

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MEDIA BUREAU INC  
C/O STEVE GREENBAUM

v.

PHILADELPHIA GAS WORKS

C-20043422

SEP 17 11 08:53  
MEDIA BUREAU

**INTERIM ORDER**  
**SETTING RESOLUTION CONFERENCE**

On or about July 23, 2004, Media Bureau Inc c/o Steve Greenbaum ("Complainant") filed a complaint against Philadelphia Gas Works ("Respondent"), at the above-captioned Docket Number. To my knowledge, Respondent has not filed an Answer to the complaint.

Based upon a review of the complaint, I direct the parties to attempt to resolve this matter themselves. Respondent shall contact Complainant no later than September 28, 2004, to set a mutually convenient time, date and place for Respondent and Complainant to hold a conference about resolving the case. The conference must take place no later than October 12, 2004, unless this is not possible.

**Within ten (10) days following the conference, Respondent shall file a short report with Bruce Bigelow ("Mediator"), setting forth:**

- (a) The time, date and place of the conference;
- (b) Who participated for each party;
- (c) A statement whether a full resolution, including withdrawal of complaint, was achieved, and, if not, whether the parties consent to have this case set for mediation by the mediation staff of the Commission; and
- (d) A statement of any issues which have been resolved, if a full resolution was not achieved.

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The Commission encourages mediation if the parties cannot reach an agreement through the resolution conference. Mediation is an informal process in which the parties attempt to resolve the case with the help of a mediator. The mediator is a neutral staff member of the Commission who does not give advice, make a decision, or represent any party. Instead, the mediator assists the parties in their efforts to come to an agreement.

If the parties do not reach an agreement on their own, and do not consent to mediate, they are entitled to the hearing process. The hearing process usually includes the presentation of oral testimony and other evidence before a Commission administrative law judge, who will then consider the case and make a written decision to resolve it.

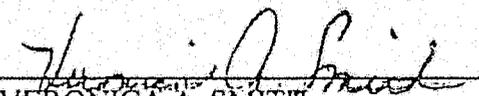
If it is not possible to have the conference by the date set for that purpose, Respondent shall file a report with the Mediator, on or before ten (10) days following the conference due date, giving the reason(s) why the due date could not be met.

In either situation, a report must be filed with the Mediator by the applicable due date set forth above.

If you have any questions, you should contact the Mediator. His address and phone number are:

Mediator Bruce Bigelow  
P. O. Box 3265  
Harrisburg, PA 17105-3265  
(717) 783-5413  
Email: [bbigelow@state.pa.us](mailto:bbigelow@state.pa.us)

Date: September 14, 2004

  
VERONICA A. SMITH  
Chief Administrative Law Judge

ORIGINAL

**Philadelphia Gas Works**  
Legal Department



800 W. Montgomery Avenue, Philadelphia, PA 19122  
Fax: (215) 684-6798

Laureto A. Farinas, Esq.  
Senior Attorney  
Legal Department  
Direct Dial: 215-684-6982  
FAX: 215-684-6798  
E-mail: laureto.farinas@pgworks.com

September 17, 2004

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

RE: Media Bureau, Inc. c/o Steve Greenbaum v. PGW, Docket No ~~C-20043326~~

*C-20043422*

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 contact me at my direct-dial number above. Thank you for your assistance.

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Sincerely,

Enclosures

cc: Media Bureau, Inc. c/o Steve Greenbaum  
Eloise Carnall

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SEP 17 2004

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Media Bureau, Inc c/o  
Steve Greenbaum

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Docket No. C - 20043326 -

v.

C-2004 3422

Philadelphia Gas Works

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. PGW hereby avers the following

1. Admitted.
2. Admitted.
3. Denied. PGW denies the averment in Paragraph 3 of the Complaint concerning the accuracy of the Complainant's bill and an overcharge on the account for gas service at 723-725 N. 3<sup>rd</sup> Street. PGW records indicate that, due to a system error after PGW's conversion to its new billing system in 1999, PGW generated the Complainant's bills based upon estimated meter readings from June 1999 until January 2000 for a usage of 0 ccf of gas per period for all but one billing period as shown on the statement of account which is attached hereto as Exhibit "A". These bills were estimated such that they only reflected a charge in the amount of \$10.70 per month. This is the standard Customer Charge.

The automatic meter reading device ("AMR") recorded reads that populated computer records on the Meter Reading Query. These readings however, were not used to generate a bill for actual gas usage due to the system error.

On May 19, 2000, the error was found and corrected, which resulted in the generation of a bill for previously unbilled services in the amount of \$2179.59 for 2374 ccfs of gas.

A decision of the Bureau of Consumer Services ("BCS") dated July 9, 2004, found that the billing was correct as rendered. The BCS Decision ordered PGW to give the customer a credit rate adjustment in the amount of \$142.60 along with

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the late payment charges being waived in the amount of \$208.41. The BCS decision put the Complainant on a payment arrangement consisting of the current bill plus \$350 toward the arrears per month beginning the August 2004 PGW bill due date.

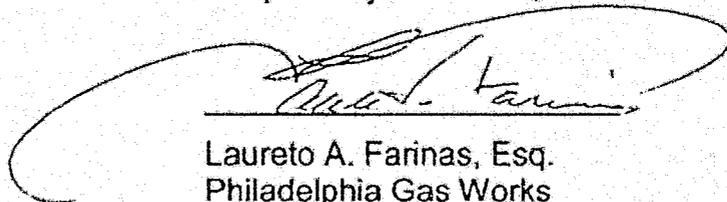
Total account balance as of August 2004 is \$3048.71.

4. Denied. 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.

**Wherefore**, PGW respectfully requests that this Commission find against the Complainant and dismiss the complaint in this matter.

Respectfully submitted,

September 17, 2004

A handwritten signature in black ink, appearing to read "Laureto A. Farinas", is written over a horizontal line. The signature is stylized and includes a large, sweeping flourish that extends to the left and loops back under the line.

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

# EXHIBIT A

# HISTORY REQUEST REPORT FOR ACCOUNT # 1117062373 AND SA # 9961489473 AS OF 09/16/2004

Account #: 1117062373	SA #: 9961489473	Bill Cycle: 14	Rate Class: GS	Phone #: 5921242(215)
Name: MEDIA BUREAU INC		Address: 723 N 4TH ST/HILA PA		
Pay Agreement Indicator: N	Easyway Indicator:	CRP Status:		
Blocker Start Date: 20040426	Blocker End Date: 20050805	Meter #: 1351311		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
12/16/1998	BILL	\$123.19	\$123.19	\$0.00	11/14/1998	12/16/1998	R	6468	\$123.19	123	1351311
01/20/1999	BILL	\$371.47	\$371.47	\$0.00	12/16/1998	01/20/1999	R	6883	\$371.47	395	1351311
02/08/1999	PAY	(\$79.00)	(\$79.00)	\$0.00							
02/16/1999	BILL	\$266.50	\$266.50	\$0.00	01/20/1999	02/16/1999	R	7177	\$266.50	294	1351311
02/22/1999	PAY	(\$158.00)	(\$158.00)	\$0.00							
03/05/1999	PAY	(\$158.00)	(\$158.00)	\$0.00							
03/15/1999	BILL	\$385.70	\$385.70	\$0.00	02/16/1999	03/15/1999	R	7608	\$385.70	431	1351311
04/09/1999	BILL	\$197.77	\$197.77	\$0.00	03/15/1999	04/09/1999	R	7823	\$197.77	215	1351311
04/20/1999	PAY	(\$79.00)	(\$79.00)	\$0.00							
05/13/1999	PAY	(\$173.00)	(\$173.00)	\$0.00							
05/17/1999	BILL	\$120.33	\$120.33	\$0.00	04/09/1999	05/17/1999	R	7949	\$120.33	126	1351311
06/14/1999	BILL	\$10.70	\$10.70	\$0.00	05/17/1999	06/14/1999	Y	7949	\$10.70	0	1351311
07/21/1999	BILL	\$13.31	\$13.31	\$0.00	06/14/1999	07/21/1999	R	7952	\$495.97	3	1351311
07/22/1999	PAY	(\$346.00)	(\$346.00)	\$0.00							
08/18/1999	BILL	\$10.70	\$10.70	\$0.00	07/21/1999	08/18/1999	R	7952	\$506.67	0	1351311
09/17/1999	BILL	\$10.70	\$10.70	\$0.00	08/18/1999	09/17/1999	Y	7952	\$517.37	0	1351311
09/18/1999	BILL	\$10.70	\$10.70	\$0.00	09/17/1999	10/16/1999	Y	7952	\$528.07	0	1351311
11/09/1999	PAY	(\$344.37)	(\$344.37)	\$0.00							
11/16/1999	BILL	\$10.70	\$10.70	\$0.00	10/16/1999	11/16/1999	Y	7952	\$0.00	0	1351311
11/16/1999	BILL	\$10.70	\$10.70	\$0.00	10/16/1999	11/16/1999	Y	7952	\$194.40	0	1351311
11/20/1999	CANB	(\$10.70)	(\$10.70)	\$0.00							
12/16/1999	PAY	(\$194.00)	(\$194.00)	\$0.00							
12/16/1999	BILL	\$10.70	\$10.70	\$0.00	11/16/1999	12/16/1999	Y	7952	\$409.95	0	1351311
01/21/2000	PAY	(\$11.10)	(\$11.10)	\$0.00							
01/21/2000	BILL	\$10.70	\$10.70	\$0.00	12/16/1999	01/21/2000	Y	7952	\$322.27	0	1351311
02/18/2000	PAY	(\$10.70)	(\$10.70)	\$0.00							
02/22/2000	BILL	\$1,884.59	\$1,884.59	\$0.00	01/21/2000	02/22/2000	R	83	\$2,072.03	2131	1351311
03/21/2000	BILL	\$164.59	\$164.59	\$0.00	02/22/2000	03/21/2000	R	258	\$2,287.77	175	1351311

Account #: 1117062373 SA #: 9961489473 Bill Cycle: 14 Rate Class: GS Phone #: 5921242(215)

Name: MEDIA BUREAU INC Address: 723 N 4TH ST/PHILA,PA

Pay Agreement Indicator: N Easyway Indicator: CRP Status:

Blocker Start Date: 20040426 Blocker End Date: 20050805 Meter #: 1351311

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
04/19/2000	BILL	\$70.50	\$70.50	\$0.00	03/21/2000	04/19/2000	R	326	\$2,390.08	68	1351311
04/27/2000	BSEGCN	\$0.00	\$0.00	(\$1,884.59)							
04/27/2000	CANB	(\$1,884.59)	(\$1,884.59)	\$0.00							
05/19/2000	BILL	\$10.70	\$10.70	\$0.00	04/19/2000	05/19/2000	R	326	\$544.34	0	1351311
05/19/2000	BILL	\$2,179.59	\$2,179.59	\$0.00	08/18/1999	05/19/2000	R	326	\$2,424.64	2374	1351311
06/02/2000	CANB	(\$10.70)	(\$10.70)	\$0.00							
06/02/2000	BSEGCN	\$0.00	\$0.00	(\$10.70)							
06/02/2000	CANB	(\$10.70)	(\$10.70)	\$0.00							
06/02/2000	BSEGCN	\$0.00	\$0.00	(\$10.70)							
06/02/2000	CANB	(\$70.50)	(\$70.50)	\$0.00							
06/02/2000	CANB	(\$10.70)	(\$10.70)	\$0.00							
06/02/2000	CANB	(\$10.70)	(\$10.70)	\$0.00							
06/02/2000	CANB	(\$10.70)	(\$10.70)	\$0.00							
06/02/2000	BSEGCN	\$0.00	\$0.00	(\$164.59)							
06/02/2000	CANB	(\$164.59)	(\$164.59)	\$0.00							
06/02/2000	BSEGCN	\$0.00	\$0.00	(\$10.70)							
06/02/2000	BSEGCN	\$0.00	\$0.00	(\$10.70)							
06/05/2000	PAY	(\$1.58)	(\$1.58)	\$0.00							
06/16/2000	BILL	\$10.70	\$10.70	\$0.00	05/19/2000	06/16/2000	R	326	\$2,184.59	0	1351311
06/26/2000	CANP	\$1.58	\$1.58	\$0.00							
06/30/2000	XFER	(\$2,136.79)	(\$2,136.79)	(\$2,136.79)							
07/19/2000	BILL	\$10.70	\$10.70	\$0.00	06/16/2000	07/19/2000	R	326	(\$43.36)	0	1351311
07/31/2000	XFER	(\$10.70)	(\$10.70)	(\$10.70)							
09/18/2000	BILL	\$21.40	\$21.40	\$0.00	07/19/2000	09/18/2000	R	326	\$0.00	0	1351311
10/02/2000	XFER	(\$21.40)	(\$21.40)	(\$21.40)							
10/18/2000	BILL	\$10.70	\$10.70	\$0.00	09/18/2000	10/18/2000	R	326	\$15.90	0	1351311
11/08/2000	PAY	(\$10.70)	(\$10.70)	\$0.00							
11/16/2000	BILL	\$26.54	\$26.54	\$0.00	10/18/2000	11/16/2000	R	344	\$58.24	18	1351311
12/08/2000	PAY	(\$26.54)	(\$26.54)	\$0.00							

Account #: 1117062373 SA #: 9961489473 Bill Cycle: 14 Rate Class: GS Phone #: 5921242(215)

Name: MEDIA BUREAU INC Address: 723 N 4TH ST/PHILA,PA

Pay Agreement Indicator: N Easyway Indicator: CRP Status:

Blocker Start Date: 20040426 Blocker End Date: 20050805 Meter #: 1351311

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
12/18/2000	BILL	\$329.32	\$329.32	\$0.00	11/18/2000	12/18/2000	R	646	\$344.48	302	1351311
01/19/2001	BILL	\$357.17	\$357.17	\$0.00	12/18/2000	01/19/2001	R	915	\$779.50	269	1351311
02/13/2001	PAY	(\$403.64)	(\$403.64)	\$0.00	01/19/2001	02/13/2001	R	957	\$472.12	42	1351311
03/16/2001	PAY	(\$104.15)	(\$104.15)	\$0.00	02/16/2001	03/16/2001	R	957	\$463.69	0	1351311
04/19/2001	BILL	\$15.59	\$15.59	\$0.00	03/20/2001	04/19/2001	R	957	\$405.28	0	1351311
04/19/2001	PAY	(\$97.23)	(\$97.23)	\$0.00	04/19/2001	05/18/2001	R	957	\$455.46	0	1351311
05/18/2001	BILL	\$15.59	\$15.59	\$0.00	05/18/2001	06/20/2001	R	957	\$465.21	0	1351311
05/24/2001	PAY	(\$28.28)	(\$28.28)	\$0.00	06/20/2001	07/20/2001	R	957	\$483.83	0	1351311
06/20/2001	BILL	\$15.59	\$15.59	\$0.00	07/20/2001	08/20/2001	R	957	\$465.38	0	1351311
07/20/2001	PAY	(\$23.89)	(\$23.89)	\$0.00	08/20/2001	09/19/2001	R	957	\$465.47	0	1351311
08/10/2001	PAY	(\$21.30)	(\$21.30)	\$0.00	09/19/2001	10/19/2001	R	957	\$475.16	0	1351311
08/20/2001	BILL	\$15.59	\$15.59	\$0.00	10/19/2001	11/19/2001	R	957	\$481.04	0	1351311
09/14/2001	PAY	(\$19.73)	(\$19.73)	\$0.00	11/19/2001	12/18/2001	R	957	\$489.17	0	1351311
09/19/2001	BILL	\$15.59	\$15.59	\$0.00	12/18/2001	01/18/2002	R	957	\$593.86	0	1351311
10/18/2001	PAY	(\$17.65)	(\$17.65)	\$0.00	01/18/2002	02/19/2002	R	957	\$607.23	0	1351311
10/19/2001	BILL	\$19.26	\$19.26	\$0.00	02/19/2002	03/19/2002	R	957	\$563.33	0	1351311
11/16/2001	PAY	(\$19.46)	(\$19.46)	\$0.00	03/19/2002	04/18/2002	R	957	\$503.66	0	1351311
01/19/2001	BILL	\$19.26	\$19.26	\$0.00	04/18/2002	05/17/2002	R	957	\$556.64	0	1351311
02/14/2001	PAY	(\$19.71)	(\$19.71)	\$0.00	05/17/2002	06/03/2002	PAY	(\$15.23)	(\$15.23)	\$0.00	
12/18/2001	BILL	\$19.26	\$19.26	\$0.00							
01/18/2002	BILL	\$19.26	\$19.26	\$0.00							
01/23/2002	PAY	(\$20.94)	(\$20.94)	\$0.00							
02/19/2002	BILL	\$19.26	\$19.26	\$0.00							
02/25/2002	PAY	(\$35.02)	(\$35.02)	\$0.00							
03/19/2002	BILL	\$19.26	\$19.26	\$0.00							
03/22/2002	PAY	(\$22.94)	(\$22.94)	\$0.00							
04/18/2002	PAY	(\$17.36)	(\$17.36)	\$0.00							
04/18/2002	BILL	\$19.26	\$19.26	\$0.00							
05/17/2002	BILL	\$19.26	\$19.26	\$0.00							
06/03/2002	PAY	(\$15.23)	(\$15.23)	\$0.00							

Account #: 1117062373 SA #: 9961489473 Bill Cycle: 14 Rate Class: GS Phone #: 59212421215  
 Name: MEDIA BUREAU INC Address: 723 N 4TH ST/PHILA, PA  
 Pay Agreement Indicator: N Easyway Indicator: CRP Status:  
 Blocker Start Date: 20040426 Blocker End Date: 20050905 Meter #: 1351311

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
06/19/2002	BILL	\$19.26	\$19.26	\$0.00	06/17/2002	06/19/2002	R	957	\$557.78	0	1351311
06/25/2002	PAY	(\$14.03)	(\$14.03)	\$0.00							
07/18/2002	BILL	\$19.26	\$19.26	\$0.00	06/19/2002	07/18/2002	R	957	\$562.68	0	1351311
08/16/2002	BILL	\$19.26	\$19.26	\$0.00	07/18/2002	08/16/2002	R	957	\$615.75	0	1351311
09/17/2002	BILL	\$19.26	\$19.26	\$0.00	08/16/2002	09/17/2002	R	957	\$507.64	0	1351311
09/18/2002	PAY	(\$49.14)	(\$49.14)	\$0.00							
10/17/2002	BILL	\$19.26	\$19.26	\$0.00	09/17/2002	10/17/2002	R	957	\$561.40	0	1351311
11/18/2002	BILL	\$19.26	\$19.26	\$0.00	10/17/2002	11/18/2002	R	957	\$637.18	0	1351311
11/20/2002	PAY	(\$21.51)	(\$21.51)	\$0.00							
11/20/2002	PAY	(\$31.34)	(\$31.34)	\$0.00							
12/18/2002	BILL	\$19.26	\$19.26	\$0.00	11/18/2002	12/18/2002	R	957	\$573.82	0	1351311
01/09/2003	PAY	(\$58.15)	(\$58.15)	\$0.00							
01/21/2003	BILL	\$19.26	\$19.26	\$0.00	12/18/2002	01/21/2003	R	957	\$464.92	0	1351311
02/19/2003	BILL	\$19.26	\$19.26	\$0.00	01/21/2003	02/19/2003	R	957	\$546.04	0	1351311
03/20/2003	BILL	\$19.26	\$19.26	\$0.00	02/19/2003	03/20/2003	R	957	\$631.86	0	1351311
04/21/2003	BILL	\$19.26	\$19.26	\$0.00	03/20/2003	04/21/2003	R	957	\$688.48	0	1351311
05/20/2003	PAY	(\$37.37)	(\$37.37)	\$0.00							
05/20/2003	BILL	\$19.26	\$19.26	\$0.00	04/21/2003	05/20/2003	R	957	\$612.52	0	1351311
06/18/2003	BILL	\$19.26	\$19.26	\$0.00	05/20/2003	06/18/2003	R	957	\$668.72	0	1351311
07/18/2003	BILL	\$19.26	\$19.26	\$0.00	06/18/2003	07/18/2003	R	957	\$725.61	0	1351311
08/18/2003	BILL	\$19.26	\$19.26	\$0.00	07/18/2003	08/18/2003	R	957	\$781.53	0	1351311
09/11/2003	PAY	(\$47.82)	(\$47.82)	\$0.00							
09/18/2003	BILL	\$19.26	\$19.26	\$0.00	08/18/2003	09/18/2003	R	957	\$667.55	0	1351311
10/17/2003	BILL	\$19.26	\$19.26	\$0.00	09/18/2003	10/17/2003	R	957	\$724.47	0	1351311
11/14/2003	PAY	(\$29.07)	(\$29.07)	\$0.00							
11/18/2003	BILL	\$19.26	\$19.26	\$0.00	10/17/2003	11/18/2003	R	957	\$712.28	0	1351311
12/18/2003	BILL	\$19.26	\$19.26	\$0.00	11/18/2003	12/18/2003	R	957	\$817.50	0	1351311
01/21/2004	BILL	\$19.26	\$19.26	\$0.00	12/18/2003	01/21/2004	R	957	\$983.56	0	1351311
01/23/2004	PAY	(\$54.20)	(\$54.20)	\$0.00							
02/19/2004	BILL	\$19.26	\$19.26	\$0.00	01/21/2004	02/19/2004	R	957	\$958.54	0	1351311
03/19/2004	BILL	\$19.26	\$19.26	\$0.00	02/19/2004	03/19/2004	R	957	\$1,123.95	0	1351311
04/20/2004	BILL	\$19.26	\$19.26	\$0.00	03/19/2004	04/20/2004	R	957	\$1,166.98	0	1351311
04/26/2004	XFER	(\$254.08)	(\$254.08)	(\$254.08)							

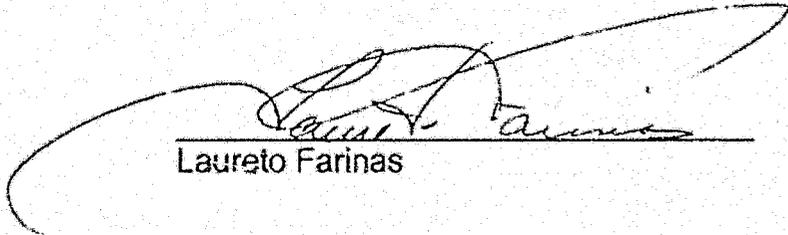
Account #: 1117062373      SA #: 9961489473      Bill Cycle: 14      Rate Class: GS      Phone #: 5921242(215)  
 Name: MEDIA BUREAU INC      Address: 723 N 4TH ST/PHILA,PA  
 Pay Agreement Indicator: N      Easyway Indicator:      CRP Status:      Meter #: 1351311  
 Blocker Start Date: 20040426      Blocker End Date: 20050805      Meter #: 1351311

Tran Date	Tran Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
05/19/2004	BILL	\$19.26	\$19.26	\$0.00	04/20/2004	05/19/2004	R	957	(\$158.17)	0	1351311
06/18/2004	BILL	\$19.26	\$19.26	\$0.00	05/19/2004	06/18/2004	R	957	(\$109.31)	0	1351311
06/23/2004	PAY	(\$38.52)	(\$38.52)	\$0.00							
07/20/2004	BILL	\$19.26	\$19.26	\$0.00	06/18/2004	07/20/2004	R	957	(\$480.26)	0	1351311
08/10/2004	ALLOWS	(\$142.60)	(\$142.60)	(\$142.60)							
08/18/2004	BILL	\$19.26	\$19.26	\$0.00	07/20/2004	08/18/2004	R	957	(\$553.81)	0	1351311

VERIFICATION

I, Laureto Farinas, hereby declare that I am counsel to the Philadelphia Gas Works; and 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: September 17, 2004



Laureto Farinas

**CERTIFICATE OF SERVICE**

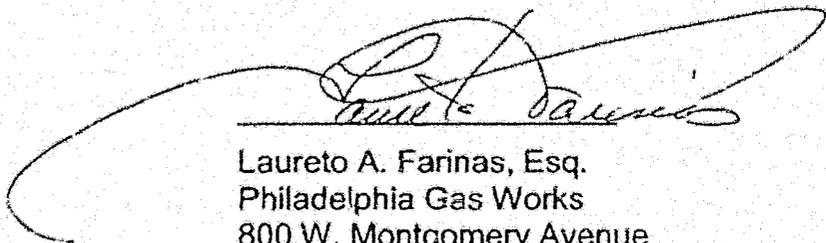
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Media Bureau, Inc.  
c/o Steve Greenbaum  
723-725 N. 9<sup>th</sup> Street  
Philadelphia, PA 19123

September 17, 2004

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

**PGW ORIGINAL**

**Philadelphia Gas Works**

800 West Montgomery Avenue, Philadelphia, PA 19122

Laureto A. Fannas, Esq.  
Senior Attorney  
Legal Department  
Direct Dial. 215-684-6982  
FAX 215-684-6798  
E-mail: laureto.fannas@pgworks.com

Revised

RECEIVED

September 17, 2004

SEP 24 2004

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

PA PUBLIC UTILITY COMMISSION  
REGULATORY BUREAU

RE: Media Bureau, Inc. c/o Steve Greenbaum v. PGW, Docket No. C-20043326

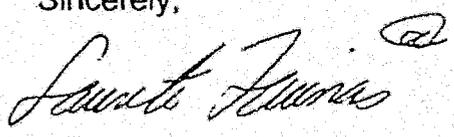
Dear Secretary McNulty:

C-20043422

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 contact me at my direct-dial number above. Thank you for your assistance.

Sincerely,



Enclosures

cc: Media Bureau, Inc. c/o Steve Greenbaum  
Eloise Carnall

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SEP 24 2004

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Media Bureau, Inc c/o  
Steve Greenbaum

Docket No. C-20043422

v.

Philadelphia Gas Works

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. PGW hereby avers the following:

1. Admitted
2. Admitted
3. Denied. PGW denies the averment in Paragraph 3 of the Complaint concerning the accuracy of the Complainant's bill and an overcharge on the account for gas service at 723-725 N. 3<sup>rd</sup> Street. PGW records indicate that, due to a system error after PGW's conversion to its new billing system in 1999, PGW generated the Complainant's bills based upon estimated meter readings from June 1999 until January 2000 for a usage of 0 ccf of gas per period for all but one billing period as shown on the statement of account which is attached hereto as Exhibit "A". These bills were estimated such that they only reflected a charge in the amount of \$10.70 per month. This is the standard Customer Charge.

The automatic meter reading device ("AMR") recorded reads that populated computer records on the Meter Reading Query. These readings however, were not used to generate a bill for actual gas usage due to the system error.

On May 19, 2000 the error was found and corrected, which resulted in the generation of a bill for previously unbilled services in the amount of \$2179.59 for 2374 ccfs of gas.

A decision of the Bureau of Consumer Services ("BCS") dated July 9, 2004, found that the billing was correct as rendered. The BCS Decision ordered PGW to give the customer a credit rate adjustment in the amount of \$142.60 along with

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DOCKETED  
OCT 12 2004

the late payment charges being waived in the amount of \$208.41. The BCS decision put the Complainant on a payment arrangement consisting of the current bill plus \$350 toward the arrears per month beginning the August 2004 PGW bill due date.

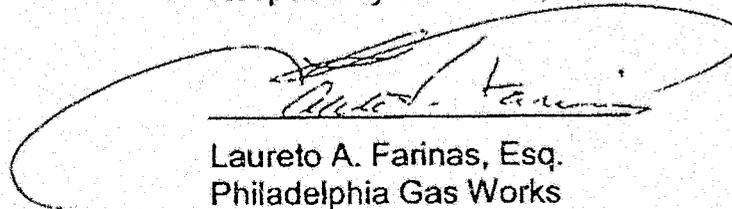
Total account balance as of August 2004 is \$3048.71.

4. Denied. 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.

**Wherefore, PGW respectfully requests that this Commission find against the Complainant and dismiss the complaint in this matter.**

Respectfully submitted,

September 17, 2004



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



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

IN REPLY PLEASE  
REFER TO OUR FILE

October 28, 2004

In Re: C-20043422

(SEE LETTER DATED 10/19/04)

Media Bureau Inc c/o Steve Greenbaum v. Philadelphia Gas Works

Billing Dispute

**DOCUMENT  
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CORRECTED Hearing Notice

This is to inform you that the notice dated October 19, 2004, on the above-captioned case contained incorrect information. The purpose of this notice is to correct that information. All corrections will be double underlined.

Type: Initial Hearing  
Date: Wednesday, December 15, 2004  
Time: 2:00 p.m.  
Location: In an available hearing room  
Philadelphia State Office Building  
Broad and Spring Garden Streets  
Philadelphia, Pennsylvania  
Presiding: Administrative Law Judge Cynthia W. Fordham  
1302 Philadelphia State Office Building  
1400 West Spring Garden Street  
Philadelphia, PA 19130  
Telephone: (215) 560-2105  
Fax: (215) 560-3133

**DOCKETED**  
NOV 19 2004

*Attention: You may lose the case if you do not come to this hearing and present facts on the issues raised.*

If you intend to file exhibits, 2 copies of all hearing exhibits to be presented into evidence must be submitted to the reporter. An additional copy must be furnished to the Presiding Officer. A copy must also be provided to each party of record.

Individuals representing themselves do not need to be represented by an attorney. All others (corporation, partnership, association, trust or governmental agency or subdivision) must be represented by an attorney. An attorney representing you should file a Notice of Appearance before the scheduled hearing date.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission:

- Scheduling Office: (717) 787-1399.
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

pc: Judge Fordham  
Cherie Pyle  
Beth Plantz  
Docket Section  
Calendar File

#504100 10/04