

# **SBG Management Services, Inc.**

P.O. Box 549 Abington, PA 19001  
Phone 215.938.6665 Fax 215.938.7613

October 29, 2013

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

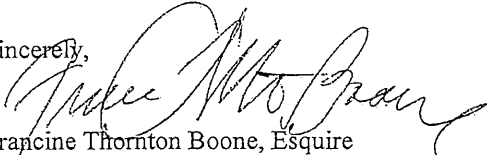
**RE: SBG Management Services, Inc. (and related entities) v. PGW, Docket Nos. C-2012-2304167; C-2012-2304183; C-2012-2304215; C-2012-2304303; C-2012-2304324; C-2012-2308454; C-2012-2308462; C-2012-2308465; and C-2012-2334253**

Dear Secretary Chiavetta:

On behalf of the Complainants in the above-referenced matters ("Complainants"), enclosed for filing is the original of its Motion to Dismiss Philadelphia Gas Works' ("PGW") Objections and Compel Response to its Set II Interrogatories to PGW along with the electronic filing confirmation with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

If you have questions or require additional information, please do not hesitate to contact me at 215-260-4562 or as described in the contact information, below. Your assistance in this matter is appreciated.

Sincerely,



Francine Thornton Boone, Esquire  
General Counsel, SBG Management Services, Inc.  
P.O. Box 549, Abington, PA 19001  
c: 215-260-4562  
e: [fboone@sbgmanagement.com](mailto:fboone@sbgmanagement.com) or [Booneft@aol.com](mailto:Booneft@aol.com)

Enclosure

cc: ALJ Eranda Vero (by email and/or regular mail)  
Laureto Farinas, Esquire, Philadelphia Gas Works (by email and/or regular mail)



Equal Housing Opportunity  
Equal Opportunity Employer

"SBG Management and the owner of the property in question does not discriminate on the basis of handicap status in the admission to, or treatment of employment in its federally assisted programs and activities."

COMMONWEALTH OF PENNSYLVANIA  
BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:

Docket No. C-2012-2304167--SBG Management Services, Inc. (Elrae) v. Philadelphia Gas Works  
Docket No. C-2012-2304183--SBG Management Services, Inc. v. Philadelphia Gas Works  
Docket No. C-2012-2304215--SBG Management Services, Inc. v. Philadelphia Gas Works  
Docket No. C-2012-2304303--SBG Management Services, Inc. (v. Philadelphia Gas Works  
Docket No. C-2012-2304324--SBG Management Services, Inc. v. Philadelphia Gas Works  
Docket No. C-2012-2308454--SBG Management Services, Inc. v. Philadelphia Gas Works  
Docket No. C-2012-2308462--SBG Management Services, Inc. v. Philadelphia Gas Works  
Docket No. C-2012-2308465--SBG Management Services, Inc. v. Philadelphia Gas Works  
Docket No. C-2012-2334253--SBG Management Services, Inc./Colonial Garden Realty Co., L.P. v.  
Philadelphia Gas Works

**CERTIFICATE OF SERVICE**

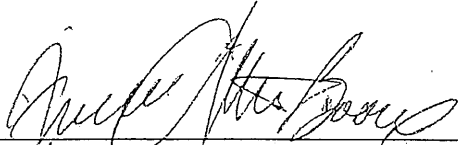
I hereby certify that on October 29, 2013, I have served the foregoing Motion to Dismiss PGW's Objections and to Compel Response to Set II Interrogatories upon the Secretary for the Pennsylvania Public Utility and a copy of the same upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54:

VIA Email and/or First Class Mail only:

For the PA Public Utility Commission:  
Administrative Law Judge Eranda Vero  
PA Public Utility Commission  
Suite 4063--801 Market Street  
Philadelphia, PA 19107  
Email: [evero@pa.gov](mailto:evero@pa.gov)

For Respondent:  
Laureto Farinas, Esquire, Philadelphia Gas Works  
800 W. Montgomery Avenue, 4<sup>th</sup> Floor, Philadelphia, PA 19122  
Email: [Laureto.Farinas@pgworks.com](mailto:Laureto.Farinas@pgworks.com).

Date: October 29, 2013

BY:   
**FRANCINE THORNTON BOONE, ESQUIRE**  
P.O. BOX 549  
ABINGTON, PA 19001  
Phone: 215-260-4562  
Office: 215-938-6665  
Electronic Mail Address: [Booneft@aol.com](mailto:Booneft@aol.com)  
Facsimile Number: 215-938-7613  
Pennsylvania Attorney I.D. No.—45118

**ATTORNEY FOR COMPLAINANTS**



Equal Housing Opportunity  
Equal Opportunity Employer

“SBG Management and the owner of the property in question does not discriminate on the basis of handicap status in the admission to, or treatment of employment in its federally assisted programs and activities.”

1 From *Please print and press hard.*  
 Date **10/29/2013** Sender's FedEx Account Number **2393-0508-3**  
 Sender's Name **FRANCINE BOONE** Phone **(215) 938-6665**  
 Company **SBG MANAGEMENT**  
 Address **1095 RYDAL RD # 325**  
 City **RYDAL** State **PA** ZIP **19046-1711**

4 Express Package Service \*To most locations. Packages up to 150 lbs. For packages over 150 lbs, see the new FedEx Express Freight US Airbill.  
 NOTE: Service order has changed. Please select carefully.  
**Next Business Day**  
 FedEx First Overnight  
 FedEx Priority Overnight  
 FedEx Standard Overnight  
**2 or 3 Business Days**  
 FedEx 2Day A.M.  
 FedEx 2Day  
 FedEx Express Saver

2 Your Internal Billing Reference  
 First 24 characters will appear on invoice.

3 To Recipient's Name **ALJ Eranda Vero** Phone **(717) 772-7777**  
 Company **PA PUC (Public Utility Commission)**  
 Address **Suite 4063-801 Market St.**  
 City **Phila, PA** ZIP **19107**  
 0111624526

5 Packaging \*Declared value limit \$500.  
 FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other  
 6 Special Handling and Delivery Signature Options  
 SATURDAY Delivery  
 No Signature Required  
 Direct Signature  
 Indirect Signature  
 Does this shipment contain dangerous goods?  
 No  Yes  Yes  
 7 Payment Bill to:  
 Sender  Recipient  Third Party  Credit Card  Cash/Check  
 Total Packages **1** Total Weight **1.2** Total Declared Value **\$**  
 611



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 FedEx 2Day A.M.  
 FedEx 2Day  
 FedEx Express Saver

2 Your Internal Billing Reference  
 First 24 characters will appear on invoice.

3 To Recipient's Name **Rosemary Chiavetta, Secretary** Phone **(717) 772-7777**  
 Company **PA Public Utility Commission**  
 Address **400 N. Street**  
 City **Harrisburg** State **PA** ZIP **17105-3265**  
 0111624526

5 Packaging \*Declared value limit \$500.  
 FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other  
 6 Special Handling and Delivery Signature Options  
 SATURDAY Delivery  
 No Signature Required  
 Direct Signature  
 Indirect Signature  
 Does this shipment contain dangerous goods?  
 No  Yes  Yes  
 7 Payment Bill to:  
 Sender  Recipient  Third Party  Credit Card  Cash/Check  
 Total Packages **1** Total Weight **1.2** Total Declared Value **\$**  
 611



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 Sender's Name **FRANCINE BOONE** Phone **(215) 938-6665**  
 Company **SBG MANAGEMENT**  
 Address **1095 RYDAL RD # 325**  
 City **RYDAL** State **PA** ZIP **19046-1711**

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 FedEx Standard Overnight  
**2 or 3 Business Days**  
 FedEx 2Day A.M.  
 FedEx 2Day  
 FedEx Express Saver

2 Your Internal Billing Reference  
 First 24 characters will appear on invoice.

3 To Recipient's Name **Laureto Farnas, Esq.** Phone **(215) 684-6982**  
 Company **Philadelphia Gas Works**  
 Address **800 W. Montgomery Ave.**  
 City **Philadelphia** State **PA** ZIP **19122**  
 0111624526

5 Packaging \*Declared value limit \$500.  
 FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other  
 6 Special Handling and Delivery Signature Options  
 SATURDAY Delivery  
 No Signature Required  
 Direct Signature  
 Indirect Signature  
 Does this shipment contain dangerous goods?  
 No  Yes  Yes  
 7 Payment Bill to:  
 Sender  Recipient  Third Party  Credit Card  Cash/Check  
 Total Packages **1** Total Weight **1.2** Total Declared Value **\$**  
 611



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

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Rev. Date 2012 - Part #163134 - ©1994-2012 FedEx - PRINTED IN U.S.A. SBS

Rev. Date 2012 - Part #163134 - ©1994-2012 FedEx - PRINTED IN U.S.A. SBS



October 30, 2013

Dear Customer:

The following is the proof-of-delivery for tracking number **804240339553**.

---

**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivered to:</b>	Shipping/Receiving
<b>Signed for by:</b>	N.CHAKOTIS	<b>Delivery location:</b>	2 N CIRCLE DR PA 17105
<b>Service type:</b>	FedEx Standard Overnight	<b>Delivery date:</b>	Oct 30, 2013 10:19
<b>Special Handling:</b>	Deliver Weekday  Direct Signature Required		



---

**Shipping Information:**

<b>Tracking number:</b>	804240339553	<b>Ship date:</b>	Oct 29, 2013
		<b>Weight:</b>	2.0 lbs/0.9 kg

**Recipient:**  
ROSEMARY CHIAVETS  
PA PUBLIC UTILITY COMMISSION  
400 N ST  
PA 17105 US

**Shipper:**  
FRANCINE BOONE  
SBG MANAGEMENT  
1095 RYDAL RD # 325  
RYDAL, PA 190461711 US

Thank you for choosing FedEx.



October 30, 2013

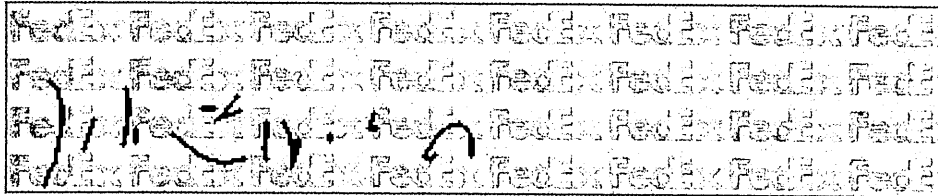
Dear Customer:

The following is the proof-of-delivery for tracking number **804240339564**.

---

**Delivery Information:**

<b>Status:</b>	Delivered	<b>Delivered to:</b>	Receptionist/Front Desk
<b>Signed for by:</b>	M.GOVAN	<b>Delivery location:</b>	801 MARKET ST 4063 PA 19107
<b>Service type:</b>	FedEx Standard Overnight	<b>Delivery date:</b>	Oct 30, 2013 10:50
<b>Special Handling:</b>	Deliver Weekday  Direct Signature Required		



---

**Shipping Information:**

<b>Tracking number:</b>	804240339564	<b>Ship date:</b>	Oct 29, 2013
		<b>Weight:</b>	2.0 lbs/0.9 kg

**Recipient:**  
ALJ EVANDA VERO  
PA PNC  
801 MARKET ST STE 4063  
PA 19107 US

**Shipper:**  
FRANCINE BOONE  
SBG MANAGEMENT  
1095 RYDAL RD # 325  
RYDAL, PA 190461711 US

Thank you for choosing FedEx.



October 30, 2013

Dear Customer:

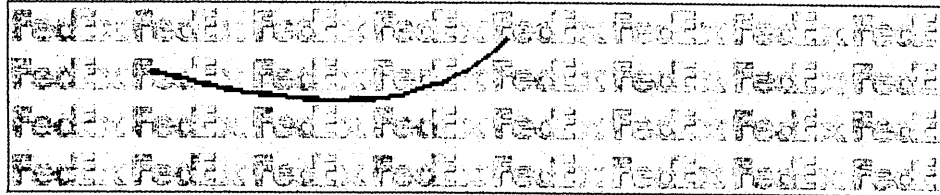
The following is the proof-of-delivery for tracking number **804240339575**.

---

**Delivery Information:**

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<b>Status:</b>	Delivered	<b>Delivered to:</b>	Shipping/Receiving
<b>Signed for by:</b>	M.LOPEZ	<b>Delivery location:</b>	1800 N 9TH ST PA 19122
<b>Service type:</b>	FedEx Standard Overnight	<b>Delivery date:</b>	Oct 30, 2013 09:30
<b>Special Handling:</b>	Deliver Weekday  Direct Signature Required		



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**Shipping Information:**

---

<b>Tracking number:</b>	804240339575	<b>Ship date:</b>	Oct 29, 2013
		<b>Weight:</b>	2.0 lbs/0.9 kg

**Recipient:**  
LAURETO FARINAS  
PHILADELPHIS GAS WORKS  
800 W MONTGOMERY AVE  
PA 19122 US

**Shipper:**  
FRANCINE BOONE  
SBG MANAGEMENT  
1095 RYDAL RD # 325  
RYDAL, PA 190461711 US

Thank you for choosing FedEx.