



Philadelphia Gas Works

800 West Montgomery Avenue, Philadelphia, PA 19122

Kristine Trock, Paralegal

Legal Department

Direct Dial: (215) 684-6862

Fax: (215) 684-6798

E-mail: kristine.trock@pgworks.com

February 8, 2010

James McNulty, Secretary
Pennsylvania Public Utility Commission
Room B-20, North Office Building
Harrisburg, PA 17105-3265

Re: Danee Slaton v. PGW, Docket No. C – 2010 – 2155867

Dear Secretary McNulty:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files the original Answer to the Complainant's Petition For An Interim Emergency Order for Restoration of Gas Service in the above captioned matter.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,

Kristine Trock

Enclosure

cc: Thu B. Tran, Esquire (E-Mail and Regular Mail)
Ms. Danee Slaton (Regular Mail)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Danee Slaton

v.

Philadelphia Gas Works

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Docket No. C – 2010 – 2155867

**Answer of Philadelphia Gas Works
To The Complainant's Petition For An
Interim Emergency Order For Restoration of Gas Service**

Pursuant to 52 Pa. Code §§3.6 and 5.61, the Philadelphia Gas Works ("PGW") hereby answers the Petition for an Interim Emergency Order for Restoration of Gas Service. PGW hereby avers the following:

1. Admitted. By way of further answer, 630 East Clementine Street, Philadelphia, Pennsylvania is the Service Address.
2. Admitted. By way of further answer, the Petitioner legally received gas service at the Service Address under PGW's low income Customer Responsibility Program (CRP) until November 2009 when PGW suspended her CRP enrollment for her failure to pay the monthly CRP bill, which was less than \$40 per month.
3. Admitted.
4. Admitted. By way of further answer, PGW terminated gas service on November 13, 2009 for nonpayment. The Complainant's balance at the time of gas service termination was \$2,059.06 and included a reinstatement of the arrears under CRP.
5. Denied. To the contrary, according to PGW records, PGW terminated gas service on November 13, 2009. By way of further answer, on January 20, 2010, PGW discovered gas service on at the Service Address and left a "72 hour" notice of termination.
6. Denied.

7. Admitted. By way of further answer, under PGW policies, theft of service is outside the rules governing CRP and not treated as usage to be discounted under that program.

8. Denied. The Petitioner had not acted diligently to restore service as theft of service occurred before the most recent termination.

9. Denied. PGW lacks sufficient information to determine the truth of the averment concerning the immediacy of the Complainant's need for relief. Therefore, PGW denies this averment.

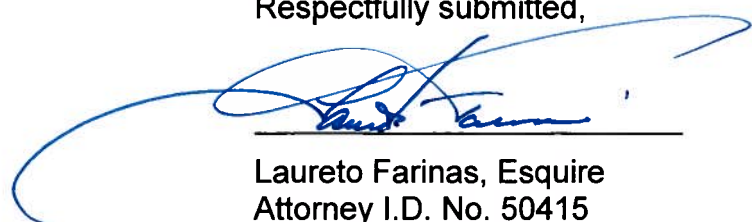
10. Denied. PGW denies that the restoration of gas service pending the resolution of this matter would not be injurious to the public interest. The Petitioner's record for making timely payments to PGW is extremely poor, even when enrolled in a low-income program. In restoring service without full payment of the outstanding balance, this Commission would provide a signal to customers that nonpayment and/or theft of service is not a bar to receiving utility service.

11. Admitted.

Whereas, this Commission should deny the Petitioner's request for an Interim Emergency Order for Restoration of Gas Service to the Service Address.

Respectfully submitted,

February 8, 2010



Laureto Farinas, Esquire
Attorney I.D. No. 50415
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982

VERIFICATION

I, Laureto Farinas, hereby declare that I am counsel for the Philadelphia Gas Works. I am authorized to make this verification on its behalf. The facts set forth in the foregoing Answer are true and correct to the best of my knowledge, information and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

February 8, 2010



Laureto Farinas, Esquire

CERTIFICATE OF SERVICE


I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Thu Tran, Esq.
Philip Bertocci, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102

February 8, 2010



Laureto Farinas, Esquire
Philadelphia Gas Works
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Philadelphia, PA 19122
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