

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PENN. P.U.C.
SECRETARY'S BUREAU

Abraham Ituah :
 :
v. :
 :
Philadelphia Gas Works :

Docket No. C-2011-2232679

ANSWER TO DEFENDANT PRELIMINARY OBJECTION AND MOTION TO STRIKE

Pursuit to 52 pa. Code sub section 5.101, plaintiff, Abraham Ituah hereby file an answer to Defendant preliminary objection in the above captioned matter which is before the commission. The Commission may have the authority to grant the request for refund, compensation and purity damages depending on the circumstances of the matter before it. See 67 F.3d 1119, the decision on this case, suggests that the commission is not without authority to grant complainant's request for compensation and punitive damages. The Defendant knew the danger of shutting the gas off at the time the law makers made it unlawful to shut off utility in a home, 15 months old twin babies live. The technician willfully and negligently endangers the life and health of the 15 months old babies without regret.

With reference to Plaintiff complaint filed before the commission. All relevant facts were presented but the Defendant continues to present misleading information to the commission in order to conceal the truth. In the same manner, PUC interviewer and PGW registered false information causing the PUC to enter unfavorable decision in the past before this Appeal was filed.

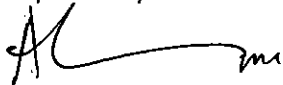
I like to state that Defendant knew or should have known that the State laws rules does not permit a shut off of service between December through March. The rule states "No utility shall terminate or refuse to restore service if health of household members would be adversely

affected, ..." Without a doubt, PGW knew that it was unlawful to endanger the life and health of the Plaintiff twin babies that were at home, when the PGW employee went to the basement on 1/5/11 to shut off the gas and left silently. No explanation was given for such action at the time but Plaintiff knew the gas was shut off six (6) hours later, when the babies started crying. Defendant knew such act was wrong but continues to believe that nothing gone wrong, hence all explanations provided on the preliminary objection and answers to plaintiff complaint are inaccurately presented to misleading the commission.

Plaintiff, hereby request that Defendant motion for relief should be denied because information provided on the preliminary objection and answers to complaint were inaccurate, misleading and it lacks merit. In addition, I pray that the commission ask Defendant to stop creating bills of services Plaintiff did not request. For instance, 5229 Germantown Avenue (PECO only) and 3843 Fairmount Avenue (Rental) are addresses PGW created bills Plaintiff never requested.

In view of the foregoing, Plaintiff deserves refund, compensation and punitive damages as the commission may deem adequate.

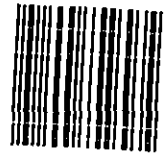
Respectfully Submitted,



Abraham Ituah, April 26, 2011
PLAINTIFF DATE

CC: Laureto Farinas, Esquire

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