

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

PENN WYNN, INC.	:	
Complainant,	:	
	:	
	:	
v.	:	
	:	Docket No. C-2014-2441965
PHILADELPHIA GAS WORKS,	:	
Respondent.	:	

ANSWER TO RESPONDENT’S NEW MATTER

Penn Wynn, Inc., Complainant, hereby responds to the Respondent’s New Matter in accordance with the Paragraphing thereof as follows:

8. Paragraph 1-7 of the Complaint are incorporated herein by reference as if the same were set forth herein at length.

9. Denied. The Complainant’s averments of incorrect billings refers to rate charges that were in excess of those offered by representatives of Respondent.

10. Denied as set forth. It is averred that the discussions between representatives of Complainant and Respondent were limited to the deferral of payments and did not include rate issues.

11. Denied. There were no previous payment agreements concerning the current delinquency.

12. Denied as set forth. The filing of the instant Complaint was a result of the Respondent’s failure to negotiate a mutually satisfactory payment arrangement in good faith.

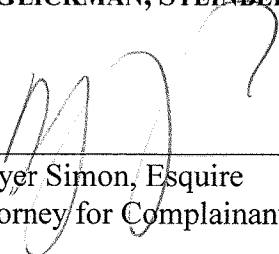
13. Denied as set forth. The Complainant's objective was to compel Respondent to negotiate a mutually satisfactory payment arrangement in good faith.

14. Denied as set forth. The Complainant's objective was to compel Respondent to negotiate a mutually satisfactory payment arrangement in good faith.

WHEREFORE, Complainant respectfully requests that the Commission find against the Respondent and grant the relief requested in the Complaint.

Respectfully Submitted,

RUBIN, GLICKMAN, STEINBERG AND GIFFORD, P.C.

By: 

Meyer Simon, Esquire
Attorney for Complainant

Date: 10/20/14

VERIFICATION

Robert S. Dubin, the President of Penn Wynn, Inc., hereby states that he is acquainted with the facts set forth in the within document, instrument, discovery document and/or pleading; that the same are true and correct to the best of his knowledge, information and belief, and that this statement is made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.



ROBERT S. DUBIN