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ORIGINAL

November 2, 2005

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Carlotta M. Lindsay vs. PGW, Docket No.: C-20055402

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,

A handwritten signature in black ink, appearing to be the initials "M" followed by a long horizontal stroke.

Enclosure

cc: Carlotta M. Lindsay
Orlando Rosario

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION NOV 02 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Carlotta M. Lindsay

:
:

v.

:
:

Docket No.: C-20055402

Philadelphia Gas Works

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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 this paragraph concerning the Complainant's gas service being terminated, and all other averments that are conclusions. PGW records indicate that the Complainant has three broken payment arrangement dating back to September 25, 2003. The most current broken payment arrangement is July, 2004. The current arrearage on the Complainant's account is \$7,254.10 as shown on the statement of accounts which is attached hereto as Exhibit "A". PGW records also indicate that the Complainant received a re-bill in the amount of \$4,911.08 due to a malfunctioned Automatic Meter Reading ("AMR") device for the period of January 30, 2002 to June 23, 2003.
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.

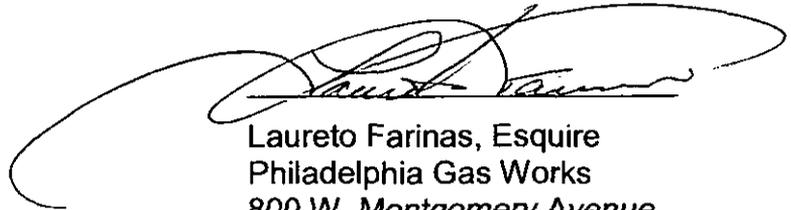
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6. Admitted.
7. Admitted.

Wherefore, PGW respectfully requests that this Commission find against the Complainant. 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,

November 2, 2005

A handwritten signature in black ink, appearing to read "Laureto Farinas", is written over a horizontal line. The signature is highly stylized with large loops and flourishes.

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

EXHIBIT A

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

HISTORY REQUEST REPORT FOR ACCOUNT # 623086630 AND SA # 8356974521 AS OF 11/02/2005

Account #: 623086630	SA #: 8356974521	Bill Cycle: 17	Rate Class: GS	Phone #: 3810790(215)
Name: LINDSAY, CARLOTTA		Address: 7147 BOYER ST/PHILA, PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20051007	Blocker End Date: 20070207	Meter #: 1648961		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
03/22/2002	BILL	\$70.19	\$70.19	\$0.00	01/30/2002	03/22/2002	Y	104	\$70.19	49	1648961
04/05/2002	PAY	(\$70.19)	(\$70.19)	\$0.00							
04/23/2002	BILL	\$35.97	\$35.97	\$0.00	03/22/2002	04/23/2002	Y	131	\$35.97	27	1648961
05/15/2002	PAY	(\$35.97)	(\$35.97)	\$0.00							
05/22/2002	BILL	\$27.83	\$27.83	\$0.00	04/23/2002	05/22/2002	Y	148	\$27.83	17	1648961
06/20/2002	PAY	(\$27.83)	(\$27.83)	\$0.00							
06/24/2002	BILL	\$25.82	\$25.82	\$0.00	05/22/2002	06/24/2002	Y	162	\$25.82	14	1648961
07/23/2002	BILL	\$23.10	\$23.10	\$0.00	06/24/2002	07/23/2002	Y	173	\$49.24	11	1648961
07/25/2002	LPC	\$0.32	\$0.32	\$0.32							
08/21/2002	BILL	\$22.08	\$22.08	\$0.00	07/23/2002	08/21/2002	Y	183	\$71.93	10	1648961
08/23/2002	LPC	\$0.61	\$0.61	\$0.61							
09/20/2002	BILL	\$24.45	\$24.45	\$0.00	08/21/2002	09/20/2002	Y	195	\$97.26	12	1648961
09/24/2002	LPC	\$0.88	\$0.88	\$0.88							
09/27/2002	PAY	(\$71.93)	(\$71.93)	\$0.00							
10/22/2002	BILL	\$27.78	\$27.78	\$0.00	09/20/2002	10/22/2002	Y	210	\$53.42	15	1648961
10/24/2002	LPC	\$0.31	\$0.31	\$0.31							
11/21/2002	BILL	\$37.24	\$37.24	\$0.00	10/22/2002	11/21/2002	Y	234	\$91.32	24	1648961
11/23/2002	LPC	\$0.66	\$0.66	\$0.66							
12/11/2002	PAY	(\$91.32)	(\$91.32)	\$0.00							
12/23/2002	BILL	\$51.29	\$51.29	\$0.00	11/21/2002	12/23/2002	Y	270	\$51.29	36	1648961
01/24/2003	BILL	\$47.42	\$47.42	\$0.00	12/23/2002	01/24/2003	Y	302	\$99.35	32	1648961
01/28/2003	LPC	\$0.64	\$0.64	\$0.64							
02/24/2003	BILL	\$52.96	\$52.96	\$0.00	01/24/2003	02/24/2003	Y	339	\$153.54	37	1648961
02/26/2003	LPC	\$1.23	\$1.23	\$1.23							
02/27/2003	PAY	(\$99.35)	(\$99.35)	\$0.00							
03/25/2003	BILL	\$43.38	\$43.38	\$0.00	02/24/2003	03/25/2003	Y	366	\$98.24	27	1648961
03/27/2003	LPC	\$0.67	\$0.67	\$0.67							
04/24/2003	BILL	\$37.40	\$37.40	\$0.00	03/25/2003	04/24/2003	Y	387	\$136.85	21	1648961

Account #: 623086630	SA #: 8356974521	Bill Cycle: 17	Rate Class: GS	Phone #: 3810790(215)
Name: LINDSAY, CARLOTTA		Address: 7147 BOYER ST/PHILA, PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20051007	Blocker End Date: 20070207	Meter #: 1648961		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
04/26/2003	LPC	\$1.21	\$1.21	\$1.21							
04/28/2003	PAY	(\$98.24)	(\$98.24)	\$0.00							
05/16/2003	PAY	(\$136.85)	(\$136.85)	\$0.00							
05/23/2003	BILL	\$29.55	\$29.55	\$0.00	04/24/2003	05/23/2003	Y	401	(\$68.69)	14	1648961
06/23/2003	BILL	\$4,911.08	\$4,911.08	\$0.00	05/23/2003	06/23/2003	R	4137	\$4,842.39	3750	1648961
06/23/2003	BILL	\$4,911.08	\$4,911.08	\$0.00	05/23/2003	06/23/2003	R	14	\$4,842.39	3750	1648961
07/23/2003	BILL	\$34.52	\$34.52	\$0.00	06/23/2003	07/23/2003	R	31	\$4,949.54	17	1648961
07/25/2003	LPC	\$72.63	\$72.63	\$72.63							
08/21/2003	BILL	\$26.58	\$26.58	\$0.00	07/23/2003	08/21/2003	R	42	\$5,049.27	11	1648961
08/23/2003	LPC	\$73.15	\$73.15	\$73.15							
09/23/2003	BILL	\$30.70	\$30.70	\$0.00	08/21/2003	09/23/2003	R	56	\$5,153.52	14	1648961
09/25/2003	LPC	\$73.55	\$73.55	\$73.55							
10/22/2003	BILL	\$132.64	\$132.64	\$0.00	09/23/2003	10/22/2003	R	146	\$5,286.16	90	1648961
11/21/2003	BILL	\$221.10	\$221.10	\$0.00	10/22/2003	11/21/2003	R	302	\$5,507.26	156	1648961
11/25/2003	PAY	(\$180.00)	(\$180.00)	\$0.00							
12/23/2003	BILL	\$506.04	\$506.04	\$0.00	11/21/2003	12/23/2003	R	679	\$5,912.61	377	1648961
12/27/2003	LPC	\$79.31	\$79.31	\$79.31							
01/25/2004	BILL	\$679.57	\$679.57	\$0.00	12/23/2003	01/25/2004	R	1193	\$6,592.18	514	1648961
02/24/2004	BILL	\$634.11	\$634.11	\$0.00	01/25/2004	02/24/2004	R	1672	\$7,226.29	479	1648961
03/16/2004	PAY	(\$607.00)	(\$607.00)	\$0.00							
03/24/2004	BILL	\$465.56	\$465.56	\$0.00	02/24/2004	03/24/2004	R	2014	\$7,084.85	342	1648961
04/22/2004	PAY	(\$607.00)	(\$607.00)	\$0.00							
04/23/2004	BILL	\$297.03	\$297.03	\$0.00	03/24/2004	04/23/2004	R	2228	\$6,774.88	214	1648961
05/24/2004	BILL	\$77.26	\$77.26	\$0.00	04/23/2004	05/24/2004	R	2277	\$6,852.14	49	1648961
05/24/2004	PAY	(\$607.00)	(\$607.00)	\$0.00							
06/23/2004	BILL	\$35.49	\$35.49	\$0.00	05/24/2004	06/23/2004	R	2294	\$6,374.30	17	1648961
06/25/2004	LPC	\$93.67	\$93.67	\$93.67							
07/14/2004	PAY	(\$607.00)	(\$607.00)	\$0.00							
07/23/2004	BILL	\$31.55	\$31.55	\$0.00	06/23/2004	07/23/2004	R	2308	\$5,798.85	14	1648961
07/30/2004	PAY	(\$607.00)	(\$607.00)	\$0.00							
08/23/2004	BILL	\$34.34	\$34.34	\$0.00	07/23/2004	08/23/2004	R	2324	\$5,304.06	16	1648961
08/25/2004	LPC	\$77.87	\$77.87	\$77.87							
09/01/2004	XFER	(\$5,031.14)	(\$5,031.14)	(\$5,031.14)							

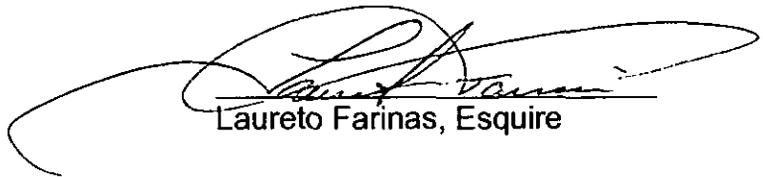
Account #: 623086630	SA #: 8356974521	Bill Cycle: 17	Rate Class: GS	Phone #: 3810790(215)
Name: LINDSAY, CARLOTTA		Address: 7147 BOYER ST/PHILA,PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20051007	Blocker End Date: 20070207	Meter #: 1648961		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust. Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter.#
09/09/2004	PAY	(\$272.95)	(\$272.95)	\$0.00							
09/23/2004	BILL	\$35.91	\$35.91	\$0.00	08/23/2004	09/23/2004	R	2341	\$35.88	17	1648961
10/19/2004	PAY	(\$40.00)	(\$40.00)	\$0.00							
10/22/2004	BILL	\$186.83	\$186.83	\$0.00	09/23/2004	10/22/2004	R	2465	\$182.71	124	1648961
11/23/2004	PAY	(\$186.83)	(\$186.83)	\$0.00							
11/23/2004	BILL	\$384.22	\$384.22	\$0.00	10/22/2004	11/23/2004	R	2729	\$380.10	264	1648961
12/11/2004	NSFCHA	\$20.00	\$20.00	\$20.00							
12/11/2004	NSFPAY	\$0.00	\$0.00	\$186.83							
12/11/2004	CANP	\$186.83	\$186.83	\$0.00							
12/22/2004	BILL	\$638.03	\$638.03	\$0.00	11/23/2004	12/22/2004	R	3138	\$1,233.46	409	1648961
12/23/2004	LPC	\$8.50	\$8.50	\$8.50							
12/24/2004	PAY	(\$186.83)	(\$186.83)	\$0.00							
01/20/2005	PAY	(\$390.00)	(\$390.00)	\$0.00							
01/25/2005	BILL	\$1,047.58	\$1,047.58	\$0.00	12/22/2004	01/25/2005	R	3798	\$1,714.05	660	1648961
01/26/2005	LPC	\$9.84	\$9.84	\$9.84							
02/23/2005	BILL	\$799.66	\$799.66	\$0.00	01/25/2005	02/23/2005	R	4300	\$2,539.27	502	1648961
02/24/2005	LPC	\$25.56	\$25.56	\$25.56							
03/23/2005	BILL	\$697.49	\$697.49	\$0.00	02/23/2005	03/23/2005	R	4782	\$3,274.31	482	1648961
03/24/2005	LPC	\$37.55	\$37.55	\$37.55							
04/22/2005	BILL	\$258.08	\$258.08	\$0.00	03/23/2005	04/22/2005	R	4959	\$3,580.41	177	1648961
04/25/2005	LPC	\$48.02	\$48.02	\$48.02							
05/23/2005	BILL	\$117.66	\$117.66	\$0.00	04/22/2005	05/23/2005	R	5035	\$3,749.96	76	1648961
05/24/2005	LPC	\$51.89	\$51.89	\$51.89							
06/17/2005	REVADJ	(\$947.32)	(\$947.32)	(\$947.32)							
06/22/2005	BILL	\$63.66	\$63.66	\$0.00	05/23/2005	06/22/2005	R	5070	\$2,908.33	35	1648961
06/23/2005	LPC	\$42.03	\$42.03	\$42.03							
07/21/2005	XFER	\$5,031.14	\$5,031.14	\$5,031.14							
07/21/2005	ALLOWS	(\$787.00)	(\$787.00)	(\$787.00)							
07/22/2005	BILL	\$31.59	\$31.59	\$0.00	06/22/2005	07/22/2005	R	5083	\$7,184.06	13	1648961
08/23/2005	BILL	\$36.11	\$36.11	\$0.00	07/22/2005	08/23/2005	R	5099	\$7,220.17	16	1648961
09/23/2005	BILL	\$33.93	\$33.93	\$0.00	08/23/2005	09/23/2005	R	5113	\$7,254.10	14	1648961
10/07/2005	XFER	(\$7,254.10)	(\$7,254.10)	(\$7,254.10)							
10/24/2005	BILL	\$121.68	\$121.68	\$0.00	09/23/2005	10/24/2005	R	5170	\$121.68	57	1648961

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: November 2, 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:

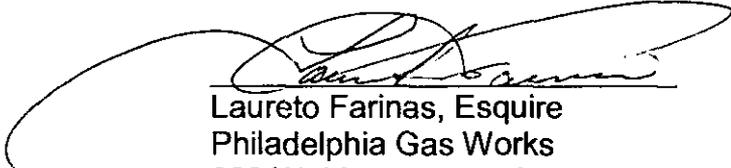
Carlotta M. Lindsey
7147 Boyer Street
Philadelphia, PA 19119-1813

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