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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

NOV - 3 2014

Charles Wright

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

v.

Docket No. C – 2014 – 2447806

Philadelphia Gas Works

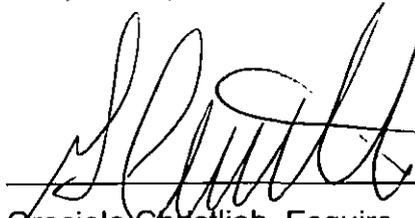
NOTICE TO PLEAD

To: Charles Wright,

Pursuant to 52 Pa. Code §5.102, you are hereby notified to file a written Answer or other response to the enclosed Motion for Summary Judgment, within twenty (20) 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,

November 3, 2014



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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Charles Wright

v.

Philadelphia Gas Works

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PA PUBLIC UTILITY COMMISSION  
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Docket No. C-2014-2447806

**Philadelphia Gas Works'**  
**Motion For Summary Judgement**

Pursuant to 52 Pa. Code §5.102, the Philadelphia Gas Works ("PGW") hereby moves for a summary judgement and the dismissal of the above captioned matter on the grounds that the exact and identical factual and legal issues that are the basis of the instant complaint have been addressed and previously settled by the parties by way of a Certificate of Satisfaction under Docket No. C-2013-2369058, filed on November 20, 2013.

In support of this motion, PGW hereby avers the following:

1. The Complaint established service at the Service Address on March 1, 2012.
2. The account is listed as residential gas heat and other domestic usage.
3. The bills are based on actual gas usage.
4. On May 25, 2013, the Complainant filed a Formal Complaint against PGW under Docket No. C-2013-2369058 wherein the Complainant sought a payment agreement.
5. On November 20, 2013, the Complainant and PGW settled the formal complaint under Docket No. C-2013-2369058. PGW and the Complainant agreed to a payment agreement of \$142.00 for the budget plus \$17.00 towards the arrears for a total of \$159.00 a month for 62 months.
6. On November 20, 2013, PGW filed a Certificate of Satisfaction with the Commission indicating that the formal complaint under Docket No. C-2013-

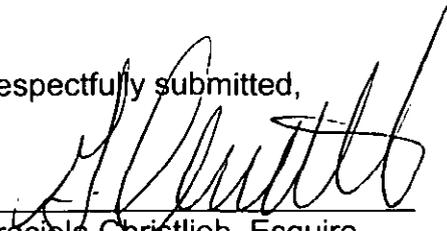
2369058 was settled. A copy of the Certificate of Satisfaction was sent to the Complainant.

7. 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.
8. The Complainant did not file an objection to the Certificate of Satisfaction.
9. On April 29, 2014, the agreement broke due to missed and/or partial payments.
10. On August 18, 2014, PGW terminated the Complainant's service for non-payment.
11. On October 10, 2014 the Complainant filed the Complaint against PGW in the instant matter under Docket No. C-2014-2447806.
12. The Complaint under Docket No. C-2014-2447806 again requests a payment agreement on the same balance that was at issue under Docket No. C-2013-2369058.

**WHEREFORE**, PGW respectfully requests that pursuant to Titus Wright v. PGW, Docket No. C-2013-2368462, and 52 Pa.Code § 5.24(b), the Commission dismiss the instant complaint as all of the factual and legal issues that are the basis of the instant complaint were previously addressed and settled under Docket No. C-2013-2369058. PGW further requests that the Commission issue an order for the payment of the arrearage on the Complainant's PGW account in the amount of \$1,966.85 in full.

November 3, 2014

Respectfully submitted,

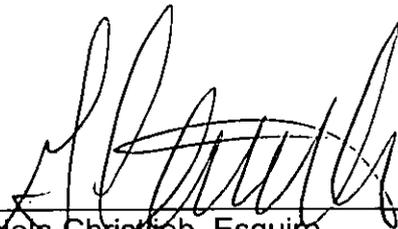


Graciela Christlieb, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

**VERIFICATION**

I, Graciela Christlieb, hereby declare that I am counsel to the Philadelphia Gas Works; and 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.

November 3, 2014



Graciela Christlieb, Esquire

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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**

Charles Wright  
5710 Reedland Street  
Philadelphia, PA 19143

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