



Mary M. Chan, Paralegal
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ORIGINAL

October 12, 2005

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James McNulty, Secretary
Pennsylvania Public Utility Commission
Room B-20, North Office Building
Harrisburg, PA 17105-3265

OCT 12 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Khalilah Devore vs. PGW, Docket No.: C-20055333

Dear Secretary McNulty:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files the original and three (3) copies of its Answer to the Complaint in the above captioned matter.

If additional information is needed about this matter, please do not hesitate to contact me at my direct-dial number above. Thank you for your assistance in this matter.

**DOCUMENT
FOLDER**

Sincerely,

Enclosure

cc: Khalilah Devore
Anthony Langford

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

OCT 12 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Khalilah Devore

:

:

v.

:

Docket No.: C-20055333

:

Philadelphia Gas Works

:

DOCUMENT
FOLDER

Answer of the Philadelphia Gas Works

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby answers the Complaint filed in the above captioned matter. PGW hereby avers the following:

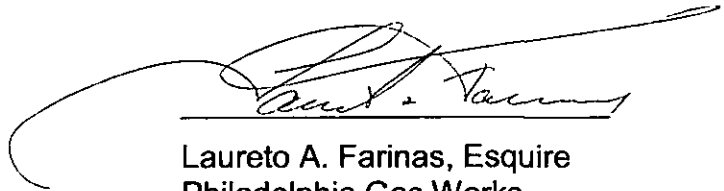
1. Admitted.
2. Admitted.
3. Admitted.
4. (a-b) Denied. PGW denies the averments contained in Paragraph 4 of the Complaint concerning the inaccuracy of the Complainant's bills, and all other averments that are conclusions. The Complainant's bills are correct as rendered. The Complainant's bills are based on actual gas usage to 6062 Walton Avenue, 1R (Service Address). The amount this is in write off status for this account is \$2,005.53
A decision of the Bureau of Consumer Services ("BCS") dated May 2, 2005, the Complainant must pay \$169 in budget bill plus \$305 towards the arrears monthly.
5. Denied. The averments in Paragraph 5 of the Complaint are requests for relief to which no response is required. PGW therefore denies the averments in this paragraph.
6. Admitted.
7. Admitted.

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OCT 14 2005

Wherefore, PGW respectfully requests that this Commission find against the Complainant, and affirm the decision of the BCS in this matter. PGW requests that, the Commission enter an Interim Order directing the Complainant to make payment of the current bill during the pendency of the hearing in this matter. PGW further requests that the Interim Order directing payment authorize PGW to terminate service if the Complainant fails to comply with that Interim Order.

Respectfully submitted,

October 12, 2005

A handwritten signature in black ink, appearing to read "Laureto A. Farinas", is written over a horizontal line. The signature is stylized and includes a long, sweeping flourish that extends to the left and then curves back towards the center.

Laureto A. Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

(215) 684-6982

EXHIBIT "A"

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OCT 12 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

HISTORY REQUEST REPORT FOR ACCOUNT # 998839173 AND SA # 168646644 AS OF 10/10/2005

Account #: 998839173	SA #: 168646644	Bill Cycle: 01	Rate Class: GS	Phone #: 4328112(215)
Name: DEVORE, KHALILAH		Address: 6062 WALTON AVE,1R/PHILA,PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20050929	Blocker End Date: 20070929	Meter #: 1708764		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
03/20/2003	BILL	\$304.57	\$304.57	\$0.00	01/31/2003	03/20/2003	R	2259	\$304.57	255	1708764
04/16/2003	PAY	(\$70.00)	(\$70.00)	\$0.00							
04/21/2003	BILL	\$92.26	\$92.26	\$0.00	03/20/2003	04/21/2003	R	2325	\$326.83	66	1708764
05/20/2003	BILL	\$39.59	\$39.59	\$0.00	04/21/2003	05/20/2003	R	2347	\$366.42	22	1708764
06/18/2003	BILL	\$54.83	\$54.83	\$0.00	05/20/2003	06/18/2003	R	2380	\$426.74	33	1708764
06/20/2003	LPC	\$5.49	\$5.49	\$5.49							
06/23/2003	PAY	(\$50.00)	(\$50.00)	\$0.00							
07/16/2003	PAY	(\$50.00)	(\$50.00)	\$0.00							
07/18/2003	BILL	\$45.12	\$45.12	\$0.00	06/18/2003	07/18/2003	R	2405	\$371.86	25	1708764
08/18/2003	BILL	\$38.50	\$38.50	\$0.00	07/18/2003	08/18/2003	R	2425	\$410.36	20	1708764
09/18/2003	BILL	\$40.00	\$40.00	\$0.00	08/18/2003	09/18/2003	R	2446	\$456.51	21	1708764
09/20/2003	LPC	\$6.15	\$6.15	\$6.15							
10/17/2003	BILL	\$46.68	\$46.68	\$0.00	09/18/2003	10/17/2003	R	2472	\$509.94	26	1708764
10/21/2003	LPC	\$6.75	\$6.75	\$6.75							
11/17/2003	PAY	(\$100.00)	(\$100.00)	\$0.00							
11/18/2003	BILL	\$74.69	\$74.69	\$0.00	10/17/2003	11/18/2003	R	2518	\$484.63	46	1708764
12/18/2003	BILL	\$167.92	\$167.92	\$0.00	11/18/2003	12/18/2003	R	2637	\$652.55	119	1708764
01/21/2004	BILL	\$256.17	\$256.17	\$0.00	12/18/2003	01/21/2004	R	2825	\$918.50	188	1708764
01/23/2004	LPC	\$9.78	\$9.78	\$9.78							
01/29/2004	XFER	(\$918.50)	(\$918.50)	(\$918.50)							
02/11/2004	PAY	(\$30.00)	(\$30.00)	\$0.00							
02/19/2004	BILL	\$227.94	\$227.94	\$0.00	01/21/2004	02/19/2004	R	2996	\$197.94	171	1708764
03/10/2004	PAY	(\$75.00)	(\$75.00)	\$0.00							
03/11/2004	XFER	\$918.50	\$918.50	\$918.50							
03/19/2004	BILL	\$178.93	\$178.93	\$0.00	02/19/2004	03/19/2004	R	3119	\$1,235.99	123	1708764
03/23/2004	LPC	\$15.62	\$15.62	\$15.62							
04/13/2004	PAY	(\$100.00)	(\$100.00)	\$0.00							
04/20/2004	BILL	\$126.64	\$126.64	\$0.00	03/19/2004	04/20/2004	R	3205	\$1,279.66	86	1708764

Account #: 998839173

SA #: 168646644

Bill Cycle: 01

Rate Class: GS

Phone #: 4328112(215)

Name: DEVORE, KHALILAH

Address: 6062 WALTON AVE,1R/PHILA,PA

Pay Agreement Indicator: N

Easyway Indicator:

CRP Status:

Blocker Start Date: 20050929

Blocker End Date: 20070929

Meter #: 1708764

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage -	Meter #
04/22/2004	LPC	\$17.03	\$17.03	\$17.03							
05/19/2004	BILL	\$57.60	\$57.60	\$0.00	04/20/2004	05/19/2004	R	3237	\$1,356.19	32	1708764
05/21/2004	LPC	\$18.93	\$18.93	\$18.93							
06/04/2004	BILL	\$24.14	\$24.14	\$0.00	05/19/2004	06/04/2004	R	3246	\$1,380.33	9	1708764
06/25/2004	LPC	\$20.16	\$20.16	\$20.16							
07/27/2004	LPC	\$20.16	\$20.16	\$20.16							
08/09/2004	PAY	(\$40.00)	(\$40.00)	\$0.00							
08/25/2004	LPC	\$20.16	\$20.16	\$20.16							
09/03/2004	PAY	(\$60.00)	(\$60.00)	\$0.00							
09/25/2004	LPC	\$20.11	\$20.11	\$20.11							
10/18/2004	PAY	(\$40.00)	(\$40.00)	\$0.00							
10/26/2004	LPC	\$19.81	\$19.81	\$19.81							
11/25/2004	LPC	\$19.81	\$19.81	\$19.81							
12/17/2004	PAY	(\$94.65)	(\$94.65)	\$0.00							
12/23/2004	LPC	\$18.98	\$18.98	\$18.98							
01/11/2005	PAY	(\$92.20)	(\$92.20)	\$0.00							
01/26/2005	LPC	\$17.89	\$17.89	\$17.89							
02/08/2005	PAY	(\$264.08)	(\$264.08)	\$0.00							
02/24/2005	LPC	\$14.19	\$14.19	\$14.19							
03/03/2005	XFER	(\$960.67)	(\$960.67)	(\$960.67)							

HISTORY REQUEST REPORT FOR ACCOUNT # 998839173 AND SA # 1197098414 AS OF 10/10/2005

Account #: 998839173	SA #: 1197098414	Bill Cycle: 01	Rate Class: GS	Phone #: 4328112(215)
Name: DEVORE, KHALILAH		Address: 1607 S FRAZIER ST/PHILA,PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20050929	Blocker End Date: 20070929	Meter #: 1520896		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
07/23/2004	BILL	\$39.93	\$39.93	\$0.00	06/08/2004	07/23/2004	R	3988	\$1,460.58	20	1520896
08/23/2004	BILL	\$32.95	\$32.95	\$0.00	07/23/2004	08/23/2004	R	4003	\$1,474.28	15	1520896
08/25/2004	LPC	\$0.59	\$0.59	\$0.59							
09/23/2004	BILL	\$34.51	\$34.51	\$0.00	08/23/2004	09/23/2004	R	4019	\$1,469.99	16	1520896
09/25/2004	LPC	\$1.09	\$1.09	\$1.09							
10/22/2004	BILL	\$59.44	\$59.44	\$0.00	09/23/2004	10/22/2004	R	4053	\$1,510.85	34	1520896
10/26/2004	LPC	\$1.61	\$1.61	\$1.61							
11/23/2004	BILL	\$109.77	\$109.77	\$0.00	10/22/2004	11/23/2004	R	4122	\$1,642.93	69	1520896
11/25/2004	LPC	\$2.50	\$2.50	\$2.50							
12/17/2004	PAY	(\$5.35)	(\$5.35)	\$0.00							
12/22/2004	BILL	\$218.09	\$218.09	\$0.00	11/23/2004	12/22/2004	R	4255	\$1,784.14	133	1520896
12/23/2004	LPC	\$4.14	\$4.14	\$4.14							
01/11/2005	PAY	(\$7.80)	(\$7.80)	\$0.00							
01/25/2005	BILL	\$420.14	\$420.14	\$0.00	12/22/2004	01/25/2005	R	4513	\$2,129.54	258	1520896
01/26/2005	LPC	\$7.37	\$7.37	\$7.37							
02/08/2005	PAY	(\$35.92)	(\$35.92)	\$0.00							
02/23/2005	BILL	\$370.23	\$370.23	\$0.00	01/25/2005	02/23/2005	R	4740	\$2,227.20	227	1520896
02/24/2005	LPC	\$13.24	\$13.24	\$13.24							
03/03/2005	XFER	\$960.67	\$960.67	\$960.67							
03/04/2005	PAY	(\$100.00)	(\$100.00)	\$0.00							
03/10/2005	PAY	(\$300.00)	(\$300.00)	\$0.00							
03/23/2005	BILL	\$271.13	\$271.13	\$0.00	02/23/2005	03/23/2005	R	4931	\$2,098.33	191	1520896
04/19/2005	PAY	(\$100.00)	(\$100.00)	\$0.00							
04/20/2005	PAY	(\$200.00)	(\$200.00)	\$0.00							
04/22/2005	BILL	\$124.12	\$124.12	\$0.00	03/23/2005	04/22/2005	R	5009	\$1,922.45	78	1520896
05/19/2005	PAY	(\$100.00)	(\$100.00)	\$0.00							
05/23/2005	BILL	\$72.52	\$72.52	\$0.00	04/22/2005	05/23/2005	R	5055	\$1,922.30	46	1520896
05/24/2005	LPC	\$27.33	\$27.33	\$27.33							

Account #: 998839173	SA #: 1197098414	Bill Cycle: 01	Rate Class: GS	Phone #: 4328112(215)
Name: DEVORE, KHALILAH		Address: 1607 S FRAZIER ST/PHILA,PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20050929	Blocker End Date: 20070929	Meter #: 1520896		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
06/13/2005	BILL	\$47.00	\$47.00	\$0.00	05/23/2005	06/13/2005	R	5080	\$1,947.72	25	1520896
06/23/2005	LPC	\$28.42	\$28.42	\$28.42							
06/29/2005	PAY	(\$50.00)	(\$50.00)	\$0.00							
08/02/2005	LPC	\$29.12	\$29.12	\$29.12							
09/01/2005	LPC	\$28.69	\$28.69	\$28.69							
09/26/2005	WO	(\$2,005.53)	(\$2,005.53)	(\$2,005.53)							

EXHIBIT "B"

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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 <CompanyCode>**0766**</CompanyCode>
 <CompanyType>**GAS TRANSPORTER**</CompanyType>
 - <Customer>
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 <CustomerLastName>**DEVORE**</CustomerLastName>
 <AccountNumber>**0998839173**</AccountNumber>
 <CustomerServAddress>
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 <ServAddress2>**1 ST FL REAR**</ServAddress2>
 <ServCity>**PHILADELPHIA**</ServCity>
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 - <OtherInfo>
 <BCSInvestigatorFName>**MATTHEW**</BCSInvestigatorFName>
 <BCSInvestigatorLName>**HRIVNAK**</BCSInvestigatorLName>
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 <CompanyCode>**0766**</CompanyCode>
 <CompanyType>**GAS TRANSPORTER**</CompanyType>

*BCS
 +
 D.B.
 JR.*

VERIFICATION

I, Laureto A. Farinas, hereby declare that I am counsel to the Philadelphia Gas Works; that, as such, I am authorized to make this verification on its behalf: that the facts set forth in the foregoing Answer are true to the best of my knowledge, information and belief, and that I expect to be able to prove these at a hearing held in this matter. I make this verification subject to the penalties of 18. Pa. C.S. §4904, pertaining to false statements to authorities.

Date: October 12, 2005


Laureto A. Farinas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY
OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED
BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF §1.54
(RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

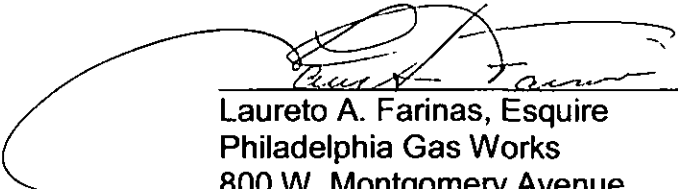
*Khalilah Devore
1607 S. Frazier Street
Philadelphia, PA 19143*

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

October 12, 2005



Laureto A. Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122