

Philadelphia Gas Works



800 West Montgomery Avenue, Philadelphia, PA 19122

Laureto A. Farinas, Senior Attorney

Legal Department

Direct Dial: 215-684-6982

FAX: 215-684-6798

E-mail: laureto.farinas@pgworks.com

October 13, 2005

ORIGINAL

RECEIVED

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

DOCUMENT
FOLDER

OCT 13 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Christine Robinson v. PGW, Docket No. C – 20055311

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.

Sincerely,

Laureto Farinas, Senior Attorney

Enclosure

cc: Service List
Susan Kelly

86

RECEIVED

OCT 13 2005

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Christine Robinson

v.

Philadelphia Gas Works

:
:
:
:
:

Docket No.: C – 20055311

Answer of the Philadelphia Gas Works

DOCUMENT
FOLDER

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. 3212 "D" Street, Philadelphia (Service Address) and all other averments that are conclusions. The Complainant's bills are correct as rendered. The Complainant's bills are based on actual meter readings to the Service Address. The Account balance of \$4597.09 is in "Write off" status.

DOCKETED
OCT 17 2005

According to PGW records the Complainant Ms. Robinson is associated Mr. Floyd Brittingham the Customer or Record for the Service Address as her boyfriend. Ms. Christine S. Robinson is also noted to be the roommate/girlfriend of Floyd Brittingham.

The Complainant and Mr. Brittingham shared the primary telephone number as of October 3, 2005. Mr. Brittingham was residing with her at the Service Address according to her contact with PGW on May 25, 2005. A decision of the Bureau of Consumer Services dated August 15, 2005, which is attached hereto as Exhibit "A", The PUC decision was rendered, customers letter reading as: under new PA Law, Chapter 14, the PUC is unable to offer restoration terms. As the applicant for 39 N. Frazier Street

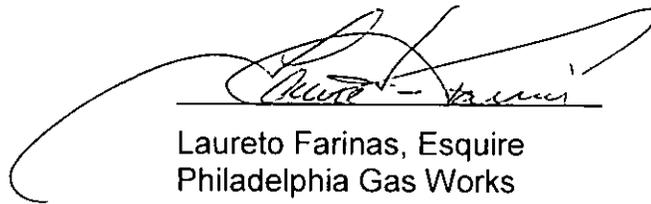
and previous tenant at 3212 "D" Street, the Complainant would have the pay portion of the balance, the security deposit and 20% of the 3212 St. bill (\$1313) by February 26, 2005 before having the service transferred into her name for Frazier Street. The Complainant would also need a valid lease or deed, proof of income and her SS card apply for low income programs.

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.

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 13, 2005



Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982

RECEIVED

OCT 13 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT A

<AccountNumber>**0318585090**</AccountNumber>
 - <CustomerServAddress>
 <ServAddress1>**5830 WALTON AVE**</ServAddress1>
 <ServCity>**PHILADELPHIA**</ServCity>
 <ServState>**PA**</ServState>
 <ServZip5>**19143**</ServZip5>
 </CustomerServAddress>
 </Customer>
 <DecisionIssue>**N**</DecisionIssue>
 <OralWritten>**W**</OralWritten>
 <Violation>**ACTUAL**</Violation>
 <Chapter>**56**</Chapter>
 <SectionRule>**163(1)L**</SectionRule>
 <TotalBalance>**1007.51**</TotalBalance>
 <DateClosed>**2005-08-15**</DateClosed>
 <Resolution>**CITE: 56.163(1)L--LATE CO REPORT DEAR NANCY E
 KAHAULELIO: I AM WRITING IN REFERENCE TO YOUR COMPLAINT
 AGAINST THE PHILADELPHIA GAS WORKS CONCERNING THE BILL WHICH
 CAUSED A LIEN TO BE PLACED ON YOUR PROPERTY AT 5830 WALTON
 AVE. ONCE AN ACCOUNT HAS BEEN FINAL BILL THE PA PUBLIC UTILITY
 COMMISSION DOES NOT HAVE JURISDICTION, HOWEVER PGW HAS
 PROVIDED INFORMATION ON HOW YOU CAN HAVE THE LIEN REMOVED.
 IF THE PROPERTY OWNERS PROVIDE A COPY OF A LEASE AND A COPY OF
 THE RENTERS LICENSE, PGW WILL THEN REMOVE THE LIEN. IF A
 RENTERS LICENSE IS NOT PROVIDED THEN ACCORDING TO THE CITY OF
 PHILADELPHIA, A CITY OWNED UTILITY CAN HOLD THE PROPERTY
 OWNER RESPONSIBLE FOR THE TENANTS UNPAID BILLS. THE FINAL BILL
 FOR CORNELL KAHAULELIO IS IN THE AMOUNT OF 1007.51. BY THIS
 LETTER I AM CLOSING YOUR COMPLAINT.**</Resolution>
 <BalanceDate />
 - <OtherInfo>
 <BCSInvestigatorFName>**ISAAC**</BCSInvestigatorFName>
 <BCSInvestigatorLName>**DUNSTAN**</BCSInvestigatorLName>
 <NbrOfTimeSend>**1**</NbrOfTimeSend>
 <NbrOfTimeFaxed>**0**</NbrOfTimeFaxed>
 <PUCFax FaxAreaCode="717">**7876641**</PUCFax>
 </OtherInfo>
 </Case>
 - <Case>
 <CaseNbr>**1823348**</CaseNbr>
 <CompanyName>**PGW (PHILA. GAS WORKS (NGDC))**</CompanyName>
 <CompanyCode>**0766**</CompanyCode>
 <CompanyType>**GAS TRANSPORTER**</CompanyType>
 - <Customer>
 <CustomerFirstName>**CHRISTINE**</CustomerFirstName>
 <CustomerLastName>**ROBINSON**</CustomerLastName>
 <AccountNumber>**003112534130**</AccountNumber>
 - <CustomerServAddress>
 <ServAddress1>**39 N FRAZIER ST**</ServAddress1>
 <ServCity>**PHILADELPHIA**</ServCity>
 <ServState>**PA**</ServState>
 <ServZip5>**19139**</ServZip5>
 </CustomerServAddress>

BCS DB

</Customer>

<DecisionIssue>**N**</DecisionIssue><OralWritten>**W**</OralWritten><Violation>**NO**</Violation><TotalBalance>**0.00**</TotalBalance><DateClosed>**2005-08-15**</DateClosed><Resolution>**VERBAL CLOSING, NO DECISION. CO POS BEST**

AVAILABLE....UNDER NEW PA LAW CHAPTER 14 THE PUC IS UNABLE TO OFFER YOU RESTORATION TERMS AS YOU AND/OR THE ARREARS HAVE HAD TWO OR MORE PRIOR PAYMENT ARRANGEMENTS WITH THE COMPANY AND/OR THE PUC. UNDER THE LAW THE COMPANY COULD REQUEST THE FULL OUTSTANDING BALANCE, PLUS A SECURITY DEPOSIT PLUS THE RECONNECTION FEE. YOU MUST CONTACT THE COMPANY POSITION IS BETTER THEN ALLOWED BY LAW AND IS AS FOLLOWS: CO POS: MS. CHRISTINE ROBINSON IS THE APPLICANT FOR 39 N. FRAZIER STREET AND SHE IS ASSOCIATED WITH MR. FLOYD H. BRITTINGHAM AT 3212 D STREET # 177-60-7164. THE CUSTOMER, MS. ROBINSON WAS ASKED TO VISIT A CUSTOMER SERVICE CENTER AND TO PROVIDE PROOF OF RESIDENCE ALONG WITH SS CARDS. SHE WAS INFORMED ON 12/14/04, THAT TO TRANSFER SERVICE INTO HER NAME, SHE WOULD BE REQUIRED TO PAY A PORTION OF THE WRITE OFF AMOUNT AT THE PREMISE OF 3212 D STREET WHICH SHE SHARED WITH MR. BRITTINGHAM, THE WRITE-OFF AMOUNT IS \$4597.09, PGW IS REQUESTING THAT MS. ROBINSON PAY 20% \$919.00 (3212 D ST.), A SECURITY DEPOSIT OF \$394.00 (FOR 39 N. FRAZIER ST.) = \$1,313.00 BY 2/26/05, BEFORE HAVING THE SERVICE TURNED ON AT 39 N. FRAZIER STREET. SHE IS ALSO REQUIRED TO PROVIDE A VALID LEASE OR DEED, PROOF OF RESIDENCE FOR THE LAST TWO YEARS, INCOME INFORMATION VERIFICATION AND SHE CAN APPLY FOR CRP IF LOW INCOME; WITH SS CARDS FOR THE HOUSEHOLD. MS. ROBINSON CAN APPLY FOR CRISIS & LIHEAP GRANTS WHEN AVAILABLE. SHE IS NOT BEING DENIED SERVICE AT THE NEW RESIDENCE, BUT, SHE IS BEING ASKED TO BE RESPONSIBLE FOR THE AMOUNT OF MONIES DUE FROM 3212 D STREET. IF SHE IS NOT ELIGIBLE FOR CRP, THEN BEGINNING 2/2005, BB+ 153.00 (24 MONTH PERIOD) PER MONTH, IF HER INCOME IS DETERMINED TO BE LOW.</Resolution>

<BalanceDate>**2005-02-08**</BalanceDate><LetterDescription>**CHAPTER 14 EGW OFF DISMISS****LETTER**</LetterDescription><HeadDate>**2005-08-15**</HeadDate>

- <OtherInfo>

<BCSInvestigatorFName>**TIMOTHY**</BCSInvestigatorFName><BCSInvestigatorLName>**PLATT**</BCSInvestigatorLName><NbrOfTimeSend>**1**</NbrOfTimeSend><NbrOfTimeFaxed>**0**</NbrOfTimeFaxed><PUCFax FaxAreaCode="717">**7876641**</PUCFax>

</OtherInfo>

</Case>

- <Case>

<CaseNbr>**1870957**</CaseNbr><CompanyName>**PGW (PHILA. GAS WORKS (NGDC))**</CompanyName><CompanyCode>**0766**</CompanyCode><CompanyType>**GAS TRANSPORTER**</CompanyType>

- <Customer>

VERIFICATION

I, Laureto 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 13, 2005



Laureto Farinas, Esquire

CERTIFICATE OF SERVICE

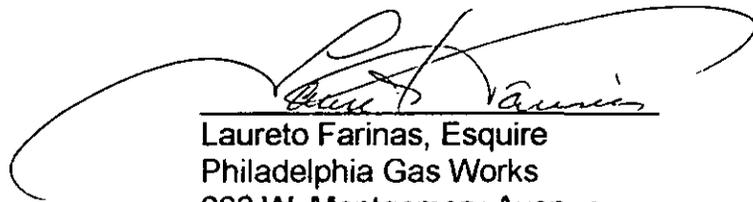
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY
OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED
BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF §1.54
(RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

*Ms. Christine Robinson
39 N. Frazier Street
Philadelphia, PA 19139*

October 13, 2005



Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982