

DOCKET NO.: C-20031077  
RESPONDENT OR APPLICANT: GASCO DISTRIBUTION SYSTEMS INC.  
PARTY OR COMPLAINANT: RICHTER, FRED L.

ENTRY TYPE	DATE	BUREAU	PERSONNEL
1 N	08/18/03	SEC	HENRYJAMIE
FORMAL COMPLAINT OF FRED L. RICHTER VS. GASCO DISTRIBUTION SYSTEMS, INC.			
2 N	08/29/03	SEC	HENRYJAMIE
NOTICE OF COMPLAINT SENT TO RESPONDENT FOR ANSWER IN 20 DAYS			
3 N	01/08/04	SEC	FRISCIA
SEE C-20039507 FOR OALJ NOTICE ADV PRESIDING OFFICER FOR CASE IS ALJ GESOFF			
4 N	02/24/04	SEC	WILLIAMSDONNA
OCA FLD ANSWER TO GASCO AMENDED MOT TO CONSOLIDATE & EXT OF TIME TO ANSWER W/C			
5 N	03/03/04	SEC	FRISCIA
ALJ GESOFF 1ST INTERIM ORDER CONSOLIDATING C-20039507 W/C-20031077 ET AL ISSUED			
6 N	03/03/04	SEC	FRISCIA
SEE C-20039507 FOR VARIOUS DOCUMENTS			
7 N	02/19/04	SEC	MOTTER
RESP FLD AMENDED MOT TO CONSOL C-20031077 ET AL W/9507 & FOR EXT TO ANSWER			
8 N	01/13/05	SEC	JACOBDIANE
ALJ GESOFF'S RECOMMENDED DECISION SERVED TO PARTIES			
9 N	01/13/05	SEC	JACOBDIANE
SEE C-20039507 FOR EXCEPTIONS & REPLY EXCEPTIONS			
10 N	01/18/05	SEC	ZEIDERS
SEE C-20039507 FOR OCA LTR ADV WILL NOT BE FILING EXCEPTIONS W/CERT SVC			

CAPTION SHEET

CASE MANAGEMENT SYSTEM

- 1. REPORT DATE: 00/00/00
- 2. BUREAU: ALJ
- 3. SECTION(S):
- 5. APPROVED BY: DIRECTOR: SUPERVISOR:
- 6. PERSON IN CHARGE:
- 8. DOCKET NO: C-20031077
- 4. PUBLIC MEETING DATE: 00/00/00
- 7. DATE FILED: 08/18/03
- 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: RICHTER, FRED L.

RESPONDENT/APPLICANT: GASCO DISTRIBUTION SYSTEMS INC.

COMP/APP COUNTY: MCKEAN

UTILITY CODE: 120002

ALLEGATION OR SUBJECT

COMPLAINANT STATES THE COMPLAINT IS THE NEW RATE INCREASE THAT SHOULD NOT BE ALLOWED. HE WANTS THE PUC TO REFUSE THIS RATE INCREASE REQUEST.

**DOCKETED**  
AUG 28 2003

DOCUMENT  
FOLDER

ORIGINAL

Pennsylvania Public Utility Commission

SECT. 1  
BUREAU

2003 JUN 18 11 09:42

REC-110

Formal Complaint Form

Please Print.

C-20031077

1. Your name, mailing address and telephone number.

Name FRED L. Richter

Street/P.O.Box 90 CHURCH ST. - KUSHKUGA Apt

#

City Kane State PA Zip 6735-4922

County McKean Area Code/Home Phone 814-778-6174

Area Code/Work Phone RETIRED

2. Name of company your complaint concerns:

GASCO

3. What is your complaint? (Use additional paper if need more space).

New RATE INCREASE should NOT be allowed,

4. What do you want the Public Utility Commission to do about your complaint?

(Use additional paper if need more space).

Refuse RATE Request INCREASE by GASCO.

5. You must sign and date your complaint below.

The information I have placed on this form is true and correct to the best

of my

knowledge. I understand that I could be punished under Pennsylvania  
State Law

if I purposely give false information.

*Frank L. Richter*

*August 14, 2003*

Signature

Date

Continued on next page

6. If you are represented by a lawyer you must provide your lawyer's name,  
address and telephone number.

Lawyer's  
Name \_\_\_\_\_

Street  
\_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_

Zip \_\_\_\_\_

Area Code/Phone Number  
\_\_\_\_\_

Mail to:

Secretary

Pennsylvania Public Utility Commission

P. O. Box 3265

Harrisburg, PA 17105-3265

For more information, please contact the Secretary's Bureau at  
717-772-7777.

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: AUGUST 29, 2003

C-20031077

GASCO DISTRIBUTION SYSTEMS INC  
4435 EAST PIKE  
ZANESVILLE OH 43701

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by FRED L. RICHTER. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

DOCUMENT  
FOLDER

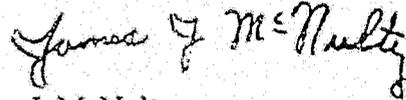
AUGUST 29, 2003

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



James J. McNulty  
Secretary

JH

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: AUGUST 29, 2003

FRED L. RICHTER  
Complainant

VS.

GASCO DISTRIBUTION SYSTEMS, INC.  
Respondent

Complaint Docket  
No: C-20031077

DOCUMENT  
FOLDER  
**DOCKETED**  
AUG 28 2003

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

---

TO: GASCO DISTRIBUTION SYSTEMS, INC.

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

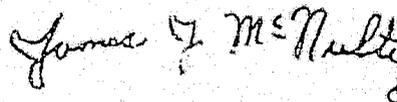
1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



James J. McNulty  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

**ORIGINAL**

**LEBOEUF, LAMB, GREENE & MACRAE  
L.L.P.**

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATION S

NEW YORK  
WASHINGTON, DC  
ALBANY  
BOSTON  
DENVER  
HARRISBURG  
HARTFORD  
HOUSTON  
JACKSONVILLE  
LOS ANGELES  
NEWARK  
PITTSBURGH  
SALT LAKE CITY  
SAN FRANCISCO

200 NORTH THIRD STREET  
SUITE 300  
P.O. Box 12105  
HARRISBURG, PA 17108-2105  
1717) 232-6199  
FACSIMILE (717) 232-8720  
E-MAIL ADDRESS: EDWARD LANZA@LGM.COM

LONDON  
IA LONDON BASED  
MULTINATIONAL PARTNERSHIP  
PARIS  
BRUSSELS  
JOHANNESBURG  
(PTY) LTD.  
MOSCOW  
RIYADH  
(AFFILIATED OFFICE)  
TASHKENT  
BISHKEK  
ALMATY  
BEIJING

**DOCUMENT  
FOLDER**

February 19, 2004

**BY HAND**

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17101-3265

*C-20031077*

SECRETARY'S BUREAU

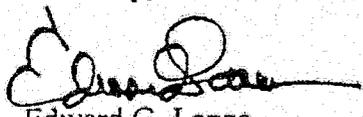
2004 FEB 19 PM 2:21

RECEIVED

Re: Irwin Popowsky, et al. v. Gasco Distribution Systems, Inc.  
Docket No. C-20039507, et al.

Dear Mr. McNulty:

Enclosed please find an original and three (3) copies of the Respondent's Amended Motion to Consolidate and For Extension of Time to Answer of Gasco Distribution Systems, Inc. ("Gasco") in the above referenced-matter. A Notice to Plead and a Certificate of Service are also enclosed.

Sincerely,  
  
Edward G. Lanza  
Counsel for Gasco

*RJP*

Enclosures

cc: All Parties on Certificate of Service  
Hon. Larry Gesoff, ALJ  
Fred A. Steele

*114*

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

	:	Docket No.	
Irwin A. Popowsky, Consumer Advocate,	:	C-20039507	
Carolyn J. Verolini,	:	C-20039508	
Karen Stebbins,	:	C-20039509	
Victoria L. Lantz,	:	C-20039510	
Brian K. Smith,	:	C-20039516	
Scott and Mary Smith,	:	C-20039517	
Mary Kay and James E. Peters,	:	C-20039518	
Carolyn K. Yetto,	:	C-20039532	
Winnifred L. Roesch,	:	C-20039533	
Nina J. Nojar,	:	C-20039534	
Geraldine Madison,	:	C-20039536	
Michael T. and Deborah K. Timblin,	:	C-20039537	
John and Karen Lawton,	:	C-20039538	
Jean Polehonki,	:	C-20039540	
Charles W. Cook,	:	C-20039541	
Joseph and Margaret Segulin,	:	C-20039542	
Dennis and Linda Forquer,	:	C-20039548	
Wayne E. Schmidt,	:	C-20039549	
Albert and Karen Bokma,	:	C-20039550	
Evert Vanestrom,	:	C-20039554	
Gloria Dowell,	:	C-20039555	
Donald J. Blair, Sr.	:	C-20039556	
Nancy McCanna,	:	C-20039573	
Ellsworth A. Smith,	:	C-20039590	
Mary N. Housler-Slocum,	:	C-20039591	
Stephanie L. Dolan,	:	C-20039592	
Genevieve A. Carlson	:	C-20039685	
Russell L. Swanson	:	C-20039767	
Sherman Keller	:	C-20039768	
Joseph & Margaret Segulin,	:	C-20031067	
Winfred L. Edinger,	:	C-20031068	
Betty Lyle,	:	C-20031069	
Tammy Alexis,	:	C-20031070	
Harry Reinard,	:	C-20031071	
Robert L. McClain,	:	C-20031072	
Lawrence A. Ross,	:	C-20031073	
Joseph S. Groves,	:	C-20031074	
Geraldine Nunn,	:	C-20031075	
Anthony Zippo,	:	C-20031076	
Fred L. Richter,	:	C-20031077	
Arthur A. Paulson, Jr.,	:	C-20031078	
Chantel Armstrong,	:	C-20031079	
Connie Packard,	:	C-20031080	

SECRETARY'S OFFICE

FEB 19 PM 2:21

RECEIVED

Isabel Chrisman,	:	C-20031081
Barbara A. Overbeck,	:	C-20031082
Irwin A. Popowsky, Consumer Advocate,	:	C-20031083
Martha Buhl,	:	C-20031086
Shirley Howard,	:	C-20031092
Sarah Sanders,	:	C-20031093
Winnifred L. Roesch,	:	C-20031094
Norma Armour,	:	C-20031095
Mary Carrow,	:	C-20031096
Wayne F. Schmidt,	:	C-20031097
Quinten C. Johnson,	:	C-20031098
William D. Swartzfager,	:	C-20031099
Charles W. Cook,	:	C-20031100
Kane Borough,	:	C-20031101
Gloria Dowell,	:	C-20031102
Nina J. Nogar,	:	C-20031103
Kay L. Copley,	:	C-20031104
Lars & Karen Olsson,	:	C-20031105
Scott & Mary Smith,	:	C-20031106
Rodney G. Peterson,	:	C-20031118
Grace M. Runyan,	:	C-20031119
Clyde W. Anderson,	:	C-20031120
Bernadine Swanson,	:	C-20031134
Jack Safreed,	:	C-20031140
Gary Leonard,	:	C-20031141
Martha Jerman,	:	C-20031142
Thomas & Mary Ann Vantine,	:	C-20031147
Kevin L. Ott,	:	C-20031148
James B. Ewing,	:	C-20031154
Mildred L. Smith,	:	C-20031161
Hazel Walton,	:	C-20031163
Alberta Barbour,	:	C-20031167
Gerald Rook,	:	C-20031168
Doris Swanson,	:	C-20031169
James E. Snyder,	:	C-20031170
Daniel J. Rook,	:	C-20031171
Thomas R. Rook,	:	C-20031172
Gerrod Willover	:	C-20031173
Virginia McCullough,	:	C-20031174
Audrey Troutman,	:	C-20031175
David W. Lawson,	:	C-20031176
L. Sherwood Anderson,	:	C-20031177
Robert Fiscus,	:	C-20031178
Dan Michael Burggraf,	:	C-20031179
Amy Hulings,	:	C-20031180
Harry Hulings,	:	C-20031181

Dorris Grolmund,	:	C-20031182
Walter S. Seth,	:	C-20031238
Eugene Walker,	:	C-20031248
Carolyn Ingersoll,	:	C-20031257
Steven E. Rose,	:	C-20031710
Ronald E. Royer,	:	Z-01150834
	:	
v.	:	
	:	
Gasco Distribution Systems, Inc.	:	

---

**NOTICE TO PLEAD**

---

To: All Parties on Certificate of Service

You are hereby notified to file a written response to the attached Amended Motion to Consolidate and for Extension of Time to Answer within ten (10) days from the date of service hereof in accordance with 52 Pa. Code § 5.103(c). Failure to file a response may result in a decision on the motion being entered against you.



Edward G. Lanza, Esquire  
 LeBoeuf, Lamb, Greene & MacRae, L.L.P.  
 200 North Third Street, Suite 300  
 Harrisburg, PA 17108-2105  
 (717) 232-8199  
 Fax: (717) 232-8720

**Counsel for Respondent  
 Gasco Distribution Systems, Inc.**

Dated: February 19, 2004

SECRETARY'S BUREAU

2004 FEB 19 PM 2:21

RECEIVED

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Irwin A. Popowsky, Consumer Advocate,	:	Docket No.	C-20039507
Carolyn J. Verolini,	:		C-20039508
Karen Stebbins,	:		C-20039509
Victoria L. Lantz,	:		C-20039510
Brian K. Smith,	:		C-20039516
Scott and Mary Smith,	:		C-20039517
Mary Kay and James E. Peters,	:		C-20039518
Carolyn K. Yetto,	:		C-20039532
Winnifred L. Roesch,	:		C-20039533
Nina J. Nojar,	:		C-20039534
Geraldine Madison,	:		C-20039536
Michael T. and Deborah K. Timblin,	:		C-20039537
John and Karen Lawton,	:		C-20039538
Jean Polehonki,	:		C-20039540
Charles W. Cook,	:		C-20039541
Joseph and Margaret Segulin,	:		C-20039542
Dennis and Linda Forquer,	:		C-20039548
Wayne E. Schmidt,	:		C-20039549
Albert and Karen Bokma,	:		C-20039550
Evert Vanestrom,	:		C-20039554
Gloria Dowell,	:		C-20039555
Donald J. Blair, Sr.	:		C-20039556
Nancy McCanna,	:		C-20039573
Ellsworth A. Smith,	:		C-20039590
Mary N. Housler-Slocum,	:		C-20039591
Stephanie L. Dolan,	:		C-20039592
Genevieve A. Carlson	:		C-20039685
Russell L. Swanson	:		C-20039767
Sherman Keller	:		C-20039768
Joseph & Margaret Segulin,	:		C-20031067
Winifred L. Edinger,	:		C-20031068
Betty Lyle,	:		C-20031069
Tammy Alexis,	:		C-20031070
Harry Reinard,	:		C-20031071
Robert L. McClain,	:		C-20031072
Lawrence A. Ross,	:		C-20031073
Joseph S. Groves,	:		C-20031074
Geraldine Nunn,	:		C-20031075
Anthony Zippo,	:		C-20031076
Fred L. Richter,	:		C-20031077
Arthur A. Paulson, Jr.,	:		C-20031078
Chantel Armstrong,	:		C-20031079
Connie Packard,	:		C-20031080

Isabel Chrisman,	:	C-20031081
Barbara A. Overbeck,	:	C-20031082
Irwin A. Popowsky, Consumer Advocate,	:	C-20031083
Martha Buhl,	:	C-20031086
Shirley Howard,	:	C-20031092
Sarah Sanders,	:	C-20031093
Winnifred L. Roesch,	:	C-20031094
Norma Armour,	:	C-20031095
Mary Carrow,	:	C-20031096
Wayne E. Schmidt,	:	C-20031097
Quinten C. Johnson,	:	C-20031098
William D. Swartzfager,	:	C-20031099
Charles W. Cook,	:	C-20031100
Kane Borough,	:	C-20031101
Gloria Dowell,	:	C-20031102
Nina J. Nogar,	:	C-20031103
Kay L. Copley,	:	C-20031104
Lars & Karen Olsson,	:	C-20031105
Scott & Mary Smith,	:	C-20031106
Rodney G. Peterson,	:	C-20031118
Grace M. Runyan,	:	C-20031119
Clyde W. Anderson,	:	C-20031120
Bernadine Swanson,	:	C-20031134
Jack Safreed,	:	C-20031140
Gary Leonard,	:	C-20031141
Martha Jerman,	:	C-20031142
Thomas & Mary Ann Vantine,	:	C-20031147
Kevin L. Ott,	:	C-20031148
James B. Ewing,	:	C-20031154
Mildred L. Smith,	:	C-20031161
Hazel Walton,	:	C-20031163
Alberta Barbour,	:	C-20031167
Gerald Rook,	:	C-20031168
Doris Swanson,	:	C-20031169
James E. Snyder,	:	C-20031170
Daniel J. Rook,	:	C-20031171
Thomas R. Rook,	:	C-20031172
Gerrod Willover	:	C-20031173
Virginia McCullough,	:	C-20031174
Audrey Troutman,	:	C-20031175
David W. Lawson,	:	C-20031176
L. Sherwood Anderson,	:	C-20031177
Robert Fiscus,	:	C-20031178
Dan Michael Burggraf,	:	C-20031179
Amy Hulings,	:	C-20031180
Harry Hulings,	:	C-20031181

Dorris Grolemond,	:	C-20031182
Walter S. Seth,	:	C-20031238
Eugene Walker,	:	C-20031248
Carolyn Ingersoll,	:	C-20031257
Steven E. Rose,	:	C-20031710
Ronald E. Royer,	:	Z-01150834
	:	
	:	
v.	:	
	:	
Gasco Distribution Systems, Inc.	:	

**DOCKETED**  
JUL 20 2004

---

**RESPONDENT'S AMENDED MOTION TO CONSOLIDATE  
AND FOR AN EXTENSION OF TIME TO ANSWER**

---

Pursuant to 52 Pa. Code §§ 5.81 and 1.15, Gasco Distribution Systems, Inc. ("Gasco"), hereby files a Motion to Consolidate a number of Formal Complaints before the Public Utility Commission ("Commission") for disposition and for an extension of time to answer the Formal Complaints. In support thereof, Gasco respectfully avers as follows:

1. Beginning on or about February 27, 2003, Respondent Gasco has been served with approximately ninety-five (95) Formal Complaints filed by customers in its Kane Division. A listing of the Formal Complaints received by Gasco thus far and sorted by PUC Docket Number is attached as Appendix A.

2. The Formal Complaints received by Gasco set forth allegations regarding the level of Gasco's rates for gas service in Kane and the change in the Gas Cost Rate (GCR) proposed by the company in its filings of February 1, 2003 at Docket No. M-000021629 and August 1, 2003 at Docket No. M-00031722. Although a few of these complaints also mention other perceived problems with Gasco's service, the allegations concerning the level of rates is the one common complaint running through all the filings.

**DOCUMENT  
FOLDER**

3. The Commission's regulations authorize the presiding officer to order proceedings involving a common question of law or fact to be consolidated. The regulation further provides that the presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay. 52 Pa. Code §5.81

4. All the Formal Complaints listed in the attached Appendix A present identical factual issues and common questions of law.

5. Because of the volume of complaints, requiring Gasco to file individual answers to each Formal Complaint listed in Appendix A would create a burdensome and costly obligation for Gasco. Consolidation of the referenced matters would avoid unnecessary costs and delay.

6. Gasco anticipates that more Formal Complaints similar to the cases listed in Appendix A may be filed by other customers who may have similar complaints regarding Gasco's rates.

7. Because of the identical nature of the different Formal Complaints filed to date, Gasco respectfully submits that the Formal Complaints that have been filed, or may be filed with the Commission in the future, should be consolidated into one proceeding.

8. Further, Gasco respectfully submits that, to avoid numerous and duplicative responses to pleadings, Gasco should be allowed to file one Answer to all the Formal Complaints once customers have been given an opportunity to file Formal Complaints in connection with the company's February 1, 2003 and August 1, 2003 GCR filings.

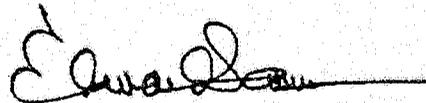
9. Gasco respectfully requests that the Commission establish a procedural schedule that contemplates a consolidated proceeding for purposes of litigation, hearings and

disposition of the captioned Formal Complaints. At the present time, Gasco and the Office of Consumer Advocate ("OCA") are engaged in discovery and intend to enter into settlement negotiations following an initial exchange of interrogatories.

10. Undersigned counsel has sought and received consent from the OCA to delay the filing of answers to the captioned Formal Complaints pending resolution of this motion. Further, the OCA does not object to the consolidation of these matters.

WHEREFORE, Gasco respectfully requests that the Commission grant this Motion to Consolidate and extend the time to answer the Formal Complaints by thirty (30) days from the date of the Commission's Order on this Motion and for such other relief as the Commission may deem just and proper.

Respectfully Submitted,



Edward G. Lanza, Esquire  
LeBoeuf, Lamb, Greene & MacRae, LLP  
200 North Third Street, Suite 300  
Harrisburg, PA 17108-2105  
(717) 232-8199

Counsel for Respondent  
Gasco Distribution Systems, Inc.

Date: February 19, 2004

RECEIVED  
2004 FEB 19 PM 2:21  
SECRETARY'S BUREAU

**Formal Complaint List**  
**GCR Complaints vs. Gasco Distribution Systems, Inc.**  
**Docket No. C-20039507, et al.**

Docket No.	Complainant's Name	Filed	Issues Raised
C-20039507	Irwin A. Popowsky, Office of Consumer Advocate	02/11/03	Increase in rates
C-20039508	Carolyn J. Verolini	02/20/03	Elderly couple living on fixed income cannot afford the size of the gas raise proposed.
C-20039509	Karen Stebbins	02/20/03	Unfair raise increase. 15% to 25% is not fair when others are raising their rate 8%.
C-20039510	Victoria L. Lantz	02/20/03	After a forced cut they are asking for a raise out of reason.
C-20039516	Brian K. Smith	02/10/03	Size of increase they want to charge.
C-20039517	Scott and Mary Smith	02/10/03	Size of the rate increase.
C-20039518	Mary Kay and James E. Peters	02/10/03	They are applying far over a 15% increase.
C-20039532	Carolyn K. Yetto	02/13/03	Rate increase proposed by Gasco.
C-20039533	Winnifred L. Roesch	02/13/03	26% rate increase.
C-20039534	Nina J. Nojar	02/20/03	They have requested a 15% to 25% increase while other companies have asked for 8 1/2% increase.
C-20039536	Geraldine Madison	02/21/03	Cost for gas is much to high.
C-20039537	Michael T. and Deborah K. Timblin	02/24/03	15% - 25% rate increase.
C-20039538	John and Karen Lawton	02/24/03	Want to know why Gasco wants a 26% rate change when other gas companies are raising only 8%.
C-20039540	Jean Polehonki	02/14/03	Rate increase.
C-20039541	Charles W. Cook	02/24/03	The 26% rate increase these people are trying to get.
C-20039542	Joseph and Margaret Segulin	02/24/03	Size of increase Gasco is requesting.
C-20039548	Dennis and Linda Forquer	02/24/03	Had problems with Gasco last year for over charging for gas. They still owe us money. They want to raise rates 26%.
C-20039549	Wayne E. Schmidt	02/24/03	They want to raise rates 15% - 25%.
C-20039550	Albert and Karen Bokma	02/21/03	Gasco is asking for a 16% increase.
C-20039554	Evert Vanerstrom	02/14/03	Rate increase.
C-20039555	Gloria Dowell	2/28/03	The price of gas is being rates to 15%.
C-20039556	Donald J. Blair, Sr.	03/05/03	Increase in gas price.
C-20039573	Nancy McCanna	02/26/03	Gasco should not get to higher the gas rates as they are too high now.
C-20039590	Ellsworth A. Smith	02/27/03	The size of increase Gasco has requested from the PUC.

Docket No.	Complainant's Name	Filed	Issues Raised
C-20039591	Mary N. Housler-Slocum	02/27/03	Rates are too high.
C-20039592	Stephanie L. Dolan	02/27/03	Gasco paid us back dues then raise the price of gas. Never received a new gas bill.
C 20039685	Genevieve A. Carlson	03/07/03	Raising the gas price when they are getting more than other gas companies.
C-20039767	Russell L. Swanson	03/17/03	Why do rates have to be raised so much?
C-20039768	Sherman Keller	03/17/03	Feels the increase is way to high. Just got over filing a complaint about the extremely high cost of gas. Why is Gasco proposing another increase?
C-20031067	Joseph & Margaret Segulin	08/04/03	Rate increase higher than NFG.
C-20031068	Winifred L. Edinger	08/06/03	Proposed rate increase of 41%.
C-20031069	Betty Lyle	08/04/03	Rate increase of 40% way too much.
C-20031070	Tammy Alexis	08/04/03	Gasco wants to raise their prices again.
C-20031071	Harry Reinard	08/04/03	The percent they are raising the gas. Leak repair and quality of gas.
C-20031072	Robert L. McClain	08/04/03	Rates too high.
C-20031073	Lawrence A. Ross	08/03/03	Gas rate increase.
C-20031074	Joseph S. Groves	08/03/03	Excessive rate increases and overcharging customers.
C 20031075	Geraldine Nunn	08/18/03	Does not want such a large increase on gas bill. Cannot afford it.
C-20031076	Anthony Zippo	08/18/03	Budget increase was \$41 per month - from \$50 to \$91.
C-20031077	Fred L. Richter	08/18/03	New rate increase should not be allowed.
C-20031078	Arthur A. Paulson, Jr.	08/06/03	Rate increase they are asking for is very unfair.
C-20031079	Chantel Armstrong	08/07/03	Excessive rate increase for MCF's and rate structure.
C-20031080	Connie Packard	08/08/03	Excessive rate increase by MCF in rate structure.
C-20031081	Isabel Chrisman	08/08/03	Rates are high enough. Rates going higher.
C-20031082	Barbara A. Overbeck	08/11/03	Price rate is going to be too high.
C-20031083	Office of Consumer Advocate	08/14/03	Rate increase.
C-20031086	Martha Buhl	08/11/03	Objecting to rate increase.
C-20031092	Shirley Howard	08/11/03	Objecting to rate increase.
C-20031093	Sarah Sanders	08/11/03	Objecting to rate increase.
C-20031094	Winnifred L. Roesch	08/11/03	Increase they are asking for is too high.
C-20031095	Norma Armour	08/11/03	High + raising rates.
C-20031096	Mary Carrow	08/11/03	Rate raise too high.
C-20031097	Wayne E. Schmidt	08/11/03	Rate increase is too much.
C-20031098	Quinten C. Johnson	08/11/03	Raise in gas bill is not necessary.

Docket No.	Complainant's Name	Filed	Issues Raised
C-20031099	William D. Swartzfager	08/13/03	40% percent rate increase too extreme.
C-20031100	Charles W. Cook	08/13/03	The exorbitant rate increase requested.
C-20031101	Kane Borough	08/14/03	Rate increase. Unclear rate structure. Mistakes in budget billing.
C-20031102	Gloria Dowell	08/21/03	Raising gas price so high.
C-20031103	Nina J. Nogar	08/18/03	Upcoming rate increase is between 42% and 65% too excessive.
C-20031104	Kay L. Copley	08/13/03	Increase in gas price.
C-20031105	Lars & Karen Olsson	08/21/03	Raising gas bill more than is reasonable.
C-20031106	Scott & Mary Smith	08/13/03	Increasing rates 45% -65%.
C-20021118	Rodney G. Peterson	08/27/03	The constant gas price increases.
C-20031119	Grace M. Runyan	08/25/03	Rate increase they overcharge customers. Unclear bill.
C-20031120	Clyde W. Anderson	08/22/03	Rate increase.
C-20031134	Bernadine Swanson	08/29/03	Increase in rates.
C-20031140	Jack Safreed	08/29/03	Rates much too high.
C-20031141	Gary Leonard	08/29/03	42% rate increase.
C-20031142	Martha Jerman	09/02/03	Can't afford higher gas bills.
C-20031147	Thomas & Mary Ann Vantine	09/02/03	Rate increase of 40%.
C-20031148	Kevin L. Ott	09/02/03	Raising gas rates.
C-20031154	James B. Ewing	09/02/03	Rate increase.
C-20031161	Mildred L. Smith	09/04/03	Gas is too high.
C-20031163	Hazel Walton	09/04/03	Lower gas rate.
C-20031167	Alberta Barbour	09/04/03	Rate increase.
C-20031168	Gerald Rook	09/04/03	Rate increase of 41%.
C-20031169	Doris Swanson	09/04/03	Bills are high enough.
C-20031170	James E. Snyder	09/04/03	Rate increase of 41%.
C-20031171	Daniel J. Rook	09/04/03	Rate increase of 41%.
C-20031172	Thomas R. Rook	09/04/03	Rate increase of 41%.
C-20031173	Gerrod Willover	09/05/03	Gas is high enough.
C-20031174	Virginia Mccullough	09/05/03	Rate increase.
C-20031175	Audrey Troutman	09/05/03	Rate increase.
C-20031176	David E. Lawson	09/05/03	Rate increase, furnace blowing cold air, problem with late fee charge, credit amount received last year wasn't enough to compensate for 1 month.
C-20031177	L. Sherwood Anderson	09/08/03	Opposed to increase in gas rate.
C-20031178	Robert Fiscus	09/08/03	Price for gas is too high.
C-20031179	Dan Michael Burggraf	09/08/03	Gas rates too high. Lost 2 payment checks.
C-20031180	Amy Hulings	09/08/03	High bills. Payment arrangements are more than they can afford.
C-20031181	Harry Hulings	09/08/03	Rates are too high.

Docket No.	Complainant's Name	Filed	Issues Raised
C-20031182	Dorris Grolemond	09/08/03	Increase in rates.
C-20031238	Walter S. Seth	09/11/03	Rate increase of 50% is extreme. Bill for 25 MCF will rise by \$92.
C-20031248	Eugene Walker	09/12/03	Increase in their rate of 52% is way out of line.
C-20031257	Carolyn Ingersoll	09/13/03	Don't see need for such a large increase.
C-20031710	Steven E. Rose	10/27/03	Gasco can't justify raising the price of natural gas.
Z-01150834	Ronald E. Royer	02/26/03	Does not dispute bill but is disputing that gas service was terminated many months ago, 05-02 and that Gasco has failed to inform you. Also, gas leaking from meter in front of house for at least 3-4 mos.

40265

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

---

CERTIFICATE OF SERVICE

---

RECEIVED  
2004 FEB 19 PM 2:21  
SECRETARY'S BUREAU

I hereby certify that I have, on this date, served a true and correct copy of the foregoing documents upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Irwin A. Popowsky, Esquire  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, PA 17101-1923

Carolyn J. Verolini  
1387 Kushequa Avenue  
Kane, PA 16735

Karen Stebbins  
P.O. Box 119  
Hazel Hurst, PA 16733

Victor L. Lantz  
P.O. Box 27  
Mt. Jewett, PA 16740

Brian K. Smith  
7 Boyd Street  
P.O. Box 313  
Mt. Jewett, PA 16740

Scott and Mary Smith  
3 Poplar Street  
P.O. Box 306  
Mt. Jewett, PA 16740

Mary Kay and James E. Peters  
P.O. Box 251  
Mt. Jewett, PA 16740

Carolyn K. Yetto  
730 Welsh Street  
Kane, PA 16735

Winnifred L. Roesch  
28 Kushequa Avenue  
P.O. Box 387  
Mt. Jewett, PA 16740

Nina J. Nogar  
P.O. Box 197  
Hazel Hurst, PA 16733

Geraldine Madison  
P.O. Box 17  
Hazel Hurst, PA 16733

Michael & Deborah Timblin  
376 Main Street  
P.O. Box 63  
Hazel Hurst, PA 16733

John and Karen Lawton  
13 Gallup Avenue  
P.O. Box 70  
Mt. Jewett, PA 16740

Charles W. Cook  
P.O. Box 386  
Mt. Jewett, PA 16740

Dennis and Linda Forquer  
66 Brier Lane  
Kane, PA 16735

Albert and Karen Bokma  
230 Ash Street  
Kane, PA 16735

Gloria Dowell  
P.O. Box 31  
Hazel Hurst, PA 16733

Nancy McCanna  
7 Gallup Avenue  
P.O. Box 536  
Mt. Jewett, PA 16740

Mrs. Mary N. Housler-Slocum  
9605 Route 6  
Kane, PA 16735

Genevieve A. Carlson  
112 Brickwork Road  
Kane, PA 16735

Sherman Keller  
4 Bridge Street  
P.O. Box 327  
Mt. Jewett, PA 16740

Jean Polehonki  
3079 Route 219  
Kane, PA 16735

Joseph and Margaret Segulin  
P.O. Box 508  
Mt. Jewett, PA 16740

Wayne E. Schmidt  
P.O. Box 237  
Hazel Hurst, PA 16733

Evert Vanerstrom  
116 Hemlock Avenue  
Kane, PA 16735

Donald J. Blair, Sr.  
P.O. Box 667  
Mt. Jewett, PA 16740

Ellsworth A. Smith  
P.O. Box 334  
Mt. Jewett, PA 16740

Stephanie L. Dolan  
P.O. Box 225  
Kane, PA 16735

Russell L. Swanson  
23 Anderson Street  
P.O. Box 202  
Mt. Jewett, PA 16740

Winifred L. Edinger  
134 W. Main Street  
P.O. Box 7167  
Mt. Jewett, PA 16740

Betty Lyle  
4 Gallup Avenue  
P.O. Box 95  
Mt. Jewett, PA 16740

Harry Reinard  
23 Randall Avenue  
P.O. Box 77  
Hazel Hurst, PA 16733

Lawrence A. Ross  
1 Brennan Avenue  
Mt. Jewett, PA 16740

Geraldine Nunn  
35 Randall Avenue  
P.O. Box 59  
Hazel Hurst, PA 16733

Fred L. Richter  
90 Church Street - Kushequa  
Kane, PA 16735-4922

Chantell Armstrong  
P.O. Box 221  
Mt. Jewett, PA 16740

Isabel Chrisman  
18 Fullet Street  
P.O. Box 93  
Mt. Jewett, PA 16740-0093

Erin Gannon, Esquire  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, PA 17101-1923

Shirley Howard  
39 Midway Road  
Kane, PA 16735

Tammy Alexis  
P.O. Box 283  
Mt. Jewett, PA 16740

Robert L. McClain  
P.O. Box 108  
Hazel Hurst, PA 16733

Joseph S. Groves  
17 Boyd Street  
P.O. Box 16  
Mt. Jewett, PA 16740

Anthony Zippo  
P.O. Box 447  
Mt. Jewett, PA 16740

Arthur A. Paulson, Jr.  
1 Anderson Street  
Mt. Jewett, PA 16740

Connie Packard  
P.O. Box 235  
Mt. Jewett, PA 16740

Barbara A. Overbeck  
P.O. Box 218  
Mt. Jewett, PA 16740

Martha Buhl  
205 Poplar Street  
Kane, PA 16435

Sarah Sanders  
53 Midway Road  
Kane, PA 16735

Winnifred L. Roesch  
P.O. Box 387  
Mt. Jewett, PA 16740

Mary Carrow  
P.O. Box 123  
Mt. Jewett, PA 16740

Quinten C. Johnson  
37 N. School Street  
Hazel Hurst, PA 16733

Charles W. Cook  
P.O. Box 386  
Mt. Jewett, PA 16740

Kay L. Copley  
35 Anderson Street  
P.O. Box 98  
Mt. Jewett, PA 16740

Scott and Mary Smith  
P.O. Box 306  
Mt. Jewett, PA 16740

Grace M. Runyan  
55 Rosebud Lane  
P.O. Box 52  
Mt Jewett, PA 16740

Bernadine Swanson  
5 Oberg Avenue  
P.O. Box 208  
Mt. Jewett, PA 16740

Gary Leonard  
518 Hanes Street  
Kane, PA 16735

Thomas and Mary Ann Vantine  
216 Walnut Street  
Kane, PA 16735

Norma Armour  
12 Maple Lane  
P.O. Box 353  
Mt. Jewett, PA 16740

Wayne Schmidt  
P.O. Box 237  
Hazel Hurst, PA 16733

William D. Swartzfaer  
21 Oberg Avenue  
P.O. Box 133  
Mt. Jewett, PA 16740

Niva J. Nogar  
P.O. Box 187  
Hazel Hurst, PA 16733-0187

Lars and Karen Olsson  
P.O. Box 252  
Mt. Jewett, PA 16740

Rodney G. Peterson  
13 McClellan Avenue  
P.O. Box 65  
Mt. Jewett, PA 16740

Clyde W. Anderson  
P.O. Box 432  
Mt. Jewett, PA 16740

Jack Safreed  
14 Oberg Avenue  
P.O. Box 7135  
Mt. Jewett, PA 16740

Martha Jerman  
118 Hemlock Avenue  
Kane, PA 16735

Kevin L. Ott  
35 Brickyard Road  
Kane, PA 16735

James B. Ewing  
118 Chestnut Street  
Kane, PA 16735

Hazel Walton  
Haines Street  
Kane, PA 16735

Gerald Rook  
134 Hacker Street  
Kane, PA 16735

James E. Snyder  
611 Oakland Avenue  
Greensburg, PA 15601

Thomas R. Rook  
287 Old Mill Road  
Kane, PA 16735

Virginia McCullough  
507 Dawson Street  
Kane, PA 16735

David E. Lawson  
426 Hackar Street  
Kane, PA 16735

Robert Fiscus  
415 Haines Street  
Kane, PA 16735

Amy Hulings  
46 Gausman Ct.  
Kane, PA 16735

Doris Grolemond  
507 Bayard Street  
Kane, PA 16735

Eugene Walker  
269 Main Street  
P.O. Box 933  
Hazel Hurst, PA 16733

Mildred L. Smith  
P.O. Box 7124  
Mt. Jewett, PA 16740

Alberta Barbour  
3825 Rt. 219  
Mt. Jewett, PA 16740

Doris Swanson  
1023 Jo Jo Road  
Kane, PA 16735

Daniel J. Rook  
529 Maple Street  
Kane, PA 16735

Gerrod Willover  
Haines Street  
Kane, PA 16735

Audrey Troutman  
115 W. Main Street  
P.O. Box 39  
Mt. Jewett, PA 16740-0037

L. Sherwood Anderson  
416 Bayard Street  
Kane, PA 16735

Dan Michael Burggraf  
396 Lindholm Road  
Kane, PA 16735

Harry Hulings  
545 Hackar Street  
Kane, PA 16735

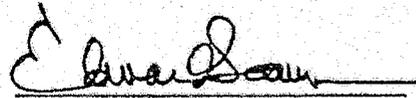
Walter S. Seth  
31 Spruce Street  
Kane, PA 16735

Carolyn Ingersoll  
7 High Street  
P.O. Box 435  
Mt. Jewett, PA 16740

Steven E. Rose  
P.O. Box 211  
Kane, PA 16735

Ronald E. Royer  
P.O. Box 408  
Old Smethport Road  
Kane, PA 16735

Respectfully submitted,



Edward G. Lanza, Esq.  
LeBoeuf, Lamb, Greene & MacRae, LLP  
200 North Third Street, Suite 300  
Harrisburg, PA 17108-2105  
(717) 232-8199

Counsel for Respondent  
Gasco Distribution Systems, Inc.

Dated: February 19, 2004

RECEIVED

2004 FEB 19 PM 2:21

SECRETARY'S BUREAU



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560 (In PA only)

IRWINA. POPOWSKY  
Consumer Advocate

FAX: (717) 783-7152  
consumer@paoca.org  
RECEIVED  
FEB 24 PM 3:51  
SECRETARY'S BUREAU

February 24, 2004

James J. McNulty, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17120

DOCUMENT  
FOLDER

Irwin A. Popowsky, Consumer Advocate, Docket No. C-20039507; Carolyn J. Verolini, Docket No. C-20039508; Karen Stebbins, Docket No. C-20039509; Victoria L. Lantz, Docket No. C-20039510; Brian K. Smith, Docket No. C-20039516; Scott and Mary Smith, Docket No. C-20039517; Mary Kay and James E. Peters, Docket No. C-20039518; Carolyn K. Yetto, Docket No. C-20039532; Winnifred L. Roesch, Docket No. C-20039533; Nina J. Nojar, Docket No. C-20039534; Geraldine Madison, Docket No. C-20039536; Michael T. and Deborah K. Timblin, Docket No. C-20039537; John and Karen Lawton, Docket No. C-20039538; Jean Polehonki, Docket No. C-20039540; Charles W. Cook, Docket No. C-20039541; Joseph and Margaret Segulin, Docket No. C-20039542; Dennis and Linda Forquer, Docket No. C-20039548; Wayne E. Schmidt, Docket No. C-20039549; Albert and Karen Bokma, Docket No. C-20039550; Evert Vanestrom, Docket No. C-20039554; Gloria Dowell, Docket No. C-20039555; Donald J. Blair, Sr., Docket No. C-20039556; Nancy McCanna, Docket No. C-20039573; Ellsworth A. Smith, Docket No. C-20039590; Mary N. Housler-Slocum, Docket No. C-20039591; Stephanie L. Dolan, Docket No. C-20039592; Genevieve A. Carlson, Docket No. C-20039685; Russell L. Swanson, Docket No. C-20039767; Sherman Keller, Docket No. C-20039768; Joseph and Margaret Segulin, Docket No. C-20031067; Winifred L. Edinger, Docket No. C-20031068; Betty Lyle, Docket No. C-20031069; Tammy Alexis, Docket No. C-20031070; Harry Reinard, Docket No. C-20031071; Robert L. McClain, Docket No. C-20031072; Lawrence A. Ross, Docket No. C-20031073; Joseph S. Groves, Docket No. C-20031074; Geraldine Nunn, Docket No. C-20031075; Anthony Zippo, Docket No. C-20031076; Fred L. Richter, Docket No. C-20031077; Arthur A. Paulson, Jr., Docket No. C-20031078; Chantel Armstrong, Docket No. C-20031079; Connie Packard, Docket No. C-20031080; Isabel Chrisman, Docket No. C-20031081; Barbara A. Overbeck, Docket No. C-20031082; Irwin A. Popowsky, Consumer Advocate, Docket No. C-20031083; Martha Buhl, Docket No. C-20031086; Shirley Howard, Docket No. C-20031092; Sarah Sanders, Docket No. C-20031093; Winnifred L. Roesch, Docket No. C-20031094; Norma Armour, Docket No. C-20031095; Mary Carrow, Docket No. C-20031096; Wayne E. Schmidt, Docket No. C-20031097; Quinten C. Johnson, Docket No. C-20031098; William D. Swartzfager, Docket No. C-20031099; Charles W. Cook, Docket No. C-20031100; Kane Borough, Docket No. C-20031101; Gloria Dowell, Docket No. C-20031102; Nina J. Nogar, Docket No. C-20031103; Kay L. Copley, Docket No. C-20031104; Lars and Karen Olsson, Docket No. C-20031105; Scott and Mary

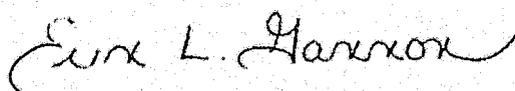
Smith, Docket No. C-20031106; Rodney G. Peterson, Docket No. C-20031118; Grace M. Runyan, Docket No. C-20031119; Clyde W. Anderson, Docket No. C-20031120; Bernadine Swanson, Docket No. C-20031134; Jack Safreed, Docket No. C-20031140; Gary Leonard, Docket No. C-20031141; Martha Jerman, Docket No. C-20031142; Thomas and Mary Ann Vantine, Docket No. C-20031147; Kevin L. Ott, Docket No. C-20031148; James B. Ewing, Docket No. C-20031154; Mildred L. Smith, Docket No. C-20031161; Hazel Walton, Docket No. C-20031163; Alberta Barbour, Docket No. C-20031167; Gerald Rook, Docket No. C-20031168; Doris Swanson, Docket No. C-20031169; James E. Snyder, Docket No. C-20031170; Daniel J. Rook, Docket No. C-20031171; Thomas R. Rook, Docket No. C-20031172; Gerrod Willover, Docket No. C-20031173; Virginia McCullough, Docket No. C-20031174; Audrey Troutman, Docket No. C-20031175; David W. Lawson, Docket No. C-20031176; L. Sherwood Anderson, Docket No. C-20031177; Robert Fiscus, Docket No. C-20031178; Dan Michael Burggraf, Docket No. C-20031179; Amy Hulings, Docket No. C-20031180; Harry Hulings, Docket No. C-20031181; Dorris Grolemond, Docket No. C-20031182; Walter S. Seth, Docket No. C-20031238; Eugene Walker, Docket No. C-20031248; Carolyn Ingersoll, Docket No. C-20031257; Steven E. Rose, Docket No. C-20031710; Ronald E. Royer, Docket No. Z-01150834 v. Gasco Distribution Systems, Inc.

Dear Secretary McNulty:

Enclosed please find for filing an original and three (3) copies of the Office of Consumer Advocate's Answer To Gasco Distribution Company's Amended Motion To Consolidate And For Extension Of Time To Answer in the above-captioned proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Sincerely,



Erin L. Gannon  
Assistant Consumer Advocate

Enclosures

cc: All parties of record  
Honorable Larry Gesoff, ALJ (via Electronic Mail & First Class Mail)  
78163 doc,1/ELG/smr

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Irwin A. Popowsky, Consumer Advocate,	:	Docket No.	C-20039507
Carolyn J. Verolini,	:		C-20039508
Karen Stebbins,	:		C-20039509
Victoria L. Lantz,	:		C-20039510
Brian K. Smith,	:		C-20039516
Scott and Mary Smith,	:		C-20039517
Mary Kay and James E. Peters,	:		C-20039518
Carolyn K. Yetto,	:		C-20039532
Winnifred L. Roesch,	:		C-20039533
Nina J. Nojar,	:		C-20039534
Geraldine Madison,	:		C-20039536
Michael T. and Deborah K. Timblin,	:		C-20039537
John and Karen Lawton,	:		C-20039538
Jean Polehonki,	:		C-20039540
Charles W. Cook,	:		C-20039541
Joseph and Margaret Segulin,	:		C-20039542
Dennis and Linda Forquer,	:		C-20039548
Wayne E. Schmidt,	:		C-20039549
Albert and Karen Bokma,	:		C-20039550
Evert Vanestrom,	:		C-20039554
Gloria Dowell,	:		C-20039555
Donald J. Blair, Sr.	:		C-20039556
Nancy McCanna,	:		C-20039573
Ellsworth A. Smith,	:		C-20039590
Mary N. Housler-Slocum,	:		C-20039591
Stephanie L. Dolan,	:		C-20039592
Genevieve A. Carlson,	:		C-20039685
Russell L. Swanson,	:		C-20039767
Sherman Keller,	:		C-20039768
Joseph and Margaret Segulin,	:		C-20031067
Winifred L. Edinger,	:		C-20031068
Betty Lyle,	:		C-20031069
Tammy Alexis,	:		C-20031070
Harry Reinard,	:		C-20031071
Robert L. McClain,	:		C-20031072
Lawrence A. Ross,	:		C-20031073
Joseph S. Groves,	:		C-20031074
Geraldine Nunn,	:		C-20031075
Anthony Zippo,	:		C-20031076
Fred L. Richter,	:		C-20031077
Arthur A. Paulson, Jr.,	:		C-20031078
Chantel Armstrong,	:		C-20031079

**DOCKETED**  
MAR 23 2004

**DOCUMENT  
FOLDER**

SECRETARY'S OFFICE

MAR 23 2004

DO NOT REMOVE

Connie Packard,	:	C-20031080
Isabel Chrisman,	:	C-20031081
Barbara A. Overbeck,	:	C-20031082
Irwin A. Popowsky, Consumer Advocate,	:	C-20031083
Martha Buhl,	:	C-20031086
Shirley Howard,	:	C-20031092
Sarah Sanders,	:	C-20031093
Winnifred L. Roesch,	:	C-20031094
Norma Armour,	:	C-20031095
Mary Carrow,	:	C-20031096
Wayne E. Schmidt,	:	C-20031097
Quinten C. Johnson,	:	C-20031098
William D. Swartzfager,	:	C-20031099
Charles W. Cook,	:	C-20031100
Kane Borough,	:	C-20031101
Gloria Dowell,	:	C-20031102
Nina J. Nogar,	:	C-20031103
Kay L. Copley,	:	C-20031104
Lars and Karen Olsson,	:	C-20031105
Scott and Mary Smith,	:	C-20031106
Rodney G. Peterson,	:	C-20031118
Grace M. Runyan,	:	C-20031119
Clyde W. Anderson,	:	C-20031120
Bernadine Swanson,	:	C-20031134
Jack Safreed,	:	C-20031140
Gary Leonard,	:	C-20031141
Martha Jerman,	:	C-20031142
Thomas and Mary Ann Vantine,	:	C-20031147
Kevin L. Ott,	:	C-20031148
James B. Ewing,	:	C-20031154
Mildred L. Smith,	:	C-20031161
Hazel Walton,	:	C-20031163
Alberta Barbour,	:	C-20031167
Gerald Rook,	:	C-20031168
Doris Swanson,	:	C-20031169
James E. Snyder,	:	C-20031170
Daniel J. Rook,	:	C-20031171
Thomas R. Rook,	:	C-20031172
Gerrod Willover,	:	C-20031173
Virginia McCullough,	:	C-20031174
Audrey Troutman,	:	C-20031175
David W. Lawson,	:	C-20031176
L. Sherwood Anderson,	:	C-20031177
Robert Fiscus,	:	C-20031178
Dan Michael Burggraf,	:	C-20031179
Amy Hulings,	:	C-20031180

Harry Hulings,	:	C-20031181
Doris Grolemond,	:	C-20031182
Walter S. Seth,	:	C-20031238
Eugene Walker,	:	C-20031248
Carolyn Ingersoll,	:	C-20031257
Steven E. Rose,	:	C-20031710
Ronald E. Royer,	:	Z-01150834
	:	
v.	:	
	:	
Gasco Distribution Systems, Inc.	:	

---

OFFICE OF CONSUMER ADVOCATE'S  
ANSWER TO GASCO DISTRIBUTION COMPANY'S  
AMENDED MOTION TO CONSOLIDATE AND FOR  
EXTENSION OF TIME TO ANSWER

---

Pursuant to Section 5.103(c), 52 Pa. Code § 5.103(c), the Office of Consumer Advocate (OCA) answers Gasco Distribution Systems, Inc.'s (Gasco or Company) Amended Motion to Consolidate ninety-five (95) Formal Complaints filed by the OCA and customers of the Company's Kane Division with the Interim Gas Cost Rate (GCR) filing made by the Company on January 15, 2003<sup>1</sup> at Docket No. M-00021629 and Annual Gas Cost Rate filing on August 1, 2003 at Docket No. M-00031722. Gasco also requests an extension of time to answer the Formal Complaints. As explained below, the OCA does not oppose the Company's Amended Motion to Consolidate or its requested extension of time. The OCA files this Answer to address certain issues raised by the Company's filing.

1. The OCA supports consolidation of the ninety-five Formal Complaints with the Company's Interim and Annual GCR filings, as well as any other complaints related to Gasco's gas cost rates that may be filed. Specifically, the OCA requests that the complaints docketed at

---

<sup>1</sup> Gasco's Amended Motion indicates that the Interim Gas Cost Rate filing was made on February 1, 2003, but it is the OCA's understanding that this was the proposed effective date of the interim rates.

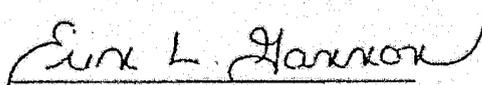
C-20031788 and C-20042458 should be consolidated with this proceeding. As Gasco has indicated, each of these complaints pertains to the justness and reasonableness of Gasco's rates resulting from the Company's January 15, 2003 and August 1, 2003 filings, a common question of law or fact. The OCA agrees that consolidation would avoid unnecessary costs and delay.

2. The OCA does not oppose the Company's request for an extension of time to answer the formal complaints.

3. Gasco prefaced its original Motion to Consolidate with a "Notice to Plead," which stated that "[f]ailure to file a response may result in a decision on the motion being entered against you." In its Answer to that motion, filed on May 16, 2003, the OCA noted that "the wording of the Notice suggests that the Motion is adverse to the customers' interest, and unless read carefully, may suggest that failure to file a written response will result in dismissal of the customers' complaints. Given that there is no PUC requirement to file a Notice to Plead, the OCA submits that the Notice is unnecessarily confusing." Gasco has prefaced its Amended Motion to Consolidate with an identical Notice to Plead. The OCA respectfully requests that if the ALJ grants the Amended Motion, a clarification be included in the Order explaining that the customer complaints will simply be addressed in one proceeding, rather than individually. In the alternative, the OCA requests that Gasco provide that clarification to the complainants in writing. In addition, the OCA requests that the Company refrain from including this language in future pleadings in the consolidated proceedings.

WHEREFORE, the Office of Consumer Advocate respectfully requests that the Commission grant the Motion to Consolidate filed by Gasco Distribution Systems, Inc., with the clarifications set forth above.

Respectfully submitted,



Erin L. Gannon  
Assistant Consumer Advocate

Christine Maloni Hoover  
Senior Assistant Consumer Advocate

Counsel for:  
Irwin A. Popowsky  
Consumer Advocate

Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
(717) 783-5048

Dated: February 24, 2004

00078140.doc

## CERTIFICATE OF SERVICE

	:	Docket No.	
Irwin A. Popowsky, Consumer Advocate,	:		C-20039507
Carolyn J. Verolini,	:		C-20039508
Karen Stebbins,	:		C-20039509
Victoria L. Lantz,	:		C-20039510
Brian K. Smith,	:		C-20039516
Scott and Mary Smith,	:		C-20039517
Mary Kay and James E. Peters,	:		C-20039518
Carolyn K. Yetto,	:		C-20039532
Winnifred L. Roesch,	:		C-20039533
Nina J. Nojar,	:		C-20039534
Geraldine Madison,	:		C-20039536
Michael T. and Deborah K. Timblin,	:		C-20039537
John and Karen Lawton,	:		C-20039538
Jean Polehonki,	:		C-20039540
Charles W. Cook,	:		C-20039541
Joseph and Margaret Segulin,	:		C-20039542
Dennis and Linda Forquer,	:		C-20039548
Wayne E. Schmidt,	:		C-20039549
Albert and Karen Bokma,	:		C-20039550
Evert Vanestrom,	:		C-20039554
Gloria Dowell,	:		C-20039555
Donald J. Blair, Sr.	:		C-20039556
Nancy McCanna,	:		C-20039573
Ellsworth A. Smith,	:		C-20039590
Mary N. Housler-Slocum,	:		C-20039591
Stephanie L. Dolan,	:		C-20039592
Genevieve A. Carlson,	:		C-20039685
Russell L. Swanson,	:		C-20039767
Sherman Keller,	:		C-20039768
Joseph and Margaret Segulin,	:		C-20031067
Winifred L. Edinger,	:		C-20031068
Betty Lyle,	:		C-20031069
Tammy Alexis,	:		C-20031070
Harry Reinard,	:		C-20031071
Robert L. McClain,	:		C-20031072
Lawrence A. Ross,	:		C-20031073
Joseph S. Groves,	:		C-20031074
Geraldine Nunn,	:		C-20031075
Anthony Zippo,	:		C-20031076
Fred L. Richter,	:		C-20031077
Arthur A. Paulson, Jr.,	:		C-20031078
Chantel Armstrong,	:		C-20031079
Connie Packard,	:		C-20031080

Isabel Chrisman,	:	C-20031081
Barbara A. Overbeck,	:	C-20031082
Irwin A. Popowsky, Consumer Advocate,	:	C-20031083
Martha Buhl,	:	C-20031086
Shirley Howard,	:	C-20031092
Sarah Sanders,	:	C-20031093
Winnifred L. Roesch,	:	C-20031094
Norma Armour,	:	C-20031095
Mary Carrow,	:	C-20031096
Wayne E. Schmidt,	:	C-20031097
Quinten C. Johnson,	:	C-20031098
William D. Swartzfager,	:	C-20031099
Charles W. Cook,	:	C-20031100
Kane Borough,	:	C-20031101
Gloria Dowell,	:	C-20031102
Nina J. Nogar,	:	C-20031103
Kay L. Copley,	:	C-20031104
Lars and Karen Olsson,	:	C-20031105
Scott and Mary Smith,	:	C-20031106
Rodney G. Peterson,	:	C-20031118
Grace M. Runyan,	:	C-20031119
Clyde W. Anderson,	:	C-20031120
Bernadine Swanson,	:	C-20031134
Jack Safreed,	:	C-20031140
Gary Leonard,	:	C-20031141
Martha Jerman,	:	C-20031142
Thomas and Mary Ann Vantine,	:	C-20031147
Kevin L. Ott,	:	C-20031148
James B. Ewing,	:	C-20031154
Mildred L. Smith,	:	C-20031161
Hazel Walton,	:	C-20031163
Alberta Barbour,	:	C-20031167
Gerald Rook,	:	C-20031168
Doris Swanson,	:	C-20031169
James E. Snyder,	:	C-20031170
Daniel J. Rook,	:	C-20031171
Thomas R. Rook,	:	C-20031172
Gerrod Willover,	:	C-20031173
Virginia McCullough,	:	C-20031174
Audrey Troutman,	:	C-20031175
David W. Lawson,	:	C-20031176
L. Sherwood Anderson,	:	C-20031177
Robert Fiscus,	:	C-20031178
Dan Michael Burggraf,	:	C-20031179
Amy Hulings,	:	C-20031180



Winnifred L. Roesch  
28 Kushequa Avenue  
P. O. Box 387  
Mt. Jewett, PA 16740

Geraldine Madison  
P. O. Box 17  
Hazel Hurst, PA 16733

Carolyn J. Verolini  
1387 Kushequa Avenue  
Kane, PA 16735

Victor L. Lantz  
P. O. Box 27  
Mt. Jewett, PA 16740

Scott and Mary Smith  
3 Poplar Street  
P. O. Box 306  
Mt. Jewett, PA 16740

Carolyn K. Yetto  
730 Welsh Street  
Kane, PA 16735

Nina J. Nogar  
P. O. Box 197  
Hazel Hurst, PA 16733

Michael and Deborah Timblin  
376 Main Street  
P. O. Box 63  
Hazel Hurst, PA 16733

John and Karen Lawton  
13 Gallup Avenue  
P. O. Box 70  
Mt. Jewett, PA 16740

Charles W. Cook  
P. O. Box 386  
Mt. Jewett, PA 16740

Dennis and Linda Forquer  
66 Brier Lane  
Kane, PA 16735

Albert and Karen Bokma  
230 Ash Street  
Kane, PA 16735

Gloria Dowell  
P. O. Box 31  
Hazel Hurst, PA 16733

Nancy McCanna  
7 Gallup Avenue  
P. O. Box 536  
Mt. Jewett, PA 16740

Mrs. Mary N. Housler-Slocum  
9605 Route 6  
Kane, PA 16735

Genevieve A. Carlson  
112 Brickwork Road  
Kane, PA 16735

Sherman Keller  
4 Bridge Street  
P. O. Box 327  
Mt. Jewett, PA 16740

Jean Polehonki  
3079 Route 219  
Kane, PA 16735

Joseph and Margaret Segulin  
P. O. Box 508  
Mt. Jewett, PA 16740

Wayne E. Schmidt  
P. O. Box 237  
Hazel Hurst, PA 16733

Evert Vanerstrom  
116 Hemlock Avenue  
Kane, PA 16735

Donald J. Blair, Sr.  
P. O. Box 667  
Mt. Jewett, PA 16740

Ellsworth A. Smith  
P. O. Box 334  
Mt. Jewett, PA 16740

Stephanie L. Dolan  
P. O. Box 225  
Kane, PA 16735

Russell L. Swanson  
23 Anderson Street  
P. O. Box 202  
Mt. Jewett, PA 16740

Winifred L. Edinger  
134 W. Main Street  
P. O. Box 7167  
Mt. Jewett, PA 16740

Betty Lyle  
4 Gallup Avenue  
P. O. Box 95  
Mt. Jewett, PA 16740

Harry Reinard  
23 Randall Avenue  
P. O. Box 77  
Hazel Hurst, PA 16733

Lawrence A. Ross  
1 Brennan Avenue  
Mt. Jewett, PA 16740

Geraldine Nunn  
35 Randall Avenue  
P. O. Box 59  
Hazel Hurst, PA 16733

Fred L. Richter  
90 Church Street - Kushequa  
Kane, PA 16735-4922

Chantell Armstrong  
P. O. Box 221  
Mt. Jewett, PA 16740

Isabel Chrisman  
18 Fullet Street  
P. O. Box 93  
Mt. Jewett, PA 16740-0093

Shirley Howard  
39 Midway Road  
Kane, PA 16735

Tammy Alexis  
P. O. Box 283  
Mt. Jewett, PA 16740

Robert L. McClain  
P. O. Box 108  
Hazel Hurst, PA 16733

Joseph S. Groves  
17 Boyd Street  
P. O. Box 16  
Mt. Jewett, PA 16740

Anthony Zippo  
P. O. Box 447  
Mt. Jewett, PA 16740

Arthur A. Paulson, Jr.  
1 Anderson Street  
Mt. Jewett, PA 16740

Connie Packard  
P. O. Box 235  
Mt. Jewett, PA 16740

Barbara A. Overbeck  
P. O. Box 218  
Mt. Jewett, PA 16740

Martha Buhl  
205 Poplar Street  
Kane, PA 16435

Sarah Sanders  
53 Midway Road  
Kane, PA 16735

Winnifred L. Roesch  
P. O. Box 387  
Mt. Jewett, PA 16740

Mary Carrow  
P. O. Box 123  
Mt. Jewett, PA 16740

Quinten C. Johnson  
37 N. School Street  
Hazel Hurst, PA 16733

Charles W. Cook  
P. O. Box 386  
Mt. Jewett, PA 16740

Kay L. Copley  
35 Anderson Street  
P. O. Box 98  
Mt. Jewett, PA 16740

Scott and Mary Smith  
P. O. Box 306  
Mt. Jewett, PA 16740

Grace M. Runyan  
55 Rosebud Lane  
P. O. Box 52  
Mt. Jewett, PA 16740

Bernadine Swanson  
5 Oberg Avenue  
P. O. Box 208  
Mt. Jewett, PA 16740

Gary Leonard  
518 Haines Street  
Kane, PA 16735

Thomas and Mary Ann Vantine  
216 Walnut Street  
Kane, PA 16735

Norma Armour  
12 Maple Lane  
P. O. Box 353  
Mt. Jewett, PA 16740

Wayne Schmidt  
P. O. Box 237  
Hazel Hurst, PA 16733

William D. Swartzfaer  
21 Oberg Avenue  
P. O. Box 133  
Mt. Jewett, PA 16740

Niva J. Nogar  
P. O. Box 187  
Hazel Hurst, PA 16733-0187

Lars and Karen Olsson  
P. O. Box 252  
Mt. Jewett, PA 16740

Rodney G. Peterson  
13 McClellan Avenue  
P. O. Box 65  
Mt. Jewett, PA 16740

Clyde W. Anderson  
P. O. Box 432  
Mt. Jewett, PA 16740

Jack Safreed  
14 Oberg Avenue  
P. O. Box 7135  
Mt. Jewett, PA 16740

Martha Jerman  
118 Hemlock Avenue  
Kane, PA 16735

Kevin L. Ott  
35 Brickyard Road  
Kane, PA 16735

James B. Ewing  
118 Chestnut Street  
Kane, PA 16735

Hazel Walton  
Haines Street  
Kane, PA 16735

Gerald Rook  
134 Hacker Street  
Kane, PA 16735

James E. Snyder  
611 Oakland Avenue  
Greensburg, PA 15601

Thomas R. Rook  
287 Old Mill Road  
Kane, PA 16735

Virginia McCullough  
507 Dawson Street  
Kane, PA 16735

David E. Lawson  
426 Hacker Street  
Kane, PA 16735

Robert Fiscus  
415 Haines Street  
Kane, PA 16735

Amy Hulings  
46 Gausman Ct.  
Kane, PA 16735

Doris Grolemond  
507 Bayard Street  
Kane, PA 16735

Eugene Walker  
269 Main Street  
P. O. Box 933  
Hazel Hurst, PA 16733

Mildred L. Smith  
P. O. Box 7124  
Mt. Jewett, PA 16740

Alberta Barbour  
3825 Rt. 219  
Mt. Jewett, PA 16740

Doris Swanson  
1023 Jo Jo Road  
Kane, PA 16735

Daniel J. Rook  
529 Maple Street  
Kane, PA 16735

Gerrod Willover  
Haines Street  
Kane, PA 16735

Audrey Troutman  
115 W. Main Street  
P. O. Box 39  
Mt. Jewett, PA 16740-0037

L. Sherwood Anderson  
416 Bayard Street  
Kane, PA 16735

Dan Michael Burggraf  
396 Lindholm Road  
Kane, PA 16735

Harry Hulings  
545 Hacker Street  
Kane, PA 16735

Walter S. Seth  
31 Spruce Street  
Kane, PA 16735

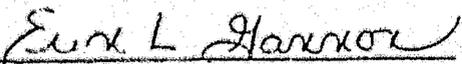
Carolyn Ingersoll  
7 High Street  
P. O. Box 435  
Mt. Jewett, PA 16740

Becky Olson  
205 Clay Street  
Kane, PA 16735

Stephen E. Rose  
P. O. Box 211  
Kane, PA 16735

Ronald E. Royer  
P. O. Box 408  
Old Smethport Road  
Kane, PA 16735

Sue E. Holt  
306 Pine Street  
Kane, PA 16735

---

Christine Maloni Hoover  
Senior Assistant Consumer Advocate

Erin L. Gannon  
Assistant Consumer Advocate

Counsel for  
Office of Consumer Advocate  
555 Walnut Street 5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
(717) 783-5048  
78160.doc,1/ELG/smn