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Attorney for Complainant

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Joon Kap Kim

v.

Philadelphia Gas Works  
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DOCKET NO. C-2010-2175913

**Complainant's Response to Philadelphia Gas Works'  
Preliminary Objections and Motion to Strike Impertinent Matter**

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Denied. Paragraph 6 of Philadelphia Gas Works' Preliminary Objections and Motion to Strike Impertinent Matter contains only a conclusion of law to which no responsive pleading is required and the same is being denied.

7. Admitted

8. Denied. To the contrary the Commission has jurisdiction.

9. Denied. Paragraph 9 of Philadelphia Gas Works' Preliminary Objections and Motion to Strike Impertinent Matter contains only a conclusion of law to which no responsive pleading is required and the same is being denied.

10. Denied. Paragraph 10 of Philadelphia Gas Works' Preliminary Objections and Motion to Strike Impertinent Matter contains only a conclusion of law to which no responsive pleading is required and the same is being denied.

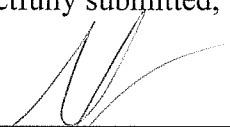
11. Denied. Philadelphia Gas Works is manipulating concept and words to confuse the issue. The placement of a lien against the complainant's property is no different than making the complainant personally responsible for the unpaid balance.

12. Denied. It is denied that Complainant's complaint is an impertinent matter. To the contrary the Complainant is seeking justice from the Pennsylvania Utility Commission.

**Wherefore**, the Complainant respectfully requests that this Commission overrule the Philadelphia Gas Works' Preliminary Objections and Motion to Strike Impertinent Matter.

June 14, 2010

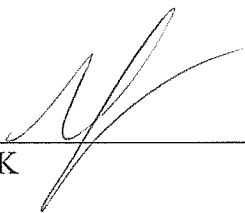
Respectfully submitted,

  
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Uam Pak, Esq.  
Attorney for Complainant

**VERIFICATION**

I, UAM PAK, ESQUIRE, verify that I am the attorney for the Complainant, and am authorized to make this verification on behalf of Complainant, and that the statements contained in the foregoing document are true and correct upon my information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A., Section 4904 relating to unsworn falsification to authorities.

June 14, 2010

  
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UAM PAK