

Philadelphia Gas Works



800 W. Montgomery Avenue, Philadelphia, PA 19122
Telephone: (215) 236-0500

Laureto A. Fannas
Senior Attorney
Legal Department

Direct Dial: 215-684-6982
FAX: 215-684-6798

E-mail: laureto.fannas@pgworks.com

ORIGINAL

July 15, 2002

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

RECEIVED

JUL 15 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Donna Bell v PGW, Docket No. C - 20027507

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 amended Answer to the Complaint in the above captioned matter.

If additional information is needed about this matter, please contact me at my direct-dial number above. Thank you for your assistance.

DOCUMENT
FOLDER

Sincerely,

Enclosures

cc: Donna Bell
Linda Pereira

94

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

Donna Bell

v.

Philadelphia Gas Works

:
:
:
:
:

Docket No. C - 20027507

RECEIVED

JUL 15 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE
BUREAU

Answer Of 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, *nunc pro tunc*, as PGW had not responded within the twenty (20) days prescribed in 52 Pa. Code §5.61. PGW did not have record of having been served with the Complainant. After receiving an additional copy of the complainant for the Office of the Administrative Law Judge, PGW investigated and files this Answer. PGW respectfully requests that this Answer be admitted into the record of this proceeding and the averments contained in Paragraphs 3 and 4 of the Complainant are denied as pled herein. PGW hereby avers the following:

1. Admitted.
2. Admitted.
3. Denied. PGW denies the averments in Paragraph concerning the accuracy of the Complainant's bill and the usage at the service address. PGW records indicate that the Complainant began service as the service address on 6/12/01. There is an automatic meter reading device ("AMR") in service address and bills are generated based upon actual usage as shown listing of bills and payments which is attached hereto as Exhibit "A".
The current account balance for service up to 6/12/02 is \$610.00.
4. The averments in Paragraph 4 of the Complaint are requests for relief to which no response is required. PGW therefore denies the averments in Paragraph 4.

DOCUMENT
FOLDER

DOCKETED

JUL 17 2002

BILLS FROM 01/01/1996 TO 07/15/2002

Account #: 97398473

Customer Name: BELL, DONNA M

Customer Address: 1833 N 52ND ST, 1F/PHILA, PA

Bill Cycle: 10

BILLS

Service Agreement ID	Meter #	Bill Start Date	Bill End Date	Bill Due Date	Meter Read Start	Meter Read End	Usage (CCF)	Read Code	Bill Amount	Bill Cancelled	Closing Bill	CRP Monthly Amount	Easyway Current Month	Easyway Curr Amt	Days
132323177	1565264	05/13/2002	06/12/2002	07/10/2002	2345	2376	31	Regular	\$41.83	No	No	\$0.00	0	\$0.00	30
132323177	1565264	04/12/2002	05/13/2002	06/10/2002	2316	2345	29	Regular	\$39.01	No	No	\$0.00	0	\$0.00	31
132323177	1565264	03/13/2002	04/12/2002	05/09/2002	2223	2316	93	Regular	\$92.10	No	No	\$0.00	0	\$0.00	30
132323177	1565264	02/12/2002	03/13/2002	04/10/2002	2055	2223	168	Regular	\$169.95	No	No	\$0.00	0	\$0.00	29
132323177	1565264	01/14/2002	02/12/2002	03/12/2002	1877	2055	178	Regular	\$190.76	No	No	\$0.00	0	\$0.00	29
132323177	1565264	12/12/2001	01/14/2002	02/11/2002	1674	1877	203	Regular	\$215.86	No	No	\$0.00	0	\$0.00	33
132323177	1565264	11/13/2001	12/12/2001	01/11/2002	1603	1674	71	Regular	\$88.47	No	No	\$0.00	0	\$0.00	29
132323177	1565264	10/15/2001	11/13/2001	12/11/2001	1528	1603	75	Regular	\$96.63	No	No	\$0.00	0	\$0.00	29
132323177	1565264	09/13/2001	10/15/2001	11/09/2001	1490	1528	38	Regular	\$53.65	No	No	\$0.00	0	\$0.00	32
132323177	1565264	08/14/2001	09/13/2001	10/10/2001	1470	1490	20	Regular	\$36.27	No	No	\$0.00	0	\$0.00	30
132323177	1565264	07/16/2001	08/14/2001	09/11/2001	1451	1470	19	Regular	\$36.94	No	No	\$0.00	0	\$0.00	29
132323177	1565264	06/12/2001	07/16/2001	08/10/2001	1428	1451	23	Regular	\$42.27	No	No	\$0.00	0	\$0.00	34

PAYMENTS FROM 01/01/1996 TO 07/15/2002

Account #: 97398473

Customer Name: BELL, DONNA M

Customer Address: 1833 N 52ND ST, 1F/PHILA, PA

Bill Cycle: 10

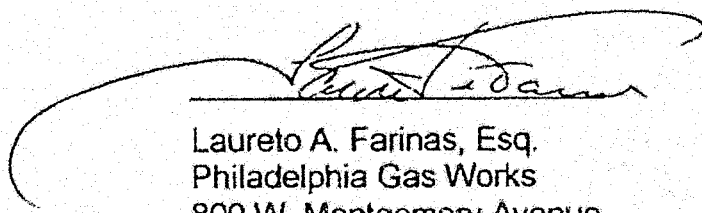
PAYMENTS

Service Agreement ID	Pay Amount	Pay Date	Pay Status	Late Pay Charge	Utility Type	Grant Type	Pay Source Code
132323177	\$162.33	07/11/2002	F	\$10.50	G		PPC
132323177	\$153.47	06/03/2002	F	\$0.00	G		PPC
132323177	\$50.00	03/27/2002	F	\$9.57	G		REM
132323177	\$53.85	12/05/2001	F	\$0.57	G		REM
132323177	\$36.73	11/02/2001	F	\$0.45	G		REM
132323177	\$36.94	09/20/2001	F	\$0.46	G		REM
132323177	\$42.27	08/10/2001	F	\$0.00	G		PPC

Wherefore, PGW respectfully requests that this Commission find in favor of PGW and dismiss the instant complaint.

Respectfully submitted,

July 15, 2002

A handwritten signature in black ink, appearing to read "Laureto A. Farinas", is written over a horizontal line. The signature is stylized and cursive.

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

EXHIBIT A

RECEIVED

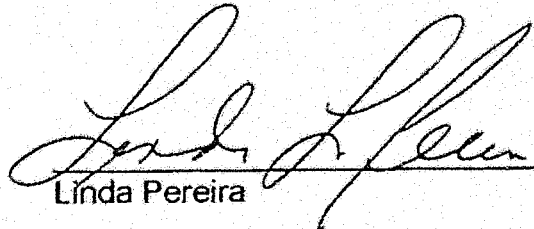
JUL 15 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VERIFICATION

I, Linda Pereira, hereby declare that I am a Customer Review Officer with 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 Response are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18. Pa. C.S. §4904, pertaining to false statements to authorities.

Date: July 15, 2002


Linda Pereira

CERTIFICATE OF SERVICE

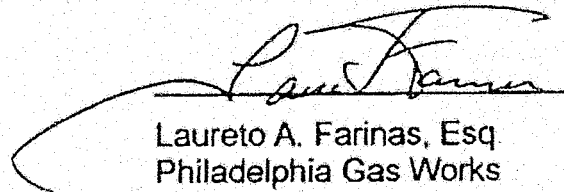
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

Donna M. Bell
1833-A N. 52nd Street
Philadelphia, PA 19131

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

July 15, 2002



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

RECEIVED

JUL 15 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU