



SBG Management Services, Inc.
 P.O. Box 549 Abington, PA 19001
 Phone 215.938.6665 Fax 215.935-6987

RECEIVED

October 9, 2014

OCT 08 2014

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

**PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU**

Re: SBG v. PGW: Complainants' Responsive Motion to Dismiss PGW's Objections For Applications for Subpoenas

In the Matters of: SBG Management Services, Inc./Colonial Garden Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2304183; SBG Management Services, Inc./Fairmount Realty, v. Philadelphia Gas Works, Docket No. C-2012-2304215 ; SBG Management Services, Inc./Simon Gardens Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2304324; SBG Management Services, Inc./Elrae Garden Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2304167 ; SBG Management Services, Inc./Marshall Square Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2304303; SBG Management Services, Inc./Marchwood Realty v. Philadelphia Gas Works, Docket No. C-2012-2308454; SBG Management Services, Inc./Simon Gardens Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2308460; SBG Management Services, Inc./Oak Lane Realty Co., LP v. Philadelphia Gas Works, Docket No. C-2012-2308462; SBG Management Services, Inc./Fern Rock Realty v. Philadelphia Gas Works, Docket No. C-2012-2308465; and SBG Management Services, Inc./Colonial Garden Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2308469

Dear Madam Secretary Chiavetta:

Kindly accept for filing Complainant's Responsive Motion to Respondent's Objections for Applications for Subpoenas, Notices to Plead for Subpoenas and Certificate of Service thereof in the above-referenced matters. Copies are attached hereto in each of the matters listed above to be filed with the Commission, The Honorable ALJ Eranda Vero and Mr. Farinas for PGW have been served upon the Respondent and all active parties on today's date via U.S. Mail/overnight mail.

Signature: 
 Name/Address/Phone: DONNA S. ROSS, ESQUIRE

COUNSEL FOR SBG MANAGEMENT SERVICES, INC.

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ABINGTON, PA 19001

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Mobile Phone: 484-888-9578

Office: 215-938-6665; Telefacsimile Number: 215-935-6987

Email: dsross@sbgmanagement.com; dsross90@gmail.com

Pennsylvania Attorney I.D. No. 59747

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**PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU**

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BEFORE THE PA PUBLIC UTILITY COMMISSION
PENNSYLVANIA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

SBG MANAGEMENT SERVICES, INC./
COLONIAL GARDEN REALTY, LP : DOCKET NO. C-2012-2304183
Complainant :

V. :
PHILADELPHIA GAS WORKS :
Respondent :

SBG MANAGEMENT SERVICES, INC./
FAIRMOUNT REALTY : DOCKET NO. C-2012-2304215
Complainant :

V. :
PHILADELPHIA GAS WORKS :
Respondent :

SBG MANAGEMENT SERVICES, INC./
SIMON GARDENS REALTY, LP : DOCKET NO. C-2012-2304324
Complainant :

V. :
PHILADELPHIA GAS WORKS :
Respondent :

SBG MANAGEMENT SERVICES, INC./
ELRAE GARDEN REALTY, LP : DOCKET NO. C-2012-2304167
Complainant :

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./
MARCHWOOD REALTY : DOCKET NO. C-2012-2308454
Complainant :

V. :
PHILADELPHIA GAS WORKS :
Respondent :

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

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OCT 07 2014

V.
PHILADELPHIA GAS WORKS
Respondent

SBG MANAGEMENT SERVICES, INC./
FERN ROCK REALTY
Complainant

: DOCKET NO. C-2012-2308465

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

V.
PHILADELPHIA GAS WORKS
Respondent

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

: DOCKET NO. C-2012-2334253

V.
PHILADELPHIA GAS WORKS
Respondent

COMPLAINANTS'

SBG MANAGEMENT SERVICES, INC., et al COLONIAL GARDEN REALTY CO. (I and II), FAIRMOUNT REALTY CO., SIMON GARDENS, ELRAE GARDEN REALTY, MARCHWOOD REALTY, FERNROCK REALTY, OAK LANE REALTY CO., L.P., AND MARSHALL SQUARE REALTY ("COMPLAINANTS"), RESPONSIVE MOTION TO DISMISS PGW'S OBJECTIONS TO COMPLAINANTS' APPLICATIONS FOR SUBPOEANAS FOR PERSONS TO ATTEND AND TESTIFY AT HEARINGS IN THESE CONSOLIDATED MATTERS

Pursuant to 52 Pa.Code §5.421, which sets forth the requirements for application for a subpoena before the Commission. Complainants' ("SBG") by and through their counsel hereby responds to Respondent ("PGW") Objections for Applications of Subpoenas requested to be issued by the Commission at hearings to be scheduled in the above-captioned matters, and in support thereof, avers as follows:

Summary:

On September 29, 2014, in response to a discovery deadline imposed by the July 23, 2014 Order of the presiding officer setting the date of October 6, 2014 as the last day that parties could make application for subpoenas for witnesses to attend and testify at hearings which are yet to be scheduled, not willing to disregard a court order, Complainants' complied with the court imposed deadline and applied for subpoenas. (See Order attached hereto as Exhibit "A"). Complainants' made application for necessary persons who have responded to discovery propounded in these matters, have had direct contact with Complainants' customer accounts and have specific knowledge on the issues before the Commission. These persons are all employed, or have been employed by Respondent, PGW: Bernard L. Cummings, Ralph T. Savage, Tyra Jackson, Tiffany Higgins, Linda Pereira, Ramya Rajan, Randy Hollman, Anne Marie Cromley (retired), John Dunn, III, and Phred Jones. The only non-PGW employee is The

Honorable Daniel D. McCafferty, who has testified in the previous hearings, and has information regarding the cases yet to be concluded and presented. The majority of the subpoenas seek the attendance of PGW employees, who are parties to these matters and are being called in rebuttal to PGW's case in chief. (See Applications for Subpoenas attached hereto as Exhibit "C").

While some of the persons for whom the subpoenas have been applied have testified previously in hearings held over one year ago, it is necessary for them to appear and provide testimony in the upcoming hearings especially since several of the cases have not yet been concluded and/or presented. Moreover, since the last hearings subsequently received discovery has proven that these persons being asked to testify have given verifications and responses which are germane to issues before the Commission.

The persons for whom Complainants seek to subpoena are not Complainants' witnesses, but rather PGW employees and former employees who have specific knowledge and information that relates to the transactions and matters before the Commission concerning Complainants' grievances regarding their accounts. The persons for whom the applications are sought are opposing parties whom will not attend and testify on their own, their appearance is necessary and must be compelled by the Commission to support, confirm and corroborate the responses/information that they have provided and verified on documents obtained in discovery which has been received since the conclusion of the hearings last summer. And while opposing counsel has noted that the notice of objection was inadvertently not attached to the application, there is no prejudice because Complainants' counsel has provided such cure of the notice and Respondent has made a timely objection.

The applications for subpoena were made in good faith and in accordance with an Order of Court. The applications for subpoena request the presence of parties who have relevant, specific information regarding these proceedings and have provided verified responses to discovery and/or have specific information on transactions that have occurred on Complainants' disputed transactions and service matters on their accounts. Complainants' respectfully requests that the Commission over-rule and dismiss Respondent's objections and sign the applications submitted, insert the assigned hearing date or allow Complainants' an opportunity to re-submit the Applications once a hearing date is determined by the Commission.

I. Complainants' Response To PGW's Objections

1. Admitted.
2. Admitted. More specifically, on September 29, 2014, the presiding officer contacted the parties' counsel separately via phone. Complainants' counsel informed the presiding officer that she had forwarded the application requests that day in order to comply with the court ordered date of October

6, 2014 to seek application for subpoenas, informing the presiding officer that she was going to be out of town later in the week and wanted to ensure proper service prior to the deadline imposed by the court. The presiding officer stated that since there is no hearing date set suggested that counsel for Complainants not send the applications subpoenas, which by that time was too late as they had been put in the mailbox. Counsel reiterated that she adhered to the timeline in the court order to the best of her ability and that she would request an opportunity to amend once the hearing date was decided. The presiding officer relayed her discussion with Complainants' counsel in an email sent to Respondent's counsel sent later that evening, however, the email was silent on her direction regarding the applications for subpoenas and did not specify that the applications should not be sent in accordance with the July 23, 2014 order. Complainants' counsel has nothing in writing from the presiding officer indicating that the deadline applications for subpoenas has been extended and without further written direction from the Commission, sought application accordingly. (See ALJ Vero's email attached hereto as Exhibit "B").

3. Admitted.
4. Denied. The application requests that he attend and testify and bring with him any and all documents and information upon which he relied regarding actions taken by him regarding Complainants' accounts in the above referenced matters. The persons asked to testify are well aware of the responses, conversations and actions that they have taken to address the issues on the accounts in question. Moreover, in most instances they have signed verified statements and made admissions about their specific duties, response and actions taken in the matters before the Commission.
5. Denied. The direction states that the witness should be prepared to testify about his/her specific action taken on the Complainants' accounts in the above-referenced matters and to bring the relevant information to support the witnesses' responses as provided in discovery and actions they took on the accounts in question.
6. Denied. The subpoena requests that the witness bring the documentation and information upon which they relied when they took actions on the accounts in question.
7. Admitted.
8. Denied in part. Admitted in part. For the reason set forth in paragraph 5 and 6 above, the statement is denied. The statement is admitted in part as to the notice being attached, however, since there was no assigned hearing date as of yet and Respondent filed a timely objection/response within 10 days as prescribed by the notice, Respondent is not prejudiced and the notice issue is moot.
9. Denied.
10. Denied. There are nine (9) consolidated matters, each under a different docket number. The matters are being tried in segregated hearings, not all at once. Each docket is deserving of a full and complete

review of the claims and evidence presented. The Commission has not completed testimony in the six cases heard and has not scheduled at least three cases for hearing at all. Respondents have not put on their case in chief in any of the matters heard thus far. Each case should be given its procedural due process and an opportunity to develop a full evidentiary record and hearing. Moreover, some of the witnesses called have information on all of the consolidated cases. Some of the witnesses Complainant is seeking to testify may have information on only one of the docketed cases. However, since the hearing dates have not yet been determined, the applications cannot designate which witnesses are necessary to which proceedings and schedule them accordingly. When the presiding officer ascribes the assigned dates for hearing then the subpoenas may be amended accordingly.

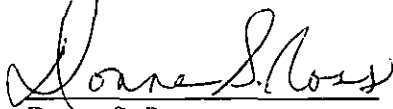
11. Denied. Complainants' change of counsel has no bearing on the requests for subpoenas. Complainants are entitled to full due process, a fully developed record, and full evidentiary hearing on each case docketed in these matters. This charge is irrelevant and erroneous. As stated in paragraph 10, there are several witnesses, such as John Dunn, III and Ralph T. Savage, who have pertinent and relevant testimony in all of the matters before the Commission and they should be compelled to testify in all the matters.
12. Denied. Respondent's argument is specious and speculative. This is an attempt for counsel to assert his own questionable legal theory on Complainants' case and is without legal authority or merit. The applications designate that the witnesses are instructed to provide testimony on their discovery responses and actions taken during their course of employment working on Complainants' accounts.
13. Admitted in part, denied in part. Complainant cannot confirm or deny the Commission's intention to schedule dates for Respondent to present its cases in chief.
14. Admitted in part, denied in part. Complainant cannot confirm or deny the Commission's intention to schedule dates for Respondent to cross-examine and/or present its cases in chief.
15. Admitted in part, denied in part. While the presiding officer did direct that the parties to file direct testimony in some of the remaining matters yet to be scheduled, the directive does not negate nor abrogate the Complainants' rights to subpoena adverse witnesses to testify at the hearings. In fact, it would be malpractice for Complainants' counsel not to call relevant PGW witnesses by way of subpoena in rebuttal. It is highly doubtful that PGW employees with knowledge of these matters would willingly provide direct testimony on Complainants' behalf. These are adversarial proceedings, which is why the rules of evidence are applicable and subpoenas may issue. Again, Respondent is seeking to limit and abrogate Complainants' due process by trying to direct the Commission to quash Complainants' right to a full, fair, and impartial evidentiary hearing.
16. Lastly, Respondents certificate of service of their objections is faulty as the certificate shows that the objections were sent by email only, which is not in accordance with 52 Pa. Code §1.54 and 1.55.

17. There are still outstanding motions and additional discovery may be received, Complainants may need the opportunity to subpoena additional witnesses that are yet unnamed.

WHEREFORE, for the reasons set forth above, Complainants, SBG, respectfully requests/moves that this Commission dismiss Respondent's objections and sign the applications for subpoenas as requested, allowing for Complainants to insert the date certain, when a date certain is ascertained for the hearings as scheduled, or in the alternative, allow for the Complainants to amend the applications and reissue the subpoenas as prescribed by the Commission.

Date: 10/09/2014

Respectfully Submitted By:

A handwritten signature in cursive script, appearing to read "Donna S. Ross".

Donna S. Ross

Counsel for Complainants (SBG)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SBG Management Services, Inc. / Fairmount Manor Realty Co., L.P.	:	
	:	
v.	:	C-2012-2304215
	:	
Philadelphia Gas Works	:	
	:	
SBG Management Services, Inc. / Elrea Garden Realty Co., L.P.	:	
	:	
v.	:	C-2012-2304167
	:	
Philadelphia Gas Works	:	
	:	
SBG Management Services, Inc. / Marshall Square Realty Co, L.P.	:	
	:	
v.	:	C-2012-2304303
	:	
Philadelphia Gas Works	:	
	:	
SBG Management Services, Inc. / Colonial Garden Realty Co., L.P.	:	
	:	
v.	:	C-2012-2304183
	:	
Philadelphia Gas Works	:	
	:	
SBG Management Services, Inc. / Simon Garden Realty Co., L.P.	:	
	:	
v.	:	C-2012-2304324
	:	
Philadelphia Gas Works	:	
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SBG Management Services, Inc. / Colonial Garden Realty Co., LP.	:	
	:	
v.	:	C-2012-2334253
	:	
Philadelphia Gas Works	:	

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Exhibit "A"

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SBG Management Services, Inc. / Marchwood Realty	:	
	:	
v.	:	C-2012-2308454
	:	
Philadelphia Gas Works	:	
	:	
SBG Management Services, Inc. / Oak Lane Realty Co., LP	:	
	:	
v.	:	C-2012-2308462
	:	
Philadelphia Gas Works	:	
	:	
SBG Management Services, Inc. / Fernrock Realty	:	
	:	
v.	:	C-2012-2308465
	:	
Philadelphia Gas Works	:	

DISCOVERY ORDER

I. **HISTORY OF THE PROCEEDING**

On October 9, 2013, the Complainants served Set II of Interrogatories and Requests for Production of Documents on the Respondent, PGW. The Complainants' Set II of Interrogatories and Requests for Production of Documents consisted of 44 interrogatories. On October 21, 2013, PGW filed timely objections to Complainants' Interrogatories and Requests Production of Documents. On October 30, 2013, the Complainants filed a Motion to deny PGW's objections and to compel responses to the Complainants' Interrogatories and Requests for Production of Documents Set II (Motion to Compel). The Respondent's Answer to the Complainants' Motion to Compel was filed on November 4, 2013.

On November 14, 2013, I issued an Order granting, in part, and denying, in part, the Complainants' Motion to Compel.

On November 19, 2013, the Respondent filed a Motion for Reconsideration of paragraphs 5, 10, and 11 of the November 14, 2013 Order (Motion for Reconsideration) requesting additional time to respond to Complainants' Set II of Interrogatories and Requests Production of Documents.

On December 3, 2013, the Complainants and the Respondent filed a Joint Motion to Amend the November 14, 2013 Order to Extend the Time to Conduct Discovery and to Continue the Hearing Dates in the Nine Consolidated Matters (Joint Motion). In their Joint Motion, the parties averred that they had reached an agreement on the extension of time to answer the Complainants' Set II-Discovery Requests and requested a continuance of the scheduled hearings in order to allow the Respondent to provide the required information and the Complainants to review it. The parties stated that they had negotiated this proposal in good faith and believed it to be helpful to the development of facts critical to a resolution of these cases.

By Order dated December 9, 2013, I granted the Parties' Joint Motion requesting an extension of the time to conduct discovery and a continuance of the hearings scheduled in these cases.¹

On January 2, 2014, the Complainants filed a Second Motion to Compel a full response and complete answer to Complainants' Request for Production of Documents and Interrogatories, Set II, Interrogatory No. 26 (Second Motion to Compel). This Motion did not contain a certification by counsel setting forth the specific actions the parties have undertaken to resolve their discovery disputes informally. See Prehearing Order dated March 27, 2013, ¶ 9, in each of the above captioned Complaints.

By e-mail dated January 21, 2014, counsel for PGW informed me that the parties had informally agreed to extend the period of time that PGW had to respond to Complainants' Set II of Interrogatories and Requests Production of Documents from January 17, 2014, to January 31, 2014, and requested that any evidentiary hearing in the three sets of consolidated matters be scheduled after March 31, 2014. The Complainants did not object to this request.

¹ The granting of this Joint Motion rendered Respondent's Motion for Reconsideration moot.

PGW's communication of January 21, 2014, was essentially a request to amend the ordering paragraphs of my December 9, 2013 Order, and was treated as such. By Order dated February 4, 2014, I granted PGW's request to amend the December 9, 2013 Order to extend the time to conduct discovery and to continue the hearing dates. In particular, the February 4, 2014 Order extended the period of time available to PGW for proving a full and complete response to Complainants' Set II of Interrogatories and Requests for Production of Documents to January 31, 2014.

On February 10, 2014, the Complainants filed an Amended Second Motion to Compel. On February 18, 2014, PGW filed its response to Complainants' Amended Second Motion to Compel.

On April 9, 2014, I issued an Order granting, in part, and denying, in part, the Complainants' Amended Second Motion to Compel. The Order denied the Complainants' Amended Second Motion to Compel supplemental responses with regard to Complainants' Set II discovery requests numbered 14, 17, 18, 19, 20, 21, 26, 28, 31, 33, 34, 35, 37, 38, and 39. The Order also directed PGW to submit supplemental responses to Complainants' Set II discovery requests numbered 5, 6, 7, 8, 9, 10, 11, 12, 13, 15, 16, 22, 23, 24, 27, 29, 30, and 36, within forty-five (45) days from the day of that Order, or by May 27, 2014.² See April 9, 2014 Order, Ordering Paragraphs ## 3, 4.

On April 14, 2014, the Complainants filed a Motion for Reconsideration of the April 9, 2014 Order. In particular, the Complainants requested that I reconsider and/or modify my ruling concerning Complainants Set II-17, 18, 19, 21, 35, 36, 37, 38, and 39. On May 5, 2014, the Respondent filed its response to the Complainants' Motion for Reconsideration of the April 9, 2014 Order.

On May 12, 2014, I issued an Order which granted the Complainants' Motion for Reconsideration of the April 9, 2014 Order only to the extent that it instructed PGW to submit a

² May 25, 2014 fell on a Sunday and May 26, 2014 was a holiday.

supplemental response to Complainants Set II-38 within the original 45-day deadline set by the April 9, 2014 Order, and denied the remainder of the Motion.

By e-mail dated June 6, 2014 and time stamped 11:09 a.m., counsel for the Complainants, Ms. Boone, informed me that the parties had agreed to extend PGW's time to file the supplemental responses to Complainants' Set II of Interrogatories and Requests for Production of Documents on the Respondent from May 27, 2014 to June 27, 2014. The parties had also agreed to extend the Complainants' time to file a motion to compel to July 11, 2014. This information was confirmed by PGW's counsel's own e-mail to me dated June 6, 2014 and time stamped 11:23 a.m.

At 1:27 p.m. on the same day, I acknowledged receipt of the information from the parties and I took the opportunity to warn the parties against any attempt to abuse the discovery proceedings. I also clarified my expectations for the parties concerning the rest of the discovery proceedings.

On June 10, 2014, I received a copy of PGW's objections to Complainants' Set III of Interrogatories and Requests for Production of Documents (Complainants' Set III), which was served on PGW on May 28, 2014, and consists of 28 interrogatories.

By e-mail dated June 10, 2014, I inquired with the parties as to whether this new round of discovery requests was affected by the latest agreement between the parties with regard to the time frame for responding to Complainants' Set II of Interrogatories and Requests for Production of Documents (Complainants' Set II).

By e-mail dated June 10, 2014, and time stamped at 3:46 p.m., Ms. Boone informed me that the parties were requesting the following adjustments to the prior agreement: 1) that PGW's responses to Complainants' Set II and Set III would be due on June 27, 2014; and 2) that any of SBG's motions to compel to PGW's responses to Complainants' Set II and Set III would be due on July 16, 2014.

I responded to Ms. Boone's last communication via e-mail dated June 10, 2014, and time stamped at 5:32 p.m., and took the opportunity to clarify a few points concerning the discovery proceedings in these matters. *Inter alia*, I explained that the Commission's regulations do not provide for Motions to an ALJ for Reconsideration of the ALJ's Order; that the Complainants' Set II and Set III are separate and distinct from each other; and that no motions should be filed that attempt to address both. I emphasized to the parties that, at this point in the discovery proceedings, I would not accept any more motions to compel PGW's responses to Complainants' Set II. In addition, I acknowledged that the parties had extended SBG's time for filing discovery motions from July 11, 2014, to July 16, 2014, and reminded them of the overall history of these cases.

Finally, I provided the parties with a blank Discovery Plan Form designed to urge the parties to plan for the conclusion of the discovery proceedings. I informed the parties of my intention to hold a Discovery Conference with the parties on the second week of July and asked you to inform me of your availability.

On June 13, 2014, I received from PGW a Certificate of Service for its Set I of Interrogatories and Request for Production of Documents (PGW's Set I).

On July 3, 2014 I issued a Discovery Order, which informed the parties, *inter alia*, that a Discovery Conference was scheduled for July 11, 2014, at 1:30 p.m., and requested that they submit discovery memoranda, essentially completing the Discovery Plan Form.

Both parties submitted their Discovery Memoranda timely. Through their respective Discovery Memoranda the parties informed me that they had agreed to extend the period of time for the Complainants to respond to PGW's Set I from July 3, 2014,³ to "the end of August 2014." In addition, the parties informed me that they had agreed, yet again, to extend the time for PGW's responses to SBG's Set II and III from June 27, 2014, to July 11, 2014. See the Complainants' Discovery Memorandum, page 16. As required by my July 3, 2014 Order, the

³ See 52 Pa.Code § 5.342.

parties submitted their discovery plans containing deadlines for the completion of the various stages of discovery proceedings.

The Discovery Conference was held as scheduled on July 11, 2014, at 1:30 p.m. Both parties appeared represented by counsel. After reviewing the discovery plans submitted by the parties and addressing some of the issues raised by them at the Discovery Conference, the following discovery schedule shall be adopted:

1. Discovery on the above-captioned matters will be completed by September 15, 2014. This includes all responses and objections to any existing or new discovery requests propounded by the parties.
2. Each party is limited to ten (10) new, not already propounded, interrogatories or requests for production of documents, with no more than four (4) subsections each.
3. The last date for filing any and all discovery motions, prehearing motions, and applications for subpoenas is October 6, 2014.⁴
4. A prehearing conference will be scheduled to take place on October 30, 2014.

THEREFORE,

IT IS ORDERED:

1. That discovery on the above captioned-matters will be completed by September 15, 2014. This includes all responses and objections to any existing or new discovery requests propounded by the parties.


⁴ This date has been modified from the September 30, 2014 deadline set at the Discovery Conference in order to allow the parties more time to prepare the motions and applications for subpoenas.

2. That each party shall be limited to ten (10) new, not already propounded, interrogatories or requests for production of documents, with no more than four (4) subsections each.

3. That the last date for filing any and all discovery motions, prehearing motions, and applications for subpoenas is October 6, 2014.

4. That a prehearing conference shall be scheduled to take place on October 30, 2014 on the above-captioned cases.

Date: July 23, 2014



Eranda Vero
Administrative Law Judge

SBG Management Services, Inc./Fairmount Manor Realty Co., L.P.; SBG Management Services, Inc./Elrea Garden Realty Co., L.P.; SBG Management Services, Inc./Marshall Square Realty Co, L.P.; SBG Management Services, Inc./Colonial Garden Realty Co., L.P.; SBG Management Services, Inc./Simon Garden Realty Co., L.P.; SBG Management Services, Inc./Colonial Garden Realty Co., LP.; SBG Management Services, Inc./Marchwood Realty; SBG Management Services, Inc./Oak Lane Realty Co., LP; SBG Management Services, Inc./Fernrock Realty v. Philadelphia Gas Works
Docket Numbers C-2012-2304215, C-2012-2304167, C-2012-2304303, C-2012-2304183, C-2012-2304324, C-2012-2334253, C-2012-2308454, C-2012-2308462, C-2012-2308465

SERVICE LIST

Francine Thornton Boone, Esquire
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Laureto Farinas, Esquire
Philadelphia Gas Works
4th Floor
800 W. Montgomery Avenue
Philadelphia, PA 19122
215-684-6982



Donna Ross <dsross90@gmail.com>

RE: my conversation with Ms. Ross today

2 messages

Donna S. Ross <dsross@sbgmanagement.com> Tue, Sep 30, 2014 at 1:54 PM
To: "Vero, Eranda" <evero@pa.gov>, "Laureto.Farinas@pgworks.com" <Laureto.Farinas@pgworks.com>
Cc: "dsross90@gmail.com" <dsross90@gmail.com>

Dear Judge Vero:

I appreciate your candor during our conversation yesterday. As I said, my client and I are preparing for trial and we are trying to adhere to the deadlines imposed in your discovery orders. I welcome a three-way conference call or meeting with you and Mr. Farinas to shore up procedural processes and schedules. I am currently in the process of moving and I have noted a tentative date of October 30th as a scheduled pre-hearing conference. I would be very grateful if we could move the date up or over to the next week. I am scheduled to move into my new home over a two day period of October 30 & 31. Would the court be inclined to grant this request? If not, please advise so that I may reschedule with the movers. I am trying to coordinate this move in order to free up my calendar for the month of November, which is tentatively scheduled for our hearings in these matters. I thank you in advance for your time and for your and Mr. Farinas consideration.

Sincerely,

Donna Ross

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OCT - 7 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

-----Original Message-----

From: Vero, Eranda [mailto:evero@pa.gov]
Sent: Monday, September 29, 2014 6:08 PM
To: Laureto.Farinas@pgworks.com
Cc: Donna S. Ross
Subject: my conversation with Ms. Ross today

Dear Mr. Farinas,

I spoke with Ms. Ross today regarding the recent changes in SBG's legal representation in the 9 consolidated matters. More precisely, I inquired after Ms. Boone's status in these matters and whether Ms. Ross was joining or substituting Ms. Boone as legal counsel for SBG. As I have informed you and Ms. Boone in previous occasions, I have been out of the office since the end of August and won't be officially returning back to work until mid-October. While away from office, I have tried to check my e-mails regularly but did not have access to all the filings submitted by the parties. Consequently, I was not aware that Ms. Boone has filed a petition to withdraw from these matters. Ms. Ross informed me of her filing an entry of appearance and of Ms. Boone's filing of the petition to withdraw. Ms. Ross informed me of her efforts to adhere to the established discovery schedule and I informed her that she could contact me with any procedural or scheduling questions or concerns. We talked briefly about the history of proceedings in these matters and I emphasized to her my concerns regarding the progress of the discovery proceeding as I have expressed them to you and Ms. Boone in many occasions. I informed Ms. Ross of the necessity that she familiarize herself with the materials in these cases in order to avoid a repeat of past events. I also informed her that I expect the three of us to get together, either formally or informally, in order to discuss outstanding issues in the eve of the further hearings.

This is, I believe, a faithful summary of my conversation with Ms. Ross today. I am Cc-ing her to this e-mail so that she may review my summary of the said conversation.

Eranda Vero
Administrative Law Judge
Pennsylvania Public Utility Commission

Exhibit
"B"

801 Market Street
Philadelphia, PA 19107

Farinas, Laureto A <Laureto.Farinas@pgworks.com>

Tue, Sep 30, 2014 at 2:23 PM

To: "Vero, Eranda" <evero@pa.gov>

Cc: "dsross90@gmail.com" <dsross90@gmail.com>, "Donna S. Ross" <dsross@sbgmanagement.com>

Judge Vero:

Thank you for the email message regarding your conversation with Ms. Ross. Although I saw the email last night, I wanted to check the filings that I have received from SBG. If Ms. Boone's petition to withdraw from representation was filed at or around the time of the service of the Requests for Admission, I do not received it.

Please let us know when you would like to schedule our conference to be held once you return to work.

Thank you,

Laureto Farinas

[Quoted text hidden]

RECEIVED

OCT - 7 2014

EXHIBIT 'C'

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	:	DOCKET NO. C-2012-2308454

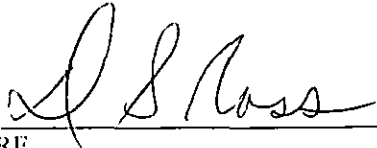
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:
OAK LANE REALTY CO., LP	:
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	:
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	:
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.421, you are hereby notified to file a written response or objection to this Application for Subpoena which was served on this date, of the above-captioned matters, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted, the Pennsylvania Public Utility Commission ("Commission") may rule on this matter without further input, and a judgment may be entered against you. All pleadings, such as an Answer, Response or Objection to the enclosed Applications For Subpoenas, must be filed with the Secretary of the Commission, with a copy served on the undersigned counsel for Complainants.

Date: 10/09/2014

Respectfully Submitted By: 
 DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dsross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747



**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of:
SBG Management Services, Inc., et al.

vs.

Philadelphia Gas Works

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

SUBPOENA

To: Honorable Daniel McCaffery – Court of Common Pleas of Philadelphia County,
Trial Division-Criminal, City Hall-Room 534, Philadelphia, PA 19107
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the _____ Complainants _____ and to remain until excused;

2. And bring with you and produce the following: Any and all documents, writings,
reports, correspondence, materials, data/information, financial accounting records, recordings
and other verified proofs and information that have not already been provided, upon which you
relied in support of your responses provided to Complainants' discovery requests and actions
taken by you pertaining to the above-captioned matters.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania

)

) SS:

County of

)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	:	DOCKET NO. C-2012-2308454


<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
OAK LANE REALTY CO., LP	: DOCKET NO. C-2012-2308462
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	: DOCKET NO. C-2012-2308465
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	: DOCKET NO. C-2012-2334253
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.421, you are hereby notified to file a written response or objection to this Application for Subpoena which was served on this date, of the above-captioned matters, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted, the Pennsylvania Public Utility Commission ("Commission") may rule on this matter without further input, and a judgment may be entered against you. All pleadings, such as an Answer, Response or Objection to the enclosed Applications For Subpoenas, must be filed with the Secretary of the Commission, with a copy served on the undersigned counsel for Complainants.

Date: 10/09/2014

Respectfully Submitted By: 
 DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dsross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747



**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of:
SBG Management Services, Inc., et al.

vs.

Philadelphia Gas Works

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

SUBPOENA

To: Phred Jones – Philadelphia Gas Works
800 W. Montgomery Avenue, Philadelphia, PA 19122
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the _____ Complainants _____ and to remain until excused;

2. And bring with you and produce the following: Any and all documents, writings, reports, correspondence, materials, data/information, financial accounting records, recordings and other verified proofs and information that have not already been provided, upon which you relied in support of your responses provided to Complainants' discovery requests and actions taken by you pertaining to the above-captioned matters.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania)
) SS:
County of)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	: DOCKET NO. C-2012-2308454

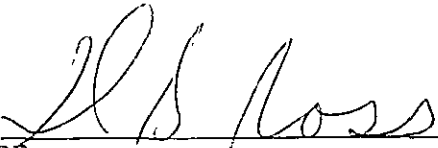
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
OAK LANE REALTY CO., LP	: DOCKET NO. C-2012-2308462
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	: DOCKET NO. C-2012-2308465
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	: DOCKET NO. C-2012-2334253
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

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Date: 10/09/2014

Respectfully Submitted By: 
 DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dsross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:
SBG Management Services, Inc., et al.

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

vs.

Philadelphia Gas Works

SUBPOENA

To: Ramya Rajan, Manager of the Customer Resource Center – Philadelphia Gas Works
800 W. Montgomery Avenue, Philadelphia, PA 19122
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the Complainants and to remain until excused;

2. And bring with you and produce the following: Any and all documents,
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recordings and other verified proofs and information upon which you relied in support of your
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above-captioned matters.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania)
) SS:
County of)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	:	DOCKET NO. C-2012-2308454

Complainant	:
V.	:
PHILADELPHIA GAS WORKS	:
Respondent	:
	:
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	:

NOTICE TO PLEAD

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Date: 10/09/2014

Respectfully Submitted By: 

DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dsross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:
SBG Management Services, Inc., et al.

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

vs.

Philadelphia Gas Works

SUBPOENA

To: Randy Hollman (formerly of) Customer Resource Center – Philadelphia Gas Works
800 W. Montgomery Avenue, Philadelphia, PA 19122
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
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BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania

)

) SS:

County of

)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	: DOCKET NO. C-2012-2308454


Complainant	:
V.	:
PHILADELPHIA GAS WORKS	:
Respondent	:
	:
SBG MANAGEMENT SERVICES, INC./	:
OAK LANE REALTY CO., LP	: DOCKET NO. C-2012-2308462
Complainant	:
V.	:
PHILADELPHIA GAS WORKS	:
Respondent	:
	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	: DOCKET NO. C-2012-2308465
Complainant	:
V.	:
PHILADELPHIA GAS WORKS	:
Respondent	:
	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	: DOCKET NO. C-2012-2334253
Complainant	:
V.	:
PHILADELPHIA GAS WORKS	:
Respondent	:

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.421, you are hereby notified to file a written response or objection to this Application for Subpoena which was served on this date, of the above-captioned matters, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted, the Pennsylvania Public Utility Commission ("Commission") may rule on this matter without further input, and a judgment may be entered against you. All pleadings, such as an Answer, Response or Objection to the enclosed Applications For Subpoenas, must be filed with the Secretary of the Commission, with a copy served on the undersigned counsel for Complainants.

Date: 10/09/2014

Respectfully Submitted By: 
 DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dsross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:
SBG Management Services, Inc., et al.

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

vs.

Philadelphia Gas Works

SUBPOENA

To: Linda Pereira, Senior Customer Review Officer – Philadelphia Gas Works
800 W. Montgomery Avenue, Philadelphia, PA 19122
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the Complainants and to remain until excused;

2. And bring with you and produce the following: Any and all documents,
writings, reports, correspondence, materials, data/information, financial accounting records,
recordings and other verified proofs and information upon which you relied in support of your
responses provided to Complainants' discovery requests and actions taken by you pertaining to the
above-captioned matters.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania)
) SS:
County of)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	: DOCKET NO. C-2012-2308454

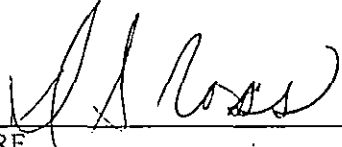
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
OAK LANE REALTY CO., LP	: DOCKET NO. C-2012-2308462
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	: DOCKET NO. C-2012-2308465
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	: DOCKET NO. C-2012-2334253
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.421, you are hereby notified to file a written response or objection to this Application for Subpoena which was served on this date, of the above-captioned matters, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted, the Pennsylvania Public Utility Commission ("Commission") may rule on this matter without further input, and a judgment may be entered against you. All pleadings, such as an Answer, Response or Objection to the enclosed Applications For Subpoenas, must be filed with the Secretary of the Commission, with a copy served on the undersigned counsel for Complainants.

Date: 10/09/2014

Respectfully Submitted By: 
 DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dsross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747

RECEIVED

OCT 07 2014

**PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU**



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:
SBG Management Services, Inc., et al.

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

vs.

Philadelphia Gas Works

SUBPOENA

To: Tiffany Higgins, Manager of the Customer Review Unit – Philadelphia Gas Works
800 W. Montgomery Avenue, Philadelphia, PA 19122
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the Complainants and to remain until excused;

2. And bring with you and produce the following: Any and all documents,
writings, reports, correspondence, materials, data/information, financial accounting records,
recordings and other verified proofs and information upon which you relied in support of your
responses provided to Complainants' discovery requests and actions taken by you pertaining to the
above-captioned matters.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania)
) SS:
County of)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	:	DOCKET NO. C-2012-2308454

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

V.
PHILADELPHIA GAS WORKS
Respondent
SBG MANAGEMENT SERVICES, INC./
FERN ROCK REALTY : DOCKET NO. C-2012-2308465
Complainant

V.
PHILADELPHIA GAS WORKS
Respondent
SBG MANAGEMENT SERVICES, INC./
COLONIAL GARDEN REALTY, LP : DOCKET NO. C-2012-2334253
Complainant


V.
PHILADELPHIA GAS WORKS
Respondent

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.421, you are hereby notified to file a written response or objection to this Application for Subpoena which was served on this date, of the above-captioned matters, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted, the Pennsylvania Public Utility Commission ("Commission") may rule on this matter without further input, and a judgment may be entered against you. All pleadings, such as an Answer, Response or Objection to the enclosed Applications For Subpoenas, must be filed with the Secretary of the Commission, with a copy served on the undersigned counsel for Complainants.

Date: 10/09/2014

Respectfully Submitted By: 
DONNA S. ROSS, ESQUIRE
COUNSEL FOR COMPLAINANTS
Mailing Address: P.O. Box 549, Abington, PA 19001
Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
Mobile Phone: 484-888-9578
Office: 215-938-6665; facsimile: 215-935.6987
Email: dsross@sbgmanagement.com; dsross90@gmail.com
Pa. Attorney Id. No. 59747



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:
SBG Management Services, Inc., et al.

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

vs.

Philadelphia Gas Works

SUBPOENA

To: Tyra Jackson, Director of Regulatory Compliance – Philadelphia Gas Works
800 W. Montgomery Avenue, Philadelphia, PA 19122
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the Complainants and to remain until excused;

2. And bring with you and produce the following: Any and all documents, writings, reports, correspondence, materials, data/information, financial accounting records, recordings and other verified proofs and information upon which you relied in support of your responses provided to Complainants' discovery requests and actions taken by you pertaining to the above-captioned matters.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania)
) SS:
County of)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	:	DOCKET NO. C-2012-2308454

Complainant	:
V.	:
PHILADELPHIA GAS WORKS	:
Respondent	:
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

: DOCKET NO. C-2012-2308465


: DOCKET NO. C-2012-2334253

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.421, you are hereby notified to file a written response or objection to this Application for Subpoena which was served on this date, of the above-captioned matters, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted, the Pennsylvania Public Utility Commission ("Commission") may rule on this matter without further input, and a judgment may be entered against you. All pleadings, such as an Answer, Response or Objection to the enclosed Applications For Subpoenas, must be filed with the Secretary of the Commission, with a copy served on the undersigned counsel for Complainants.

Date: 10/09/2014

Respectfully Submitted By: 
 DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:
SBG Management Services, Inc., et al.

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

vs.

Philadelphia Gas Works

SUBPOENA

To: Ralph T. Savage, III, Director of the Customer Resource Center (a/k/a Ted Savage) –
Philadelphia Gas Works 800 W. Montgomery Avenue, Philadelphia, PA 19122
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the Complainants and to remain until excused;

2. And bring with you and produce the following: Any and all documents,
writings, reports, correspondence, materials, data/information, financial accounting records,
recordings and other verified proofs and information upon which you relied in support of your
responses provided to Complainants' discovery requests and actions taken by you pertaining to the
above-captioned matters.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania)
) SS:
County of)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	: DOCKET NO. C-2012-2308454

<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:
OAK LANE REALTY CO., LP	:
<i>Complainant</i>	:
	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	:
<i>Complainant</i>	:
	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	:
<i>Complainant</i>	:
	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:

: DOCKET NO. C-2012-2308462

: DOCKET NO. C-2012-2308465

: DOCKET NO. C-2012-2334253

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

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Date: 10/09/2014

Respectfully Submitted By: 

DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dsross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:
SBG Management Services, Inc., et al.

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

vs.

Philadelphia Gas Works

SUBPOENA

To: Bernard L. Cummings, V.P. Customer Service & Collections – Philadelphia Gas Works
800 W. Montgomery Avenue, Philadelphia, PA 19122

(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the Complainants and to remain until excused;

2. And bring with you and produce the following: Any and all documents,
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BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania)
) SS:
County of)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

Donna S. Ross, Esquire
SBG Property Management Services, Inc.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-938-6987
Email: dsross90@gmail.com; dsross@sbgmanagement.com
Pennsylvania Attorney ID. NO. 59747

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	: DOCKET NO. C-2012-2308454

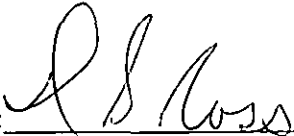
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
OAK LANE REALTY CO., LP	: DOCKET NO. C-2012-2308462
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
FERN ROCK REALTY	: DOCKET NO. C-2012-2308465
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:
SBG MANAGEMENT SERVICES, INC./	:
COLONIAL GARDEN REALTY, LP	: DOCKET NO. C-2012-2334253
<i>Complainant</i>	:
V.	:
PHILADELPHIA GAS WORKS	:
<i>Respondent</i>	:

NOTICE TO PLEAD

TO: PHILADELPHIA GAS WORKS, RESPONDENT:

Pursuant to 52 Pa. Code Section 5.421, you are hereby notified to file a written response or objection to this Application for Subpoena which was served on this date, of the above-captioned matters, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted, the Pennsylvania Public Utility Commission ("Commission") may rule on this matter without further input, and a judgment may be entered against you. All pleadings, such as an Answer, Response or Objection to the enclosed Applications For Subpoenas, must be filed with the Secretary of the Commission, with a copy served on the undersigned counsel for Complainants.

Date: 10/09/2014

Respectfully Submitted By: 
 DONNA S. ROSS, ESQUIRE
 COUNSEL FOR COMPLAINANTS
 Mailing Address: P.O. Box 549, Abington, PA 19001
 Street Address: 1095 Rydal Road, Suite 325, Rydal, PA 19046
 Mobile Phone: 484-888-9578
 Office: 215-938-6665; facsimile: 215-935.6987
 Email: dsross@sbgmanagement.com; dsross90@gmail.com
 Pa. Attorney Id. No. 59747



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:
SBG Management Services, Inc., et al.

Docket Nos.: C-2012-2304183; C-2012-2304215;
C-2012-2304324; C-2012-2304167;
C-2012-2304303; C-2012-2308454;
C-2012-2308460; C-2012-2308462;
C-2012-2308465; C-2012-2308469

vs.

Philadelphia Gas Works

SUBPOENA

To: John J. Dunn, III – 5635 Wisteria Ave. Penn Sauken, NJ 08109-1243
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to _____
(place)
_____, at _____

Pennsylvania, on _____, at _____ o'clock, in the above case, to testify
(date)
on behalf of the Complainants and to remain until excused;

2. And bring with you and produce the following: Any and all documents, writings, reports, correspondence, materials, data/information, financial accounting records, recordings and other verified proofs and information upon which you relied in support of your responses provided to Complainants' discovery requests and actions taken by you pertaining to the above-captioned matters.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date _____

Administrative Law Judge

Commonwealth of Pennsylvania

)

) SS:

County of

)

AFFIDAVIT OF SERVICE

Before me, the undersigned authority, personally appeared _____
who, being duly sworn according to law, deposes and says that he/she served a true and correct
copy of the within SUBPOENA upon _____
by handing the same to him/her at _____ on the
_____ day of _____, 2014 at _____ a.m./p.m.

(Signature)

Sworn to and subscribed before me
this _____ day of _____, 2014

Notary Public

00100

FedEx Package Express US Airbill 8063 1205 4664

1 From Please print and press hard Date 10/9/2014 Sender's FedEx Account Number 2393-0908-3 Sender's Name Donna S. Ross Phone 215 938-6665 Company SBC MANAGEMENT Address 1075 RYDAL RD City RYDAL State PA ZIP 19046-1711

2 Your Internal Billing Reference

3 To Recipient's Name Honorable E. J. McVey Phone 215 560-2105 Company PA-PUC Address 801 Market Street Suite 4063 City Philadelphia State PA ZIP 19107

4 Express Package Service Packages up to 150 lbs. Per package over 100 lbs, use the new FedEx Express Freight Kit label

5 Packaging 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

7 Payment Method Recipient, Third Party, Credit Card, Cash/Check

8 Total Packages, Total Weight, Total Declared Value

9 Does this shipment contain dangerous goods?

10 Total Packages, Total Weight, Total Declared Value

11 The liability is limited to USD 100 unless you declare a higher value. See back for details. By using the FedEx you agree to the terms and conditions on the back of the label and the terms of the FedEx Service Guide, including terms for lost or damaged items.



00087

00100

FedEx Package Express US Airbill 8063 1205 4675

1 From Please print and press hard Date 10/9/2014 Sender's FedEx Account Number 2393-0908-3 Sender's Name Donna Ross Phone 215 938-6665 Company SBC MANAGEMENT Address 1075 RYDAL RD City RYDAL State PA ZIP 19046-1711

2 Your Internal Billing Reference

3 To Recipient's Name Mr. Lawrence Farinas Phone 215 684-6980 Company PGW Address 800 W. Montgomery Ave 4th Floor City Philadelphia State PA ZIP 19122

4 Express Package Service Packages up to 150 lbs. Per package over 100 lbs, use the new FedEx Express Freight Kit label

5 Packaging 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

7 Payment Method Recipient, Third Party, Credit Card, Cash/Check

8 Total Packages, Total Weight, Total Declared Value

9 Does this shipment contain dangerous goods?

10 Total Packages, Total Weight, Total Declared Value

11 The liability is limited to USD 100 unless you declare a higher value. See back for details. By using the FedEx you agree to the terms and conditions on the back of the label and the terms of the FedEx Service Guide, including terms for lost or damaged items.



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FedEx Package Express US Airbill 8063 1205 4686

1 From Please print and press hard Date 10/9/2014 Sender's FedEx Account Number 2393-0908-3 Sender's Name Donna Ross Phone 215 938-6665 Company SBC MANAGEMENT Address 1075 RYDAL RD City RYDAL State PA ZIP 19046-1711

2 Your Internal Billing Reference

3 To Recipient's Name Honorable Secretary Rosemary Chiavetta, Esq. Phone 717 772-7777 Company PA-PUC Address Commonwealth Keystone Bldg 400 North Street City Harrisburg State PA ZIP 17120

4 Express Package Service Packages up to 150 lbs. Per package over 100 lbs, use the new FedEx Express Freight Kit label

5 Packaging 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

7 Payment Method Recipient, Third Party, Credit Card, Cash/Check

8 Total Packages, Total Weight, Total Declared Value

9 Does this shipment contain dangerous goods?

10 Total Packages, Total Weight, Total Declared Value

11 The liability is limited to USD 100 unless you declare a higher value. See back for details. By using the FedEx you agree to the terms and conditions on the back of the label and the terms of the FedEx Service Guide, including terms for lost or damaged items.



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COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC
UTILITY COMMISSION

RECEIVED

OCT - 7 2014

In the Matter of:

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Complainants' Response to PGW's Objections For Applications of Subpoenas

In the Matters of: SBG Management Services, Inc./Colonial Garden Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2304183; SBG Management Services, Inc./Fairmount Realty, v. Philadelphia Gas Works, Docket No. C-2012-2304215; SBG Management Services, Inc./Simon Gardens Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2304324; SBG Management Services, Inc./Elrae Garden Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2304167; SBG Management Services, Inc./Marshall Square Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2304303; SBG Management Services, Inc./Marchwood Realty v. Philadelphia Gas Works, Docket No. C-2012-2308454; SBG Management Services, Inc./Simon Gardens Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2308460; SBG Management Services, Inc./Oak Lane Realty Co., LP v. Philadelphia Gas Works, Docket No. C-2012-2308462; SBG Management Services, Inc./Fern Rock Realty v. Philadelphia Gas Works, Docket No. C-2012-2308465; and SBG Management Services, Inc./Colonial Garden Realty, LP v. Philadelphia Gas Works, Docket No. C-2012-2308469

Certificate of Service

I hereby certify that as of today's date, I have served the foregoing instrument in the above referenced matters, upon the parties set forth below, via First Class, U.S. mail/overnight delivery and/or by hand delivery to all parties as listed below, in accordance with the requirements of 52 Pa.Code Section 1.54 and the PA Public Utility Commission Orders.

The Honorable ALJ Eranda Vero
Pennsylvania Public Utility Commission, Suite 4063,
801 Market Street, Philadelphia, PA 19107

For Pennsylvania Public Utility Commission
Via U.S. Mail First Class/overnight mail

Mr. Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue, 4th Floor
Philadelphia, PA 19122

For Respondent PGW
Via U.S. Mail First Class/overnight mail

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

For Complainants
Via Hand Delivery

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

For Pennsylvania Public Utility Commission
Via U.S. Mail First Class/overnight mail

Date: 10/09/2014

By: 

DONNA S. ROSS, ESQUIRE
SBG MANAGEMENT SERVICES, INC.
P.O. Box 549
Abington, PA 19001
Phone: 484-888-9578
Office: 215-938-6665
Facsimile: 215-935-6987-
Email: dsross@sbgmanagement.com; dsross90@gmail.com
Pennsylvania Attorney ID. No. 59747

FedEx Package Express **US Airbill**

FedEx Tracking Number **8063 1205 4686**

Form ID No. **0215**

Recipient's Copy

MUR3

1 From

Date 10/9/2014

Sender's Name Donna Ross Phone 605 665 665

Company SBG MANAGEMENT

Address 1095 RYDAL RD **OCT 07 2014** Dept./Floor/Suite/Room

City RYDAL **PA PUBLIC UTILITY COMMISSION, SECRETARY'S BUREAU**

2 Your Internal Billing Reference

3 To

Recipient's Name Honorable Secretary Rosemary Chiavetta Esq Phone 717 772-7777

Company PA - PUC

Address Commw. & H. Key Stone Bldg Dept./Floor/Suite/Room

Address HCO North Street

City Harrisburg State PA ZIP 17120

0115759565

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

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

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 (not required) Yes Shipper's Declaration not required

Dry Ice Dry Ice, 5, 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. Obtain recip. Acct. No.

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

Total Packages _____ Total Weight _____ lbs. Credit Card Acct. _____

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



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