

Wolf, Block, Schorr and Solis-Cohen LLP

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ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

DOCUMENT
FOLDER

RECEIVED
01 JAN 31 PM 3:55
PA P.U.C.
SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0002 (Adam Kruger)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Adam Kruger (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

59

ORIGINAL

**BEFORE THE
PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042C0002

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SECRETARY'S BUREAU

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY ADAM KRUGER**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Adam Kruger. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DSH:25729.1

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5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Mr. Kruger's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY: 
Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

Date: January 31, 2001

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VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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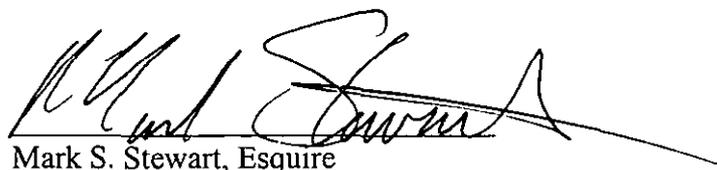
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Adam Kruger
8812 Manchester Street
Philadelphia, PA 19152



Mark S. Stewart, Esquire

Date: January 31, 2001

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01 JAN 31 PM 3:55
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MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

DOCUMENT
FOLDER

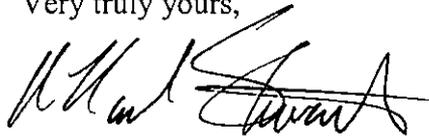
RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0003 (Anthony Jankavsky)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Anthony Jankavsky (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

60

ORIGINAL

**BEFORE THE
PUBLIC UTILITY COMMISSION**

**RECEIVED
01 JAN 31 PM 3:54
PA. P.U.C.
SECRETARY'S BUREAU**

Pennsylvania Public Utility
Commission
Complainant

v.

Docket No. R-00006042C0003

Philadelphia Gas Works
Respondent

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY ANTHONY JANKAVSKY**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Anthony Jankavsky. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. PGW's proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. By way of further response, PGW has not raised base rates in over nine years. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.

4. This paragraph sets forth Complainant's prayer for relief. No response is required.

**DOCUMENT
FOLDER**

**DOCKETED
FEB 2 2001**

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY: 

Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

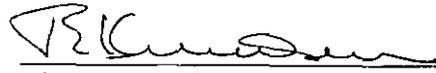
Date: January 31, 2001

RECEIVED
01 JAN 31 PM 3:54
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SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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01 JAN 31 PM 3:54
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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 persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Anthony Jankavsky
3916 Stevens Street
Philadelphia, PA 19114



Mark S. Stewart, Esquire

Date: January 31, 2001

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01 JAN 31 PM 3:54
PA.P.U.C.
SECRETARY'S BUREAU

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MARK S. STEWART
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E-MAIL: MSTEWART@WOLFBLOCK.COM

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January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

DOCUMENT
FOLDER

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0004 (Frances Williams)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Frances Williams (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

6

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BEFORE THE
PUBLIC UTILITY COMMISSION

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01 JAN 31 PM 3:51
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SECRETARY'S BUREAU

Pennsylvania Public Utility
Commission
Complainant

v.

Docket No. R-00006042C0004

Philadelphia Gas Works
Respondent

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY FRANCES WILLIAMS**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Frances Williams. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. PGW's proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. By way of further response, PGW has not raised base rates in over nine years. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.

4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DSI1:25730.1

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FEB 2 2001

5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that this Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

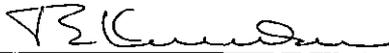
Date: January 31, 2001

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VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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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 persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Frances Williams
5216 N. 11th Street
Philadelphia, PA 19141-2809



Mark S. Stewart, Esquire

Date: January 31, 2001

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MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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01 JAN 31 PM 3:50
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SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0005 (Judith Flanagan)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Judith Flanagan (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

89

ORIGINAL

**BEFORE THE
PUBLIC UTILITY COMMISSION**

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01 JAN 31 PM 3:50
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SECRETARY'S BUREAU**

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042C0005

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY JUDITH FLANAGAN**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Judith Flanagan. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. PGW's proposed base rate increase is fully justified, and PGW will demonstrate the same in the above-captioned rate investigation. By way of further response, PGW has not raised base rates in over nine years. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

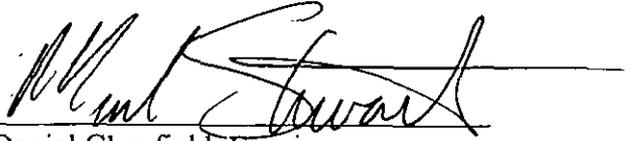
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FEB 2 2001

**DOCUMENT
FOLDER**

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

Date: January 31, 2001

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VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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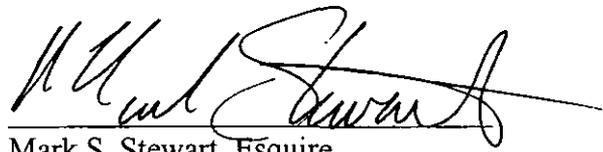
ORIGINAL

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Judith Flanagan
6561 Edmund Street
Philadelphia, PA 19135



Mark S. Stewart, Esquire

Date: January 31, 2001

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ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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01 JAN 31 PM 3:49
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SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0006 (Deborah Kane)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Deborah Kane (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

69

BEFORE THE PUBLIC UTILITY COMMISSION **ORIGINAL**

Pennsylvania Public Utility
Commission
Complainant

v.

Philadelphia Gas Works
Respondent

Docket No. R-00006042C0006

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SECRETARY'S BUREAU

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY DEBORAH KANE**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Deborah Kane. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers. PGW does not have knowledge or information sufficient to form a belief as to the truth of the averments regarding meter reading.

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FEB 2 2001

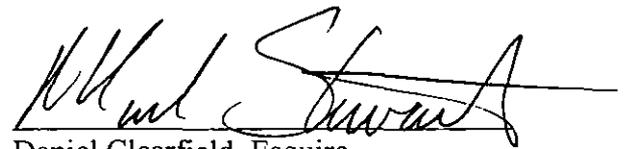
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Ms. Kane's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire

Mark S. Stewart, Esquire

WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

212 Locust Street, Suite 300

Harrisburg, PA 17101

(717) 237-7160

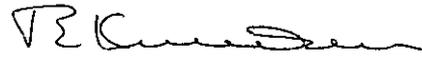
Date: January 31, 2001

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VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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P.A.P.U.C.
SECRETARY'S BUREAU

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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 persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Deborah Kane
7134 Keystone Street
Philadelphia, PA 19135



Mark S. Stewart, Esquire

Date: January 31, 2001

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PA.P.U.C.
SECRETARY'S BUREAU

Wolf, Block, Schorr and Solis-Cohen LLP

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Harrisburg, PA 17101

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MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWARD@WOLFBLOCK.COM

ORIGINAL

January 31, 2001

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SECRETARY'S BUREAU

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

DOCUMENT
FOLDER

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0007 (Hasha Salaman)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Hasha Salaman (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

70

ORIGINAL

**BEFORE THE
PUBLIC UTILITY COMMISSION**

**RECEIVED
01 JAN 31 PM 3:48
F.A.P.U.C.
SECRETARY'S BUREAU**

Pennsylvania Public Utility
Commission
Complainant
v.
Philadelphia Gas Works
Respondent

Docket No. R-00006042C0007

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY HASHA SALAMAN**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Hasha Salaman. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers. PGW does not have knowledge or information sufficient to form a belief as to the truth of the specific averments regarding service and non-responsiveness.

DSH:25733.1

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FEB 2 2001

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4. This paragraph sets forth Complainant's prayer for relief. No response is required.

5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that this Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY: 
Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

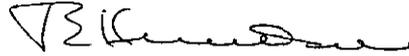
Date: January 31, 2001

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SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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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 persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Hasha Salaman
9204 Burbank Road
Philadelphia, PA 19115-4003



Mark S. Stewart, Esquire

Date: January 31, 2001

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F: 717 237 7161
www.wolfblock.com

ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

DOCUMENT
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01 JAN 31 PM 3:48
PA P.U.C.
SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0008 (David A. Posternock)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart
For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: David A. Posternock (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

ORIGINAL

BEFORE THE
PUBLIC UTILITY COMMISSION

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01 JAN 31 PM 3:48
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Pennsylvania Public Utility
Commission
Complainant

v.

Docket No. R-00006042C0008

Philadelphia Gas Works
Respondent

ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY DAVID A. POSTERNOCK

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the
Complaint of David A. Posternock. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.

4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DSH:25794.1

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5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Mr. Posternock's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY: 
Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

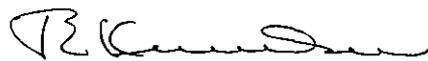
Date: January 31, 2001

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SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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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 persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

David A. Posternock
215 Beck Street
Philadelphia, PA 19147



Mark S. Stewart, Esquire

Date: January 31, 2001

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www.wolfblock.com

ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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01 JAN 31 PM 3:45
PA.P.U.C.
SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0009 (Anne Golden)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Anne Golden (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

72

ORIGINAL

BEFORE THE
PUBLIC UTILITY COMMISSION

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01 JAN 31 PM 3:46
PA.P.U.C.
SECRETARY'S BUREAU

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042C0009

ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY ANNE GOLDEN

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Anne Golden. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a

prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.

4. This paragraph sets forth Complainant's prayer for relief. No response is required.

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FEB 2 2001

5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Ms. Golden's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

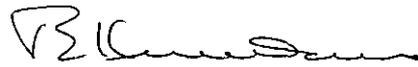
Date: January 31, 2001

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01 JAN 31 PM 3:46
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VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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ORIGINAL

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Anne Golden
6649 Hegerman Street
Philadelphia, PA 19135



Mark S. Stewart, Esquire

Date: January 31, 2001

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SECRETARY'S BUREAU

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MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

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January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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01 JAN 31 PM 3:54
PA.P.U.C.
SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0010 (Richard Sterling)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Richard Sterling (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

62

BEFORE THE
PUBLIC UTILITY COMMISSION

ORIGINAL

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042

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SECRETARY'S BUREAU
00010

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY RICHARD STERLING**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Richard Sterling. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a

prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers. PGW specifically denies that it has failed to provide heat to any customers.

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4. This paragraph sets forth Complainant's prayer for relief. No response is required.

5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Ms. Golden's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

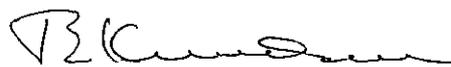
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Date: January 31, 2001

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

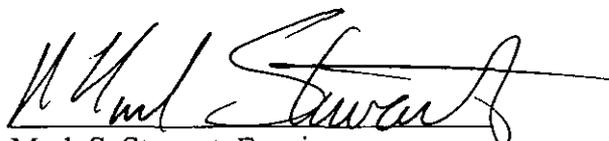
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I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

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Richard Sterling
2524 Memphis Street
Philadelphia, PA 19125



Mark S. Stewart, Esquire

Date: January 31, 2001

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ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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01 JAN 31 PM 3:53
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SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0011 (Loretta Hutchings)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Loretta Hutchings (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

63

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**BEFORE THE
PUBLIC UTILITY COMMISSION**

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01 JAN 31 PM 3:53
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Pennsylvania Public Utility
Commission
Complainant

v.

Docket No. R-00006042C0011

Philadelphia Gas Works
Respondent

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY LORETTA HUTCHINGS**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Loretta Hutchings. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.

4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DSH:25777.1

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5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Ms. Hutchings' Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

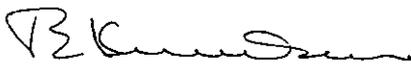
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VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01


Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

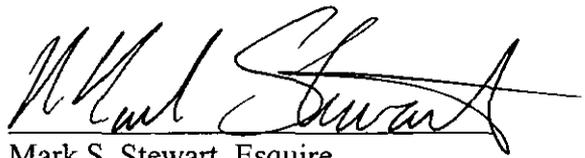
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Loretta Hutchings
6421 Glenmore Avenue
Philadelphia, PA 19142



Mark S. Stewart, Esquire

Date: January 31, 2001

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Wolf, Block, Schorr and Solis-Cohen LLP

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www.wolfblock.com

ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0012 (Robert Mullineaux)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Robert Mullineaux (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

64

BEFORE THE
PUBLIC UTILITY COMMISSION

ORIGINAL

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042C001

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SECRETARY'S BUREAU

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY ROBERT MULLINEAUX**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Robert Mullineaux. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified, and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

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5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Mr. Mullineaux's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

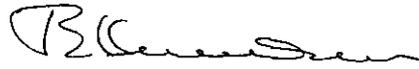
Date: January 31, 2001

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PA.P.U.C.
SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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SECRETARY'S BUREAU

ORIGINAL

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

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Robert Mullineaux
239 S. 13th Street
Philadelphia, PA 19107



Mark S. Stewart, Esquire

Date: January 31, 2001

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Suite 300
Harrisburg, PA 17101
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F: 717 237 7161
www.wolfblock.com

ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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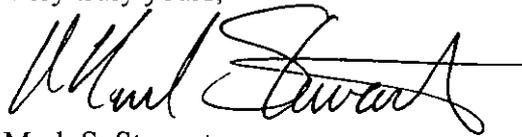
RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0013 (Kimberly Lisacek)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Kimberly Lisacek (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

65

ORIGINAL

**BEFORE THE
PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042C0013

RECEIVED
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SECRETARY'S BUREAU

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY KIMBERLY LISACEK**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Kimberly Lisacek. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified, and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DS11:25787.1

**DOCUMENT
FOLDER**

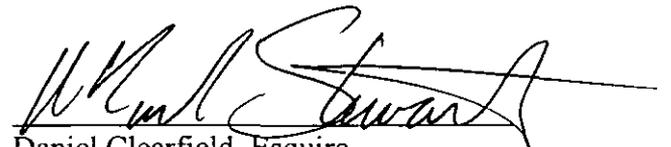
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FEB 2 2001

5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Ms. Lisacek's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

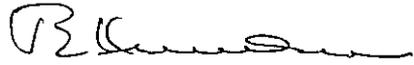
Date: January 31, 2001

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01 JAN 31 PM 3:52
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SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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ORIGINAL

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Kimberly Lisacek
2343 S. Bancroft Street
Philadelphia, PA 19145



Mark S. Stewart, Esquire

Date: January 31, 2001

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Wolf, Block, Schorr and Solis-Cohen LLP

212 Locust Street
Suite 300
Harrisburg, PA 17101

T: 717 237 7160
F: 717 237 7161
www.wolfblock.com

ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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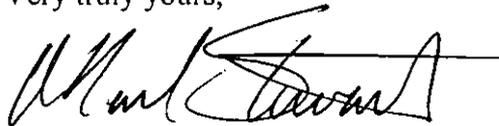
RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0014 (Deborah Salvato)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Deborah Salvato (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

66

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**BEFORE THE
PUBLIC UTILITY COMMISSION**

**RECEIVED
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Pennsylvania Public Utility
Commission
Complainant
v.
Philadelphia Gas Works
Respondent

Docket No. R-00006042C0014

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY DEBORAH SALVATO**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Deborah Salvato. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a

prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers. The reference to a maintenance program is too vague for PGW to be capable of forming a response.

DSH:25778.1

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**DOCKETED
FEB 2 2001**

4. This paragraph sets forth Complainant's prayer for relief. No response is required.

5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Ms. Salvato's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY: 
Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

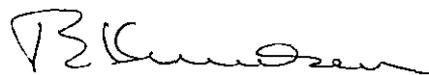
Date: January 21, 2001

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SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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CERTIFICATE OF SERVICE

ORIGINAL

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Deborah Salvato
2225 S. Garnet Street
Philadelphia, PA 19145



Mark S. Stewart, Esquire

Date: January 31, 2001

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01 JAN 31 PM 3:51
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SECRETARY'S BUREAU

Wolf, Block, Schorr and Solis-Cohen LLP

212 Locust Street
Suite 300
Harrisburg, PA 17101

T: 717 237 7160
F: 717 237 7161
www.wolfblock.com

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MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

DOCUMENT
FOLDER

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0016 (David G. Rickard)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: David G. Rickard (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

13

ORIGINAL

BEFORE THE
PUBLIC UTILITY COMMISSION

RECEIVED
01 JAN 31 PM 3:45
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SECRETARY'S BUREAU

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042C0016

**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY DAVID G. RICKARD**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of David Rickard. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DSH:25808.1

DOCUMENT
FOLDER

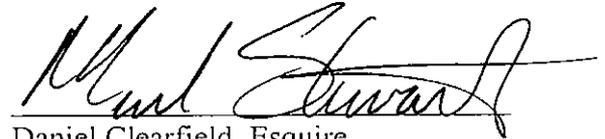
DOCKETED
FEB 2 2001

5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Mr. Rickard's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

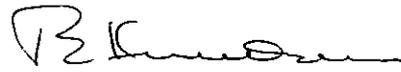
Date: January 31, 2001

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01 JAN 31 PM 3:45
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VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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CERTIFICATE OF SERVICE

ORIGINAL

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

David G. Rickard
3311 G Street
Philadelphia, PA 19134



Mark S. Stewart, Esquire

Date: January 31, 2001

RECEIVED
01 JAN 31 PM 3:45
PA.P.U.C.
SECRETARY'S BUREAU

Wolf, Block, Schorr and Solis-Cohen LLP

212 Locust Street
Suite 300
Harrisburg, PA 17101
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www.wolfblock.com

ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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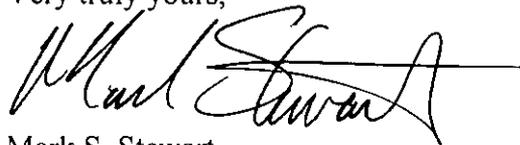
RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0017 (Alliza Hildebrand)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Alliza Hildebrand (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

TH

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BEFORE THE
PUBLIC UTILITY COMMISSION

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Pennsylvania Public Utility
Commission
Complainant

v.

Docket No. R-00006042C0017

Philadelphia Gas Works
Respondent

ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY ALIZA HILDEBRAND

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Aliza Hildebrand. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DS11:25788.1

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5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Ms. Hildebrand's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

Date: January 31, 2001

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SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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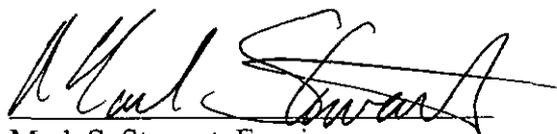
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Aliza Hildebrand
2114 Fitzwater Street
Philadelphia, PA 19146



Mark S. Stewart, Esquire

Date: January 31, 2001

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SECRETARY'S BUREAU

Wolf, Block, Schorr and Solis-Cohen LLP

212 Locust Street
Suite 300
Harrisburg, PA 17101

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www.wolfblock.com

ORIGINAL

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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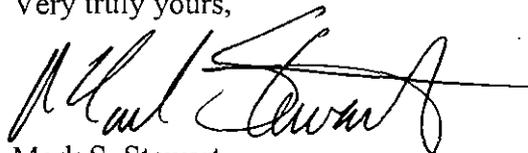
RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0019 (Gerrie Stein)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Gerrie Stein (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

76

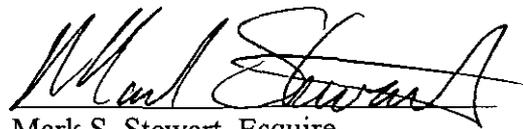
ORIGINAL

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Gerrie A. Stein
12733 Verda Drive
Philadelphia, PA 19154



Mark S. Stewart, Esquire

Date: January 31, 2001

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01 JAN 31 PM 3:43
PA.R.U.C.
SECRETARY'S BUREAU

BEFORE THE
PUBLIC UTILITY COMMISSION

ORIGINAL

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042C0019

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**ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY GERRIE STEIN**

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Gerrie Stein. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DSH:25790.1

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5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that this Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire

Mark S. Stewart, Esquire

WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

212 Locust Street, Suite 300

Harrisburg, PA 17101

(717) 237-7160

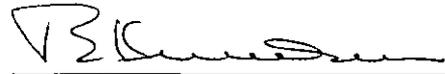
Date: January 31, 2001

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SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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Wolf, Block, Schorr and Solis-Cohen LLP

212 Locust Street
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Harrisburg, PA 17101

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www.wolfblock.com

MARK S. STEWART
DIRECT DIAL: (717) 237-7191
E-MAIL: MSTEWART@WOLFBLOCK.COM

ORIGINAL

January 31, 2001

VIA HAND DELIVERY

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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01 JAN 31 PM 3:43
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SECRETARY'S BUREAU

RE: Pennsylvania Public Utility Commission v. Philadelphia Gas Works
Docket No. R-00006042C0018 (Harry Robinson)

Dear Secretary McNulty:

Enclosed for filing please find the original and three copies of Philadelphia Gas Work's Answer in the above-referenced matter. As evidenced by the attached Certificate of Service, all parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me at your convenience.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

cc: Harry Robinson (w/enc)
Les Fyock (w/enc)
Abby Pozefsky (w/enc)

DSH:25858.1

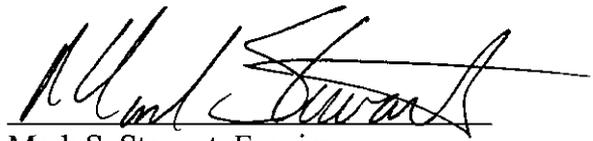
75

ORIGINAL
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below via first class mail in accordance with the requirements of 52 Pa. Code § 1.54 of the Commission's rules:

Service via First-Class Mail

Harry Robinson
c/o Ruch, Shipon and Skarbek
5200 Roosevelt Boulevard
Philadelphia, PA 19124


Mark S. Stewart, Esquire

Date: January 31, 2001

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01 JAN 31 PH 3:43
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SECRETARY'S BUREAU

ORIGINAL

BEFORE THE
PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility
Commission :
Complainant :
v. :
Philadelphia Gas Works :
Respondent :

Docket No. R-00006042C0018

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01 JAN 31 PM 3:43
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SECRETARY'S BUREAU

ANSWER OF PHILADELPHIA GAS WORKS TO
FORMAL COMPLAINT BY HARRY ROBINSON

Philadelphia Gas Works ("PGW"), by its counsel, respectfully submits its Answer to the Complaint of Harry Robinson. PGW states as follows:

1. Admitted.
2. Admitted.
3. Denied. To the extent that the statements set forth in this paragraph constitute a prayer for relief or conclusion of law, no response is required. By way of further response, PGW has not raised base rates in over nine years. The proposed base rate increase is fully justified and PGW will demonstrate the same in the above-captioned rate investigation. Further, PGW's request is needed to allow its new management to keep the Company financially stable, continue to improve service, and be able to institute additional efficiency measures. All of these efforts will benefit PGW's customers.
4. This paragraph sets forth Complainant's prayer for relief. No response is required.

DSH:25789.1

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FEB 2 2001

DOCUMENT
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5. To the extent that the Complaint appears to be directed at the increase in PGW's Gas Cost Rate, that increase has already been approved by the Commission, subject to review in PGW's next annual GCR proceeding. Accordingly, PGW asserts that Mr. Robinson's Complaint is not pertinent to its base rate proceeding and should be dismissed.

WHEREFORE, PGW respectfully requests that the Complaint be dismissed.

Respectfully submitted,

BY:



Daniel Clearfield, Esquire
Mark S. Stewart, Esquire
WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP
212 Locust Street, Suite 300
Harrisburg, PA 17101
(717) 237-7160

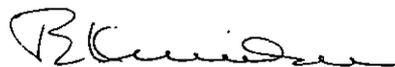
Date: January 31, 2001

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01 JAN 31 PM 3:44
PA:U.C.
SECRETARY'S BUREAU

VERIFICATION

I, Thomas Knudsen, hereby state that I am authorized to make this Verification for Philadelphia Gas Works and that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 1/31/01



Thomas Knudsen
Interim Chief Financial Officer
Philadelphia Gas Works

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01 JAN 31 PM 3:44
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LAW OFFICES
WOLF, BLOCK, SCHORR AND SOLIS-COHEN LLP

212 LOCUST STREET
SUITE 300
HARRISBURG, PA 17101-0213

(717) 237-7160
FACSIMILE: (717) 237-7161

DANIEL CLEARFIELD
DIRECT DIAL: (717) 237-7173
E-MAIL: DCLEARFIELD@WOLFBLOCK.COM

February 1, 2001

VIA HAND DELIVERY

Johnnie Simms
PA Public Utility Commission
Office of Trial Staff
Commonwealth Keystone Building
400 North Street; 2nd Floor
Harrisburg, PA 17120

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RE: Philadelphia Gas Works' Permanent Base Rate Filing,
Docket No. R-00006042

Dear Mr. Simms

Enclosed please find the following PGW responses to OTS Set 1 Interrogatories:

- OTS-RS - 1, 2, 4, 5(b-c), 6, 8, 10, 11, 12(a-e), 13(b, d-e), 14, 15, 16, 17, 20, 22, 23 and 25
- OTS-RR - 11, 12, 13, 14 and 17
- OTS-RE - 10, 17, 18, 20, 21, 27, 29, 40 and 43
- OTS-RB - 1, 3 and 4

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Pursuant to our conversation, the remaining responses to OTS Set I Interrogatories will be submitted early next week. Please note that we are hereby notifying all parties other than active parties in PGW's interim rate proceeding (and their representatives) that, henceforth, PGW is going to consider them inactive and will only supply copies of pleadings and other documents if requested. I have attached a service list of the parties who are considered active in this regard. Additionally, we will confirm the service list at the Pre-hearing.

Sincerely,

Daniel Clearfield

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

/smd

cc: Parties of record (w/encl.)

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).

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Dated: February 1, 2001


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February 2, 2001

VIA HAND DELIVERY

James McNulty, Secretary
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Harrisburg, PA 17105

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RE: Philadelphia Gas Works' Permanent Base Rate Filing,
Docket No. R-00006042

Dear Secretary McNulty:

On behalf of Philadelphia Gas Works, enclosed for filing is an original and three copies of its Reply to the Answers of OCA, OTS, and PICGUG to its Petition for Waiver and Establishment of Expedited Hearings Schedule for Base Rate Proceeding in the above-referenced matter. All parties of record have been served according to the attached Certificate of Service.

Very truly yours,



Mark S. Stewart

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

MSS/jlg

Enclosure

cc: All Parties of Record (Per Attached Certificate of Service) w/enc.

Robert Rosenthal, Director, FUS, w/enc.

Karen Moury, Esq., Law Bureau, w/enc.

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

In Re: Petition of Philadelphia Gas Works for :
Waiver of Certain Notification and Filing :
Requirements and Establishment of :
Expedited Hearing Schedule for Base :
Rate Proceeding :

Docket No. R-00006042

PHILADELPHIA GAS WORKS' REPLY TO THE ANSWERS OF
OCA, OTS, AND PICGUG TO ITS PETITION FOR WAIVER
AND ESTABLISHMENT OF EXPEDITED
HEARING SCHEDULE FOR BASE RATE PROCEEDING

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Philadelphia Gas Works ("PGW") respectfully submits this Reply to the new matter contained in the Answers of the Office of Consumer Advocate ("OCA"), Office of Trial Staff ("OTS"), and Philadelphia Industrial and Commercial Gas Users Group ("PICGUG") to PGW's Petition for Waiver of Potentially Applicable Notification and Filing Requirements and Establishment of Expedited Hearing Schedule for Base Rate Proceedings ("Petition").¹ In response thereto, PGW avers as follows:

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1. The undercurrent through all of the parties' Answers to PGW's Petition is a disturbing desire to either ignore or distort the plain language of the Natural Gas Choice and Competition Act ("Gas Choice Act"), 66 Pa. C.S. §§ 2201-2212. For instance, OCA states, "[T]he fact still remains that PGW is now under PUC jurisdiction and this filing is being made under the Commission's regulations." OCA Answer at 7. However, OCA's pronouncement is only partially true. Section 2212(b), on which the answering parties place so much reliance,

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¹ In the alternative, PGW respectfully requests leave to respond to the arguments of OCA, OTS, and PICGUG concerning the juxtaposition of the Natural Gas Choice and Competition Act, 66 Pa. C.S. §§ 2201-2212, and the Public Utility Code.

states that, "subject to the provisions of this section," PGW shall be subject to regulation and control by the Commission. 66 Pa. C.S. § 2212(b). In their rush to force PGW into complying with the Commission's regulations applicable to investor-owned utilities, the answering parties have apparently ignored this "subject to" language as well as the referenced provisions of Section 2212.

2. Looking to those referenced provisions, Section 2212(d) plainly states that PGW shall continue to operate under the prior tariff and the policies or programs that were in existence on the date on which the Commission assumed jurisdiction. Additionally, Section 2212(e) directs that, notwithstanding any other provision of the Public Utility Code, in determining PGW's revenue needs and approving its rates, the Commission shall follow the ratemaking methodology and requirements that were applicable prior to its assumption of jurisdiction. These exceptions to Section 2212(b)'s delegation of authority to the Commission are clearly still in effect (i.e., a final restructuring order has not been entered and PGW's bonds have not been retired, etc.), and, despite the parties' protestations to the contrary, still bind the Commission. Consequently, the answering parties' attempts to ignore the language of the Gas Choice Act must be rejected. The Act's directives clearly mandate that the ratemaking "policies and programs" and filing requirements in place prior to PUC jurisdiction attaching are still applicable to PGW. PGW's filing is in complete compliance with its prior ratemaking policies and requirements.

3. In addition to ignoring the language of the Gas Choice Act, the parties have distorted that language, reading out words and terms that are inconvenient to their position. For instance, PICGUG asserts that Section 2212(e) of the Act only relates to PGW's previous ratemaking methodology, and that "because providing information related to PGW's base rate

filing would not impact the ratemaking methodology" the PUC should require PGW to comply with 52 Pa. Code §§ 53.52 and 53.53. PICGUG Answer at ¶ 10. Similarly, OTS declares that the Commission will be in compliance with the Gas Choice Act so long as "PGW is permitted to satisfy the requirements of its bond ordinances and a cash flow methodology is utilized in determining rates." OTS Answer at 5. In both instances, the parties have conveniently read the term "requirements" out of Section 2212(e)'s commandment that the PUC shall utilize the same ratemaking methodology and requirements in setting PGW's rates, and have impermissibly reduced it to mere surplusage.

4. As detailed above, Section 2212(e) instructs the Commission, without exception, to follow the same ratemaking methodology and requirements in setting PGW's rates and charges. If the Gas Choice Act required the Commission to adhere to the same ratemaking methodology, and said no more, then and only then could the answering parties' interpretation of the Section 2212(e) be correct. However, Section 2212(e) does not so read, and instead directs the Commission to follow PGW's prior, and not the Commission's, requirements in conjunction with setting rates.

5. The parties, particularly OTS, also suggest that the Philadelphia Gas Commission's ("PGC") practice of concluding rate proceedings in five months "has no relevance" to this proceeding. OTS Answer at 4. Once again, OTS' focus on the Commission's obligation to use the cash flow method and allow PGW to satisfy its bond covenants ignores or renders impotent terms in the Gas Choice Act. Section 2212(d) unmistakably dictates that PGW shall continue to operate after the PUC assumes jurisdiction under its prior tariff and the policies or programs in existence prior to that assumption; i.e., while the PGC was the regulating body.

Just as the PGC's requirements and policies in setting PGW's rate did not require PGW to file the same voluminous data as required by the Commission's regulations, the PGC's policies and practice call for PGW's rate proceeding to be completed in five instead of nine months. Again, by enacting the Gas Choice Act, the General Assembly has commanded that the PGC's – and not this Commission's – policies and requirements will govern this proceeding.

6. The answering parties further suggest that PGW should have known, as early as June 22, 1999, the date of the signing of the Gas Choice Act, that it would have to satisfy the PUC's filing regulations, 52 Pa. Code §§ 53.52 and 53.53, and be subject to the Commission's timelines for rate cases. The parties' assertions defy credulity. As of the dates referenced by the parties, all that PGW knew was how the plain language of the Gas Choice Act read. PGW could never be expected to know that the Act would be perverted to the point where "shall" would really mean "may," "same" would mean "different," and "prior to the assumption of jurisdiction" would become "after the assumption of jurisdiction." If the Commission accepts the parties' positions in their Answers, then all of these revisions to the Gas Choice Act shall have been affected.

7. Just as important, the PUC has acknowledged that PGW's rate request will be considered not on the basis of the PUC's traditional rate of return/rate base just and reasonable standard, but on the basis of the prior ratemaking methodology used by the Philadelphia Gas Commission.² Logically, the data and material filed by PGW in satisfaction of prior "ratemaking

² See, PUC Order of August 17, 2000, Docket No. R-00005654. The PGC was required to set rates so that PGW could satisfy all of its bond ordinance covenants, to pay all of its expenses, and to have sufficient cash to be able to pay its
(continued...)

requirements” should be sufficient to evaluate whether the Company has justified its requested rate increase. Moreover, if any party believes that additional information is relevant they can make discovery requests.

8. The parties also object to the expedited time frame, which is really the normal time frame for the purposes of the PGC, PGW and the Gas Choice Act, on the basis that PGW does not actually face a financial crisis, as alleged, because of the \$11 million of interim relief that the Commission allowed. OTS’ assertions regarding the \$11 million increase are particularly astonishing given the fact that it established on the record in the interim proceeding that PGW actually needed and was entitled to \$27.5 million on an interim basis.³ Nonetheless, the assertions of the parties cannot change the fiscal obligations that PGW must meet beginning in Spring 2001, such as its nearly \$100 million commercial paper line of credit payoff. PGW’s financial constraints are very real, and provide all the more justification to follow the Gas Choice Act’s requirement that the policies of the PGC, such as the five month process, be followed.

9. Finally, the parties offer various invocations of the public good and suggest that for reasons of “sound policy” the Commission should require an extended proceeding and compel PGW to file all of the information required by its regulations. However, the rules of

²(...continued)

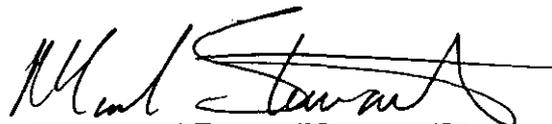
obligations when due. While this rate level was subject to an overall just and reasonableness standard, meeting the previously mentioned obligation was deemed per se just and reasonable. See, Public Advocate v. Philadelphia Gas Commission, 674 A.2d 1056, 1061 (Pa. 1996) (“it is presumed that rates set in accordance with the 1972 City ordinance . . . are constitutional”).

³ PGW is, however, encouraged to see that OTS is now acknowledging that the Commission has a statutory obligation to use the cash flow method in setting PGW’s rates. OTS Answer at 5.

statutory construction clearly reject such invocations. The specific and explicit provisions of the Gas Choice Act, which require the PUC to follow the PGC's requirements and policies in regard to setting PGW's rates, unquestionably trump these vague and ambiguous assertions of the public interest. Furthermore, the public good, as well as the policy determinations in this matter, have been determined in the first instance by the General Assembly through their enactment of the Gas Choice Act. The Legislature has not provided this Commission with policy discretion on the subjects encompassed by PGW's Petition.

WHEREFORE, PGW respectfully requests that the Commission promptly grant the relief requested in its Petition for Waiver of Potentially Applicable Notification and Filing Requirements and Establishment of Expedited Hearing Schedule for Base Rate Proceedings.

Respectfully submitted,



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Dated: February 2, 2001

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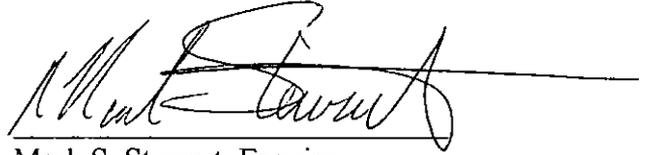
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A handwritten signature in cursive script, appearing to read "Mark S. Stewart", written over a horizontal line.

Mark S. Stewart, Esquire

Dated: February 2, 2001