

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INEZ M. FRISBY	: Docket F-2010-2198205
Complainant	
v.	:
	:
PHILADELPHIA GAS WORKS	:
Respondent	

**ANSWER TO PHILADELPHIA GAS WORKS
PRELIMINARY OBJECTIONS AND MOTION TO STRIKE**

Complainant Inez M. Frisby hereby answers Philadelphia Gas Works' Preliminary Objections and Motion to Strike as follows:

1. Admitted in part; denied in part. It is admitted that Complainant resides at 3721 N. 18th Street. It is denied that she filed a complaint with the Commission under this docket number regarding excavations by PGW on the sidewalk in front of 3721 N. 18th St.

2. Admitted.

3. Admitted.

4. Admitted.

5. Denied. It is denied that the relief requested constitutes "compensation for damages." It is denied that Complainant's request constitutes "impertinent matter."

6. The averment is a conclusion of law to which no response is required.

7. Admitted.

8. Denied. It is denied that the relief requested constitutes "damages." It is denied that Complainant seeks "compensation" in the form of "damages" alleged by

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PGW.

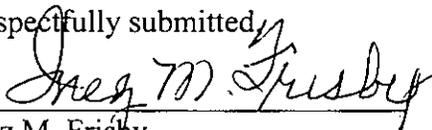
9. The averment is a conclusion of law to which no response is required.

10. The averment that the Commission is “without authorization to award compensation for damages” is a conclusion of law to which no response is required. The averment that Complainant’s request constitutes “impertinent matter” is a conclusion of law to which no response is required.

11. It is denied that Complainant has requested “compensation for damages” as alleged by PGW; to the contrary, she seeks a credit against her account for PGW’s failure to provide promised weatherization services.

Wherefore, Complainant respectfully requests that the Preliminary Objections and Motion to Strike be denied.

Respectfully submitted,


Inez M. Frisby

October 15, 2010

VERIFICATION

I, Inez M. Frisby, hereby state that the facts contained in the foregoing Answer are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. §4904 (relating to unsworn falsification to authorities).

Date: *Oct 15, 2010*

Inez M. Frisby
Inez M. Frisby

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**Inez M. Frisby v. Philadelphia Gas Works
PUC Docket No. F-2010-2198205**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of Inez M. Frisby's Answer to Philadelphia Gas Works Preliminary Objections and Motion to Strike upon the following person by the means listed as follows below:

By First Class U.S. Mail

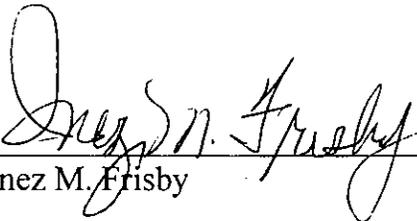
Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

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Dated: October 15, 2010



Inez M. Frisby

INEZ M. FRISBY
3721 N. 18th ST.
PHILA., PA 19140



Rosemary Chiavetta, Secretary
Pa Public Utility Commission
Room B-20, North Office Building
Harrisburg, Pa 17105-3265