

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Patrick Black

v.

Philadelphia Gas Works

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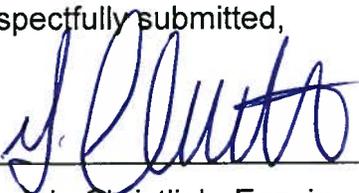
Docket No. C – 2014 – 2415665

NOTICE TO PLEAD

To: Patrick Black,

Pursuant to 52 Pa. Code §5.101, you are hereby notified to file a written response to the enclosed Preliminary Objections and Motion to Strike, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted and a judgment may be entered against you.

Respectfully submitted,



Graciela Christlieb, Esquire
Attorney I.D. 200760
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6164

July 21, 2014

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Docket No. C – 2014 – 2415665

**Philadelphia Gas Works’
Preliminary Objections**

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 issues were previously resolved in a settlement of prior case(s) through an un-objected to Certificate of Satisfaction.

1. The Complaint established service at the Service Address on June 26, 2001.
2. The account is listed as residential gas heat and other domestic usage.
3. The bills are based on actual gas usage.
4. The Complainant has three dismissed bankruptcies. Each time the Complainant’s balance was moved forward to his new account due to the bankruptcy being dismissed.
5. The Complainant’s most recent account began on September 11, 2006.
6. The Complainant has a history of ten broken PGW payment agreements and one broken PUC payment agreement.
7. The Complainant has one prior Customer Responsibility Program (CRP) agreement. On November 8, 2011, the Complainant was

removed from CRP due to no longer being income eligible. The Complainant owed \$2,155.04 in missed CRP payments at that time.

8. The last payment posted to the Complainant's account on September 21, 2012.
9. On December 31, 2013, the Complainant and PGW settled a formal complaint under Docket No. C-2013-2379053. The Complainant agreed to pay \$1,607 and re-enroll in CRP.
10. The Complainant failed to comply with the settlement agreement.
11. Commission regulations at 52 Pa.Code § 5.24(b) permit a utility to file a **Certificate of Satisfaction**, indicating that a complaint has been addressed. A complainant then has ten (10) days in which to object to the Certificate, and if no objection is filed, the matter is closed.

Wherefore, PGW respectfully requests that this Commission sustain PGW's preliminary objections to the Complaint and dismiss the Complaint.

Respectfully submitted,



Graciela Christlieb, Esquire
Attorney I.D. 200760
Philadelphia Gas Works
800 W. Montgomery Avenue
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July 21, 2014

VERIFICATION

I, Graciela Christlieb, hereby declare that I am counsel for the Philadelphia Gas Works. I am authorized to make this verification on its behalf. The facts set forth in the foregoing Answer are true and correct to the best of my knowledge, information and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

July 21, 2014



Graciela Christlieb, 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 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

For Complainant:

Mr. Patrick Black
3407 Vista Street
Philadelphia, PA 19136

July 21, 2014

A handwritten signature in blue ink, appearing to read 'G. Christlieb', is written over a horizontal line.

Graciela Christlieb, Esquire
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Philadelphia, PA 19122
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