

SBG Management Services, Inc.

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

January 2, 2014

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: Corrected Letter for Corrected Notice to Plead

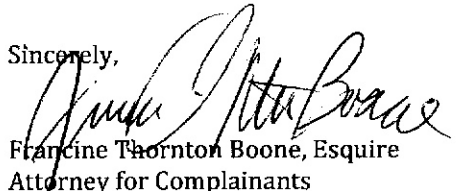
Dear Secretary Chiavetta:

On behalf of the Complainants in the above-referenced matters, enclosed for filing is the original "Corrected Notice to Plead" for the Second Motion to Compel. Copies to be served in accordance with the attached Certificate of Service. The original Notice to Plead and the Second Motion to Compel were filed on December 31, 2013 by e-filing and by mailing a "hard-copy" by overnight mail.

The Original Notice to Plead contained a typographical error and stated the Respondent had twenty days to respond, instead of five days to respond pursuant to 5 Pa. Code Section 5.342(g). I contacted the Secretary's Office and was told that a letter of correction could be filed with the Secretary and served in accordance with the rules of service. Accordingly, I am enclosing and e-filing the "Corrected Notice to Plead", which is also being served on the parties and the Commission.

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
Attorney for Complainants
General Counsel, SBG Management Services, Inc.
P.O. Box 549, Abington, PA 19001
t: 215-260-4562
e: fboone@sbgmanagement.com or Booneft@aol.com

Enclosure

cc: ALJ Eranda Vero (by email and/or first class mail)
Laureto Farinas, Esquire, Philadelphia Gas Works (by email and/or first class mail)
Phil Pulley, SBG Management Services, Inc. (by email)
Kathy Treadwell, SBG Management Services, Inc. (by email)

Francine Thornton Boone, Esquire
SBG Property Management Services, Inc.
702 N. Marshall Street
Philadelphia, PA 19123
cell: (215) 260 – 4562
fax: (215) 938 - 7613
email: Booneft@aol.com
Attorney I.D. No. 45118

Attorney for Complainants

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SBG MANAGEMENT SERVICES, INC./ COLONIAL GARDEN REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304183
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./ FAIRMOUNT REALTY <i>Complainant</i>	: DOCKET NO. C-2012-2304215
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./ SIMON GARDENS REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304324
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./ ELRAE GARDEN REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304167
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./ MARSHALL SQUARE REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304303
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./ MARCHWOOD REALTY <i>Complainant</i>	: DOCKET NO. C-2012-2308454
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:

OAK LANE REALTY CO., LP
Complainant

V.

PHILADELPHIA GAS WORKS
Respondent

SBG MANAGEMENT SERVICES, INC./
FERN ROCK REALTY
Complainant

V.

PHILADELPHIA GAS WORKS
Respondent

SBG MANAGEMENT SERVICES, INC./
COLONIAL GARDEN REALTY, LP
Complainant

V.

PHILADELPHIA GAS WORKS
Respondent

: DOCKET NO. C-2012-2308462

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: DOCKET NO. C-2012-2308465

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: DOCKET NO. C-2012-2334253

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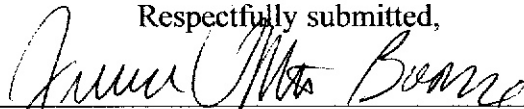
---CORRECTED NOTICE TO PLEAD---

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.103 and 5.342, you are hereby notified to file a written response to the Second Motion To Compel, which was served on December 31, 2013, of the above-captioned matters, within five (5) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted and a judgment may be entered against you.

Date: January 2, 2014

Respectfully submitted,



FRANCINE THORNTON BOONE, ESQUIRE

Attorney I.D. #45118

General Counsel, SBG Management Services, Inc.

P.O. Box 549

Abington, PA 19001

E: Booneft@aol.com; T: 215-260-4562

Attorney for Complainants

**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
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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 January 2, 2014, I have served the foregoing Complainants' "Corrected Notice to Plead", with a **corrected cover letter**, 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:

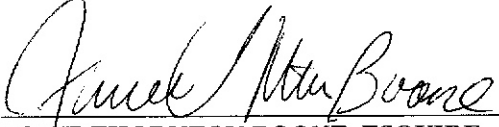
VIA Email and/or First Class Mail only:

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

For Respondent:
Laureto Farinas, Esquire, Philadelphia Gas Works
Attorney for PGW and Respondents
800 W. Montgomery Avenue, 4th Floor, Philadelphia, PA 19122
Email: Laureto.Farinas@pgworks.com

Phil Pulley and Kathy Treadwell, SBG Management Services, Inc.:
P.O. Box 549, Abington, PA 19001
Email: phil@sbgmanagement.com
Email: ktreadwell@sbgmanagement.com

Date: January 2, 2014

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
Facsimile Number: 215-938-7613
Pennsylvania Attorney I.D. No.—45118
ATTORNEY FOR COMPLAINANTS

SBG Management Services, Inc.

P.O. Box 549 Abington, PA 19001
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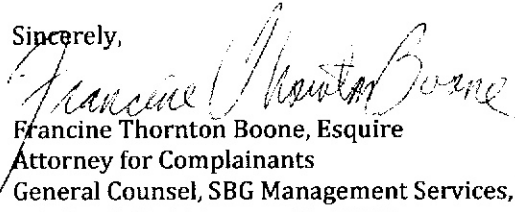
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Attorney I.D. No. 45118

Attorney for Complainants

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SBG MANAGEMENT SERVICES, INC./ SIMON GARDENS REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304324
V.	:
PHILADELPHIA GAS WORKS <i>Respondent</i>	:
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PHILADELPHIA GAS WORKS <i>Respondent</i>	:
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SBG MANAGEMENT SERVICES, INC./ MARSHALL SQUARE REALTY, LP <i>Complainant</i>	: DOCKET NO. C-2012-2304303
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PHILADELPHIA GAS WORKS <i>Respondent</i>	:
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SBG MANAGEMENT SERVICES, INC./ MARCHWOOD REALTY <i>Complainant</i>	: DOCKET NO. C-2012-2308454
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SBG MANAGEMENT SERVICES, INC./	:

**COMMONWEALTH OF PENNSYLVANIA
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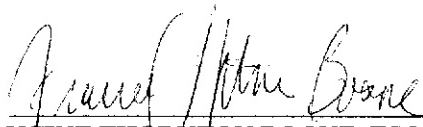
VIA Email and/or First Class Mail only:

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

For Respondent:
Laureto Farinas, Esquire, Philadelphia Gas Works
Attorney for PGW and Respondents
800 W. Montgomery Avenue, 4th Floor, Philadelphia, PA 19122
Email: Laureto.Farinas@pgworks.com

Phil Pulley and Kathy Treadwell, SBG Management Services, Inc.:
P.O. Box 549, Abington, PA 19001
Email: phil@sbgmanagement.com
Email: ktreadwell@sbgmanagement.com

Date: January 2, 2014

BY: 
FRANCINE THORNTON BOONE, ESQUIRE
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ABINGTON, PA 19001
Phone: 215-260-4562; Office: 215-938-6665
Electronic Mail Address: Booneft@aol.com
Facsimile Number: 215-938-7613
Pennsylvania Attorney I.D. No.—45118
ATTORNEY FOR COMPLAINANTS