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April 14, 2023

**Via Electronic Filing**

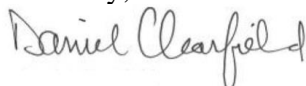
Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

RE: *SBG Management Services, Inc. et al., v. PGW*; Docket Nos. C-2012-2304183; C-2012-2304324; C-2015-2486618; C-2015-2486642; C-2015-2486648; C-2015-2486655; C-2015-2486664; C-2015-2486670; C-2015-2486674; and C-2015-2486677; **PGW'S MOTION TO COMPEL SBG RESPONSES TO SET II INTERROGATORIES AND REQUEST FOR EXPEDITED TREATMENT**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' ("PGW") Motion to Compel SBG Management Services, Inc. *et al.* Responses to Set II Interrogatories with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Daniel Clearfield, Esq.

DC/lww  
Enclosure

cc: Hon. Eranda Vero w/enc.  
Cert. of Service w/enc.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SBG Management Services, Inc. <i>et al.</i>	:	C-2012-2304183
	:	C-2012-2304324
	:	C-2015-2486618
	:	C-2015-2486677
	:	C-2015-2486674
	:	C-2015-2486670
v.	:	C-2015-2486664
	:	C-2015-2486655
	:	C-2015-2486648
Philadelphia Gas Works	:	C-2015-2486674

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**NOTICE TO PLEAD**

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**To:** Each of the Complainants  
**c/o** *Counsel for Complainants*

Patricia M. Starner, Esquire  
Michael Yanoff, Esquire  
Shawn M. Rodgers, Esquire  
GOLDSTEIN LAW PARTNERS, LLC  
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[srodgers@goldsteinlp.com](mailto:srodgers@goldsteinlp.com)

You are hereby notified that a written response to the enclosed Motion to Compel by Philadelphia Gas Works must be filed **within 2 business days or by 4:30 PM on Tuesday, April 18, 2023** if Ordered by Administrative Law Judge Eranda Vero, or otherwise filed within five days from service hereof, pursuant to 52 Pa. Code § 5.342(g)(1). A written response must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served on the Administrative Law Judge and undersigned counsel.

Daniel Clearfield

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Carl R. Shultz, Esquire  
Bryce R. Beard, Esquire  
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Date: April 14, 2023

*Attorneys for Philadelphia Gas Works*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SBG Management Services, Inc. <i>et al.</i>	:	C-2012-2304183
	:	C-2012-2304324
	:	C-2015-2486618
	:	C-2015-2486677
	:	C-2015-2486674
	:	C-2015-2486670
v.	:	C-2015-2486664
	:	C-2015-2486655
	:	C-2015-2486648
Philadelphia Gas Works	:	C-2015-2486674

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**MOTION OF PHILADELPHIA GAS WORKS  
TO COMPEL SBG MANAGEMENT SERVICES, INC.  
ET AL. RESPONSES TO SET II INTERROGATORIES  
AND REQUEST FOR EXPEDITED TREATMENT**

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Pursuant to 52 Pa. Code §§ 5.342, 5.371, and 5.372, Philadelphia Gas Works (“PGW”) hereby moves to compel the responses of SBG Management Services, Inc. *et al.* (collectively “SBG”) to PGW Set II Interrogatories (“PGW Set II”). PGW also requests that Your Honor grant expedited treatment and order SBG to **Answer this Motion within 2 business days, or by 4:30 PM on Tuesday, April 18, 2023** under the circumstances provided herein, and that SBG be ordered to provide full and complete responses to PGW Set II no later than Thursday, April 20, 2023 to allow PGW to adequately prepare for the April 25 and 26, 2023 evidentiary hearings in this matter. In support of this Motion, PGW avers as follows:

1. On February 1, 2023, PGW served its Set II Interrogatories on SBG.<sup>1</sup> A copy of PGW Set II, containing six (6) interrogatories, is included as **Attachment A**.

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<sup>1</sup> The Certificate of Service for PGW Set II was filed with the Commission at <https://www.puc.pa.gov/pcdocs/1772774.pdf>

2. SBG did not object to PGW Set II pursuant to 52 Pa. Code § 5.342(e) within 10-days of service, or by February 13, 2023.<sup>2</sup>

3. Pursuant to 52 Pa. Code § 5.342(d), SBG's responses to PGW Set II were due within 20 days of service, or by February 21, 2023.

4. SBG failed to provide any responses to PGW Set II on or by February 21, 2023.

5. By email dated March 29, 2023, PGW inquired on the status of SBG's overdue responses to PGW Set II. A copy of the email is included as **Attachment B**. Through the March 29 email, PGW voluntarily and in good-faith extended SBG's deadline to provide full and complete responses to PGW Set II within 5 business days, or until Wednesday, April 5, 2023. The email also explained to SBG that PGW required responses to Set II in order to prepare for the April 25 and 26, 2023 evidentiary hearings, and further noted PGW's desire to continue global settlement discussions but that those further discussions were awaiting SBG to complete its "analysis."

6. By phone call on March 31, 2023, Counsel for SBG requested an extension until April 12, 2023 to provide full and complete responses to PGW Set II. PGW, in good-faith agreed to SBG's request. Counsel for SBG followed that call with an email dated March 31, 2023, reflecting PGW's further good-faith extension of SBG's deadline for responses to PGW Set II until April 12, 2023. A copy of the email is included as **Attachment C**.

7. To date, SBG has failed to provide any responses to PGW Set II.

8. The information sought in PGW Set II relates to the new claims raised in SBG's Remand Direct Testimony of Christopher E. Hanson and seeks production of the foundation for

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<sup>2</sup> Because the Commission's 10-day objection deadline fell on Saturday, February 11, 2023, SBG's objections would have been due by Monday, February 13, 2023 under 52 Pa. Code § 1.12.

the portion of his testimony on “vacated” liens. In his testimony, Mr. Hanson argues “vacated” liens, which under the law are treated as null and void, were “in fact frequently satisfied through payments” by SBG and “were possibly satisfied as opposed to nullified” and thus SBG is owed an additional \$163,098. *See SBG Remand Direct at 7:6-18*. In particular, PGW Set II requests the foundational support for SBG’s Remand Direct testimony which provided:

... I am unaware of any evidence provided by PGW that the “vacated” liens were not paid. I understand from Counsel that, for SBG, the vacated liens were in fact frequently satisfied through payments made directly or indirectly by SBG contemporaneous with property sales or refinancing or at other times. I reviewed refinancing and sale transaction information provided by SBG, including Form HUD-1s. I identified several cases where the transaction information itemized amounts to be paid to PGW that were contemporaneous to the status date of liens listed as “vacated”.<sup>7</sup> On the basis of this information supporting that vacated liens were possibly satisfied as opposed to nullified, I included all vacated liens as a separate category in the recalculations at Counsel’s request.

SBG Remand Direct at 7:9-18 (emphasis added). Additionally, Mr. Hanson’s testimony provides only one example in support of the above testimony in Footnote 7, which provides:

For example, a settlement summary for the Colonial Garden property at 5427 Wayne Avenue was dated August 31, 2011 and reflected \$365,000 to be set aside for obligations to PGW. There were \$66,062 in liens on the property with a status of vacated on August 4, 2011. An additional \$244,745 reflected a status of satisfied in November 2011, a total of \$310,807 in liens removed from the property.

SBG Remand Direct at n.7.

9. Of note, PGW has already refuted the singular example from SBG’s Footnote 7 in PGW’s Remand Rebuttal St. No. 1-R served on February 7, 2023.<sup>3</sup> Further, SBG’s Remand

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<sup>3</sup> *See* PGW’s Remand Rebuttal St. No. 1-R at 13-16.

Rebuttal testimony, served on February 16, 2023, did not respond to PGW's Remand Rebuttal on "vacated" liens or even discuss SBG's new theory from its Remand Direct on "vacated" liens.<sup>4</sup> However, given SBG's statement that vacated liens were paid in "several cases" but only one (albeit clearly refutable) example was provided by SBG, PGW has a right to discovery on the foundational basis for Mr. Hanson's claim that, "frequently," notwithstanding the vacation of the lien, SBG, nonetheless satisfied the lien (and did not simply pay its gas bill). Simply put, PGW Set II is requesting production of what information Mr. Hanson relied to support his Remand Direct testimony at 7:9-18 on "vacated" liens. Only by receiving full and complete answers to these interrogatories will PGW be able to properly prepare for the upcoming hearing. It would be grossly unfair to require PGW to engage in cross-examination of Mr. Hanson on his, at this point, unsupported assertion without the benefit of the data requested in PGW's discovery requests.

10. Based on the circumstances discussed above, and in light of the evidentiary hearings scheduled for April 25 and 26, 2023, PGW hereby requests expedited treatment of this Motion, and asks that Your Honor order SBG to **Answer this Motion within 2 business days, or by 4:30 PM on Tuesday, April 18, 2023**, and that SBG be ordered to **provide full and complete responses to PGW Set II no later than Thursday, April 20, 2023** to allow PGW to adequately prepare for the April 25 and 26, 2023 evidentiary hearings in this matter.

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<sup>4</sup> See generally SBG's Remand Rebuttal served February 16, 2023.

**WHEREFORE**, for the reasons set forth above, PGW respectfully requests that SBG Management Services, Inc. *et al*, be:

- a. Ordered to Answer this Motion by 4:30 PM on Tuesday, April 18, 2023 under the circumstances provided herein;
- b. Compelled to provide full and complete responses to PGW's Set II Interrogatories no later than Thursday, April 20, 2023; and
- c. Ordered to provide any other relief in favor of PGW that is deemed to be reasonable and appropriate.

Respectfully submitted,



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April 14, 2023

*Attorneys for Philadelphia Gas Works*



# **Attachment A**

## **PGW's February 1, 2023 Set II Interrogatories to SBG**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SBG Management Services, Inc. <i>et al.</i>	:	C-2012-2304183
	:	C-2012-2304324
	:	C-2015-2486618
	:	C-2015-2486677
	:	C-2015-2486674
	:	C-2015-2486670
v.	:	C-2015-2486664
	:	C-2015-2486655
	:	C-2015-2486648
Philadelphia Gas Works	:	C-2015-2486674

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**PHILADELPHIA GAS WORKS' INTERROGATORIES ADDRESSED TO SBG  
MANAGEMENT SERVICES, INC. *ET AL.*, SET II**

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Pursuant to 52 Pa. Code §§ 5.341, 5.342 and 5.349, Philadelphia Gas Works (“PGW”) hereby propounds the following interrogatories and requests for documents upon the SBG Management Services, Inc. *et al.* (“SBG”), to be answered by those officers, employees or agents of SBG who may be cognizant of the requested information and who are authorized to answer on behalf of SBG. These interrogatories and requests for documents are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. PGW reserves the right to propound additional interrogatories and to request additional documents as and if additional information is required. In accordance with 52 Pa. Code §§ 5.342(d) and 5.349(d), the interrogatories are to be answered in writing under oath and documents are to be furnished and served in-hand upon the undersigned within the time period prescribed by the Commission for this docket.

## ADDITIONAL INSTRUCTIONS

1. Unless otherwise indicated, the time period for all requests is 2008 to the present.
2. If you object to any part of an interrogatory or request, answer all parts of such interrogatories or requests to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.
3. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to an interrogatory or request for production or any part thereof, contained in a non-written communication, state the following with respect to the non-written communication:
  - (i) the date thereof;
  - (ii) the identity of each of the participants in the non-written communication;
  - (iii) the identity of each person present during all or any part of the non-written communication;
  - (iv) a description of the non-written communication which is sufficient to identify the particular communication without revealing the information for which a privilege or protection from non-disclosure is claimed;
  - (v) the nature of your claim of non-discoverability (e.g. attorney-client privilege); and
  - (vi) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit PGW to make a full determination as to whether your claim is valid.
4. If you claim any form of privilege or other protection from disclosure as a ground for withholding information responsive to an interrogatory or request or any part thereof, contained in a document, set forth with respect to the document:

- (i) the date and number of pages;
- (ii) the identity of the author(s) or preparer(s);
- (iii) the identity of the addressee, if any;
- (iv) the title;
- (v) the type of tangible thing (e.g. letter, memorandum, telegram, chart, report, recording disc);
- (vi) the subject matter (without revealing the information as to which privilege or protection from non-disclosure is claimed);
- (vii) the identity of each person who has received the document or to whom knowledge of the contents of the document was communicated;
- (viii) the identity of the present custodian(s);
- (ix) the nature of your claim of non-discoverability (e.g. attorney-client privilege); and
- (x) each and every fact on which you rest your claim of privilege or other protection from disclosure, stated with sufficient specificity to permit PGW to make a full determination as to whether your claim is valid.

5. If you claim any form of privilege or other protection from disclosure, otherwise than as set forth in Instructions 3 and 4, as a ground for not answering any interrogatory or request or any part thereof, set forth:

- (i) the nature of your claim as to non-discoverability; and
- (ii) each and every fact on which you rest your claim or privilege or other protection from disclosure, stating such facts with sufficient specificity to permit PGW to make a full determination as to whether your claim is valid.

6. If you know of any document, communication or information but cannot give the specific information or the full information called for by a particular interrogatory or request, so state and give the best information you have on the subject and identify every person you believe to have the required information.

7. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun, and vice versa; the masculine form of a pronoun shall be considered to include also within its meaning the feminine and neuter forms of the pronoun, and vice versa; and the use of any tense of any verb shall be considered to include also within its meaning all other tenses of the verb. In each instance, the interrogatory or request shall be construed so as to require the most inclusive answer or production.

8. Please attach written material to any answer for which written material is requested and/or available. If such written material is not available, state where it may be obtained. Label the written material with the number of the interrogatory to which it pertains.

9. On each Interrogatory response list the name and title of the person or persons who prepared the response or who is responsible for the information contained therein.

## DEFINITIONS

As used in these Interrogatories and Requests for Production of Documents, the following terms have the meaning as set forth below:

1. The term “SBG” means the SBG Management Services, Inc. and any affiliate or subsidiary unless the context indicates otherwise including but not limited to Colonial Garden Realty Co., LP; Elrae Garden Realty Co., LP; Fairmount Manor Realty Co., LP; Fern Rock Realty Co., LP; Marchwood Realty Co., LP; Marshall Square Realty Co., LP; Oak Lane Court Realty Co., LP; and Simon Garden Realty Co., LP..

2. The term “you” means SBG and any agent or representative of SBG.

3. “List”, “describe”, “explain”, “specify” or “state” means to set forth fully, in detail, and unambiguously each and every fact of which SBG or its agents or representatives have knowledge which is relevant to the answer called for by the interrogatory.

4. The terms “document” or “documents” as used herein has the same meaning and scope as in Rule 4009 of the Pennsylvania Rules of Civil Procedure and includes, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries,

calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers, accounts, worksheets, photographs, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- (a) are now or were formerly in your possession, custody or control; or
- (b) are known or believed to be responsive to these interrogatories, regardless of who has or formerly had custody, possession or control.

5. The term “date” means the exact day, month and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

6. The term “person” or “persons” means and includes any individual, committee, task force, division, department, company, contractor, state, federal or local government agency, corporation, firm, association, partnership, joint venture or any other business or legal entity.

7. The terms “identify” and “identity” when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

8. The terms “identify” and “identity” when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

9. The terms “identify” and “identity” with respect to a document mean to state the name or title of the document, the type of document (e.g., letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the possession of the SBG or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization, for such disposition, and state the date or approximate date thereof.

10. The terms “identify” and “identity” with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

11. The term “oral communication” means any utterance heard, whether in person, by telephone, or otherwise.

12. The term “identify the sources” means to identify and specify all documents and non-written communications upon which you rely in support of the allegation, contention, conclusion, position or answer in question, to state the references drawn from each such source upon which you rely in support of such allegation, contention, conclusion, position or answer and to identify all individuals whom you know to be knowledgeable with respect to the subject matter of such allegation, contention, conclusion, position or answer. Where a source is a public record (e.g., a newspaper, trade journal, judicial or administrative opinion), a quotation and page reference of the material relied upon shall be supplied.



13. The term to “state the basis” for an allegation, contention, conclusion, position or answer means (a) to identify and specify the sources therefore, and (b) to identify and specify all facts on which you rely or intend to rely in support of the allegation, contention, conclusion, position or answer, and (c) to set forth and explain the nature and application to the relevant facts of all pertinent legal theories upon which you rely for your knowledge, information and/or belief that there are good grounds to support such allegation, contention, conclusion, position or answer.

14. The terms “and” and “or” have both conjunctive and disjunctive meanings as necessary to bring within the scope of the interrogatories and request any information or documents that might otherwise be construed to be outside their scope; “all” and “any” mean both “each” and “every”.

15. The terms “relates to” or “relating to” mean referring to, concerning, responding to, containing, regarding, discussing, describing, reflecting, analyzing, constituting, disclosing, embodying, defining, stating, explaining, summarizing, or in any way pertaining to.

16. The term “including” means “including, but not limited to.”

17. The term “PUC Complaints” means any and all of the formal complaints filed with the Pennsylvania Public Utility Commission, including: SBG Management Services, Inc./Simon Garden Realty Co., L.P. v. PGW at Docket Nos. C-2012-2304324 and C-2015-2486642; SBG Management Services, Inc./Colonial Garden Realty Co., L.P. v. PGW at Docket Nos. C-2012-2304183 and C-2015-2486677; SBG Management Services, Inc./Elrea Garden Realty Co., L.P. v. PGW at Docket Nos. C-2012-2304167 and C-2015-2486674; SBG Management Services, Inc./Fern Rock Gardens Realty Co., L.P. v. PGW at Docket Nos. C-2012-2308465 and C-2015-2486670; SBG Management Services, Inc./Fairmont Manor Realty Co.,

L.P. v. PGW at Docket Nos. C-2012-2304215 and C-2015-2486664; SBG Management Services, Inc./Oak Lane Realty Co., L.P. v. PGW at Docket Nos. C-2012-2308462 and C-2015-2486655; SBG Management Services, Inc./Marchwood Realty Co., L.P. v. PGW at Docket Nos. C-2012-2308454 and C-2015-2486648; and SBG Management Services, Inc./Marshall Square Realty Co., L.P. v. PGW at Docket Nos. C-2012-2304303 and C-2015-2486618.

**PHILADELPHIA GAS WORKS' INTERROGATORIES ADDRESSED TO SBG  
MANAGEMENT SERVICES, INC. *ET AL.*, SET II**

**INTERROGATORIES**

**RE: SBG Remand Direct Testimony of Christopher E. Hanson**

1. Refer to Page 7, line 10 to 12: Please identify each lien listed as vacated that was paid directly or indirectly by SBG "contemporaneous with property sales." For each such lien, please state (1) the date the lien was filed (or perfected); (2) the date the lien was vacated, (3) the date of payment by SBG, and (4) the total amount paid by SBG regarding the lien.
2. Refer to Page 7, line 10 to 12: Please identify each lien listed as vacated that was paid directly or indirectly by SBG "contemporaneous with ... refinancings." For each such lien, please state (1) the date the lien was filed (or perfected); (2) the date the lien was vacated, (3) the date of payment by SBG, and (4) the total amount paid by SBG regarding the lien.
3. Refer to Page 7, line 10 to 12: Please identify each lien listed as vacated that was paid directly or indirectly by SBG "at other times." For each such lien, please state the date the lien was vacated, the date of payment by SBG, and the total amount paid by SBG regarding the lien.
4. Refer to Page 7, line 12 to 14 and footnote 7: Please identify (and provide a copy of) all transaction documents, including HUD1s, provided by SBG to Mr. Hanson.
5. Refer to Page 7, line 14 to 15: Please identify (and provide a copy of) all transaction documents, including HUD1s, where the "transaction documents itemized amounts to be paid to PGW that were contemporaneous to the status date of liens listed as 'vacated'".
6. Refer to Page 7, line 15 to 18: To the extent not provided in response to the foregoing Interrogatories, please Identify (and provide a copy of) any and all transaction documents or "information supporting that vacated liens were possibly satisfied as opposed to nullified."

**PHILADELPHIA GAS WORKS' INTERROGATORIES ADDRESSED TO SBG  
MANAGEMENT SERVICES, INC. *ET AL.*, SET II**

Respectfully submitted,



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Carl R. Shultz, Esq. (I.D. No. 70328)

Bryce R. Beard, Esq. (I.D. No. 325837)

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Dated: February 1, 2023

# **Attachment B**

**PGW's March 29, 2023 email  
to SBG RE Set II**

## Bryce R. Beard

---

**From:** Bryce R. Beard  
**Sent:** Wednesday, March 29, 2023 3:15 PM  
**To:** Shawn Rodgers; Patricia Starnier; Michael Yanoff  
**Cc:** Dan Clearfield; Carl R. Shultz; Christlieb, Graciela C  
**Subject:** RE: SBG Management Services Inc v. Philadelphia Gas Works, PA PUC Docket C-2012-2304183 et al - PGW Set II Interrogatories to SBG  
**Attachments:** LETTER SERVING INTERROGATORIES TO SBG SET II(108897329.1).pdf; PGW Interrogatories Set II to SBG (FINAL)(108895084.1).pdf

Good Afternoon, Counsel,

In light of Judge Vero's clear directive that the PUC hearings will proceed as currently schedule unless a settlement is reached between the parties, PGW requests that SBG provide full and complete responses to PGW's Set II discovery which was served on February 1, 2023 per the below service email. These interrogatories were not objected to by SBG, and therefore SBG's full and complete responses are overdue. I have re-attached the documents served February 1 for your convenience.

PGW requests that SBG provide full and complete answers within 5 business days, or by 4:30PM on Wednesday, April 5.

If PGW does not receive full and complete responses to the discovery by 4:30PM on April 5, PGW will a Motion to Compel in order to receive answers to the discovery which PGW requires in order to prepare for the April 25 and 26 hearings.

Please note, we are hoping to continue global settlement discussions in the very near future and are awaiting SBG to complete its analysis to further those settlement discussions.

Sincerely,

Bryce R. Beard



### Bryce R. Beard

Associate

Eckert Seamans Cherin & Mellott, LLC  
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BIO: 👤 VCARD: 📄 | 🌐 [in](#) [tw](#)

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**From:** Bryce R. Beard <bbeard@eckertseamans.com>

**Sent:** Wednesday, February 1, 2023 3:53 PM

**To:** Shawn Rodgers <srodgers@goldsteinlp.com>; Patricia Starner <Pstarner@goldsteinlp.com>; Michael Yanoff <myanoff@goldsteinlp.com>

**Cc:** Dan Clearfield <DClearfield@eckertseamans.com>; Carl R. Shultz <CShultz@eckertseamans.com>; Christlieb, Graciela C <Graciela.Christlieb@pgworks.com>

**Subject:** SBG Management Services Inc v. Philadelphia Gas Works, PA PUC Docket C-2012-2304183 et al - PGW Set II Interrogatories to SBG

Good Afternoon,

Attached please find PGW's Set II Interrogatories directed at SBG Management Services Inc. in the above referenced matters.

Due to the expedited procedural schedule Ordered by the ALJ, PGW requests that SBG provide responses to Set II as early as possible and prior to the currently scheduled evidentiary hearings in these matters.

Regards,

Bryce Beard



**Bryce R. Beard**

Associate

Eckert Seamans Cherin & Mellott, LLC  
213 Market St. 8th Floor | Harrisburg, PA 17101

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# **Attachment C**

**SBG Counsel's March 31,  
2023 email memorializing  
PGW's Good-faith  
Extension for SBG to  
Respond to Set II by April  
12, 2023**



## Bryce R. Beard

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**From:** Michael Yanoff <[myanoff@goldsteinlp.com](mailto:myanoff@goldsteinlp.com)>  
**Sent:** Friday, March 31, 2023 2:47 PM  
**To:** Dan Clearfield; Bryce R. Beard  
**Cc:** Samantha Pulley  
**Subject:** [External] SBG - PUC

Dan: this will confirm that we have an extension until April 12<sup>th</sup> to file our response to your discovery requests. Thank you for your courtesy.

### Michael Yanoff, Esq.



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## CERTIFICATE OF SERVICE

I hereby certify that this date I served a copy of PGW's Motion to Compel SBG Responses to Set II Interrogatories and Request for Expedited Treatment, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### VIA EMAIL

Shawn M. Rodgers, Esquire  
Patricia M. Starner, Esquire  
Michael Yanoff, Esquire  
Goldstein Law Partners, LLC  
11 Church Road  
Hatfield, PA 19440  
[Srodgers@goldsteinlp.com](mailto:Srodgers@goldsteinlp.com)  
[Pstarner@goldsteinlp.com](mailto:Pstarner@goldsteinlp.com)  
[Myanoff@goldsteinlp.com](mailto:Myanoff@goldsteinlp.com)

Dated: April 14, 2023



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Daniel Clearfield, Esq.

*Counsel for Philadelphia Gas Works*