (First Class U.S. Mail)

Mr. Phil Pulley and Ms. Kathy Treadwell
SBG Management Services, Inc.
P.O. Box 459, Abington, PA 19001

For Complainants (by hand)

Date: October 9, 2013

BY: 
Francine Thornton Boone, Esquire
(Attorney I.D. No. 45118)
Attorney for Complainants,
SBG Management Services, Inc., et al
702 N. Marshall Street
Philadelphia, PA 19123
T: (215) 260-4562

SBG Management Services, Inc.

P.O. Box 549 ♦ Abington, PA 19001

☎ Phone 215.938.6665

Fax 215.938.7613

VIA FIRST CLASS U.S. MAIL/OVERNIGHT MAIL

RECEIVED

October 9, 2013

OCT 09 2013

Laureto Farinas, Esquire
Senior Attorney, Philadelphia Gas
800 Montgomery Avenue, 4th Floor
Philadelphia, PA 19122

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: SBG Management Services, Inc. et al, v. Philadelphia Gas Works (PGW): Docket No. C-2012-2308465; Docket No. C-2012-2304183; Docket No. C-2012-2304215; Docket No. C-2012-2304167; Docket No. C-2012-2304303; Docket No. C-2012-2334253; Docket No. C-2012-2308462; Docket No. C-2012-2308465; and Docket No. C-2012-2308454.

Dear Mr. Farinas:

Enclosed please find the Complainants' Discovery Requests--Interrogatories, and Requests for Production of Documents--that are being served upon the Respondents in the above-referenced matters, as of today's date.

In accordance with the applicable rules, including 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 of Documents, which is the time period prescribed by the applicable statute, for the above-referenced dockets.

If you have any questions or concerns, please contact me on 215-260-4562 or via email at fboone@sbgmanagement.com. Thank you in advance for your time and consideration.

Sincerely yours,



Francine Thornton Boone, Esquire
Counsel for Complainants

cc: Rosemary Chiavetti, Secretary, Pennsylvania Public Utility Commission (w/o attachments)
Phil Pulley (for Complainants)
Kathy Treadwell (for Complainants)

1052

FedEx Package Express **US Airbill**

FedEx Tracking Number

8042 4033 9656

0215

Sender's Copy

1 From Please print and press hard.

Date 10/9/13 Sender's FedEx Account Number SENDER'S FED 2393-0508-0215

Sender's Name Francine Boone, Esq Phone 215 938-6665

Company SBG MANAGEMENT

Address 1095 RYDAL RD # 325 Dept./Floor/Suite/Floor

City RYDAL State PA ZIP 19046-1711

2 Your Internal Billing Reference

First 24 characters will appear on invoice. OPTIONAL

3 To

Recipient's Name Laureto Farinas, Esq. Phone 215, 684 6798

Company PGW

Address 800 W. Montgomery Ave Dept./Floor/Suite/Floor

Address 4TH FLOOR

City Philadelphia State PA ZIP 19122

HOLD Weekday
FedEx location address REQUIRED. NOT available for FedEx First Overnight.
 HOLD Saturday
FedEx location address REQUIRED. Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

0111624326



fedex.com 1800.GoFedEx 1800.463.3339

4 Express Package Service

* To most locations. NOTE: Service order has changed. Please select carefully. Packages up to 150 lbs. For packages over 25 lbs., use the new FedEx Express Freight US Airbill.

Next Business Day

- FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

- FedEx 2Day A.M.
Second business morning.* Saturday Delivery NOT available.
- FedEx 2Day
Second business afternoon.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500

- FedEx Envelope*
- FedEx Pak*
- FedEx Box
- FedEx Tube
- Other

6 Special Handling and Delivery Signature Options

- SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.
- No Signature Required
Package may be left without obtaining a signature for delivery.
- Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.
- Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?
One box must be checked.

No Yes As per attached Shipper's Declaration. Yes Shipper's Declaration not required. Dry Ice Dry Ice, 3 UN 1845 _____ kg Cargo Aircraft Only

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

7 Payment Bill to:

- Enter FedEx Acct. No. or Credit Card No. below.
- Sender Acct. No. in Section 4 will be billed.
 - Recipient
 - Third Party
 - Credit Card
 - Cash/Check

Total Packages 1 Total Weight _____ lbs. Total Declared Value* _____ \$

Your liability is limited to US\$500 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

611

PULL AND RETAIN THIS COPY BEFORE AFFIXING TO THE PACKAGE. NO POUCH NEEDED.

052

FedEx Package Express **US Airbill**

FedEx Tracking Number

8042 4033 9667

Form ID No

0215

Recipient's Copy

1 From

Date 10/9/13

Sender's Name FRANCIUK BOEHL, EST Phone 215 938-6665

Company SBG MANAGEMENT

Address 1095 RYDAL RD # 325

City RYDAL State PA ZIP 19046-1711

2 Your Internal Billing Reference

3 To

Recipient's Name Secretary Rozmary Chiavetta Phone 717 772-7777

Company PA Public Utility Commission

Address 400 North Street

Address Commonwealth Keystone Bldg - 2nd Floor

City Harrisburg State PA ZIP 17120

0111624526



8042 4033 9667

4 Express Package Service * To most locations. NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Priority Overnight
Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Standard Overnight
Next business afternoon. Saturday Delivery NOT available.

2 or 3 Business Days

FedEx 2Day A.M.
Second business morning. Saturday Delivery NOT available.

FedEx 2Day
Second business afternoon. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Express Saver
Third business day. Saturday Delivery NOT available.

5 Packaging * Declared value limit \$500.

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options

SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

No Signature Required
Package may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.

Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies. Residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

No Yes Yes Yes Dry Ice Cargo Aircraft Only

As per attached Shipper's Declaration. Shipper's Declaration not required.

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Sender Acct. No. in Section 7 will be billed. Recipient Third Party Credit Card Cash/Check

Total Packages 1 Total Weight LTK

Credit Card Auth: [REDACTED]

*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

611

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