

Philadelphia Gas Works
800 West Montgomery Avenue, Philadelphia, PA 19122



Mary M. Chan, Paralegal
Legal Department
Direct Dial: (215) 684-6830
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E-mail: mary.chan@pgworks.com

ORIGINAL

December 27, 2005

James McNulty, Secretary
Pennsylvania Public Utility Commission
Room B-20, North Office Building
Harrisburg, PA 17105-3265

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DEC 27 2005

RE: Ebonie Pitts vs. PGW, Docket No.: ~~C-20055437~~ ~~C-20055410~~

C-20055437 PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Secretary McNulty:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files the original and three (3) copies of its Answer to the Complaint in the above captioned matter.

If additional information is needed about this matter, please do not hesitate to contact me at my direct-dial number above. Thank you for your assistance in this matter.

Sincerely,

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Enclosure

cc: Ebonie Pitts
CRU

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION DEC 27 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Ebonie Pitts

:
:

v.

:
:

Docket No.: C-20055437

Philadelphia Gas Works

:

Answer of the Philadelphia Gas Works

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby answers the Complaint filed in the above captioned matter. PGW hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. (a-b) Denied. PGW denies the averments contained in Paragraph 4 of the Complaint concerning the Complainant's gas bills, and all other averments that are conclusions. The Complainant's gas bills are correct as rendered. The current amount on this account is \$2,733.50 as shown on the statement of accounts, which is attached hereto as Exhibit "A". The high arrears are due to the Complainant underpaying and missing monthly payments.
5. Denied. The averments in Paragraph 5 of the Complaint are requests for relief to which no response is required. PGW therefore denies the averments in this paragraph.
6. Admitted.
7. Admitted.

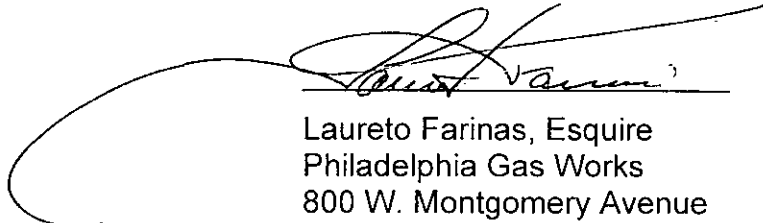
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Wherefore, PGW respectfully requests that this Commission find against the Complainant, and affirm the decision of the BCS in this matter. PGW requests that, the Commission enter an Interim Order directing the Complainant to make payment of the current bill during the pendency of the hearing in this matter. PGW further requests that the Interim Order directing payment authorize PGW to terminate service if the Complainant fails to comply with that Interim Order.

Respectfully submitted,

December 27, 2005



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

EXHIBIT A

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

HISTORY REQUEST REPORT FOR ACCOUNT # 24118919 AND SA # 3177037870 AS OF 12/27/2005

Account #: 24118919	SA #: 3177037870	Bill Cycle: 03	Rate Class: GS	Phone #: 9798977(856)
Name: PITTS, EBONIE M		Address: 108 E BRINGHURST ST,2FRT/PHILA,PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20040315	Blocker End Date: 20050315	Meter #: 1739948		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
09/03/2003	BILL	\$58.47	\$58.47	\$0.00	07/17/2003	09/03/2003	R	2756	\$58.47	26	1739948
10/02/2003	BILL	\$45.39	\$45.39	\$0.00	09/03/2003	10/02/2003	R	2781	\$2,789.87	25	1739948
10/04/2003	LPC	\$0.87	\$0.87	\$0.87							
10/31/2003	BILL	\$149.30	\$149.30	\$0.00	10/02/2003	10/31/2003	R	2884	\$2,980.40	103	1739948
11/04/2003	LPC	\$1.55	\$1.55	\$1.55							
12/03/2003	BILL	\$204.05	\$204.05	\$0.00	10/31/2003	12/03/2003	R	3021	\$3,227.92	137	1739948
12/05/2003	LPC	\$3.79	\$3.79	\$3.79							
01/05/2004	BILL	\$251.99	\$251.99	\$0.00	12/03/2003	01/05/2004	R	3203	\$3,526.44	182	1739948
01/07/2004	LPC	\$6.85	\$6.85	\$6.85							
02/03/2004	BILL	\$346.60	\$346.60	\$0.00	01/05/2004	02/03/2004	R	3477	\$3,923.35	274	1739948
02/05/2004	LPC	\$10.63	\$10.63	\$10.63							
03/04/2004	BILL	\$266.37	\$266.37	\$0.00	02/03/2004	03/04/2004	R	3667	\$4,245.23	190	1739948
03/06/2004	LPC	\$15.83	\$15.83	\$15.83							
03/15/2004	XFER	(\$1,361.69)	(\$1,361.69)	(\$1,361.69)							
04/02/2004	BILL	\$2,008.45	\$2,008.45	\$0.00	02/15/2003	04/02/2004	R	6448	\$419.64	1431	1412372
04/02/2004	BILL	\$2,008.45	\$2,008.45	\$0.00	02/15/2003	04/02/2004	R	3858	\$419.64	1431	1739948
04/02/2004	BILL	\$266.64	\$266.64	\$0.00	03/04/2004	04/02/2004	R	3858	\$266.64	191	1739948
04/14/2004	LPCWVE	(\$238.08)	(\$238.08)	(\$238.08)							
04/14/2004	XFER	\$10.51	\$10.51	\$10.51							
04/14/2004	LPCWVE	(\$39.07)	(\$39.07)	(\$39.07)							
04/15/2004	CANB	(\$346.60)	(\$346.60)	\$0.00							
04/15/2004	CANB	(\$45.39)	(\$45.39)	\$0.00							
04/15/2004	BSEGNC	\$0.00	\$0.00	(\$45.39)							
04/15/2004	BSEGNC	\$0.00	\$0.00	(\$149.30)							
04/15/2004	CANB	(\$266.64)	(\$266.64)	\$0.00							
04/15/2004	BSEGNC	\$0.00	\$0.00	(\$266.64)							
04/15/2004	BSEGNC	\$0.00	\$0.00	(\$266.37)							
04/15/2004	CANB	(\$149.30)	(\$149.30)	\$0.00							

Account #: 24118919 SA #: 3177037870 Bill Cycle: 03 Rate Class: GS Phone #: 9798977(856)

Name: PITTS, EBONIE M Address: 108 E BRINGHURST ST,2FRT/PHILA,PA

Pay Agreement Indicator: N Easyway Indicator: CRP Status:

Blocker Start Date: 20040315 Blocker End Date: 20050315 Meter #: 1739948

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
04/15/2004	BSEGNC	\$0.00	\$0.00	(\$346.60)							
04/15/2004	CANB	(\$58.47)	(\$58.47)	\$0.00							
04/15/2004	BSEGNC	\$0.00	\$0.00	(\$58.47)							
04/15/2004	CANB	(\$251.99)	(\$251.99)	\$0.00							
04/15/2004	BSEGNC	\$0.00	\$0.00	(\$251.99)							
04/15/2004	CANB	(\$204.05)	(\$204.05)	\$0.00							
04/15/2004	BSEGNC	\$0.00	\$0.00	(\$204.05)							
04/15/2004	CANB	(\$266.37)	(\$266.37)	\$0.00							
04/30/2004	PAY	(\$50.00)	(\$50.00)	\$0.00							
05/04/2004	BILL	\$228.38	\$228.38	\$0.00	04/02/2004	05/04/2004	R	4016	\$603.56	158	1739948
05/06/2004	LPC	\$5.54	\$5.54	\$5.54							
06/03/2004	BILL	\$72.85	\$72.85	\$0.00	05/04/2004	06/03/2004	R	4051	\$685.38	35	1739948
06/05/2004	LPC	\$8.97	\$8.97	\$8.97							
07/02/2004	BILL	\$37.14	\$37.14	\$0.00	06/03/2004	07/02/2004	R	4069	\$732.58	18	1739948
07/07/2004	LPC	\$10.06	\$10.06	\$10.06							
08/03/2004	BILL	\$41.32	\$41.32	\$0.00	07/02/2004	08/03/2004	R	4090	\$784.52	21	1739948
08/05/2004	LPC	\$10.62	\$10.62	\$10.62							
09/02/2004	BILL	\$30.16	\$30.16	\$0.00	08/03/2004	09/02/2004	R	4103	\$825.91	13	1739948
09/04/2004	LPC	\$11.23	\$11.23	\$11.23							
10/04/2004	BILL	\$16.24	\$16.24	\$0.00	09/02/2004	10/04/2004	R	4106	\$853.84	3	1739948
10/06/2004	LPC	\$11.69	\$11.69	\$11.69							
11/02/2004	BILL	\$12.00	\$12.00	\$0.00	10/04/2004	11/02/2004	R	4106	\$877.77	0	1739948
11/04/2004	LPC	\$11.93	\$11.93	\$11.93							
12/02/2004	BILL	\$12.00	\$12.00	\$0.00	11/02/2004	12/02/2004	R	4106	\$901.88	0	1739948
12/05/2004	LPC	\$12.11	\$12.11	\$12.11							
01/04/2005	BILL	\$12.00	\$12.00	\$0.00	12/02/2004	01/04/2005	R	4106	\$926.17	0	1739948
01/05/2005	LPC	\$12.29	\$12.29	\$12.29							
02/02/2005	BILL	\$12.00	\$12.00	\$0.00	01/04/2005	02/02/2005	R	4106	\$950.64	0	1739948
02/03/2005	LPC	\$12.47	\$12.47	\$12.47							
03/03/2005	BILL	\$12.00	\$12.00	\$0.00	02/02/2005	03/03/2005	R	4106	\$975.29	0	1739948
03/04/2005	LPC	\$12.65	\$12.65	\$12.65							
04/04/2005	BILL	\$12.00	\$12.00	\$0.00	03/03/2005	04/04/2005	R	4106	\$1,000.12	0	1739948
04/04/2005	BILL	\$12.00	\$12.00	\$0.00	03/03/2005	04/04/2005	R	4106	\$1,000.12	0	1739948

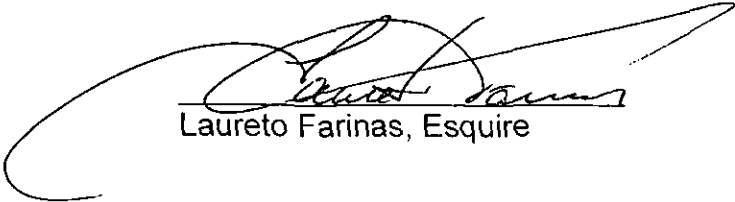
Account #: 24118919	SA #: 3177037870	Bill Cycle: 03	Rate Class: GS	Phone #: 9798977(856)
Name: PITTS, EBONIE M		Address: 108 E BRINGHURST ST,2FRT/PHILA,PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20040315	Blocker End Date: 20050315	Meter #: 1739948		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
04/05/2005	LPC	\$12.83	\$12.83	\$12.83							
04/28/2005	CANB	(\$12.00)	(\$12.00)	\$0.00							
04/28/2005	AUTO CN	\$0.00	\$0.00	(\$12.00)							
05/04/2005	XFER	\$1,589.26	\$1,589.26	\$1,589.26							
05/04/2005	LPC	\$36.85	\$36.85	\$36.85							
06/03/2005	LPC	\$36.30	\$36.30	\$36.30							
07/05/2005	LPC	\$35.75	\$35.75	\$35.75							
08/04/2005	LPC	\$35.22	\$35.22	\$35.22							
08/22/2005	WO	(\$2,733.50)	(\$2,733.50)	(\$2,733.50)							

VERIFICATION

I, Laureto Farinas, hereby declare that I am counsel to the Philadelphia Gas Works; that, as such, I am authorized to make this verification on its behalf: that the facts set forth in the foregoing Answer are true to the best of my knowledge, information and belief, and that I expect to be able to prove these at a hearing held in this matter. I make this verification subject to the penalties of 18. Pa. C.S. §4904, pertaining to false statements to authorities.

Date: December 27, 2005


Laureto Farinas, Esquire

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 §1.54
(RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

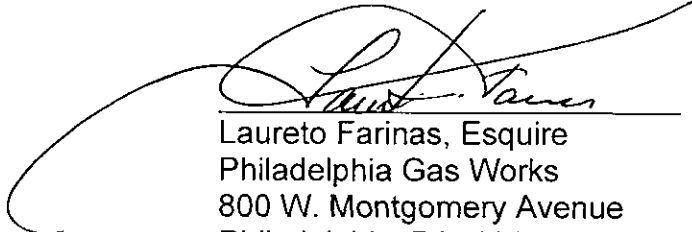
Ebonie Pitts
4368 N. 43rd Street, Apt 1
Pennsauken, NJ 08109

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DEC 27 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

December 27, 2005



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

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION

DATE: February 27, 2006
SUBJECT: **Ebonie Pitts v. Philadelphia Gas Works**
C-20055437
TO: Commission Document Folder
FROM: Herbert Nurick
Mediator

DOCUMENT
FOLDER

Pursuant to Chief Administrative Law Judge Smith's Interim Order, dated December 12, 2005, a report has been submitted to the Mediation Unit.

Please include this memo in the official Commission document folder.

pc: OALJ File

DOCKETED
MAR 7 - 2005



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

February 28, 2006

In Re: C-20055437

(SEE ATTACHED LIST)

Ebonie Pitts v. Philadelphia Gas Works

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Billing Dispute

DOCKETED
MAR 6 - 2005

Telephone Hearing Notice

This is to inform you that a hearing by telephone has been scheduled in this case on Tuesday, April 25, 2006. This is one of several hearings scheduled for this day. Your case will be dismissed if the presiding officer is not able to contact you at the time scheduled for the hearing. The hearing will be held as follows:

Type: Initial Telephonic Hearing
Date: Tuesday, April 25, 2006
Time: 9:00 a.m.
Presiding: Administrative Law Judge Kandace F. Melillo
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 787-5452
Fax: (717) 787-0481

You must provide the presiding officer with the telephone number where you can be reached to participate in the hearing. If your telephone number or area code has changed, you must contact the presiding officer at least 5 business days prior to the scheduled hearing and provide the necessary information.

On the hearing date, the Presiding Officer will contact the parties as follows:

Ebonie Pitts 856-910-1612
Laureto A. Farinas, Esquire 215-684-6982

ATTENTION: YOU MUST BE AVAILABLE WHEN CONTACTED BY THE PRESIDING OFFICER. IF YOU DO NOT TAKE PART IN THIS HEARING AND PRESENT YOUR CASE, YOUR CASE WILL BE DISMISSED.

If you have any exhibits that you will refer to during the hearing, you must send 3 copies to the presiding officer and 1 copy to every other party. All copies must be received at least 5 business days before the hearing.

Individuals may represent themselves or be represented by an attorney. Individuals representing themselves do not need to be represented by an attorney. If you have an attorney representing you, your attorney should file a Notice of Appearance at least 5 business days before the scheduled hearing date.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission at least (2) two business days prior to your hearing at least (2) two business days prior to your hearing:

- Scheduling Office: (717) 787-1399.
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

pc: Judge Melillo
Cherie Pyle, Scheduling Officer
Beth Plantz
Docket Section
Calendar File

C-20055437 EBONIE PITTS v. PHILADELPHIA GAS WORKS

EBONIE PITTS
4368 N 43RD STREET APT 1
PENNSAUKEN NJ 08109
856.910.1612

LAURETO A FARINAS ESQUIRE
PHILADELPHIA GAS WORKS
800 W MONTGOMERY AVENUE
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