

**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 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:

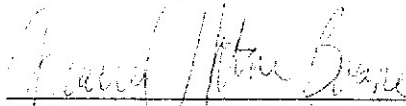
VIA Email and/or First Class Mail only:

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
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

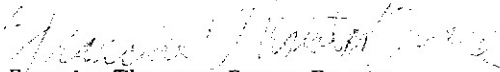
Dear Secretary Chiavetta:

On behalf of the Complainants and Philadelphia Gas Works ("PGW") 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 with 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 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
c: 215-260-4562
e: fboone@sbgmanagement.com or 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)
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 1-2-2014 Sender's FedEx Account Number 2293-0508-3

Sender's Name FRANCINE BOONE, ESQ Phone (215) 938-6665

Company SBG MANAGEMENT

Address 1095 RYDAL RD # 325

City RYDAL State PA ZIP 19046-1711

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

To Recipient's Name Secretary, Sussemy Chisetti Phone ()

Company PA Public Utilities Commission

Address Commerce with Keystone Bldg.
We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address 400 North Street
Use this line for the HOLD location address or for continuation of your shipping address.

City Harrisburg State PA ZIP 17120

HOLD Weekday
FedEx location address REQUIRED.
FedEx First Overnight.
 HOLD Saturday
FedEx location address REQUIRED.
FedEx Priority Overnight and FedEx 2Day to select locations.

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**
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.

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

5 Packaging * Declared value limit \$500.

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

6 Special Handling and Delivery Signature Options

- SATURDAY Delivery**
Available with 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
- Cargo Aircraft Only**

7 Payment Bill to:

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

Total Packages 1 Total Weight 1 lbs. Total Declared Value† 100 \$

†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.



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MUR 4

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 2293-0508-3

Sender's Name FRANCINE BOONE, ESQ Phone (215) 938-6665

Company SBG MANAGEMENT

Address 1095 RYDAL RD # 325

City RYDAL State PA ZIP 19046-1711

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
We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address 301 Market Street
Use this line for the HOLD location address or for continuation of your shipping address.

City Philadelphia State PA ZIP 19107

HOLD Weekday
FedEx location address REQUIRED.
FedEx First Overnight.
 HOLD Saturday
FedEx location address REQUIRED.
FedEx Priority Overnight and FedEx 2Day to select locations.

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**
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- FedEx Standard Overnight**
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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.

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**

6 Special Handling and Delivery Signature Options

- SATURDAY Delivery**
Available with 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
- Cargo Aircraft Only**

7 Payment Bill to:

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

Total Packages 1 Total Weight 1 lbs. Total Declared Value† 100 \$

†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.



1 From *Please print and press hard.*

Date 1-2-2014 Sender's FedEx Account Number 2293-0502-3

Sender's Name FRANCINE BOONG, ESQ Phone (215) 708-6665

Company SBO 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, ESQ Phone ()

Company PGW - LAW DEPT.

Address 500 W. Montgomery Ave
We cannot deliver to P.O. boxes or P.D. ZIP codes. Dept./Floor/Suite/Room

Address 4th Floor
Use this line for the HOLD location address or for continuation of your shipping address.

City Philadelphia State PA ZIP 19122

HOLD Weekday
FedEx location address REQUIRED. Select FedEx First Overnight.

HOLD Saturday
FedEx location address REQUIRED. Select FedEx Priority Overnight and FedEx 2Day to select location.

4 Express Package Service * To most locations.
For packages up to 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
Select SATURDAY Delivery with 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 _____ kg. 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**

Exp. Date _____

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.

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