



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Ross, Paralegal
Legal Department
Direct Dial: 215-684-6862
FAX: 215-684-6798
E-mail: danielle.ross@pgworks.com

April 4, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Philip Bassar v. PGW, Docket No. C – 2012 – 2293025

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files the original Answer to the above captioned matter. Under a separate cover letter, on this day PGW has filed Preliminary Objections to the Complaint in the above captioned matter.

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files a corrected page "2" of the Preliminary Objections which when originally filed on April 3, 2012, showed an incorrect Docket No.. We apologize for this error.

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

Sincerely,


Danielle Ross

Enclosure

cc: Philip Bassar (Regular Mail)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Philip Basser	:	
	:	
v.	:	Docket No. C – 2012 – 2293025
	:	
Philadelphia Gas Works	:	

**Philadelphia Gas Works’
Preliminary Objections and
Motion to Strike Impertinent Matter**

Pursuant to 52 Pa. Code §5.101, the Philadelphia Gas Works (“PGW”) hereby files its Preliminary Objections to the Complaint filed in the above captioned matter on the grounds that the Commission lacks jurisdiction over the subject matter of the Complaint, and that the Complaint includes impertinent matter in its requested relief to remove (or forbear collection of) the lien, and moves to strike the requested relief as “impertinent matter” pursuant to 52 Pa. Code §§5.101(a)(1) and (2).

In support of its preliminary objection and motion to strike, PGW hereby avers the following:

1. On or about March 8, 2012, the Complainant filed a formal complaint against PGW with the Commission under the above captioned matter, regarding unpaid debt for gas service to 123 N. 20th Street, 1R, Philadelphia, Pennsylvania (Subject Property).
2. The Complaint avers that the unpaid gas service to the Subject Property is under an account of the Complainant’s tenant.
3. The Complainant avers that this is the first notice that responsibility rests with the property owner when a tenant is in arrears.
4. For the period from November 2010 through December 2011 Todd Lippin was the PGW customer of record at the Subject Property and owed \$461.26 for unpaid gas service to the Subject Property.