

ORIGINAL

Philadelphia Gas Works

800 West Montgomery Avenue, Philadelphia, PA 19122



Mary M. Chan, Paralegal
Legal Department
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January 21, 2005

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

JAN 23 2005

RE: Moraima Santiago vs. PGW, Docket No.: C-20043972

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,

Enclosure

cc Moraima Santiago
Anne Cromley

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

FEB 03 2005

Moraima Santiago

:

PHILADELPHIA

:

v.

:

Docket No.: C-20043972

:

Philadelphia Gas Works

:

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. Denied in part. PGW denies the averments contained in Paragraph 4 of the Complaint concerning the loan that the Complainant took out to pay off her gas bill and all other averments that are conclusions.

PGW records indicate that on June 19, 2003, the Complainant received a bill in the amount of \$5,554 for the period of September 28, 2000 to May 21, 2003 due to PGW's under estimation of bills. PGW credited the account in the amount of \$913, reducing the bill to \$4,644.79. On March 1, 2004, PGW received a payment in the amount of \$4000. After this payment, the Complainant's balance was \$2238.67. The Complainant continues to have a running balance as she has missed payments as shown on the statement of accounts which is attached hereto as Exhibit "A".

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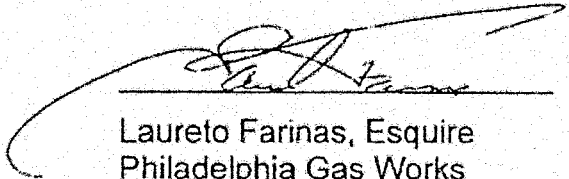
The Bureau of Consumer Services ("BCS") dated July 29, 2004, ordered PGW to credit the account of \$716.

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.

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,

January 20, 2005



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

EXHIBIT A

HISTORY REQUEST REPORT FOR ACCOUNT # 1112304078 AND SA # 1798032436 AS OF 01/20/2005

Account # 1112304078	SA # 1798032436	Bill Cycle 13	Rate Class GS
Name SANTIAGO, MORAIMA		Address: 4840 BINGHAM ST, PHILA, PA	
Pay Agreement Indicator N	Easyway Indicator	CRP Status I	
BLOCKER START DATE 20040923	BLOCKER END DATE 20060923	METER # 634711	PHONE # 4570636215

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
11/16/2001	BILL	\$1,076.95	\$1,076.95	\$0.00	09/28/2000	11/16/2001	Y	6217	\$445.02	791	1634711
12/17/2001	BILL	\$83.05	\$83.05	\$0.00	11/16/2001	12/17/2001	Y	6284	\$534.75	67	1634711
12/18/2001	PAY	(\$400.00)	(\$400.00)	\$0.00							
12/19/2001	LPC	\$6.67	\$6.67	\$6.67							
12/24/2001	XFER	(\$631.92)	(\$631.92)	(\$631.92)							
12/31/2001	PAY	(\$100.00)	(\$100.00)	\$0.00							
01/17/2002	BILL	\$147.57	\$147.57	\$0.00	12/17/2001	01/17/2002	Y	6419	\$182.75	135	1634711
01/19/2002	LPC	\$0.43	\$0.43	\$0.43							
02/19/2002	BILL	\$130.50	\$130.50	\$0.00	01/17/2002	02/15/2002	Y	6537	\$113.25	118	1634711
02/19/2002	PAY	(\$200.00)	(\$200.00)	\$0.00							
03/07/2002	PAY	(\$113.25)	(\$113.25)	\$0.00							
03/16/2002	BILL	\$109.65	\$109.65	\$0.00	02/15/2002	03/18/2002	Y	6643	\$109.65	106	1634711
04/15/2002	PAY	(\$109.65)	(\$109.65)	\$0.00							
04/17/2002	BILL	\$81.15	\$81.15	\$0.00	03/18/2002	04/17/2002	Y	6722	\$81.15	79	1634711
04/29/2002	PAY	(\$81.15)	(\$81.15)	\$0.00							
05/16/2002	BILL	\$46.47	\$46.47	\$0.00	04/17/2002	05/15/2002	Y	6759	\$46.47	37	1634711
06/03/2002	PAY	(\$46.47)	(\$46.47)	\$0.00							
06/18/2002	BILL	\$32.44	\$32.44	\$0.00	05/15/2002	06/18/2002	Y	6780	\$32.44	21	1634711
07/15/2002	PAY	(\$32.44)	(\$32.44)	\$0.00							
07/17/2002	BILL	\$22.08	\$22.08	\$0.00	06/18/2002	07/17/2002	Y	6790	\$22.08	10	1634711
07/20/2002	BILL	\$3,582.32	\$3,582.32	\$0.00	09/28/2000	07/20/2002	E	9350	\$0.00	3036	1634711
07/29/2002	PAY	(\$22.08)	(\$22.08)	\$0.00							
08/15/2002	BILL	\$22.08	\$22.08	\$0.00	07/17/2002	08/15/2002	Y	6800	\$22.08	10	1634711
09/16/2002	BILL	\$27.45	\$27.45	\$0.00	08/15/2002	09/15/2002	Y	6815	\$49.80	15	1634711
09/18/2002	LPC	\$0.27	\$0.27	\$0.27							
10/16/2002	BILL	\$26.72	\$26.72	\$0.00	09/15/2002	10/16/2002	Y	6829	\$77.13	14	1634711
10/18/2002	LPC	\$0.61	\$0.61	\$0.61							
11/15/2002	BILL	\$62.48	\$62.48	\$0.00	10/16/2002	11/15/2002	Y	6877	\$140.56	48	1634711

Account # 112304078

SA # 1798032436

Rate Class. GS

Bill Cycle 13

Phone # 4570636215

Name: SANTIAGO, MORAIMA

Address: 4840 BINGHAM ST PHILA, PA

Pay Agreement Indicator N

Easyway Indicator

CRP Status I

Blocker Start Date 20040923

Blocker End Date 20060923

Meter # 1634711

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
11/19/2002	LPC	\$0.95	\$0.95	\$0.95	11/15/2002	12/17/2002	Y	6969	\$249.24	92	1634711
12/17/2002	BILL	\$106.95	\$106.95	\$0.00							
12/19/2002	LPC	\$1.73	\$1.73	\$1.73	12/17/2002	01/17/2003	Y	7069	\$377.28	100	1634711
01/17/2003	BILL	\$124.97	\$124.97	\$0.00							
01/22/2003	LPC	\$3.07	\$3.07	\$3.07							
02/03/2003	PAY	(\$249.24)	(\$249.24)	\$0.00							
02/18/2003	BILL	\$151.98	\$151.98	\$0.00	01/17/2003	02/18/2003	Y	7202	\$281.62	133	1634711
02/20/2003	LPC	\$1.60	\$1.60	\$1.60							
03/19/2003	BILL	\$122.06	\$122.06	\$0.00	02/18/2003	03/19/2003	Y	7300	\$407.18	98	1634711
03/21/2003	LPC	\$3.50	\$3.50	\$3.50							
03/24/2003	PAY	(\$281.62)	(\$281.62)	\$0.00							
04/17/2003	BILL	\$65.42	\$65.42	\$0.00	03/19/2003	04/17/2003	Y	7344	\$192.54	44	1634711
04/22/2003	LPC	\$1.56	\$1.56	\$1.56							
05/19/2003	BILL	\$43.29	\$43.29	\$0.00	04/17/2003	05/19/2003	Y	7369	\$238.21	25	1634711
05/21/2003	LPC	\$2.38	\$2.38	\$2.38							
06/17/2003	BILL	\$5,554.95	\$5,554.95	\$0.00	05/19/2003	06/17/2003	R	1593	\$5,796.08	4279	1634711
06/17/2003	BILL	\$5,554.95	\$5,554.95	(\$5,554.95)	05/19/2003	06/17/2003	R	55	\$5,796.08	4279	1634711
06/17/2003	BILL	\$2,708.18	\$2,708.18	\$0.00	07/20/2002	06/17/2003	R	1593	\$0.00	2298	1634711
06/17/2003	BILL	\$2,708.18	\$2,708.18	\$0.00	07/20/2002	06/17/2003	R	55	\$0.00	2288	1634711
06/19/2003	LPC	\$2.92	\$2.92	\$2.92							
06/23/2003	PAY	(\$238.21)	(\$238.21)	\$0.00							
06/25/2003	XFER	(\$5,554.95)	(\$5,554.95)	(\$5,554.95)							
06/27/2003	XFER	\$5,554.95	\$5,554.95	\$5,554.95							
06/27/2003	XFER	\$5,557.87	\$5,557.87	\$5,557.87							
06/27/2003	XFER	(\$5,557.87)	(\$5,557.87)	(\$5,557.87)							
06/27/2003	REVADJ	(\$913.08)	(\$913.08)	(\$913.08)							
07/17/2003	BILL	\$68.97	\$68.97	\$0.00	06/17/2003	07/17/2003	R	98	\$4,783.43	43	1634711
07/19/2003	LPC	\$69.67	\$69.67	\$69.67							
08/04/2003	PAY	(\$69.00)	(\$69.00)	\$0.00							
08/15/2003	BILL	\$64.98	\$64.98	\$0.00	07/17/2003	08/15/2003	R	138	\$4,850.11	40	1634711
08/19/2003	LPC	\$70.70	\$70.70	\$70.70							
09/05/2003	PAY	(\$65.00)	(\$65.00)	\$0.00							
09/17/2003	BILL	\$86.63	\$86.63	\$0.00	08/15/2003	09/17/2003	R	194	\$4,943.42	56	1634711

Account # 11234078 SA # 1798032436 Bill Cycle 13 Rate Class GS Phone # 4570636(215)
 Name: SANTIAGO, MORAIMA Address: 4840 BINGHAM STIPHILA, PA
 Pay Agreement Indicator: N Easyway Indicator CRP Status: I
 Blocker Start Date: 20040523 Blocker End Date: 20060923 Meter # 1634711

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
09/19/2003	LPC	\$71.68	\$71.68	\$71.68							
10/02/2003	LPCWVE	(\$212.05)	(\$212.05)	(\$212.05)							
10/06/2003	PAY	(\$86.63)	(\$86.63)	\$0.00							
10/16/2003	BILL	\$94.50	\$94.50	\$0.00	09/17/2003	10/16/2003	R	256	\$4,739.24	62	1634711
11/03/2003	PAY	(\$94.50)	(\$94.50)	\$0.00							
11/17/2003	BILL	\$226.56	\$226.56	\$0.00	10/16/2003	11/17/2003	R	413	\$4,871.30	157	1634711
12/17/2003	BILL	\$356.37	\$356.37	\$0.00	11/17/2003	12/17/2003	R	675	\$5,227.67	262	1634711
01/20/2004	BILL	\$539.30	\$539.30	\$0.00	12/17/2003	01/20/2004	R	1081	\$5,766.97	406	1634711
02/18/2004	BILL	\$471.70	\$471.70	\$0.00	01/20/2004	02/18/2004	R	1446	\$6,238.67	365	1634711
03/01/2004	PAY	(\$4,000.00)	(\$4,000.00)	\$0.00							
03/18/2004	BILL	\$305.85	\$305.85	\$0.00	02/18/2004	03/18/2004	R	1662	\$2,544.52	216	1634711
04/07/2004	PAY	(\$800.00)	(\$800.00)	\$0.00							
04/19/2004	BILL	\$280.67	\$280.67	\$0.00	03/18/2004	04/19/2004	R	1864	\$2,025.19	202	1634711
05/18/2004	BILL	\$84.63	\$84.63	\$0.00	04/19/2004	05/18/2004	R	1916	\$2,109.82	52	1634711
06/02/2004	PAY	(\$440.00)	(\$440.00)	\$0.00							
06/17/2004	BILL	\$68.10	\$68.10	\$0.00	05/18/2004	06/17/2004	R	1957	\$1,737.92	4	1634711
07/12/2004	PAY	(\$300.00)	(\$300.00)	\$0.00							
07/19/2004	BILL	\$67.85	\$67.85	\$0.00	06/17/2004	07/19/2004	R	1997	\$1,505.77	40	1634711
07/26/2004	BSEGNC	\$0.00	\$0.00	(\$43.29)							
07/26/2004	CANB	(\$43.29)	(\$43.29)	\$0.00							
07/26/2004	CANB	(\$130.50)	(\$130.50)	\$0.00							
07/26/2004	BSEGNC	\$0.00	\$0.00	(\$130.50)							
07/26/2004	CANB	(\$65.42)	(\$65.42)	\$0.00							
07/26/2004	BSEGNC	\$0.00	\$0.00	(\$65.42)							
07/26/2004	CANB	(\$26.72)	(\$26.72)	\$0.00							
07/26/2004	BSEGNC	\$0.00	\$0.00	(\$26.72)							
07/26/2004	CANB	(\$46.47)	(\$46.47)	\$0.00							
07/26/2004	BSEGNC	\$0.00	\$0.00	(\$46.47)							
07/26/2004	CANB	(\$22.08)	(\$22.08)	\$0.00							
07/26/2004	BSEGNC	\$0.00	\$0.00	(\$22.08)							
07/26/2004	CANB	(\$109.65)	(\$109.65)	\$0.00							
07/26/2004	BSEGNC	\$0.00	\$0.00	(\$109.65)							
07/26/2004	CANB	(\$151.98)	(\$151.98)	\$0.00							
07/26/2004	BSEGNC	\$0.00	\$0.00	(\$151.98)							

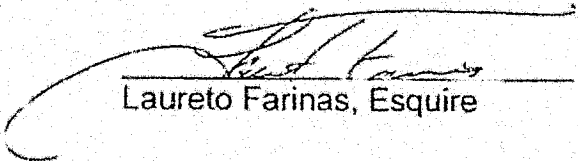
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 Pay Agreement Indicator N Easyway Indicator CRP Status: I
 Blocker Start Date: 20040823 Blocker End Date: 20060923 Meter # 1634711

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$1,076.95)							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$52.48)							
07/26/2004	CANB	(\$52.48)	(\$52.48)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$106.95)							
07/26/2004	CANB	(\$106.95)	(\$106.95)	\$0.00							
07/26/2004	CANB	(\$81.15)	(\$81.15)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$81.15)							
07/26/2004	LPCWVE	(\$25.69)	(\$25.69)	(\$25.69)							
07/26/2004	CANB	(\$122.06)	(\$122.06)	\$0.00							
07/26/2004	CANB	(\$147.57)	(\$147.57)	\$0.00							
07/26/2004	CANB	(\$22.08)	(\$22.08)	\$0.00							
07/26/2004	CANB	(\$1,076.95)	(\$1,076.95)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$83.35)							
07/26/2004	CANB	(\$27.45)	(\$27.45)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$27.45)							
07/26/2004	CANB	(\$5,554.95)	(\$5,554.95)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$5,554.95)							
07/26/2004	CANB	(\$83.05)	(\$83.05)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$122.06)							
07/26/2004	CANB	(\$151.98)	(\$151.98)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$124.97)							
07/26/2004	CANB	(\$32.44)	(\$32.44)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$22.06)							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$32.44)							
07/26/2004	CANB	(\$124.97)	(\$124.97)	\$0.00							
07/26/2004	BSEGCN	\$0.00	\$0.00	(\$147.57)							
08/17/2004	BILL	\$55.28	\$55.28	\$0.00	07/19/2004	08/17/2004	R	2028	(\$212.35)	31	1634711
09/17/2004	BILL	\$69.55	\$69.55	\$0.00	08/17/2004	09/17/2004	R	2069	(\$142.80)	41	1634711
09/23/2004	ALLOWS	(\$716.00)	(\$716.00)	(\$716.00)							
10/18/2004	BILL	\$98.72	\$98.72	\$0.00	09/17/2004	10/18/2004	R	2131	(\$760.08)	62	1634711
11/17/2004	BILL	\$275.93	\$275.93	\$0.00	10/16/2004	11/17/2004	R	2321	(\$484.15)	190	1634711
12/16/2004	BILL	\$366.60	\$366.60	\$0.00	11/17/2004	12/16/2004	R	2549	(\$117.55)	228	1634711

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: January 20, 2005


Laureto Farinas, Esquire

JAN 21 2005

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CERTIFICATE OF SERVICE

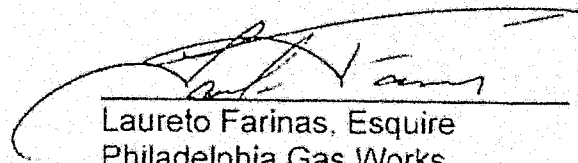
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY
OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED
BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF §1.54
(RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Moraima Santiago
4840 Bingham Street
Philadelphia, PA 19120

January 20, 2005



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