



May 9, 2006

ORIGINAL

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

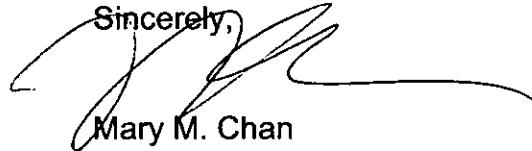
RE: Karl Blackwell vs. PGW, Docket No. C-20066240

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,



Mary M. Chan

**DOCUMENT
FOLDER**

Enclosure

cc: Karl Blackwell
Eloise Carnall

RECEIVED
MAY 9 2006
PA PUBLIC UTILITY COMMISSION
EIGHTH FLOOR BUILDING

57

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

Karl Blackwell

v.

Philadelphia Gas Works

:
:
:
:
:

Docket No.: C-20066240

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) Admitted in part; denied in part. PGW denies the averment that there are incorrect charges on the Complainant's gas bill. The Complainant's gas bills are correct as rendered.

DOCUMENT
FOLDER

RECEIVED
MAY 9 2006
PA PUBLIC UTILITY COMMISSION
SECRETARY

PGW further denies that there has been a recent proposed rate increase.

By way of further answer, all rates are approved by the Commission.

It is admitted that the Complainant received a termination notice on September 30, 2005.

PGW denies the averment that PGW denied a payment arrangement for the Complainant. By way of further answer, the Complainant and PGW couldn't agree on a payment arrangement.

PGW denies the averment that the Complainant and others are being overcharged. All rates are approved by the Commission.

- (b) Admitted in part; denied in part. It is admitted that the Complainant believes that his family and himself cannot consume the amount of gas being charged. However, PGW bills the Complainant based upon actual gas usage. PGW denies the averment that the Automatic Meter Reading

DOCKETED
MAY 16 2006

device ("AMR") is a problem. By way of further answer, the Complainant can obtain an actual meter read by reading the odometer on the meter. Further, the Complainant may request a meter test to ensure that the meter and the AMR properly functioning.

It is admitted that the Complainant has a prior final bill in write off status from a previous address at 557 Allengrove Street, Apt. 2F, Philadelphia, PA.

By way of further answer, PGW admits that the Complainant's write off bill from the previous address should be on a separate account. PGW records indicate that the balance in the amount of \$1,108.04 from the previous address is on the Complainant's first account number as shown on the statement of accounts, which is attached hereto as Exhibit "A."

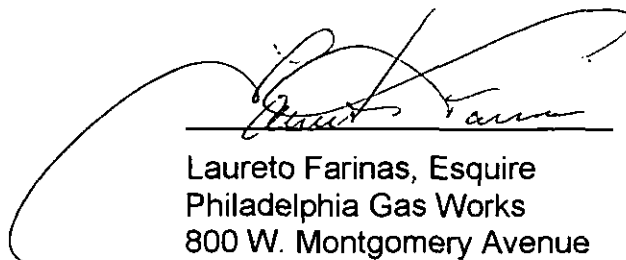
PGW denies the averment that PGW is holding the Complainant responsible for Amina Abdullah's final bill.

5. Denied. The averment in Paragraph 5 of the Complaint is a request 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.

Respectfully submitted,

May 9, 2006



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

EXHIBIT A

RECEIVED

MAY 9 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

HISTORY REQUEST REPORT FOR ACCOUNT # 3117404662 AND SA # 9961512376 AS OF 05/09/2006

Account #: 3117404662	SA #: 9961512376	Bill Cycle: 15	Rate Class: GS	Phone #: 7457157(215)
Name: BLACKWELL, KARL		Address: 557 ALLENGROVE ST,2F/PHILA,PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status: I		
Blocker Start Date: 0	Blocker End Date: 0	Meter #: 1693472		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
01/01/1996	CONVRC	\$345.85	(\$560.75)	(\$560.75)							
12/11/1998	PAY	(\$30.00)	(\$30.00)	\$0.00							
01/05/1999	TREF	\$0.00	\$622.75	\$622.75							
01/15/1999	PAY	(\$281.00)	(\$281.00)	\$0.00							
01/23/1999	BILL	\$55.89	\$55.89	\$0.00	12/12/1998	01/23/1999	Y	4432	\$55.89	61	1693472
02/08/1999	PAY	(\$32.00)	(\$32.00)	\$0.00							
02/18/1999	BILL	\$27.58	\$27.58	\$0.00	01/23/1999	02/18/1999	Y	4461	\$27.58	29	1693472
03/01/1999	BOLIHP	\$0.00	\$281.00	\$281.00							
03/16/1999	UNEARN	\$0.00	(\$4.53)	(\$4.53)							
03/16/1999	BILL	\$36.53	\$36.53	\$0.00	02/16/1999	03/16/1999	Y	4501	\$36.53	40	1693472
03/22/1999	CRPCR	\$0.00	(\$19.47)	(\$19.47)							
03/22/1999	PAY	(\$64.00)	(\$64.00)	\$0.00							
04/13/1999	BILL	\$24.33	\$24.33	\$0.00	03/16/1999	04/13/1999	Y	4526	\$24.33	25	1693472
04/13/1999	UNEARN	\$0.00	\$7.67	\$7.67							
05/20/1999	UNEARN	\$0.00	\$5.23	\$5.23							
05/20/1999	BILL	\$26.77	\$26.77	\$0.00	04/13/1999	05/20/1999	Y	4554	\$26.77	28	1693472
06/15/1999	UNEARN	\$0.00	\$13.95	\$13.95							
06/15/1999	BILL	\$18.05	\$18.05	\$0.00	05/20/1999	06/15/1999	Y	4569	\$18.05	15	1693472
07/22/1999	BILL	\$32.00	\$32.00	\$0.00	06/15/1999	07/22/1999	Y	4581	\$224.00	12	1693472
07/22/1999	BILL	\$32.00	\$32.00	\$0.00	06/15/1999	07/22/1999	Y	4597	\$180.00	28	1693472
08/19/1999	BILL	\$32.00	\$32.00	\$0.00	07/22/1999	08/19/1999	Y	4602	\$224.00	21	1693472
08/19/1999	BILL	\$32.00	\$32.00	\$0.00	07/22/1999	08/19/1999	Y	4613	\$192.00	18	1693472
09/20/1999	BILL	\$32.00	\$32.00	\$0.00	08/19/1999	09/20/1999	Y	4613	\$224.00	11	1693472
09/20/1999	BILL	\$32.00	\$32.00	\$0.00	08/19/1999	09/20/1999	Y	4620	\$224.00	7	1693472
09/30/1999	CANB	(\$32.00)	(\$32.00)	\$0.00							
09/30/1999	CANB	(\$32.00)	(\$32.00)	\$0.00							
09/30/1999	CANB	(\$32.00)	(\$32.00)	\$0.00							
10/19/1999	BILL	\$32.00	\$32.00	\$0.00	09/20/1999	10/19/1999	Y	4628	\$0.00	15	1693472

Account #: 3117404662

SA #: 9961512376

Bill Cycle: 15

Rate Class: GS

Phone #: 7457157(215)

Name: BLACKWELL, KARL

Address: 667 ALLENGROVE ST,2F/PHILA,PA

Pay Agreement Indicator: N

Easyway Indicator:

CRP Status: I

Blocker Start Date: 0

Blocker End Date: 0

Meter #: 1693472

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
11/17/1999	BILL	\$32.00	\$32.00	\$0.00	10/19/1999	11/17/1999	Y	4657	\$0.00	29	1693472
11/17/1999	BILL	\$32.00	\$32.00	\$0.00	10/19/1999	11/17/1999	Y	4651	\$288.00	23	1693472
11/20/1999	CANB	(\$32.00)	(\$32.00)	\$0.00							
12/17/1999	BILL	\$32.00	\$32.00	\$0.00	11/17/1999	12/17/1999	Y	4686	\$320.00	35	1693472
01/08/2000	BILL	\$0.00	\$0.00	\$0.00	12/17/1999	01/08/2000	R	5009	\$320.00	323	1693472
05/20/2002	UNEARN	(\$7.67)	(\$7.67)	(\$7.67)							
05/20/2002	CRPDIS	\$205.63	\$205.63	\$205.63							
05/20/2002	CRPFRZ	\$560.75	\$560.75	\$560.75							
05/20/2002	UNEARN	\$4.53	\$4.53	\$4.53							
05/20/2002	UNEARN	(\$13.95)	(\$13.95)	(\$13.95)							
05/20/2002	UNEARN	(\$5.23)	(\$5.23)	(\$5.23)							
05/22/2002	LPC	\$12.56	\$12.56	\$12.56							
06/22/2002	LPC	\$15.71	\$15.71	\$15.71							
07/23/2002	LPC	\$15.71	\$15.71	\$15.71							
07/30/2002	WO	(\$1,108.04)	(\$1,108.04)	(\$1,108.04)							

VERIFICATION

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

Dated: May 9, 2006



Laureto Farinas, Esquire

CERTIFICATE OF SERVICE

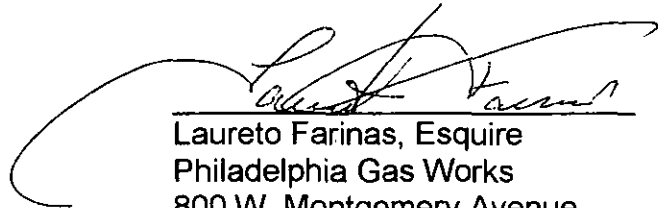
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Karl Blackwell
5902 N. Colgate Street
Philadelphia, PA 19120

Dated: May 9, 2006



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

RECEIVED
MAY 9 2006
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU