

Horace P. Payne, Jr.  
Senior Counsel

Dominion Resources Services, Inc.  
625 Liberty Avenue, Pittsburgh, PA 15222  
Phone: 412-497-6889, Fax: 412-497-6838  
E-mail: Horace\_P.\_Payne@dom.com



**Dominion™**

**ORIGINAL**

October 25, 2005

**CERTIFIED MAIL**

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**DOCUMENT  
FOLDER**

Re: Margaret E. Ellenberger v. The Peoples Natural Gas Company  
at Docket No. C-20055364

Dear Secretary McNulty:

On behalf of The Peoples Natural Gas Company, enclosed please find an original and three (3) copies of its Answer filed in the above-referenced matter.

If you have any questions or concerns regarding this matter, please do not hesitate to contact me.

Very truly yours,

Enclosures

cc: Margaret E. Ellenberger, 438 North Avenue, Kittanning, PA 16201  
Terry Richey – Dominion Tower

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OCT 25 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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ORIGINAL

COMMONWEALTH OF PENNSYLVANIA  
BEFORE  
THE PUBLIC UTILITY COMMISSION

Margaret E. Ellenberger  
v.  
The Peoples Natural Gas Company

) Complaint Docket  
) No. C-20055364  
) 2005

DOCUMENT  
FOLDER

ANSWER OF  
THE PEOPLES NATURAL GAS COMPANY  
d/b/a DOMINION PEOPLES

1. Admitted.
2. The Peoples Natural Gas Company d/b/a Dominion Peoples  
625 Liberty Avenue  
Pittsburgh, PA 15222-3197  
Horace P. Payne, Jr., Counsel for The Peoples Natural Gas Company
3. Admitted.
4. Under 66 Pa. C.S.A. § 1404 (a)(2), Dominion Peoples is permitted to render a security deposit on an open customer account if an unsatisfactory payment history has been determined. A security deposit warning letter is generated prior to assessing the security deposit if a customer has paid late or has missed a monthly payment. The security deposit warning letter is intended to provide customers with advance notice so that future payments are sent in on time, thus avoiding being assessed a deposit. The purpose of a security deposit is to help reduce the company's loss on unpaid bills, thereby keeping rates as low as possible.

DOCKETED  
NOV 01 2005

In regard to the determination of a security deposit on Complainant's account, the deposit assessed was based on the credit guidelines outlined in Dominion Peoples' tariff as follows:

A utility may require an existing ratepayer to post a deposit to reestablish credit whenever a ratepayer has been delinquent in the payment of any two consecutive bills or three or more bills within the preceding twelve months. The company will refund or apply the deposit to the ratepayer's account, plus accrued interest after the ratepayer has paid bills for service for 12 consecutive months without having paid after the due date on more than two occasions and without having service terminated or currently being delinquent.

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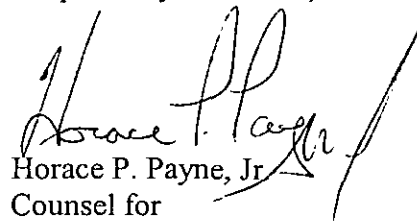
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As indicated on the attached Dominion Peoples Statement of Account ("Exhibit A"), Complainant has failed to consistently make monthly payments in a timely fashion. Complainant was issued a Security Deposit Warning Letter on July 12, 2005 ("Exhibit B") and failed to pay the outstanding balance due despite the warning. Complainant's account was assessed a security deposit of \$370.00 on September 8, 2005.

5. Complainant has failed to state in her claim that there have been any violations of any statutes by Dominion Peoples. Therefore, Dominion Peoples respectfully requests that this complaint be dismissed.
6. Unknown to Respondent.
7. Admitted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Horace P. Payne, Jr.", is written over the typed name.

Horace P. Payne, Jr.  
Counsel for  
The Peoples Natural Gas Company

The Dominion Peoples Natural Gas Company  
**ACCOUNT STATEMENT**

Account Number: 446020294434

Ratepayer: Robert and/or Margaret E. Ellenberger

Service Address: 438 North Ave., Kittanning, PA 16201

SERVICE TO	DAYS	METER READING	TYPE	CONS	BILL AMT	DUE DATE	LPC	PAYMENTS	PAYMENT DATE	BALANCE	COMMENTS	BUD	BUD ARREARS
12/02/02		153.1	A							84.29			
01/03/03	32	188.7	E	35.6	278.98	01/29/03		150.00	12/26/02	213.27			
02/04/03	32	233.7	E	45.0	387.25	02/28/03		250.00	01/27/03	350.52			
03/05/03	29	271.0	E	37.3	322.85	03/31/03		350.52	02/24/03	322.85			
04/03/03	29	291.9	E	20.9	188.12	04/29/03		322.85	03/25/03	188.12			
05/05/03	32	305.2	E	13.3	145.01	05/29/03		188.12	04/30/03	145.01			
06/04/03	30	307.6	E	2.4	35.18	06/30/03		150.00	05/27/03	30.19			
04/03/03	62	291.9	E	-15.7	-180.18					-150.00	Cancel Billing		
06/05/03	63	301.6	C	9.7	119.75	07/07/03				-30.25			
07/03/03	28	303.9	E	2.3	34.18	07/30/03				3.93			
08/04/03	32	306.5	E	2.6	37.21	08/28/03		330.00	07/21/03	-288.86			
					6.50					-282.36	Warranty Fee		
09/03/03	30	308.9	E	2.4	35.18	09/29/03		150.00	09/04/03	-397.18			
					6.50					-390.68	Warranty Fee		
10/02/03	29	314.7	E	5.8	69.46	10/28/03		50.00	09/22/03	-371.22			
					6.50			6.50		-371.22	Warranty Fee		
10/31/03	29	330.1	E	15.4	163.63	11/26/03		143.50	10/24/03	-351.09			

PA PUBLIC UTILITY COMMISSION  
 SECRETARY'S BUREAU

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"EXHIBIT A"

Type Codes:

A - Actual  
 E - Estimate

IA - Initial (Actual)  
 IE - Initial (Estimate)

FA - Final (Actual)  
 FE - Final (Estimate)

C - Customer  
 AJ - Adjustment

The Dominion Peoples Natural Gas Company  
**ACCOUNT STATEMENT**

Account Number: 4460202944434

Ratepayer: Robert and/or Margaret E. Ellenberger

Service Address: 438 North Ave., Kittanning, PA 16201

SERVICE TO	DAYS	METER READING	TYPE	CONS	BILL AMT	DUE DATE	LPC	PAYMENT			COMMENTS	BUD	BUD ARREARS
								PAYMENTS	DATE	BALANCE			
					6.50			6.50		-351.09	Warranty Fee		
12/03/03	33	351.8	A	21.7	228.07	12/26/03		203.50	11/19/03	-328.52			
					6.50			6.50		-328.52	Warranty Fee		
01/06/04	34	384.1	E	32.3	335.25	01/30/04		193.50	12/26/03	-186.77			
					6.50			6.50		-186.77	Warranty Fee		
02/05/04	30	417.6	A	33.5	371.97	03/01/04		193.50	01/29/04	-8.30			
					6.50			6.50		-8.30	Warranty Fee		
03/05/04	29	444.6	E	27.0	301.92	03/31/04		200.00	03/01/04	93.62			
					6.50					100.12	Warranty Fee		
04/05/04	31	467.3	E	22.7	256.84	04/29/04		193.50	03/19/04	163.46			
04/06/04	1	479.9	C	12.6	6.50			6.50		163.46	Warranty Fee		
05/05/04	29	491.6	E	11.7	284.37	06/01/04	2.35			450.18			
					6.50					456.68	Warranty Fee		
06/04/04	30	494.1	E	2.5	39.17	06/30/04	6.62			502.47			
					6.50					508.97	Warranty Fee		
04/05/04	-60	467.3	E	-26.8	-323.54					185.43	Cancel Billing		
06/07/04	63	483.7	C	16.4	206.61	07/02/04	-6.62			385.42			

**"EXHIBIT A"**

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**"PAGE 2 OF 5"**

The Dominion Peoples Natural Gas Company  
**ACCOUNT STATEMENT**

Account Number: 4460202944434

Ratepayer: Robert and/or Margaret E. Ellenberger

Service Address: 438 North Ave., Kittanning, PA 16201

SERVICE TO	DAYS	METER READING	TYPE	CONS	BILL AMT	DUE DATE	LPC	PAYMENTS	PAYMENT DATE	BALANCE	COMMENTS	BUD	BUD ARREARS
07/06/04	29	486.1	E	2.4	37.87	07/30/04	2.32	211.10	06/25/04	214.51			
					6.50					221.01	Warranty Fee		
08/05/04	30	489.2	A	3.1	44.56	08/27/04	1.08	123.05	07/26/04	143.60			
					6.50					150.10	Warranty Fee		
09/02/04	28	492.2	E	3.0	43.47	09/29/04	0.98	52.05	08/27/04	142.50			
					6.50					149.00	Warranty Fee		
10/04/04	32	494.7	A	2.5	37.93	10/26/04		143.50	09/21/04	43.43			
					7.50			6.50		44.43	\$1.00 Dollar Energy & Warranty Fee		
11/02/04	29	507.3	E	12.6	140.56	11/29/04		68.93	10/26/04	116.06			
					6.50			6.50		116.06	Warranty Fee		
12/04/04	32	520.7	A	13.4	148.79	12/28/04		157.06	11/29/04	107.79			
					6.50			6.50		107.79	Warranty Fee		
01/06/05	33	550.4	E	29.7	323.43	02/01/05		201.29	12/28/04	229.93			
					6.50			6.50		229.93	Warranty Fee		
02/07/05	32	587.7	A	37.3	452.94	03/01/05	0.35	200.00	01/31/05	483.22	P/A BUD(175)+40 ST	175.00	40.00
					6.50					489.72	Warranty Fee		

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The Dominion Peoples Natural Gas Company  
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Account Number: 4460202944434

Ratepayer: Robert and/or Margaret E. Ellenberger

Service Address: 438 North Ave., Kittanning, PA 16201

SERVICE TO	DAYS	METER READING	TYPE	CONS	BILL AMT	DUE DATE	LPC	PAYMENTS	PAYMENT DATE	BALANCE	COMMENTS	BUD	BUD ARREARS.
02/07/05		587.7	A							489.72			
03/08/05	29	619.3	E	31.6	385.41	04/01/05	3.78	225.00	03/03/05	653.91		175.00	40.00
					6.50					660.41	Warranty Fee		
04/07/05	30	645.3	E	26.0	321.28	05/03/05	6.38	215.50	03/30/05	772.57		175.00	40.00
					6.50			19.50		759.57	Warranty Fee		
05/06/05	29	653.6	E	8.3	112.61	06/01/05	7.95	223.07	04/20/05	657.06		175.00	40.00
					6.50			6.50		657.06	Warranty Fee		
06/07/05	32	656.6	E	3.0	47.72	07/01/05	6.48	218.50	06/02/05	492.76		175.00	40.00
					6.50			6.50		492.76	Warranty Fee		
05/06/05	-32	653.6	E	-3.0	-47.72					445.04	Cancel Billing		
06/07/05	32	654.4	C	0.8	20.79	07/13/05				465.83		175.00	40.00
07/07/05	30	657.1	E	2.7	44.03	08/02/05				509.86		186.00	255.00
					6.50					516.36	Warranty Fee		
08/05/05	29	659.7	E	2.6	42.81	08/31/05	4.19	224.00	07/19/05	339.36	Agreement dropped for non compliance		
					6.50					345.86	Warranty Fee		
07/07/05	-29	657.1	E	-2.6	-42.81					303.05	Cancel Billing		
08/05/05	29	659.3	C	2.2	37.93	09/07/05				340.98			

**"EXHIBIT A"**

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- C - Customer
- E - Estimate
- IE - Initial (Estimate)
- FE - Final (Estimate)
- AJ - Adjustment



July 12, 2005

MARGARET E ELLENBERGER  
438 NORTH AVE  
KITTANNING PA 16201-1117

**ACCOUNT NO:**  
4460202944434  
**SERVICE ADDRESS:**  
438 NORTH AVE  
KITTANNING PA 16201-1117

**Subject: Deposit Warning Letter**

We reviewed your account. For those accounts where payments are not made on time, we request a security deposit. Steps like this help us keep our rates as low as we can.

To avoid a deposit, we ask that you please make payments in full by the due date shown on each monthly bill.

If late payments continue or if a check for payment is not accepted by your bank, we may need to request a security deposit. It will be equal to 2.0 times your average usage.

If you would like to contact us, please call **(800)764-0111** Monday through Friday from 7:00 a.m. through 7:00 p.m.

Sincerely,

Dominion Peoples  
Customer Service Center

lca285

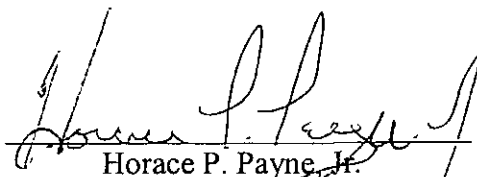
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"EXHIBIT B"



CERTIFICATION OF SERVICE

I hereby certify that I have served a copy of the foregoing upon each party to this proceeding.

Done at Pittsburgh, Pennsylvania, this 25<sup>th</sup> day of October, 2005.

  
Horace P. Payne, Jr.  
Counsel for  
The Peoples Natural Gas Company

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