

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Consumer Advocate

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June 15, 2009

James J. McNulty
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Petition of Tenant Union Representative
Network and Action Alliance of Senior
Citizens for Declaratory Order
Docket No. P-2009-2109912

Dear Secretary McNulty:

Enclosed for filing is the Notice of Intervention and Public Statement of the
Office of Consumer Advocate, in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Christy M. Appleby".

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824

Enclosures

cc: Administrative Law Judge
Office of Special Assistants

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

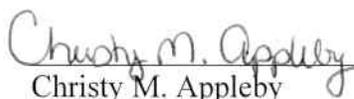
Petition of Tenant Union Representative :
Network and Action Alliance of Senior : Docket No. P-2009-2109912
Citizens for Declaratory Order :

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org
Tanya J. McCloskey
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50044
E-Mail: TMcCloskey@paoca.org
Office of Consumer Advocate
555 Walnut Street
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Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

Respectfully submitted,



Christy M. Appleby
Assistant Consumer Advocate

DATED: June 15, 2009
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PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file its Notice of Intervention and to participate in proceedings before the Commission involving the Petition of Tenant Union Representative Network and Action Alliance of Senior Citizens for Declaratory Order at Docket No. P-2009-2109912.

On May 27, 2009, Tenant Union Representative Network (TURN) and Action Alliance of Senior Citizens filed its Petition for Declaratory Order regarding Philadelphia Gas Works' (PGW) proposed Write-Off Reactivation Plan that was to become effective June 1, 2009. According to the Petition for Declaratory Order, PGW proposes to implement a Write-Off Reactivation Plan for customers who at some time in the past were terminated for non-payment, whose balances were then written off and whose applications for service restoration were granted sometime prior to April 1, 2009. Petition at 1. The Petition for Declaratory Order avers that customers were not informed at the time of service restoration that PGW did not waive its claims to the written-off balance, were not required to pay that balance in monthly installments through a payment agreement at the time of reconnection and since reconnection, were not shown that written-off balance on monthly bills. Id.

The objective of the Consumer Advocate in filing a Notice of Intervention in this matter is to protect the interests of the customers in the Company's service territory. The Consumer Advocate will seek to ensure that PGW's proposed Write-Off Reactivation Plan and implementation of the Write-Off Reactivation Plan is in compliance with statutory provisions, regulations and Commission Orders.

CERTIFICATE OF SERVICE

Petition of Tenant Union Representative :
Network and Action Alliance of Senior : Docket No. P-2009-2109912
Citizens for Declaratory Order :

I hereby certify that I have this day served a true copy of the foregoing document, Notice of Intervention and Public Statement of the Office of Consumer Advocate, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

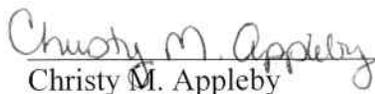
Dated this 15th day of June 2009.

SERVICE BY E-MAIL and FIRST CLASS MAIL

Philip A. Bertocci, Esquire
Thu B. Tran, Esquire
Community Legal Services
1424 Chestnut Street, 4th Floor
Philadelphia, PA 19102
Counsel for: *TURN, et al*

Abby L. Pozefsky, Sr. General Counsel
Gregory J. Stunder, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
Counsel for: *Philadelphia Gas Works*

Daniel Clearfield, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market street, 8th Floor
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