



**Philadelphia Gas Works**

800 West Montgomery Avenue, Philadelphia, PA 19122

Kristine Trock, Paralegal

**Legal Department**

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March 30, 2009

Administrative Law Judge Guy Koster  
1302 Philadelphia State Office Building  
Pennsylvania Public Utility Commission  
1400 Spring Garden Street  
Philadelphia, PA 19130

**Re: Philadelphia HGI Associates v. PGW, Docket No. C – 2008 – 2069128**

Dear Judge Koster:

Pursuant to your Initial Prehearing Conference Order dated March 12, 2009, enclosed please find PGW's Preliminary Hearing Memorandum in the above referenced case.

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

Sincerely,

A handwritten signature in blue ink that reads "Kristine Trock". The signature is written in a cursive, flowing style. Below the signature, the name "Kristine Trock" is printed in a standard black font.

Kristine Trock

Enclosure

cc: James McNulty, Secretary (Regular Mail)  
Philadelphia HGI Associates (Regular Mail)  
Linda Richenderfer, Esq. (Regular Mail)  
Ward L. Smith, Associate General Counsel (Regular Mail)  
Matthew A. Totino, Esq. (Regular Mail)  
Dennis P. Talty, Esq. (Regular Mail)  
Anne Marie Cromley (PGW Mail)  
Linda Pereira (PGW Mail)



b) PGW has no objection to the consolidation of the above captioned matters, as the principle of judicial economy is best served if the hearings for all matters are conducted at one time as time and resources would be used efficiently in the disposition of these matters.

c) Discovery Matters: Pursuant to 52 Pa. Code §5.322, PGW proposes to make an informal agreement among the parties for the exchange of information within 30 days of the Prehearing Conference.

d) Other discovery matters: If no agreement is achieved or if requested information is not provided, PGW proposes that discovery in the form of data requests will be served and answered pursuant to 52 Pa. Code §5.341, et seq.

e) Potential PGW Witnesses:

Anne Marie Cromley,  
Philadelphia Gas Works  
Customer Review Unit  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

215- 684-6816 (Office)  
Annemarie.cromley@pgworks.com

Ms. Cromley will testify on the investigation she conducted on the formal complaint and actions that PGW and the Customer of Record took on the account.

PGW – Commercial Resource Center Representative (undetermined)  
Philadelphia Gas Works  
Commercial Resource Center  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

f) PGW contends that each month it billed the appropriate party and expected payment for gas service each month. On September 2006, the Complainant requested to be billed under an alternative supplier. The switch to

the alternative supplier occurred in November 2006. Since that date, PGW billed the appropriate party and expected payment for gas service each month.

g) PGW intends to introduce the relevant sections of its Gas Service Tariff that govern the billing and payment for gas service.

Respectfully submitted,

March 30, 2009



Laureto Farinas, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982

**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:

Celeren Corporation  
c/o Linda Richenderfer, Esq.  
Klehr Harrison  
919 Market Street  
Wilmington, DE 19801 – 3062

PECO Energy Company  
c/o Ward L. Smith, Associate General Counsel  
2301 Market Street  
Philadelphia, PA 19101 – 8699

Hess Corporation  
c/o Matthew A. Totino, Esq.  
Ryan, Russell, Ogden & Seltzer  
Suite 101  
800 North Third Street  
Harrisburg, PA 17102 – 2025

For Complainant, Philadelphia HGI Associates, LP:  
Dennis P. Talty, Esq.  
101 West Main Street, Suite 200  
Moorestown, NJ 08057

March 30, 2009



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