

212 Locust Street, Suite 300, Harrisburg, Pennsylvania 17101
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Daniel Clearfield
Direct Dial: (717) 237-7173
Direct Fax: (717) 237-7161
E-mail: dclearfield@wolfblock.com

April 13, 2004

VIA E-MAIL AND FIRST CLASS MAIL

Johnnie Simms, Esq.
Richard A. Kanaskie, Esq.
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**DOCUMENT
FOLDER**

Re: Philadelphia Gas Works Cash Receipts Reconciliation
Clause, Docket No. R-00049157
Petition of Philadelphia Gas Works to Establish a Cash
Receipts Reconciliation Clause, Docket No. P-00042090

Dear Johnnie:

On behalf of Philadelphia Gas Works, enclosed please find its response to Office of Trial Staff's Interrogatories, Nos. OTS-35.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Daniel Clearfield/lcw
Daniel Clearfield

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

DC/lww

cc: Parties of Record w/enc
James McNulty w/ Certificate of Service only

DSH:40411.11/PHI211-217982

RECEIVED
APR 14 11 49:56 AM '04
SECRETARY'S BUSINESS

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document of Philadelphia Gas Works' upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA EMAIL, AND FIRST CLASS MAIL

Johnnie Simms, Esq.
Richard A. Kanaskie, Esq.
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
E-mail: josimms@state.pa.us

Stephen Gray, Esq.
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North 2nd Street
Harrisburg, PA 17101
E-mail: sgray@state.pa.us

Tanya McCloskey, Esq.
James Mullins, Esq.
Steve Keene, Esq.
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
E-mail: TmcCloskey@paoca.org
Skene@paoca.org

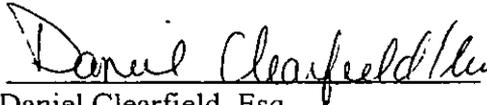
Richard Lelash
18 Seventy Acre Road
Redding, CT 06896
E-mail: lelash@sprintmail.com

Greg Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
E-mail: greg.stunder@pgworks.com

Charis Mincavage, Esquire
McNEES, WALLACE, NURICK
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
E-mail: Cmincavage@mwn.com

Philip Bertocci, Esq.
Edward A. McCool, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102
Fax: (215) 981-0434
E-mail: pbertocci@clsphila.org

Robert D. Kecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com


Daniel Clearfield, Esq.

Dated: April 13, 2004

212 Locust Street, Suite 300, Harrisburg, Pennsylvania 17101
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Daniel Clearfield
Direct Dial: (717) 237-7173
Direct Fax: (717) 237-7161
E-mail: dclearfield@wolfblock.com

April 14, 2004

VIA E-MAIL AND FIRST CLASS MAIL

Steven Gray, Esq.
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

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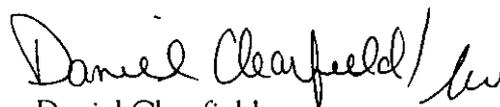
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SECRETARY'S BUREAU

Re: Philadelphia Gas Works Cash Receipts Reconciliation
Clause, Docket No. R-00049157
Petition of Philadelphia Gas Works to Establish a Cash
Receipts Reconciliation Clause, Docket No. P-00042090

Dear Steve:

On behalf of Philadelphia Gas Works, enclosed please find its response to Office of Small Business Advocate's Interrogatory, Nos. OTS-II - 18. If you have any questions, please do not hesitate to contact me.

Very truly yours,



Daniel Clearfield

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

DC/lww

Enclosure

cc: Parties of Record w/enc
James McNulty w/ Certificate of Service only

DSH:40304.11/PHI211-217982

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document of Philadelphia Gas Works' upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA EMAIL, AND FIRST CLASS MAIL

Johnnie Simms, Esq.
Richard A. Kanaskie, Esq.
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
E-mail: josimms@state.pa.us

Stephen Gray, Esq.
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North 2nd Street
Harrisburg, PA 17101
E-mail: sgray@state.pa.us

Tanya McCloskey, Esq.
James Mullins, Esq.
Steve Keene, Esq.
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
E-mail: TmcCloskey@paoca.org
Skeene@paoca.org

Richard Lelash
18 Seventy Acre Road
Redding, CT 06896
E-mail: lelash@sprintmail.com

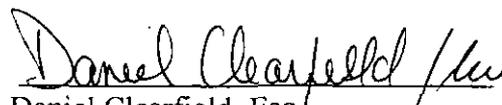
Dated: April 14, 2004

Greg Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
E-mail: greg.stunder@pgworks.com

Charis Mincavage, Esquire
McNEES, WALLACE, NURICK
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
E-mail: Cmincavage@mwn.com

Philip Bertocci, Esq.
Edward A. McCool, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102
Fax: (215) 981-0434
E-mail: pbertocci@clsphila.org

Robert D. Kecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com


Daniel Clearfield, Esq.

SECRETARY'S BUREAU

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2000 MARKET STREET • TENTH FLOOR • PHILADELPHIA, PA 19103-3291
215.299.2000 • FAX 215.299.2150 • www.foxrothschild.com

Philip L. Hinerman
Direct Dial: (215) 299-2066
Internet Address: phinerman@foxrothschild.com

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APR 14 2004

April 14, 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA FEDERAL EXPRESS

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

DOCUMENT
FOLDER

**Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works (1307(f))
Consolidated Proceeding: Docket No. R-00049157 and Docket No. P-00042090**

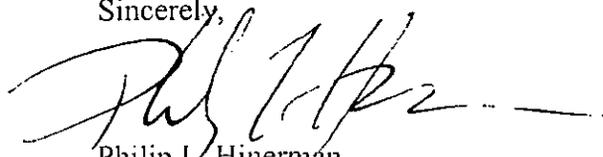
Dear Secretary McNulty:

Enclosed for filing please find an original and three (3) copies of Philadelphia Housing Authority's Petition to Intervene in the above-captioned matter.

Please return a time-stamped copy in the self-addressed stamped envelope provided indicating your filing of the Petition.

Thank you for your cooperation.

Sincerely,



Philip L. Hinerman

PLH:mgk
Enclosures

cc: Administrative Law Judge Charles E. Rainey, Jr. (w/encl.)
(via Federal Express)
Leigh A. Poltrock, Esquire (w/encl.)(via 1st Class Mail)

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APR 14 2004

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY
COMMISSION :

v. :

PHILADELPHIA GAS WORKS :

CONSOLIDATED PROCEEDING
Docket Nos. R-00049157, and
P-00042090

DOCUMENT
FOLDER

**PETITION TO INTERVENE OF
PHILADELPHIA HOUSING AUTHORITY**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The Philadelphia Housing Authority ("PHA"), by counsel, hereby files, pursuant to 52 Pa. Code §§ 5.71 – 5.74, a Petition to Intervene in the above-captioned consolidated proceedings, and, in support thereof, avers as follows:

The Parties

1. Petitioner, PHA, is a public agency organized and existing under the laws of the Commonwealth of Pennsylvania. PHA owns, operates and maintains public housing properties throughout the City of Philadelphia.
2. Respondent Philadelphia Gas Works ("PGW") provides natural gas to tenants in a number of PHA's properties.

The Proceedings

3. PGW submitted its preliminary Gas Cost Rate ("GCR") filing to the Commission on or about February 4, 2004.
4. PGW seeks rate increase for the type(s) of services offered by PHA to residents of its properties, and has designated a tariff rate and an increase for PHA accounts.

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5. Additionally, on or about March 1, 2004, PGW filed a petition (the "Petition"), docketed at P-00042090, for a cash receipts reconciliation ("CRR") for the purposes of recovering the shortfall caused by the failure of certain customers to pay their gas bills either timely or at all.

6. In the Petition, PGW seeks to impose a surcharge against paying customers, including PHA and many of its individual tenants, to compensate PGW for losses it incurred as a result of *non-payment by other customers*.

7. The Administrative Law Judge granted PGW's motion to consolidate the rate and Petition actions.

8. The ALJ entered a scheduling order following a pre-hearing conference on or about March 15, 2004, requiring the submission of written testimony by April 13, 2004, and setting public input hearings on PGW's two filings to begin on Wednesday, May 5, 2004.

PHA's Interest in the Proceedings

9. PHA stands in the position of a landlord for more than 7,000 individual housing units throughout the City of Philadelphia.

10. Many of PHA's residential units use natural gas as fuel for heat, hot water, cooking and/or other appliances.

11. PGW bills PHA for charges at some of PHA's properties, and PHA in turn bills its tenants for gas consumption and charges at those properties, and PGW also bills tenants at *certain other properties directly*.

12. PGW currently bills PHA and/or PHA tenants for gas under one of two (2) tariff rates at issue in the current 1307(f) filing: a specific PHA rate, or a Residential General Service ("GS") Rate.

13. As a ratepayer and large-scale consumer of natural gas supplied by PGW, PHA is interested in, and affected by, both the proposed base rate increases and the existing and proposed revised terms of service under PGW's tariff.

14. Additionally, PHA is interested in the proposed GCR increase because, if approved by the Commission, the increased GCR will materially and negatively affect PHA's budget on several levels, including, *inter alia*:

(a) The increased GCR, applied across multiple rate classes and throughout PHA's properties, will add significantly to the cost of a major component of PHA's operating expenses for its housing units.

(b) The higher proposed rates also could cause a material and unanticipated increase in the federally-mandated utility allowance PHA pays to its tenants.

15. In addition to the additional costs imposed on PHA and its residents if the requested rate increases are approved, if the Commission approves the Petition for a cash receipts reconciliation, PHA and those of its residents who do pay their respective bills in a timely manner all will have to pay an amount currently estimated to be at least \$80 per year per property, for each year of the two-year term PGW seeks for the reconciliation.

16. Such an assessment, particularly if applied to thousands of properties, would severely strain already limited resources.

17. PHA's residents are among the City's neediest families, yet this increase will serve to reduce funding otherwise available for public services.

18. As a ratepayer, PHA will be affected by and bound by any determination the Commission and/or the ALJ make with respect to either the Petition or PGW's 2004-2005 GCR filing for the following reasons:

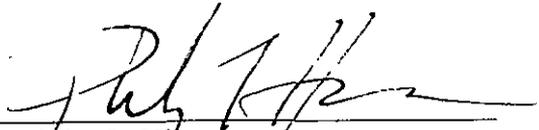
- (a) PHA has a pre-existing and limited budget for utility expenses for its residential units;
- (b) PHA and its tenants purchase gas on various rate schedules, all of which may be adversely affected by increases in the respective rates and in the method by which accounts are classified for rate paying purposes;
- (c) Imposing a surcharge on PHA and/or those of its tenants to do pay their PGW bills would tax already scarce resources even further, while effectively rewarding PGW for lax collection procedures.
- (d) This surcharge should not apply to PHA properties as PHA does not default in payments to PGW, in fact electronically pays for gas prior to the presentation of a written bill.

19. The public also has an interest in keeping publicly-funded energy costs for PHA properties at a manageable level, both by controlling the cost of direct natural gas supply to tenant housing, and in avoiding the massive financial toll that possible adjustments to the tenant utility allowance would exact upon PHA.

20. If permitted to intervene, PHA will take the position that the increases PGW seeks are excessive and unmerited as to PHA, and that PGW is not entitled to a cash receipts reimbursement.

WHEREFORE, the Philadelphia Housing Authority respectfully requests that the Commission grant its Petition to Intervene and permit PHA to participate in the consolidated proceedings as if it were a full party to the action.

Respectfully submitted,

By: 

Philip L. Hjerberman
Attorney I.D. No. 55496
FOX ROTHSCHILD LLP
2000 Market Street, Tenth Floor.
Philadelphia, PA 19103-3291
Telephone No. (215) 299-2066
Fax No. (215) 299-2150

Dated: April 14, 2004

Attorney for Petitioner

Pennsylvania Public Utility Commission v. Philadelphia Gas Works (1307(f))
Docket No. R-00049157
Petition to Intervene of Philadelphia Housing Authority
Docket No. P-00042090

CERTIFICATE OF SERVICE

I hereby certify that I am serving a true and correct copy of the foregoing Petition to Intervene of Philadelphia Housing Authority in accordance with the requirements of 52 Pa.Code §1.54 upon the following person(s) and in the following manner this 14th day of April, 2004

BY FEDERAL EXPRESS:

Administrative Law Judge Charles E. Rainey, Jr.
Pennsylvania Public Utility Commission
1302 Philadelphia State Office Building
1400 West Spring Garden St.
Philadelphia, PA 19130

BY FEDERAL EXPRESS:

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

BY FIRST CLASS MAIL, POSTAGE PREPAID:

[See attached Service List]

Pennsylvania Public Utility Commission v. Philadelphia Gas Works (1307(f))
Docket No. R-00049157
Petition to Intervene of Philadelphia Housing Authority
Docket No. P-00042090

SERVICE LIST

Johnnie Simms, Esquire
Pa. Public Utility Commission
Office of Trial Staff
Commonwealth Keystone Building, 2 West
P.O. Box 3265
Harrisburg, PA 17105-3265

Philip A. Bertocci, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102

Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
Wolf, Block, Schorr & Solis-Cohen, LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101

David M. Kleppinger, Esquire
Charis, Mincavage, Esquire
McNees, Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Richard Lelash
Financial & Regulatory Consultant
18 Seventy Acre Road
Redding, CT 06896

Stephen Keene, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17120

Steven C. Gray, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

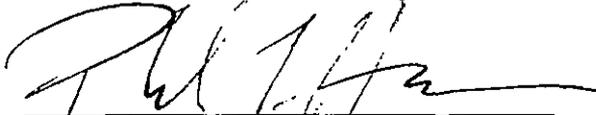
Gregory J. Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

Wendy Bettlestone, Esquire
School District of Philadelphia
Office of General Counsel
2130 Arch Street, 5th Floor
Philadelphia, PA 19103

Robert Knecht
Industrial Economics, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140

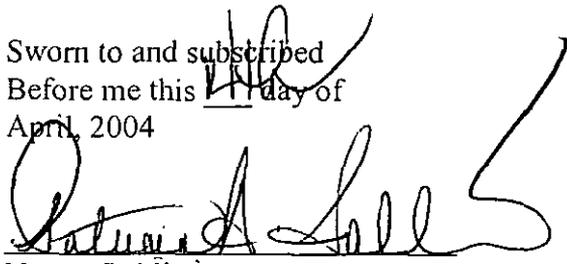
VERIFICATION

Philip L. Hinerman, being duly sworn according to law, deposes and states that he is the attorney for Philadelphia Housing Authority, that as such, he is authorized to make and execute this affidavit on its behalf, and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information and belief.

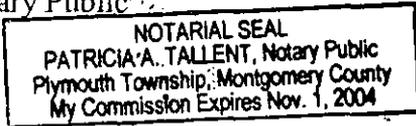


PHILIP L. HINERMAN

Sworn to and subscribed
Before me this 11 day of April, 2004



Notary Public





ORIGINAL

VINCENT J. FUMO
Chairman

PAUL S. DLUGOLECKI
Executive Director

Senate Post Office
The State Capitol
Harrisburg, PA 17120-0030
Telephone: (717) 787-5662
Fax: (717) 783-5210

DEMOCRATIC COMMITTEE ON APPROPRIATIONS

April 14, 2004

Via Hand Delivery or Overnight Mail

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
2nd Floor North
Commonwealth Keystone Office Building
Harrisburg, Pennsylvania 17105

DOCUMENT
FOLDER

**Re: *In re* Petition of Philadelphia Gas Work to Establish a Cash Receipts
Reconciliation Clause, PUC Dkt. No. P-00042090; R-00049157**

Dear Mr. McNulty:

Attached for your consideration and filing is an original and two (2) copies of the Application for Leave to Intervene of Pennsylvania State Senator, *et al.* in the above captioned matters. A copy has been sent to all counsels of record, as well as to Administrative Law Judge Rainey.

Thank you for your assistance in this matter. Please do not hesitate to contact me if I may be able to provide any additional information.

Sincerely,

Christopher B. Craig
Counsel

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2004 APR 15 AM 10:13
PA PUC
SECRETARY'S BUREAU

cc: All counsel of record.

ORIGINAL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re Petition of Philadelphia Gas Works for
Special Permission to Depart from Certain
Requirements of 52 Pa.Code §§ 53.45(b),
53.64(c) and 53.68(a) Concerning the Provisions
of Public Notice**

R-00049157

**In re Petition of Philadelphia Gas Works to
Establish a Cash Receipts Reconciliation Clause**

P-00042090

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SECRETARY'S BUREAU

**APPLICATION FOR LEAVE TO INTERVENE
OF PENNSYLVANIA STATE SENATOR VINCENT J. FUMO,
PHILADELPHIA CITY COUNCIL PRESIDENT ANNA C. VERNA,
AND PHILADELPHIA COUNCIL MEMBERS JAMES F. KENNEY,
FRANK DICICCO, MICHAEL A. NUTTER, DAVID COHEN,
JOAN L. KRAJEWSKI, AND JUAN F. RAMOS**

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MAY 03 2004

Pennsylvania State Senator Vincent J. Fumo, individually as a utility ratepayer and in his official capacity as a duly elected member of the Pennsylvania State Senate, Philadelphia City Council President Anna C. Verna, and Philadelphia City Council Members James F. Kenney, Frank DiCicco, Michael A. Nutter, David Cohen, Joan L. Krajewski and Juan F. Ramos, also in their individual capacities as utility ratepayers and in their official capacities as duly elected members of Philadelphia City Council (hereinafter collectively referred to as "the Philadelphia Public Officials") by and through their undersigned counsel, hereby file this Application for Leave to Intervene pursuant to 52 Pa.Code §§ 5.71 - 5.74, requesting this Commission to approve their intervention in the above-captioned proceedings initiated by Philadelphia Gas Works (hereinafter "PGW").

**DOCUMENT
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The primary focus of the Philadelphia Public Officials' intervention is to oppose the request of PGW to establish a Cash Receipts Reconciliation Clause (hereinafter "CRRC") and to propose greater regulatory oversight of the implementation of PGW bill collection program improvements. It is the intention of the Philadelphia Public Officials' to participate fully in these proceedings to critically evaluate the evidentiary support for the proposed implementation of the CRRC and to explore alternatives that would avoid imposing additional financial costs onto PGW ratepayers. In support thereof, the Philadelphia Public Officials aver the following:

1. Vincent J. Fumo is a an adult individual, residential PGW customer, business PGW customer, and a duly elected member of the Pennsylvania State Senate representing the voters of the First Senatorial District. Senator Fumo is also the Democratic Chairman of the Senate Appropriations Committee. As a residential customer, Senator Fumo receives and pays for natural gas service from PGW for heating and cooking purposes at his residential address in the City of Philadelphia. As a business customer, Senator Fumo through the Senate of Pennsylvania and as a private landlord, receives and pays for natural gas service from PGW for heating of his Legislative District Office, its sidewalk and several rental properties.

2. Anna C. Verna is an adult individual, residential and business PGW customer and a duly elected member of Philadelphia City Council, representing the Second Council District. Councilwoman Verna is also the duly elected President of Philadelphia City Council and the Chair of Ethics Committee , Fiscal Stability Committee and Intergovernmental Cooperation Committee, and the Rules Committees. Of particular relevance, Council President Verna was the Chair of the Finance Committee in 1998 that directed the investigation of PGW's spending and

operational costs which resulted in the current management reorganization at PGW and attempted reforms of past spending practices. Council President Verna oversees the direction and consideration of all legislative Council matters – including those budgetary, regulatory and operational policy issues involving PGW. As a residential and business customer, Council President Verna receives and pays for natural gas service from PGW for heating and cooking purposes at her residence, and heating purposes for her business, both in the City of Philadelphia.

3. James F. Kenney is an adult individual, residential PGW customer and a duly elected at-large member of Philadelphia City Council, representing the entire City. Councilman Kenney is also the Chairman of the Legislative Oversight Committee which handles all matters related to the legislative acts of Council, and budgetary and expenditure responsibilities, as permitted by acts of City Council, including but not limited to budget obligations of PGW and loan authorizations for PGW. Councilman Kenney is also a member of the City Finance Committee which also possess legislative oversight on all matters relating to finance, taxation and the indebtedness of the City – including City assets such as PGW. As a residential customer, Councilman Kenney receives and pays for natural gas service from PGW for heating and cooking purposes at his residential address in the City of Philadelphia.

4. Frank DiCicco is an adult individual, residential PGW customer and a duly elected member of Philadelphia City Council, representing the First Council District. Councilman DiCicco is also the Chairman of the Streets and Services Committee, having legislative oversight of city streets and utility lines that utilize city street right-of-ways, including but not limited to PGW gas lines. Councilman DiCicco is also a member of the City Finance Committee which also possess legislative oversight on all matters relating to finance, taxation and the

indebtedness of the City – including City assets such as PGW. As a residential customer, Councilman DiCicco receives and pays for natural gas service from PGW for heating and cooking purposes at his residential address in the City of Philadelphia.

5. Michael A. Nutter is an adult individual, residential PGW customer and a duly elected member of Philadelphia City Council, representing the Fourth Council District. Councilman Nutter is also the Chairman of the Transportation and Public Utility Committee, having direct Council oversight on expenditure and operational responsibilities of PGW, and responsibility for relations with the Pennsylvania Public Utility Commission. Additionally, Councilman Nutter is the Vice Chairman of the Commerce and Economic Development Committee, which is concerned with the proper allocation of city assets and resources for the promotion of commerce, economic development and employment within the city. As a residential customer, Councilman Nutter receives and pays for natural gas service from PGW for heating and cooking purposes at his residential address in the City of Philadelphia.

6. David Cohen is an adult individual, residential and business PGW customer and a duly elected member of Philadelphia City Council, representing the entire City. Councilman Cohen is also the Vice Chairman of the Transportation and Public Utility Committee, having direct Council oversight on expenditures and operational management of PGW, and responsibility for relations with the Pennsylvania Public Utility Commission. As a residential and business customer, Councilman Cohen receives and pays for natural gas service from PGW for heating and cooking purposes at his residential address, and heating purposes at his law office, both in the City of Philadelphia.

7. Joan L. Krajewski is an adult individual, residential PGW customer and a duly elected

member of Philadelphia City Council, representing the Sixth Council District. Councilwoman Krajewski is also the Chair of the Appropriations Committee, having direct Council oversight on all matters involving the appropriation of City funds, the procurement of equipment and supplies and the use of City money – including City assets such as PGW. As a residential customer, Councilwoman Krajewski receives and pays for natural gas service from PGW for heating and cooking purposes at her residential address in the City of Philadelphia.

8. Juan F. Ramos is an adult individual, residential PGW customer and duly elected at-large member of Philadelphia City Council, representing the entire City. Councilman Ramos is also the Vice Chair of the Streets and Services Committee, having legislative oversight of city streets and utility lines that utilize city street rights-of-ways, including but not limited to PGW gas lines. Additionally, Councilman Ramos is a member of the Public Property and Public Works Committee with oversight on all matters related to City assets and development projects – including PGW. As a residential customer, Councilman Ramos receives and pays for natural gas service from PGW for heating and cooking purposes at his residential address in the City of Philadelphia.

9. Pursuant to 52 Pa.Code §5.72(b), each of the Philadelphia Public Officials possess standing to bring this action before this Honorable Commission in both their official capacities and as individual ratepayers and have interests which may be directly affected, which are not adequately represented by existing participants, and as to which the Philadelphia Public Officials may be bound by the action of the Commission in this proceeding.

10. As of the filing of this Petition, no date has been fixed for the filing of Petitions to Intervene in this proceeding.

11. Pursuant to the Public Utility Code, 66 Pa.C.S.A. §§ 1307(a) and 2212(c), and regulations promulgated thereunder, 52 Pa.Code §5.41, PGW filed a Petition before this Commission seeking the imposition of a CRRC in order to “reconcile [PGW’s] projected and actual cash receipts with billed revenues on an ongoing basis.” Petition of PGW at 1. The aforesaid petition was consolidated with PGW’s prior request to depart from the public notice requirements for tariff addendums or tariff supplements resulting from changes in purchased gas costs. *See*, Prehearing Order of Administrative Law Judge Charles Rainey, Jr. (March 17, 2004).

12. The effect of PGW’s request, if granted by this Commission, would be to permit PGW to impose an automatic adjustment surcharge, on a going forward basis, on all gas service customers – to recover uncollectible expenses which exceed \$55.7 million per year, and to build such a charge in its distribution rate, but not listed as a separate charge on the customer’s bill. Petition of PGW at 3.

13. If permitted by this Commission, PGW’s request would not only pass onto customers the total cost of the company’s uncollectible expenses that exceed the \$55.7 million base level (roughly equating \$34.3 million), but it will also shield PGW management from the financial consequences of ineffective and inefficient collection efforts, and impose significantly higher gas service costs on paying PGW customers. Significantly, PGW does not propose sharing any cost savings that may occur with customers, if uncollected expenses fall below the proposed \$55.7 million base level. The result of PGW’s request, if permitted by this Commission, would be to increase the bill of PGW customers by as much as \$80 per year -- thereby increasing gas service rates that are already among the highest in the Commonwealth.

14. It is the position of the Philadelphia Public Officials that PGW gas service rates are

already too high, and the effect of the CRRRC, if approved by the Commission, would be to exacerbate this existing cost problem and do nothing to make gas service more affordable to customers who regularly pay their gas bills.

15. Despite the fact that PGW management has been criticized for a record of “lackluster collection results,” it now seeks to impose the financial consequence for its own management inefficiencies and its slow implementation of effective collection reforms, on regularly paying customers in the City of Philadelphia. *See, In re Matter of the Fiscal Year 2004 Consolidated Budget / Oversight Review of PGW's Proposed FY 2004 Operating and Capital Budgets and Forecasts for FY 2005 through FY 2009*, Philadelphia Gas Commission Order and Resolution at 3-5 (December 18, 2003).

16. As a result of past inefficiencies and management failures of PGW, including the failure to improve its bill collections, members of Philadelphia City Council have been requested to consider legislation that would permit PGW to forgo annual payments, in the amount of \$18 million, to the City's General Fund for the next five (5) years, and to extend by two (2) years the repayment of \$45 million loaned by the City to PGW. If approved, the effect of PGW's annual payment suspension would be to create a budgetary deficit of \$90 million in the City's Five-Year-Budget Plan.

17. In addition to his rights and interests as a customer of PGW, Senator Fumo has a direct and distinct interest as a duly elected member of the Pennsylvania General Assembly, to ensure that the statutory mandates of the legislature are appropriately executed by administrative agencies, including the interpretation and application of the “just and reasonable” standard as set forth in the Public Utility Code, 66 Pa.C.S.A. § 1301, *et seq.*

19. Similarly, in addition to their rights and interests as customers of PGW, Philadelphia City Council President Verna, and Philadelphia Council Members Kenney, DiCicco, Nutter, Cohen, Krajewski and Ramos have a direct and distinct interest as duly elected members of Philadelphia City Council, to ensure that the management and operation of a City of Philadelphia owned asset conforms with best business practices and efficient operations standards, that customers of PGW are not compelled to assume the financial burden of management failures, and that reasonable budgetary obligations of PGW to the City of Philadelphia are satisfied.

20. The Philadelphia Public Officials have a direct and distinct interest as residential and business gas service ratepayers; approval of PGW's rate request may result in a substantial increase in gas service costs to PGW customers; impact other rates and service in a manner that is not beneficial to the public or consistent with the public interest, undermine the development of efficient business practices for bill collection, and further delay management efficiencies.

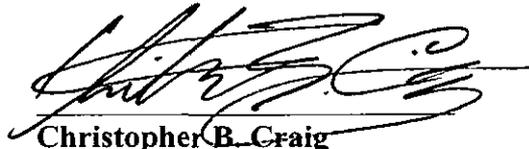
21. This matter is still pending before this Honorable Commission.

22. If not granted leave to intervene in this matter and participate in proceedings before this Commission, the members of this Commission will not be able to receive the perspective of elected public officials who have a distinct involvement with the regulatory oversight of PGW as a City of Philadelphia owned asset and who have debated and considered various city and state legislative initiatives relevant to these proceedings and the operation of PGW.

23. If this Commission were to grant leave to intervene in this matter, the Philadelphia Public Officials would fully participate in these proceedings to the extent resources permitted.

WHEREFORE, Senator Vincent J. Fumo, Philadelphia City Council President Anna C. Verna, and Philadelphia Council Members James F. Kenney, Frank DiCicco, Michael A. Nutter, David Cohen, Joan L. Krajewski and Juan F. Ramos respectfully request that this Honorable Commission grant this Application for Leave to Intervene in the above captioned matter.

Respectfully Submitted,



Christopher B. Craig

Attorney No. 65203

Counsel, Senate Democratic Appropriations Committee

Room 545, Main Capitol Building

Harrisburg, Pennsylvania 17120

(Tel) 717.787.5662

(Fax) 717.783.5210

Email ccraig@fumo.com

Counsel for Senator Fumo, et al.

Dated: April 14, 2004

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re Petition of Philadelphia Gas Works for
Special Permission to Depart from Certain
Requirements of 52 Pa.Code §§ 53.45(b),
53.64(c) and 53.68(a) Concerning the Provisions
of Public Notice

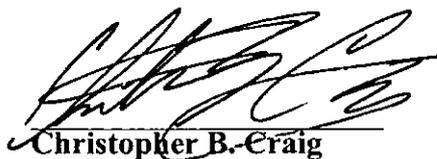
R-00049157

In re Petition of Philadelphia Gas Works to
Establish a Cash Receipts Reconciliation Clause

P-00042090

VERIFICATION

I, Christopher B. Craig, hereby depose and state that I am authorized to execute this Verification on behalf of the Petitioners. The facts set forth in the foregoing are true and correct to the best of my knowledge, information and belief. I understand that this Verification is made pursuant to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.



Christopher B. Craig

Attorney No. 65203

Counsel, Senate Democratic Appropriations Committee

Room 545, Main Capitol Building

Harrisburg, Pennsylvania 17120

717.787.5662

ccraig@fumo.com

Counsel for Senator Vincent J. Fumo, et al.

April 14, 2004

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re Petition of Philadelphia Gas Works for
Special Permission to Depart from Certain
Requirements of 52 Pa.Code §§ 53.45(b),
53.64(c) and 53.68(a) Concerning the Provisions
of Public Notice**

R-00049157

**In re Petition of Philadelphia Gas Works to
Establish a Cash Receipts Reconciliation Clause**

P-00042090

CERTIFICATION OF SERVICE

I, Christopher B. Craig, attorney for Senator Vincent J. Fumo, *et al.*, hereby certify that a copy of the foregoing document has been served in person or by first class mail at the addresses indicated below. I further certify that the manner of service satisfies the requirements of 52 Pa.Code §§ 5.75 and 1.54.

The Honorable Charles E. Rainey, Jr.
Office of Administrative Law Judge - Philadelphia District Office
Pennsylvania Public Utility Commission
1302 State Office Building
Broad & Spring Garden Streets
Philadelphia, PA 19130

Steven C. Gray, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Johnie Simms, Esquire
Pa. Public Utility Commission
Office of Trial Staff
Commonwealth Keystone Building, 2 West
P.O. Box 3265
Harrisburg, PA 17105-3265

Stephen Keene, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17120

Philip A. Bertocci, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102

Richard Lelash
Financial & Regulatory Consultant
18 Seventy Acre Road
Redding, CT 05896

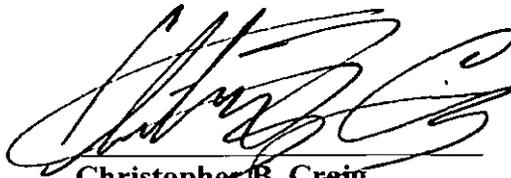
Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
Wolf Block Schorr & Solis-Cohen LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101

David M. Kleppinger, Esquire
Charis Mincavage, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Robert Knecht
Industrial Economics, Inc
2067 Massachusetts Avenue
Cambridge, MA 02140

Gregory J. Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

Wendy Beetlestone, Esquire
School District of Philadelphia
Office of General Counsel
2130 Arch Street, 5th Floor
Philadelphia, PA 19103



Christopher B. Craig
Attorney No. 65203
Counsel, Senate Democratic Appropriations Committee
Room 545, Main Capitol Building
Harrisburg, PA 17120
717.787.5662
ccraig@fumo.com

Counsel for Senator Vincent J. Fumo, et al.

2004 APR 15 AM 10:13
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SECRETARY'S BUREAU

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McNees Wallace & Nurick LLC
attorneys at law

CHARIS MINCAVAGE
DIRECT DIAL: (717) 237-5437
E-MAIL ADDRESS: CMINCAVAGE@MWN.COM

April 15, 2004

Honorable Charles E Rainey Jr.
Administrative Law Judge
Office Of Administrative Law Judge
Pa. Public Utility Commission
1302 Philadelphia State Office Bldg.
1400 West Spring Garden Street
Philadelphia, Pa 19130

DOCKETED
APR 20 2004

PA. PUB.
UTILITY
COMMISSION
SECRETARY'S
BUREAU

2004 APR 15 PM 2: 09

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**Re: Pennsylvania Public Utility Commission v. Philadelphia Gas Works;
Docket No. R-00049157**

Dear Judge Rainey:

Please be advised that the Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") will not be submitting Direct Testimony in the above-referenced proceeding. PICGUG reserves the right, however, to file rebuttal testimony in response to issues raised in other parties' direct testimony.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and kindly return it for our filing purposes.

Very truly yours,

MCNEES WALLACE & NURICK LLC

**DOCUMENT
FOLDER**

By *Charis Mincavage*
Charis Mincavage

Counsel to the Philadelphia Industrial and
Commercial Gas Users Group

Enclosures

CM/lhe

c: James J. McNulty, Secretary (via hand delivery)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

Johnnie Simms, Esq.
Office of Trial Staff
Pennsylvania Public Utility Commission
The Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
josimms@state.pa.us

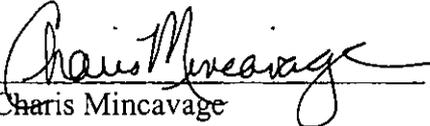
Stephen Keene, Esq.
Office of Consumer Advocate
555 Walnut Street, Forum Place - 5th Fl.
Harrisburg, PA 17120
skeene@paoca.org

Philip A. Bertocci, Esq.
Community Legal Services, Inc.
1424 Chestnut Street, 3rd Floor
Philadelphia, PA 19102
pbertocci@clsphila.org

Steven C. Gray, Esq.
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
sgray@state.pa.us

Daniel Clearfield, Esq.
Mark S. Stewart, Esq.
Wolf, Block, Schorr and Solis-Cohen LLP
212 Locust Street
Suite 300
Harrisburg, PA 17101
dclearfield@wolfblock.com
mstewart@wolfblock.com

Greg Stunder, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue.
Philadelphia, PA 19122
Greg.Stunder@pgworks.com


Charis Mincavage

Dated this 15th day of April, 2004, in Harrisburg, Pennsylvania.

PA PUC
SECRETARY'S BUREAU

2004 APR 15 PM 2:09

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COMMUNITY
LEGAL SERVICES, INC.

RECEIVED

1424 Chestnut Street, Philadelphia, PA 19102-2505
Phone: 215.981.3700, Fax: 215.981.0434
Web Address: www.clsphila.org

2004 APR 19 AM 10: 39

SECRETARY'S BUREAU
April 15, 2004

Honorable Charles E. Rainey, Jr.
Administrative Law Judge
Pennsylvania Public Utility Commission
1302 Philadelphia State Office Bldg.
1400 West Spring Garden Street
Philadelphia, PA 19130

DOCKETED
APR 20 2004

**DOCUMENT
FOLDER**

Re: Pa. PUC v. PGW, Docket Nos. R-00049157, P-00042090

Dear Judge Rainey:

As you know, Community Legal Services, Inc. represents Action Alliance of Senior Citizens, ACORN and Tenants' Action Group (collectively "Action Alliance et al.") in the above-captioned matter.

Please be advised that Action Alliance et al. will not be submitting Direct Testimony in this case. Action Alliance et al. does reserve the right to file Rebuttal Testimony in response to issues raised in the Direct Testimony of other parties.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served.

Very truly yours,

PHILIP A. BERTOCCI, ESQUIRE
LAURA MOSKOWITZ, ESQUIRE

Counsel for Action Alliance et al.

Enclosure

cc: James J. McNulty, Secretary
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the letter in these matters docketed at R-00049157 and P-00042090 upon the following parties by First Class U.S. Mail, postage prepaid as follows:

Dated: April 15, 2004

Daniel Clearfield, Esquire
Mark Stewart, Esquire
Wolf, Block, Schorr & Solis-Cohen, LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101

Gregory J. Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

Johnnie E. Simms, Esquire
Pennsylvania Public Utility Commission
Office of Trial Staff
Commonwealth Keystone Bldg., 2 West
P.O. Box 3265
Harrisburg, PA 17120

Steven C. Gray, Esquire
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

Stephen Keene, Esquire
Office of Consumer Advocate
Forum Place Building, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1921

David M. Kleppinger, Esquire
Charis Mincavage, Esquire
McNees, Wallace & Nurick
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166



PHILIP A. BERTOCCI

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2004 APR 19 AM 10:39

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WolfBlock

212 Locust Street, Suite 300, Harrisburg, Pennsylvania 17101
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

2004 APR 23 PM 9:35

SECRETARY'S BUREAU

April 20, 2004

VIA E-MAIL AND FIRST CLASS MAIL

DOCUMENT
FOLDER

Steven Gray
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Re: Philadelphia Gas Works Cash Receipts Reconciliation
Clause, Docket No. R-00049157
Petition of Philadelphia Gas Works to Establish a Cash
Receipts Reconciliation Clause, Docket No. P-00042090

Dear Steve:

Enclosed are Philadelphia Gas Works' Interrogatories, Set I, to Office of Small Business Advocate Witness Robert D. Knecht in the above-referenced proceeding. If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,



Daniel Clearfield
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

DC/lww

Enclosure

cc: Parties of Record w/enc
James McNulty w/Certificate of Service only

DSH:40707.1/PHI211-217982

Cherry Hill, NJ ■ Harrisburg, PA ■ New York, NY ■ Norristown, PA ■ Philadelphia, PA ■ Roseland, NJ ■ Wilmington, DE

WolfBlock Government Relations: Harrisburg, PA and Washington, DC
Wolf, Block, Schorr and Solis-Cohen LLP, a Pennsylvania Limited Liability Partnership

RECEIVED

CERTIFICATE OF SERVICE

APR 23 PM 9:35

I hereby certify that I have this day served a true copy of the foregoing document of Philadelphia Gas Works' upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA EMAIL, AND FIRST CLASS MAIL

Johnnie Simms, Esq.
Richard A. Kanaskie, Esq.
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
E-mail: josimms@state.pa.us

Stephen Gray, Esq.
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North 2nd Street
Harrisburg, PA 17101
E-mail: sgray@state.pa.us

Tanya McCloskey, Esq.
James Mullins, Esq.
Steve Keene, Esq.
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
E-mail: TmcCloskey@paoca.org
Skeene@paoca.org

Richard Lelash
18 Seventy Acre Road
Redding, CT 06896
E-mail: lelash@sprintmail.com

Dated: April 20, 2004

Greg Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
E-mail: greg.stunder@pgworks.com

Charis Mincavage, Esquire
McNEES, WALLACE, NURICK
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
E-mail: Cmincavage@mwn.com

Philip Bertocci, Esq.
Edward A. McCool, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102
Fax: (215) 981-0434
E-mail: pbertocci@clsphila.org

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
E-mail: rdk@indecon.com



Daniel Clearfield, Esq.

212 Locust Street, Suite 300, Harrisburg, Pennsylvania 17101
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

April 20, 2004

VIA E-MAIL AND FIRST CLASS MAIL

Stephen Keene
Office of Consumer Advocate
555 Walnut Street 5th Fl., Forum Place
Harrisburg, PA 17101-1923

DOCUMENT
FOLDER

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2004 APR 23 PM 6:34
SECRETARY'S BUREAU

Re: Philadelphia Gas Works Cash Receipts Reconciliation
Clause, Docket No. R-00049157
Petition of Philadelphia Gas Works to Establish a Cash
Receipts Reconciliation Clause, Docket No. P-00042090

Dear Steve:

Enclosed are Philadelphia Gas Works' Interrogatories, Set I, to Office of Consumer Advocate Witness Richard LeLash in the above-referenced proceeding. If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,



Daniel Clearfield
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

DC/lww

Enclosure

cc: Parties of Record w/enc
James McNulty w/Certificate of Service only

DSH:40708.1/PHI211-217982

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CERTIFICATE OF SERVICE

APR 23 PM 9:34
SECRETARY OF THE BUREAU

I hereby certify that I have this day served a true copy of the foregoing document of Philadelphia Gas Works' upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA EMAIL, AND FIRST CLASS MAIL

Johnnie Simms, Esq.
Richard A. Kanaskie, Esq.
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
E-mail: josimms@state.pa.us

Stephen Gray, Esq.
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North 2nd Street
Harrisburg, PA 17101
E-mail: sgray@state.pa.us

Tanya McCloskey, Esq.
James Mullins, Esq.
Steve Keene, Esq.
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
E-mail: TmcCloskey@paoca.org
Skeene@paoca.org

Richard Lelash
18 Seventy Acre Road
Redding, CT 06896
E-mail: lelash@sprintmail.com

Dated: April 20, 2004

Greg Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
E-mail: greg.stunder@pgworks.com

Charis Mincavage, Esquire
McNEES, WALLACE, NURICK
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
E-mail: Cmincavage@mwn.com

Philip Bertocci, Esq.
Edward A. McCool, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102
Fax: (215) 981-0434
E-mail: pbertocci@clsphila.org

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
E-mail: rdk@indecon.com

Daniel Clearfield

Daniel Clearfield, Esq.

ORIGINAL

1110 N. Mountain Road
Harrisburg, PA 17109
Telephone: 717-541-1194

ANDERSON, GULOTTA & HICKS, P.C.

200 North Fifth Street
Camden, NJ 08102
fax: 717-541-5434

toll-free: 1-800-330-1458

April 20, 2004

James J. McNulty, Secretary
Commonwealth of Pennsylvania
Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

DOCUMENT
FOLDER

SECRETARY'S BUREAU

2004 APR 21 AM 1:17

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RE: In re Petition of Philadelphia Gas Works for Special Permission to Depart from Certain Requirements of 52 Pa.Code §§ 53.45(b), 53.64(c) and 53.68(a) Concerning the Provisions of Public Notice (Case No. R-00049157);

And

In re Petition of Philadelphia Gas Works to Establish a Cash Receipts Reconciliation Clause (Case No. P-00042090)

Dear Mr. McNulty:

Please enter my appearance in the above captioned matters as co-counsel for Pennsylvania State Senator Vincent J. Fumo, Philadelphia City Council President Anna C. Verna, and Philadelphia Council Members James F. Kenney, Frank Diccico, Michael A. Nutter, David Cohen, Joan L. Krajewski, and Juan F. Ramos. I will be joining Mr. Christopher B. Craig, Esquire, as Counsel to Senator Fumo, et al.

I would appreciate it if you would add my name to the official service lists and any email service lists in these matters.

Should you have any questions, please do not hesitate to contact me at (717) 541-1194.

DOCKETED
APR 28 2004

Respectfully submitted,

Renardo L. Hicks

Renardo L. Hicks
PA Attorney ID No. 40404
Anderson, Gulotta & Hicks, PC
1110 N. Mountain Road
Harrisburg, PA 17112
Tel.: (717) 541-1194
Fax: (717) 541-5434
rhicks@aghweb.com
Counsel for Senator Fumo, et al.

cc: Attached Certificate of Service

ORIGINAL RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2004 APR 21 AM 1:17

SECRETARY'S BUREAU

Pennsylvania Public Utility Commission	:	
v.	:	Docket No. R-00049157
Philadelphia Gas Works - 1307(f)	:	
	:	
Petition of Philadelphia Gas Works to	:	
Establish a Cash Receipts Reconciliation	:	Docket No. P-00042090
Clause	:	

CERTIFICATE OF SERVICE

I, Renardo L. Hicks, hereby certify that I have this day served a copy of the Entry Of Appearance of Renardo L. Hicks as co-counsel for Pennsylvania State Senator Vincent J .Fumo, *et al.* via First Class mail, postage prepaid, upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Harrisburg, Pennsylvania, this 20th day of April, 2004.

Daniel Clearfield, Esquire
Alan C. Kohler, Esquire
Mark S. Stewart, Esquire
Wolf Block Schorr & Solis-Cohen LLP
212 Locust Street – Suite 300
Harrisburg, PA 17101

Gregory J. Stunder, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

Stephen J. Keene, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place - 5th Floor
Harrisburg, PA 17101-1923

Mr. Richard LeLash
18 Seventy Acre Road
Redding, CT 06896

Steven C. Gray, Esquire
Small Business Advocate
Suite 1102, Commerce Bldg.
300 North Second Street
Harrisburg, PA 17101

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

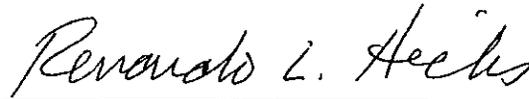
David M. Kleppinger, Esquire
Charis Mincavage, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Philip A. Bertocci, Esquire
Laura Moskowitz, Esquire
Community Legal Services, Inc.
1424 Chestnut Street, 4th Floor
Philadelphia, PA 19102-2505

Wendy Beetlestone, Esquire
School District of Philadelphia
Office of General Counsel
2130 Arch Street, 5th Floor
Philadelphia, PA 19103

Helen H. Richardson, Esquire
Mondre Energy, Inc.
1880 John F. Kennedy Blvd.
Suite 1705
Philadelphia, PA 19103

Honorable Charles E. Rainey, Jr.
Administrative Law Judge
Pa. Public Utility Commission
1302 State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130



Renardo L. Hicks
PA Attorney ID No. 40404
Anderson, Gulotta & Hicks, PC
1110 N. Mountain Road
Harrisburg, PA 17112
Tel.: (717) 541-1194
Fax: (717) 541-5434
rhicks@aghweb.com
Counsel for Senator Vincent J. Fumo, *et al.*

VINCENT J. FUMO
Chairman

PAUL S. DLUGOLECKI
Executive Director



Senate Post Office
The State Capitol
Harrisburg, PA 17120-0030
Telephone: (717) 787-5662
Fax: (717) 783-5210

DEMOCRATIC COMMITTEE ON APPROPRIATIONS

April 20, 2004

Via Hand Delivery or Overnight Mail

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
2nd Floor North
Commonwealth Keystone Office Building
Harrisburg, Pennsylvania 17105

DOCUMENT
FOLDER

**Re: *In re* Petition of Philadelphia Gas Work to Establish a Cash Receipts
Reconciliation Clause, PUC Dkt. No. P-00042090; R-00049157**

Dear Mr. McNulty:

Attached for your consideration and filing is an original and two (2) copies of the Application For Leave To Intervene Of Philadelphia District Attorney Lynne Abraham in the above captioned matters. A copy has been sent to all counsels of record, as well as to Administrative Law Judge Rainey.

Thank you for your assistance in this matter. Please do not hesitate to contact me if I may be able to provide any additional information.

Sincerely,

Christopher B. Craig
Counsel

cc: All counsel of record.

RECEIVED
2004 APR 20 PM 3:25
SECRETARY'S BUREAU
PA PUC

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re Petition of Philadelphia Gas Works for
Special Permission to Depart from Certain
Requirements of 52 Pa.Code §§ 53.45(b),
53.64(c) and 53.68(a) Concerning the Provisions
of Public Notice

R-00049157

In re Petition of Philadelphia Gas Works to
Establish a Cash Receipts Reconciliation Clause

P-00042090

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2004 APR 20 PM 3:26
PA. P.U.C.
SECRETARY'S BUREAU

APPLICATION FOR LEAVE TO INTERVENE
OF PHILADELPHIA DISTRICT ATTORNEY
LYNNE ABRAHAM

DOCUMENT
FOLDER

Philadelphia District Attorney Lynne Abraham, individually as a utility ratepayer and in her official capacity as the duly elected District Attorney of the City of Philadelphia by and through her undersigned counsel, hereby files this Application for Leave to Intervene pursuant to 52 Pa.Code §§ 5.71 - 5.74, requesting this Commission to approve her intervention in the above-captioned proceedings initiated by Philadelphia Gas Works (hereinafter "PGW") and to be included among the group of Philadelphia Public Officials who filed an Application for Leave to Intervene in this proceeding last week. *See*, Application for Leave to Intervene of Senator Fumo, *et al.*, (April 14, 2004).

Like the Philadelphia Public Officials, the primary focus of District Attorney Abraham's intervention is to oppose the request of PGW to establish a Cash Receipts Reconciliation Clause (hereinafter "CRRC") and to propose greater regulatory oversight of the implementation of

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APR 28 2004

PGW's bill collection program improvements. In support thereof, the District Attorney Abraham avers the following:

1. Lynne Abraham is a an adult individual, residential PGW customer, business PGW customer, and the duly elected District Attorney of the City of Philadelphia. As a residential customer, District Attorney Abraham receives and pays for natural gas service from PGW for heating and cooking purposes at her residential address in the City of Philadelphia. As a business customer, District Attorney Abraham, through the City of Philadelphia, receives and budgets for natural gas service from PGW for heating of the District Attorney's Office.

2. In her official capacity as the District Attorney of the City of Philadelphia, Lynne Abraham directed the grand jury investigation of the management of PGW in 1999, which resulted in criminal charges being filed against several former members of PGW's management team. As part of this investigation, in 2000 the District Attorney's Office issued a report listing findings relative to the management of PGW, business irregularities, and suggesting the need for greater management oversight of the operations of PGW. *See, In re County Investigating Grand Jury of September 9, 1999 – Report of the Grand Jury.*

3. Additionally, District Attorney Abraham has maintained her critical involvement in the management of PGW, as a City asset, by recently testified before the Philadelphia City Council Committee on Finance and the Committee on Transportation and Public Utilities on the request by PGW to seek the CRRC. Commenting on the prior management decisions that precipitated the rate increase request, District Attorney Abraham stated “[i]f there ever was a circumstance that absolutely was predictable and foreseeable, this very day and other days that

may follow were absolutely predictable and bound to happen.” See, Transcript *Council of the City of Philadelphia Continued Public Hearing – Committee on Finance and Committee on Transportation and Public Utilities* (March 30, 2004) at 49.

4. Pursuant to 52 Pa.Code §5.72(b), District Attorney Abraham possesses standing to bring this action before this Honorable Commission in both her official capacity and as an individual ratepayer and has interests which may be directly affected, which are not adequately represented by existing participants, and as to which may be bound by the action of the Commission in this proceeding.

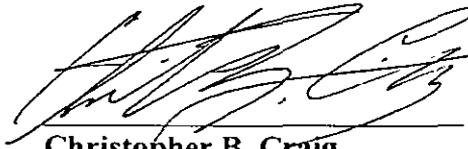
5. In addition to her rights and interests as a customer of PGW, District Attorney Abraham has a direct and distinct interest as the duly elected Philadelphia District Attorney, to ensure that the management and operation of a City of Philadelphia owned asset conforms with best business practices and efficient operations standards, that customers of PGW are not compelled to assume the financial burden of past management failures and criminal acts, and that reasonable budgetary obligations of PGW to the City of Philadelphia are satisfied.

6. District Attorney Abraham has a direct and distinct interest as residential gas service ratepayer; approval of PGW’s rate request may result in a substantial increase in gas service costs to PGW customers, impact other rates and service in a manner that is not beneficial to the public or consistent with the public interest, undermine the development of efficient business practices for bill collection, and further delay management efficiencies.

7. Paragraphs 10 through 16 and 21 through 23 of the Application for Leave to Intervene of Pennsylvania State Senator Vincent J. Fumo, *et al.*, are hereby incorporated herein as if set forth at length.

WHEREFORE, Philadelphia District Attorney Lynne Abraham respectfully request that this Honorable Commission grant this Application for Leave to Intervene in the above captioned matter.

Respectfully Submitted,



Christopher B. Craig

Attorney No. 65203

Counsel, Senate Democratic Appropriations Committee

Room 545, Main Capitol Building

Harrisburg, Pennsylvania 17120

(Tel) 717.787.5662

(Fax) 717.783.5210

Email ccraig@fumo.com

Counsel for Senator Fumo et al.

Dated: April 20, 2004

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re Petition of Philadelphia Gas Works for
Special Permission to Depart from Certain
Requirements of 52 Pa.Code §§ 53.45(b),
53.64(c) and 53.68(a) Concerning the Provisions
of Public Notice

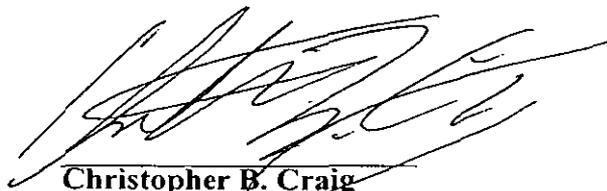
R-00049157

In re Petition of Philadelphia Gas Works to
Establish a Cash Receipts Reconciliation Clause

P-00042090

VERIFICATION

I, Christopher B. Craig, hereby depose and state that I am authorized to execute this Verification on behalf of the Petitioners. The facts set forth in the foregoing are true and correct to the best of my knowledge, information and belief. I understand that this Verification is made pursuant to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities.



Christopher B. Craig
Attorney No. 65203
Counsel, Senate Democratic Appropriations Committee
Room 545, Main Capitol Building
Harrisburg, Pennsylvania 17120
717.787.5662
ccraig@fumo.com

Counsel for Senator Vincent J. Fumo, et al.

April 14, 2004

2004 APR 20 PM 3:26
PA PUC
SECRETARY'S BUREAU

RECEIVED

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re Petition of Philadelphia Gas Works for
Special Permission to Depart from Certain
Requirements of 52 Pa.Code §§ 53.45(b),
53.64(c) and 53.68(a) Concerning the Provisions
of Public Notice**

R-0004915

PA PUBLIC
UTILITY
COMMISSION
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**In re Petition of Philadelphia Gas Works to
Establish a Cash Receipts Reconciliation Clause**

P-00042090

CERTIFICATION OF SERVICE

I, Christopher B. Craig, attorney for Senator Vincent J. Fumo, *et al.*, hereby certify that a copy of the foregoing document has been served in person or by first class mail at the addresses indicated below. I further certify that the manner of service satisfies the requirements of 52 Pa.Code §§ 5.75 and 1.54.

The Honorable Charles E. Rainey, Jr.
Office of Administrative Law Judge - Philadelphia District Office
Pennsylvania Public Utility Commission
1302 State Office Building
Broad & Spring Garden Streets
Philadelphia, PA 19130

Steven C. Gray, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Johnie Simms, Esquire
Pa. Public Utility Commission
Office of Trial Staff
Commonwealth Keystone Building, 2 West
P.O. Box 3265
Harrisburg, PA 17105-3265

Stephen Keene, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17120

Philip A. Bertocci, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102

Richard Lelash
Financial & Regulatory Consultant
18 Seventy Acre Road
Redding, CT 05896

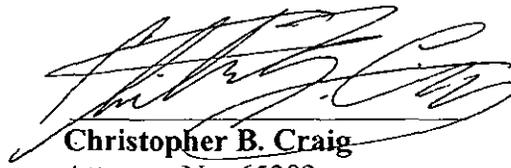
Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
Wolf Block Schorr & Solis-Cohen LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101

David M. Kleppinger, Esquire
Charis Mincavage, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Robert Knecht
Industrial Economics, Inc
2067 Massachusetts Avenue
Cambridge, MA 02140

Gregory J. Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

Wendy Beetlestone, Esquire
School District of Philadelphia
Office of General Counsel
2130 Arch Street, 5th Floor
Philadelphia, PA 19103



Christopher B. Craig

Attorney No. 65203

Counsel, Senate Democratic Appropriations Committee

Room 545, Main Capitol Building

Harrisburg, PA 17120

717.787.5662

ccraig@fumo.com

Counsel for Senator Vincent J. Fumo, et al.

RECEIVED

WolfBlock

12 Locust Street, Suite 300, Harrisburg, Pennsylvania 17101
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

2004 APR 23 PM 9:37

SECRETARY'S BUREAU

April 21, 2004

VIA E-MAIL AND FIRST CLASS MAIL

Johnnie Simms
Office of Trial Staff
PA PUC
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

DOCUMENT
FOLDER

Re: Philadelphia Gas Works Cash Receipts Reconciliation
Clause, Docket No. R-00049157
Petition of Philadelphia Gas Works to Establish a Cash
Receipts Reconciliation Clause, Docket No. P-00042090

Dear John:

Enclosed are Philadelphia Gas Works' Interrogatories, Set I, to Office of Trial Staff
Witness Charles T. Weakley, III in the above-referenced proceeding. If you have any questions
or concerns, please do not hesitate to contact me.

Very truly yours,



Daniel Clearfield
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

DC/lww

Enclosure

cc: Parties of Record w/enc
James McNulty w/Certificate of Service only

DSH:40713.1/PHI211-217982

Cherry Hill, NJ ■ Harrisburg, PA ■ New York, NY ■ Norristown, PA ■ Philadelphia, PA ■ Roseland, NJ ■ Wilmington, DE

WolfBlock Government Relations: Harrisburg, PA and Washington, DC

Wolf, Block, Schorr and Solis-Cohen LLP, a Pennsylvania Limited Liability Partnership

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document of Philadelphia Gas Works' upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA EMAIL, AND FIRST CLASS MAIL

Johnnie Simms, Esq.
Richard A. Kanaskie, Esq.
Office of Trial Staff
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
E-mail: josimms@state.pa.us

Stephen Gray, Esq.
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North 2nd Street
Harrisburg, PA 17101
E-mail: sgray@state.pa.us

Tanya McCloskey, Esq.
James Mullins, Esq.
Steve Keene, Esq.
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1921
E-mail: TmcCloskey@paoca.org
Skeene@paoca.org

Richard Lelash
18 Seventy Acre Road
Redding, CT 06896
E-mail: lelash@sprintmail.com

Dated: April 21, 2004

Greg Stunder, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
E-mail: greg.stunder@pgworks.com

Charis Mincavage, Esquire
McNEES, WALLACE, NURICK
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
E-mail: Cmincavage@mwn.com

Philip Bertocci, Esq.
Edward A. McCool, Esq.
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102
Fax: (215) 981-0434
E-mail: pbertocci@clsphila.org

Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
E-mail: rdk@indecon.com



Daniel Clearfield, Esq.

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COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560 (in PA only)

IRWINA. POPOWSKY
Consumer Advocate

FAX (717) 783-7152
consumer@paoca.org

April 29, 2004

Gregory J. Stunder, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19112

DOCUMENT
FOLDER

Re: Pennsylvania Public Utility Commission
v.
Philadelphia Gas Works, 1307(f)
Docket No. R-00049157

Petition of Philadelphia Gas Works
Regarding Cash Receipts Reconciliation
Clause
Docket No. P-00042090

Dear Mr. Stunder:

Enclosed you will find the Office of Consumer Advocate's Responses to Philadelphia Gas Works, Set I in the above-referenced proceeding.

If you have any questions, please call us. Also enclosed is a copy of the Certificate of Service for these responses, which has been filed with Secretary McNulty of the Pennsylvania Public Utility Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "S. J. Keene".

Stephen J. Keene
Senior Assistant Consumer Advocate

Enclosures

cc: All parties of record
James McNulty, Certificate of Service only

79041

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2004 APR 29 PM 4:21
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission

v.

Philadelphia Gas Works
Docket No. R-00049157

Petition of Philadelphia Gas Works Regarding
Cash Receipts Reconciliation Clause
Docket No. P-00042090

I hereby certify that I have this day served a true copy of the foregoing document, Office of Consumer Advocate's Responses to Interrogatory Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 29th day of April, 2004.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Richard A. Kanaskie, Esquire
Johnnie E. Simms, Esquire
Pennsylvania Public Utility Commission
Office of Trial Staff
P.O. Box 3265
Harrisburg, PA 17105-3265

SERVICE BY E-MAIL and FIRST CLASS MAIL

Daniel Clearfield, Esquire
Alan C. Kohler, Esquire
Wolf, Block, Schorr and Solis-Cohen LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101

Steven Gray, Esquire
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

David M. Kleppinger, Esquire
Charis Mincavgage, Esquire
McNees, Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Renardo L. Hicks
Anderson, Gullotta & Hicks, PC
1110 N. Mountain Road
Harrisburg, PA 17112
Counsel for Senator Fumo, et al.

Gregory J. Stunder, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

2004 APR 29 PM 4: 21
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Philip A. Bertocci, Esq.
Laura Moskowitz, Esq.
1424 Chestnut Street
3rd Floor
Philadelphia, PA 19102

Philip Herman, Esquire
FOX ROTHSCHILD, LLP
2000 Market Street
Tenth Floor
Philadelphia, PA 19103

Mr. William Kitsch
1233 Stanwood Street
Philadelphia, PA 1911
(215) 725-1964

Helen Richardson
Mondre Energy Inc
1880 John f. Kennedy Boulevard
Suite 1705
Philadelphia, PA 19135

Wendy Beetlestone, Esq.
School District of Philadelphia
Office of General Counsel
2130 Arch Street, 5th Floor
Philadelphia, PA 19103

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Christopher B. Craig, Esquire
Main Capitol Building
Room 545
Harrisburg, Pa 17120
Counsel for Senator Fumo, et al
District Attorney Lynne Abraham



Stephen J. Keene
Senior Assistant Consumer Advocate
Aron J. Beatty
Assistant Consumer Advocate

Counsel for
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048
78018

OALJ Hearing Report

Please Check Those Blocks Which Apply

Docket No.:	R-00049157 ; P-00042090		YES	NO
Case Name:	Pennsylvania Public Utility Commission v. Philadelphia Gas Works 1307(f)	Prehearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Location:	Philadelphia, PA	Hearing Held:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Date:	March 15, 2004	Testimony Taken:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ALJ:	Charles E. Rainey, Jr.	Transcript Due:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reporting Firm:	Commonwealth Reporting	Hearing Concluded:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Further Hearing Needed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		Estimated Add'l Days:	2 (May 11-12)	
		RECORD CLOSED:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Briefs to be Filed:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
		DATE:	May 24 main briefs June 1 reply briefs	
		Bench Decision:	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DOCUMENT FOLDER

The following participated by phone from Harrisburg:

Daniel Clearfield, Esq.	PGW
Johnnie F. Simms, Esq.	OTS
Stephen J. Keene, Esq.	OCA
Steven C. Gray, Esq.	OSBA
Charis Mincarvase, Esq.	PICGUG

REMARKS: *Evidentiary hearings to be held on May 11-12, 2004, at the Phila State Dep. Bldg.*

PLEASE PRINT CLEARLY - Incomplete Information may result in delay of processing.

Name and Telephone Number	Address			Who are you representing?
Philip A. Bertocci, Esq.	1424 Chestnut Street			Action Alliance of Senior Citizens; ACORN; TAG; CEPA
Telephone: (215) 983-3000	City	State	Zip	Fax Number:
	Phila.	PA	19102	
	E-mail Address:			
	City			
	State	Zip		
	PA			
	E-mail Address:			
	City			
	State	Zip		
	PA			
	E-mail Address:			
	City			
	State	Zip		
	PA			

MAY - 3 2004

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Check this box if additional parties or attendees appear on back of form.

Janet Smith (she was in Hbg.)

Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

Name and Telephone Number	Address			Who are you representing?
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number:
	City	State	Zip	
Telephone:	E-mail Address:			Fax Number: