

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00 :
2. BUREAU: ALJ :
3. SECTION(S) :
5. APPROVED BY: : 4. PUBLIC MEETING DATE:
DIRECTOR: : 00/00/00
SUPERVISOR: :
6. PERSON IN CHARGE: : 7. DATE FILED: 02/18/05
8. DOCKET NO: Z-01690503 : 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: MARTINEZ, SHEILA

RESPONDENT/APPLICANT: PHILADELPHIA GAS WORKS

COMP/APP COUNTY: PHILADELPHIA

UTILITY CODE: 125042

ALLEGATION OR SUBJECT

COMPLAINANT STATES THAT SHE CAN'T AFFORD TO PAY THE \$1,000 DEPOSIT BUT WILL MAKE THE PAYMENTS OF \$228 A MONTH.

DOCUMENT
FOLDER

DOCKETED
MAR 29 2005

ORIGINAL

Must be returned by February 15, 2005

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form Z - 01690503

Please print or type.

125042

1. CUSTOMER NAME (COMPLAINANT)

Your name, mailing address, county, telephone number, utility account number and service address:

Name Sheila Martinez

Street/P.O. Box 6115 Marsden St. Apt # _____

City Philadelphia State PA Zip 19135

County Phila

Area Code/HOME Phone (215) 624-1347

Area Code/WORK Phone _____

Utility Account Number 0329843433
(from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name _____

Street/P.O. Box _____

City _____ State _____ Zip _____

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PGW

RECEIVED

FEB 18 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER
(taxi, moving company, limousine)

TELEPHONE
(local, long distance)

4. COMPLAINT (check one)

A. In general, what is your complaint?

I want to oppose the company's proposed rate increase.

There are incorrect charges on my bill.

There is a reliability, safety or quality problem with my utility service.

I received a notice that my utility service is being terminated.

I would like a payment agreement.

Other.
(explain)

B. State the facts of your complaint.

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

5. RELIEF

What do you want the Public Utility Commission to do about your complaint? Use additional paper if you need more space.

I can pay the \$228. a month but I can't afford \$1,000 deposit. I rec letter after 12-15-04, to pay bef. 12-23-04. I have received a letter stating there will be a lien on my home for \$2,500.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company AND your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES
(includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification: I Shela Martinez, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Shela Martinez (Signature) 2-15-05 (Date)

9. LEGAL REPRESENTATION (IF ANY)

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

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

10. FILING

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
---	--

Facsimiles and/or electronic filings of the complaint form will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

NOTIFICATION OF INTENT TO APPEAL
(Request for Formal Complaint Forms)

Timely

Notice to Customer:

If you sign and return this form, you are notifying the Public Utility Commission that you intend to appeal this informal complaint decision. Do not return this form unless you want to appeal this decision.

If you want to appeal this decision, you must return this Notification of Intent to Appeal form within 20 days of 12/3/2004. The Commission will send you formal complaint forms.

You must comply with the terms of this decision until the Public Utility Commission completes the formal complaint process. You must make all of the required payments or the utility company may pursue the termination of your service.

Thank You
Pennsylvania Public Utility Commission

Yes, I want to appeal the decision of the Bureau of Consumer Services. Please send formal complaint forms to me at the following address:

Customer name and address:
(Please correct any mistakes.)

SHEILA MARTINEZ
6115 MARSDEN ST
PHILADELPHIA PA 19135 - 3615

215-332-7575
(Area Code) Telephone Number

Sheila Martinez
Signature

Mail this completed form to:

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

ST Number:	1690503	Date of mailing:	12/3/2004
Company:	PHILADELPHIA GAS WORKS		

SECRETARY'S BUREAU

2004 DEC 13 AM 9:34

RECEIVED

14



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

IN REPLY PLEASE
REFER TO OUR FILE

JANUARY 26, 2005

ST1690503

SHEILA MARTINEZ
6115 MARSDEN STREET
PHILADELPHIA PA 19135-3615

Dear Sir/Madam:

We have received your request to appeal the decision of the Bureau of Consumer Services.

We have enclosed one complaint form for you to complete. Please read carefully the instructions to help you complete the form.

**** Please make sure you sign the form. We must receive your original signature in order for us to process your complaint. Your form will be returned to you if an original signature is not received.**

Return the form to us on or before February 15, 2005 to the address listed below:

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

While you wait for us to reach a decision on your complaint, you must pay all undisputed bills (ones that are not a part of your complaint). As long as you pay all undisputed bills and return these formal complaint forms to us on time, the company is not permitted to terminate your service.

Commission Procedures for Formal Complaints

- We send a copy of this letter to the company so they know you are appealing the Bureau of Consumer Services' decision;
- We also send the company a copy of your completed formal complaint forms. Once they receive it, they have 20 days to send us an answer to your complaint. The company will send you a copy of their answer.

- Once we receive all the paperwork, we usually will schedule your hearing before an Administrative Law Judge.
- We will notify both you and the company by mail when the hearing date is set.
- If you cannot travel to your hearing, you can request that the hearing be held by phone. This is called a telephonic hearing. If we can, we will schedule a telephonic hearing for you.
- We will most likely schedule your hearing sometime within three months after you file your complaint forms. If you know of certain dates when you will not be available for a hearing, let us know when you file your forms. We will try to work around your schedule.
- If you cannot attend the hearing on the scheduled date, you must request a different time or date. You should request the change at least 5 days before your hearing by writing to:

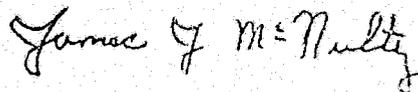
Office of Administrative Law Judge
Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

YOU SHOULD INCLUDE YOUR DAYTIME TELEPHONE NUMBER IN YOUR LETTER. DEPENDING ON YOUR REASON FOR NOT BEING ABLE TO ATTEND THE SCHEDULED HEARING, YOUR REQUEST TO CHANGE THE HEARING MAY OR MAY NOT BE APPROVED. WE WILL LET YOU KNOW OUR DECISION ON YOUR REQUEST FOR CHANGING THE HEARING DATE BEFORE THE DATE OF THE HEARING.

YOU MUST ATTEND SCHEDULED HEARINGS IN PERSON OR BY PHONE. IF YOU DO NOT ATTEND, YOUR COMPLAINT MAY BE DISMISSED (THROWN OUT).

If you have any questions about the complaint process, please call the Bureau of Consumer Services, toll free, at 1-800-782-1110.

Very truly yours,



James J. McNulty
Secretary

ddi

cc: PHILADELPHIA GAS WORKS

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: MARCH 30, 2005

SHEILA MARINEZ
Complainant

VS.

PHILADELPHIA GAS WORKS
Respondent

Complaint Docket
No: Z-01690503

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: PHILADELPHIA GAS WORKS

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,

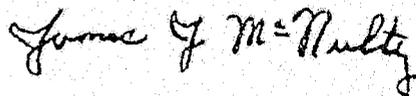
1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, 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.

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

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

DATE SERVED: MARCH 30, 2005

Z-01690503

LAURETO FARINAS ESQUIRE
PHILADELPHIA GAS WORKS
800 W MONTGOMERY AVE
PHILADELPHIA PA 19122-2898

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by SHEILA MARINEZ. 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.

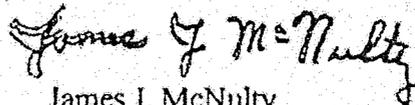
MARCH 30, 2005

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

dbb

Philadelphia Gas Works
600 West Montgomery Avenue, Philadelphia, PA 19122



ORIGINAL

Mary M. Chan, Paralegal
Legal Department
Direct Dial: (215) 684-8830
Fax: (215) 684-8798
E-mail: mary.chan@pgworks.com

April 19, 2005

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

RE: Sheila Marinez vs. PGW, Docket No.: Z-01690503

Dear Secretary McNulty:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files the original and three (3) copies of its Answer to the Complaint in the above captioned matter.

If additional information is needed about this matter, please do not hesitate to contact me at my direct-dial number above. Thank you for your assistance in this matter.

Sincerely,

Enclosure

cc: Sheila Marinez
Lucille Coleman

**DOCUMENT
FOLDER**

RJP

38

ORIGINAL
BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

APR 27 2005

Sheila Martinez

:

:

v.

:

Docket No.: Z-01690503

Philadelphia Gas Works

DOCUMENT
: FOLDER

DOCKETED

APR 27 2005

Answer of the Philadelphia Gas Works

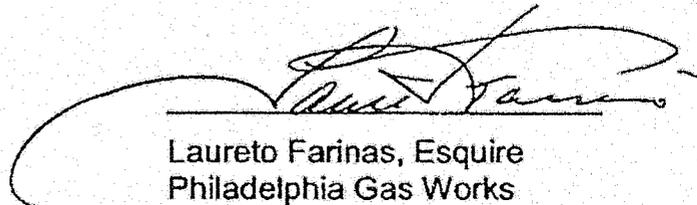
Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby answers the Complaint filed in the above captioned matter. PGW hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. PGW denies the averments contained in paragraph 4 concerning the Complainant requesting a payment arrangement. PGW records indicate that the Complainant was enrolled in PGW's Customer Responsibility Program ("CRP") since October of 2003. The Complainant has missed several monthly payments. PGW records also indicate that the Complainant last made payment in June, 2004. The Complainant's current account balance is \$5,544.25 as shown on the statement of accounts which is attached hereto as Exhibit "A".
5. Denied. The averments in Paragraph 5 of the Complaint are requests for relief to which no response is required. PGW therefore denies the averments in this paragraph.
6. n/a
7. n/a
8. n/a

Wherefore, PGW respectfully requests that this Commission find against the Complainant, and affirm the decision of the BCS in this matter. PGW requests that, the Commission enter an Interim Order directing the Complainant to make payment of the current bill during the pendency of the hearing in this matter. PGW further requests that the Interim Order directing payment authorize PGW to terminate service if the Complainant fails to comply with that Interim Order.

Respectfully submitted,

April 19, 2005

A handwritten signature in black ink, appearing to read "Laureto Farinas", is written over a horizontal line. A large, sweeping flourish extends from the left side of the signature across the page.

Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982

APR 19 2005
PHILADELPHIA GAS WORKS

EXHIBIT A

HISTORY REQUEST REPORT FOR ACCOUNT # 329843433 AND SA # 8508124768 AS OF 04/19/2005

Account # 329843433	SA # 8508124768	Bill Cycle 09	Rate Class GS	Phone # 6211347(2'5)
Name: MARTINEZ, SHEILA D	Address: 6115 MARSDEN ST/PHILAPA			
Pay Agreement Indicator: N	Easyway Indicator	CRF Status: C		
Blocker Start Date: 20050405	Blocker End Date: 20070405	Meter #: 633572		

Tran Date	Tran Type	Current Amt.	Total Amt.	Adjust Amt.	Segment Start Date	Segment End Date	Read Code	End Read	Current Balance	Usage	Meter #
10/10/2002	CRPFR	\$458.96	\$458.96	\$458.96	10/09/2002	11/08/2002	R	7292	\$538.96	209	1893572
11/03/2002	BILL	\$80.00	\$80.00	\$0.00							
11/23/2002	CRPFR	\$166.69	\$166.69	\$166.69	11/08/2002	12/11/2002	R	7515	\$1,049.83	323	1893572
12/11/2002	BILL	\$344.18	\$344.18	\$0.00							
01/13/2003	BILL	\$422.28	\$422.28	\$0.00	12/11/2002	01/13/2003	R	7573	\$1,472.11	338	1893572
01/31/2003	PAY	(\$50.00)	(\$50.00)	\$0.00							
02/11/2003	BILL	\$432.25	\$432.25	\$0.00	01/13/2003	02/11/2003	R	857	\$1,904.36	338	1893572
03/13/2003	BILL	\$388.15	\$388.15	\$0.00	02/11/2003	03/13/2003	R	8726	\$2,242.51	355	1893572
04/11/2003	BILL	\$293.49	\$293.49	\$0.00	03/13/2003	04/11/2003	R	856	\$2,542.00	235	1893572
04/17/2003	CRPFR	(\$2,542.00)	(\$2,542.00)	(\$2,542.00)							
05/13/2003	BILL	\$142.48	\$142.48	\$0.00	04/11/2003	05/13/2003	R	908	\$142.48	120	1893572
06/11/2003	BILL	\$129.50	\$129.50	\$0.00	05/13/2003	06/11/2003	R	9150	\$271.98	78	1893572
07/11/2003	BILL	\$88.00	\$88.00	\$0.00	06/11/2003	07/11/2003	R	9179	\$359.98	0	1893572
08/11/2003	BILL	\$88.00	\$88.00	\$0.00	07/11/2003	08/11/2003	R	9197	\$447.98	18	1893572
09/30/2003	CRPFR	\$1,942.00	\$1,942.00	\$1,942.00							
09/30/2003	CRPFR	(\$2,389.98)	(\$2,389.98)	(\$2,389.98)							
09/11/2003	BILL	\$103.00	\$103.00	\$0.00	08/11/2003	09/11/2003	R	9215	\$108.00	18	1893572
10/07/2003	CRPFR	\$2,389.98	\$2,389.98	\$2,389.98							
10/10/2003	BILL	\$103.00	\$103.00	\$0.00	09/11/2003	10/10/2003	R	9267	\$216.00	52	1893572
10/19/2003	CRPFR	(\$2,389.98)	(\$2,389.98)	(\$2,389.98)							
11/10/2003	BILL	\$103.00	\$103.00	\$0.00	10/10/2003	11/10/2003	R	9372	\$324.00	105	1893572
12/11/2003	BILL	\$103.00	\$103.00	\$0.00	11/10/2003	12/11/2003	R	9610	\$432.00	238	1893572
01/13/2004	BILL	\$103.00	\$103.00	\$0.00	12/11/2003	01/13/2004	R	9844	\$540.00	334	1893572
02/11/2004	BILL	\$103.00	\$103.00	\$0.00	01/13/2004	02/11/2004	R	343	\$648.00	339	1893572
03/13/2004	BILL	\$103.00	\$103.00	\$0.00	02/11/2004	03/13/2004	R	601	\$756.00	238	1893572
04/13/2004	BILL	\$103.00	\$103.00	\$0.00	03/13/2004	04/13/2004	R	938	\$864.00	337	1893572
05/12/2004	BILL	\$103.00	\$103.00	\$0.00	04/13/2004	05/12/2004	R	1142	\$572.00	204	1893572
06/10/2004	PAY	(\$48.65)	(\$48.65)	\$0.00							

Account # 329343433

SA # 8508124768

Bill Cycle 09

Rate Class GS

Phone # 621134712-51

Name: MARTINEZ, SHEILA D

Address: 6115 MARSDEN ST PHILADELPHIA

Pay Agreement Indicator: N

Easyway Indicator

CRF Status C

Blocker Start Date 20050405

Blocker End Date 20070405

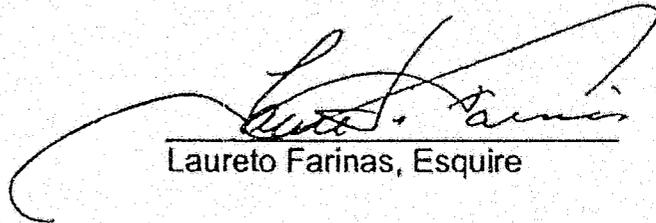
Meter # 1893572

Trans Date	Trans Type	Current Amt	Total Amt	Adjust Amt	Segment Start Date	Segment End Date	Read Code	Erd Read	Current Balance	Usage	Meter #
06/11/2004	BILL	\$103.00	\$103.00	\$0.00	05/12/2004	06/11/2004	R	1181	\$1,057.35	39	1893572
07/13/2004	BILL	\$103.00	\$103.00	\$0.00	06/11/2004	07/13/2004	R	1214	\$1,159.35	33	1893572
08/11/2004	BILL	\$224.03	\$224.03	\$0.00	07/13/2004	08/11/2004	R	1240	\$1,383.38	26	1893572
09/13/2004	BILL	\$224.03	\$224.03	\$0.00	08/11/2004	09/13/2004	R	1266	\$1,587.41	26	1893572
10/12/2004	BILL	\$224.03	\$224.03	\$0.00	09/13/2004	10/12/2004	R	1332	\$1,811.44	66	1893572
11/10/2004	BILL	\$224.03	\$224.03	\$0.00	10/12/2004	11/10/2004	R	1539	\$2,035.47	207	1893572
12/10/2004	BILL	\$224.03	\$224.03	\$0.00	11/10/2004	12/10/2004	R	1799	\$2,259.50	260	1893572
01/12/2005	BILL	\$224.03	\$224.03	\$0.00	12/10/2004	01/12/2005	R	2001	\$2,483.53	405	1893572
02/10/2005	BILL	\$224.03	\$224.03	\$0.00	01/12/2005	02/10/2005	R	2607	\$2,707.56	403	1893572
03/11/2005	BILL	\$224.03	\$224.03	\$0.00	02/10/2005	03/11/2005	R	2833	\$2,931.59	326	1893572
04/12/2005	BILL	\$224.03	\$224.03	\$0.00	03/11/2005	04/12/2005	R	3128	\$3,155.62	195	1893572

VERIFICATION

I, Laureto Farinas, hereby declare that I am counsel to the Philadelphia Gas Works; that, as such, I am authorized to make this verification on its behalf: that the facts set forth in the foregoing Answer are true to the best of my knowledge, information and belief, and that I expect to be able to prove these at a hearing held in this matter. I make this verification subject to the penalties of 18. Pa. C.S. §4904, pertaining to false statements to authorities.

Date: April 19, 2005



Laureto Farinas, Esquire

ORIGINAL

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:

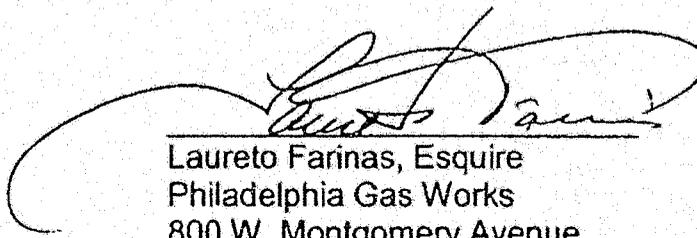
Sheila Martinez
6115 Marsden Street
Philadelphia, PA 19135

RECEIVED

APR 19 2005

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

April 19, 2005


Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982