

**Philadelphia Gas Works**

800 West Montgomery Avenue, Philadelphia, PA 19122



Mary M. Chan, Paralegal  
Legal Department  
Direct Dial: (215) 694-6830  
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ORIGINAL

December 19, 2005

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**RE: Alfredo Jennings, Sr vs. PGW, Docket No.: C-20055596**

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,

DOCUMENT  
FOLDER

Enclosure

cc: Alfredo Jennings  
Anthony Langford

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION DEC 1 9 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Alfredo Jennings, Sr. :

:

v. :

:

Philadelphia Gas Works :

Docket No.: C-20055596

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:

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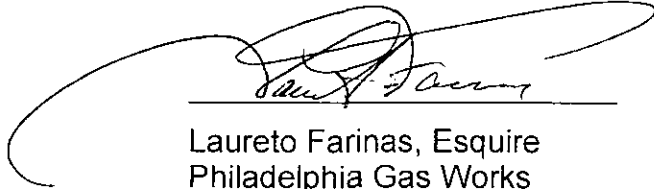
1. Admitted.
2. Admitted.
3. Admitted.
4. (a-b) Denied. PGW denies the averments contained in Paragraph 4 of the Complaint concerning the Complainant's request for a payment arrangement, and all other averments that are conclusions. PGW records indicate that the Complainant was enrolled into PGW's Customer Responsibility Program ("CRP") since April, 2000. The Complainant's current total arrearages are in the amount of \$3,390.06 as shown on the statement of accounts which is attached hereto as Exhibit "A".
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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**Wherefore**, PGW respectfully requests that this Commission find against the Complainant.

Respectfully submitted,

December 19, 2005

A handwritten signature in black ink, appearing to read "Laureto Farinas", is written over a horizontal line. A large, sweeping flourish extends from the left side of the signature across the page.

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

**EXHIBIT A**

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

# HISTORY REQUEST REPORT FOR ACCOUNT # 684722268 AND SA # 1740405751 AS OF 12/19/2005

Account #: 684722268	SA #: 1740405751	Bill Cycle: 05	Rate Class: GS	Phone #: 4650927(215)
Name: JENNINGS, ALFREDO		Address: 1231 S 32ND ST/PHILA, PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20040927	Blocker End Date: 20050828	Meter #: 1686666		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
04/05/2004	BILL	\$297.01	\$297.01	\$0.00	02/20/2004	04/05/2004	R	1822	\$297.01	213	1686666
05/05/2004	BILL	\$113.01	\$113.01	\$0.00	04/05/2004	05/05/2004	R	1894	\$414.47	72	1686666
05/07/2004	LPC	\$4.45	\$4.45	\$4.45							
06/04/2004	BILL	\$108.84	\$108.84	\$0.00	05/05/2004	06/04/2004	R	1941	\$523.31	47	1686666
07/06/2004	BILL	\$69.25	\$69.25	\$0.00	06/04/2004	07/06/2004	R	1982	\$592.56	41	1686666
08/04/2004	BILL	\$60.87	\$60.87	\$0.00	07/06/2004	08/04/2004	R	2017	\$662.25	35	1686666
08/06/2004	LPC	\$8.82	\$8.82	\$8.82							
08/20/2004	PAY	(\$100.00)	(\$100.00)	\$0.00							
09/03/2004	BILL	\$59.53	\$59.53	\$0.00	08/04/2004	09/03/2004	R	2051	\$630.21	34	1686666
09/08/2004	CANP	\$100.00	\$100.00	\$0.00							
09/08/2004	NSFPAY	\$0.00	\$0.00	\$100.00							
09/08/2004	LPC	\$8.43	\$8.43	\$8.43							
09/08/2004	NSFCHA	\$20.00	\$20.00	\$20.00							
09/27/2004	XFER	(\$750.21)	(\$750.21)	(\$750.21)							
10/01/2004	PAY	(\$100.00)	(\$100.00)	\$0.00							
10/05/2004	BILL	\$62.77	\$62.77	\$0.00	09/03/2004	10/05/2004	R	2087	\$62.77	36	1686666
11/03/2004	BILL	\$86.61	\$86.61	\$0.00	10/05/2004	11/03/2004	R	2140	\$49.38	53	1686666
12/03/2004	BILL	\$152.87	\$152.87	\$0.00	11/03/2004	12/03/2004	R	2238	\$202.99	98	1686666
12/06/2004	LPC	\$0.74	\$0.74	\$0.74							
01/05/2005	BILL	\$265.48	\$265.48	\$0.00	12/03/2004	01/05/2005	R	2397	\$471.50	159	1686666
01/06/2005	LPC	\$3.03	\$3.03	\$3.03							
02/03/2005	BILL	\$290.12	\$290.12	\$0.00	01/05/2005	02/03/2005	R	2577	\$768.63	180	1686666
02/04/2005	LPC	\$7.01	\$7.01	\$7.01							
02/08/2005	XFER	\$10,675.77	\$10,675.77	\$10,675.77							
02/19/2005	LPCWVE	(\$10.78)	(\$10.78)	(\$10.78)							
02/19/2005	XFER	\$750.21	\$750.21	\$750.21							
03/04/2005	BILL	\$239.32	\$239.32	\$0.00	02/03/2005	03/04/2005	R	2724	\$12,423.15	147	1686666
04/05/2005	BILL	\$179.74	\$179.74	\$0.00	03/04/2005	04/05/2005	R	2847	\$12,602.89	123	1686666

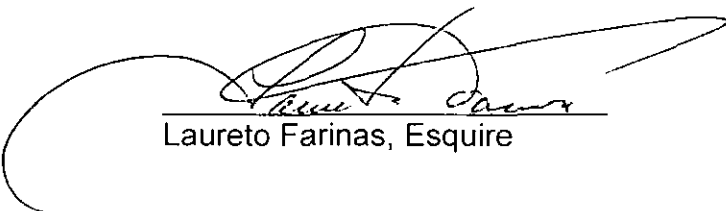
Account #: 684722268	SA #: 1740405751	Bill Cycle: 05	Rate Class: GS	Phone #: 4650927(215)
Name: JENNINGS, ALFREDO		Address: 1231 S 32ND ST/PHILA,PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20040927	Blocker End Date: 20050828	Meter #: 1686666		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
05/04/2005	BILL	\$69.22	\$69.22	\$0.00	04/05/2005	05/04/2005	R	2888	\$12,861.15	41	1686666
05/05/2005	LPC	\$189.04	\$189.04	\$189.04							
06/03/2005	BILL	\$69.00	\$69.00	\$0.00	05/04/2005	06/03/2005	R	2929	\$13,120.23	41	1686666
06/06/2005	LPC	\$190.08	\$190.08	\$190.08							
07/05/2005	BILL	\$60.22	\$60.22	\$0.00	06/03/2005	07/05/2005	R	2961	\$13,371.56	32	1686666
07/06/2005	LPC	\$191.11	\$191.11	\$191.11							
07/18/2005	BILL	\$16.58	\$16.58	\$0.00	07/05/2005	07/18/2005	R	2972	\$13,580.15	11	1686666
08/08/2005	LPC	\$192.01	\$192.01	\$192.01							
09/08/2005	LPC	\$192.26	\$192.26	\$192.26							
10/07/2005	LPC	\$189.38	\$189.38	\$189.38							
11/07/2005	LPC	\$186.54	\$186.54	\$186.54							
11/28/2005	WO	(\$14,148.33)	(\$14,148.33)	(\$14,148.33)							

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: December 19, 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:

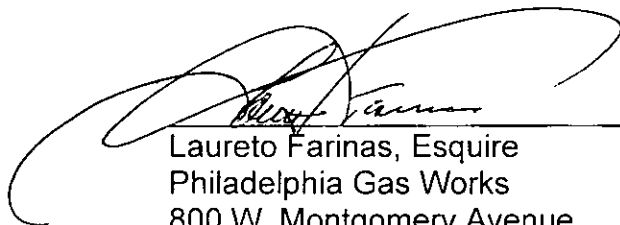
*Alfredo Jennings, Sr.  
1231 S. 32<sup>nd</sup> Street  
Philadelphia, PA 19146*

December 19, 2005

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SECRETARY'S BUREAU**

  
Laureto Farinas, Esquire  
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