

**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 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](mailto:evero@pa.gov)

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

Phil Pulley and Kathy Treadwell, SBG Management Services, Inc.:  
P.O. Box 549, Abington, PA 19001  
Email: [phil@sbgmanagement.com](mailto:phil@sbgmanagement.com)  
Email: [ktreadwell@sbgmanagement.com](mailto: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](mailto: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  
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](mailto:fboone@sbgmanagement.com) or [Booneft@aol.com](mailto: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)

FedEx Tracking Number

8047 6068 9437

Form ID No. **0215**

**From** Please print and press hard.  
 Date 1-2-2017 Sender's FedEx Account Number 2393-0508-3  
 Sender's Name FRANCINE BOONE, ESQ Phone ( 215 ) 938-6665  
 Company SBG MANAGEMENT  
 Address 1095 RYDAL RD # 325 Dept./Floor/Suite/Room  
 City RYDAL State PA ZIP 19046-1711

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

**To**  
 Recipient's Name Secretary, Sussemy Chizzotti Phone ( )  
 Company PA Public Utilities Commission  
 Address Commonwealth Keystone Bldg. HOLD Weekday  
 We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room REQUIRED.  
 Address 400 North Street HOLD Saturday  
 Use this line for the HOLD location address or for continuation of your shipping address. REQUIRED.  
 City Harrisburg State PA ZIP 17120

0112138617

**4 Express Package Service** \* To most locations.

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

- 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.
- 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**  
 Only 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?**
- No**  **Yes** As per attached Shipper's Declaration.  **Yes** Shipper's Declaration not required.  **Dry Ice** Dry Ice, 9, UN 1845 \_\_\_\_\_ x \_\_\_\_\_ kg
- Dangerous goods (including dry ice) cannot be shipped in FedEx packaging or placed in a FedEx Express Drop Box.  **Cargo Aircraft Only**

**7 Payment Bill to:**

- Enter FedEx Acct. No. or Credit Card No. below.
- Sender** Acct. No. in Section 1 will be billed.  **Recipient**  **Third Party**  **Credit Card**  **Cash/Check**

Total Packages 1 Total Weight \_\_\_\_\_ lbs. Total Declared Value! \$100.00

Our liability is limited to US\$100 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

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MUR4

FedEx Tracking Number

8047 6068 9481

Form ID No. **0215**

**From** Please print and press hard.  
 Date 1-2-2014 Sender's FedEx Account Number 2393-0508-3  
 Sender's Name FRANCINE BOONE, ESQ Phone ( 215 ) 938-6665  
 Company SBG MANAGEMENT  
 Address 1095 RYDAL RD # 325 Dept./Floor/Suite/Room  
 City RYDAL State PA ZIP 19046-1711

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

**To**  
 Recipient's Name ALJ ERANDA VERO Phone ( )  
 Company PA Public Utility Commission  
 Address Suite 4063 HOLD Weekday  
 We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room REQUIRED.  
 Address 301 Market Street HOLD Saturday  
 Use this line for the HOLD location address or for continuation of your shipping address. REQUIRED.  
 City Philadelphia State PA ZIP 19107

0112138617

**4 Express Package Service** \* To most locations.

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

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

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Total Packages 1 Total Weight \_\_\_\_\_ lbs. Total Declared Value! \$100.00

Our liability is limited to US\$100 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

**1 From** Please print and press hard.

Date 1-2-2014 Sender's FedEx Account Number 2393-0508-3  
 Sender's Name FRANCINE BOONE, EX Phone ( 215 ) 930-6665  
 Company BBG MANAGEMENT  
 Address 1095 RYDAL RD # 325 Dept./Floor/Suite/Room \_\_\_\_\_  
 City RYDAL State PA ZIP 19046-1711

**2 Your Internal Billing Reference**

First 24 characters will appear on invoice.

**3 To**

Recipient's Name LAURETO FARINAS, EX Phone ( ) \_\_\_\_\_  
 Company PCW- LAUNDEPT.  
 Address 802 W. Montgomery Ave Dept./Floor/Suite/Room \_\_\_\_\_  
 Address 4th Floor  
 City Philadelphia State PA ZIP 19122

HOLD Weekday  
FedEx location address  
REQUIRED. See [www.fedex.com](#) for details.  
FedEx First Overnight.

HOLD Saturday  
FedEx location address  
REQUIRED. See [www.fedex.com](#) for details.  
FedEx Priority Overnight and  
FedEx 2Day to select locations.

0112138619

**4 Express Package Service** \* To most locations.

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  
Saturday Delivery NOT available.

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

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

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

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

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FedEx Envelope\*  FedEx Pak\*  FedEx Box  FedEx Tube  Other

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SATURDAY Delivery  
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Direct Signature  
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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.

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

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 Sender Acct. No. in Section 1 will be billed.  Recipient  Third Party  Credit Card  Cash/Check  
 FedEx Acct. No. \_\_\_\_\_ Credit Card No. \_\_\_\_\_ Exp. Date \_\_\_\_\_

Total Packages \_\_\_\_\_ Total Weight \_\_\_\_\_ lbs. Total Declared Value! \$ 100 00

\*Our liability is limited to US\$100 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.

