

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: 09/08/06
8. DOCKET NO: C-20066853	:	9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: GOLDSMITH, RAMZE

RESPONDENT/APPLICANT: PHILADELPHIA GAS WORKS

COMP/APP COUNTY: PHILADELPHIA

UTILITY CODE: 125042

ALLEGATION OR SUBJECT

COMPLAINANT STATES LATE PAYMENT CHARGES HE IS NOT RESPONSIBLE FOR STILL SHOWING ON CREDIT REPORT. HE WOULD LIKE THE PUC TO HAVE CREDIT REPORT CORRECTED.

DOCKETED
SEP 29 2006

**DOCUMENT
FOLDER**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print or type.

1. CUSTOMER NAME (COMPLAINANT)

C-20066853

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

Name Ramze Goldsmith

Street/P.O. Box 1632 east Wynsam street Apt #

Deleted:

City Philadelphia State PA Zip 19138

Deleted:

County Philadelphia

Area Code/HOME Phone 215 930.0726

Area Code/WORK Phone

Utility Account Number 000411647883 (from your bill)

ORIGINAL

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

Name Ramze Goldsmith

Street/P.O. Box 1632 east Wynsam street

City Philadelphia State PA Zip 19138

Deleted:

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: Philadelphia Gas Works (PGW)

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER (taxi, moving company, limousine)

TELEPHONE (local, long distance)

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17

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.

In August of 2005, I sold the above mentioned property (5931 North Norwood street). On the day of settlement, I called all utility companies to get a final reading/payoff quote. The property was an investment property and the tenants paid all utilities, so I owed PGW absolutely nothing. In December of 2005 (5 months after the property was sold), service was initiated at the property in my name. I had no knowledge of the service being used in my name and for several months, late payments were placed onto my transunion credit report. Once I learned of what was going on, I contacted PGW in order to rectify the problem. They realized their mistake and removed the balance that they said I owed them, however they have yet to remove the late payments from my credit report. I was told that the process takes between 30-60 days, this was in June of 2006.

5. RELIEF

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

I would like you to assist me in getting these mistakes (the late payments for this account) removed from my credit report.

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 Harve Goldsmith, 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).

Harve Goldsmith (Signature) 9/6/00 (Date)

A U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT SETTLEMENT STATEMENT	B. TYPE OF LOAN: 1. <input type="checkbox"/> FHA 2. <input type="checkbox"/> FmHA 3. <input checked="" type="checkbox"/> CONV. UN.INS. 4. <input type="checkbox"/> VA 5. <input type="checkbox"/> CONV. INS.				
	6. FILE NUMBER: PH164782PA			7. LOAN NUMBER:	
	8. MORTGAGE INS CASE NUMBER:				

C. NOTE: This form is furnished to give you a statement of actual settlement costs. Amounts paid to and by the settlement agent are shown. Items marked "(POC)" were paid outside the closing; they are shown here for informational purposes and are not included in the totals.

D. NAME AND ADDRESS OF BUYER: Etigenia DP Roberto 3730 73rd Street #3P Jackson Heights, NY 11372	E. NAME AND ADDRESS OF SELLER: Ramze Goldsmith 1632 East Wynsam Street Philadelphia, PA 19130	F. NAME AND ADDRESS OF LENDER: Opton Ore Mortgage Corporation 701 East Gate Drive, Suite 200 Mt. Laurel, NJ 08054
G. PROPERTY LOCATION: 593 North Norwood Street Philadelphia, PA 19138 Philadelphia County, Pennsylvania	H. SETTLEMENT AGENT: 23-3004326 Trident Land Transfer Company PLACE OF SETTLEMENT 1800 John F. Kennedy Boulevard, 14th Floor Philadelphia, Pa. 19103	I. SETTLEMENT DATE: August 26, 2005

J. SUMMARY OF BUYER'S TRANSACTION	
100. GROSS AMOUNT DUE FROM BUYER:	
101. Contract Sales Price	60,000.00
102. Personal Property	
103. Settlement Charges to Buyer (Line 1400)	4,444.25
104.	
105.	
<i>Adjustments For Items Paid By Seller in advance</i>	
106. City/Town Taxes 08/27/05 to 01/01/06	237.40
107. County Taxes to	
108. School Taxes to	
109.	
110.	
111.	
112.	
120. GROSS AMOUNT DUE FROM BUYER	64,681.65
200. AMOUNTS PAID BY OR IN BEHALF OF BUYER:	
201. Deposit or earnest money	1,000.41
202. Principal Amount of New Loan(s)	51,000.00
203. Existing loan(s) taken subject to	
204. Buyers Funds	
205.	
206.	
207.	
208.	
209. AUGUST RENT CREDIT	104.84
<i>Adjustments For Items Unpaid By Seller</i>	
210. City/Town Taxes to	
211. County Taxes to	
212. School Taxes to	
213. Water Service Charge 08/09/05 to 08/27/05	11.27
214. WATER USAGE AS AGREED	7.14
215.	
216.	
217.	
218.	
219.	
220. TOTAL PAID BY/FOR BUYER	52,123.66
300. CASH AT SETTLEMENT FROM/TO BUYER:	
301. Gross Amount Due From Buyer (Line 120)	64,681.65
302. Less Amount Paid By/For Buyer (Line 220)	(52,123.66)
303. CASH (X FROM) (TO) BUYER	12,557.99

K. SUMMARY OF SELLER'S TRANSACTION	
400. GROSS AMOUNT DUE TO SELLER:	
401. Contract Sales Price	60,000.00
402. Personal Property	
403.	
404.	
405.	
<i>Adjustments For Items Paid By Seller in advance</i>	
406. City/Town Taxes 08/27/05 to 01/01/06	237.40
407. County Taxes to	
408. School Taxes to	
409.	
410.	
411.	
412.	
420. GROSS AMOUNT DUE TO SELLER	60,237.40
500. REDUCTIONS IN AMOUNT DUE TO SELLER:	
501. Excess Deposit (See Instructions)	
502. Settlement Charges to Seller (Line 1400)	5,730.76
503. Existing loan(s) taken subject to	
504. Payoff of first Mortgage to Washington Mutual	33,168.24
505. Payoff of second Mortgage	
506.	
507. (Deposit disb. as proceeds)	
508.	
509. AUGUST RENT CREDIT	104.84
<i>Adjustments For Items Unpaid By Seller</i>	
510. City/Town Taxes to	
511. County Taxes to	
512. School Taxes to	
513. Water Service Charge 08/09/05 to 08/27/05	11.27
514. WATER USAGE AS AGREED	7.14
515.	
516.	
517.	
518.	
519.	
520. TOTAL REDUCTION AMOUNT DUE SELLER	39,072.25
600. CASH AT SETTLEMENT TO/FROM SELLER:	
601. Gross Amount Due To Seller (Line 420)	60,237.40
602. Less Reductions Due Seller (Line 520)	(39,072.25)
603. CASH (X TO) (FROM) SELLER	21,165.15

By signing page 2 of this statement, the signatories acknowledge receipt of a completed copy of page 1 of this two page statement.

*Harry Gross (Daily News)
x 4916
215.854.2000*

*PGW
Acct # 000411647883
129954986
paid o.k.*

*Ms. Thomas
correspondence
Fax 215.684.6996
Transunion
800.916.8800*

*PGW
collections 215.684.6679
215.255.1777*

*sent
July 20, 2005
Cancelled bills to
Transunion*

L. SETTLEMENT CHARGES

700. TOTAL COMMISSION Based on Price				\$	@	%	4,000.00	PAID FROM	PAID FROM
Division of Commission (line 700) as Follows:								BUYERS	SELLER'S
								FUNDS AT	FUNDS AT
								SETTLEMENT	SETTLEMENT
701	\$ 4,000.00	to	Prudential Fox & Roach - Center City - Art Museum						
702	\$	to	Prudential Fox & Roach - Center City - Art Museum						
703	Commission Paid at Settlement								4,000.00
704	Conveyancing Fee/1&i to Prudential Fox & Roach - Center City - Art Museum							100.00	100.00
800. ITEMS PAYABLE IN CONNECTION WITH LOAN									
801	Loan Origination Fee	%	to						
802	Loan Discount	%	to						
803	Appraisal Fee		to	Allied Mortgage Group, Inc.		POC \$375.00b			
804	Credit Report		to	Option One Mortgage Corporation			50.00		
805	Lender's Inspection Fee		to						
806	Mortgage Ins. App. Fee		to						
807	Tax Service Fee		to	Fidelity National Tax Service			65.00		
808	Flood Cert. Fee		to	First American Flood Data			12.00		
809	Underwriting Fee		to	Option One Mortgage Corporation			515.00		
810	Funding Fee		to	Option One Mortgage Corporation			50.00		
811	Broker Fee		to	Allied Mortgage Group, Inc.			510.00		
900. ITEMS REQUIRED BY LENDER TO BE PAID IN ADVANCE									
901	Interest From	08/26/05	to	09/01/05	@	\$ 11.190000/day	(6 days 6.3750%)	67.14	
902	Mortgage Insurance Premium for		months to						
903	Hazard Insurance Premium for	1.0 years	to	Farmers Insurance Company			446.04		
904									
905									
1000. RESERVES DEPOSITED WITH LENDER									
1001	Hazard Insurance	3.000 months @	\$	37.17	per month			111.51	
1002	Mortgage Insurance		\$		per month				
1003	City/Town Taxes	9.000 months @	\$	56.86	per month			511.74	
1004	County Taxes		\$		per month				
1005	School Taxes	0.000 months @	\$		per month				
1006			\$		per month				
1007			\$		per month				
1008	Aggregate Adjustments		\$		per month			-223.06	
1100. TITLE CHARGES									
1101	Settlement or Closing Fee		to	Trident Land Transfer Company					
1102	Abstract or Title Search		to	Trident Land Transfer Company					
1103	Title Examination		to	Trident Land Transfer Company					
1104	Title Insurance Binder		to	Trident Land Transfer Company					
1105	Clerical Fee		to	Donna Rose			35.00		15.00
1106	Patric Searches		to	Trident Land Transfer Company			2.00		2.00
1107	Attorneys Fees		to						
	(includes above item numbers:)								
1108	Title Insurance		to	Trident Land Transfer Company			556.88		
	(includes above item numbers:)								
1109	Lender's Coverage	\$	60,000.00			REISSUE-OP			
1110	Owner's Coverage	\$	60,000.00			556.88 REISSUE-OP			
1111	End.		to	Trident Land Transfer Company			200.00		
1112	Closing Service Letter		to	Trident Land Transfer Company			35.00		
1113	E mail documents		to	Trident Land Transfer Company			35.00		
1200. GOVERNMENT RECORDING AND TRANSFER CHARGES									
1201	Recording Fees: Deed \$	77.50; Mortgage \$	72.50; Releases \$	71.50			150.00		71.50
1202	City/County Tax/Stamps: Deed		1,800.00; Mortgage				900.00		900.00
1203	State Tax/Stamps: Deed		600.00; Mortgage				300.00		300.00
1204	Federal Express		to	Trident Land Transfer Company			15.00		15.00
1205									
1300. ADDITIONAL SETTLEMENT CHARGES									
1301	Survey		to						
1302	Pest Inspection		to						
1303	Water Due		to	WATER REVENUE BUREAU					377.26
1304									
1305									
1400. TOTAL SETTLEMENT CHARGES (Enter on Lines 103, Section J and 502, Section K)								4,444.25	5,780.76

Trident Land Transfer Company is NOT responsible for any bills for unfileable items not listed on the settlement sheet after review and approval by the parties. The undersigned hereby acknowledge receipt of a completed copy of pages 1&2 of this statement & any attachments referred to herein. I HAVE CAREFULLY REVIEWED THE HUD-1 SETTLEMENT STATEMENT AND TO THE BEST OF MY KNOWLEDGE AND BELIEF, IT IS A TRUE AND ACCURATE STATEMENT OF ALL RECEIPTS AND DISBURSEMENTS MADE ON MY ACCOUNT OR BY ME IN THIS TRANSACTION. I FURTHER CERTIFY THAT I HAVE RECEIVED A COPY OF THE HUD-1 SETTLEMENT STATEMENT.

Buyer

Efigenia DP Roberto

Seller

Ramze Goldsmith

TO THE BEST OF MY KNOWLEDGE, THE HUD-1 SETTLEMENT STATEMENT WHICH I HAVE PREPARED IS A TRUE AND ACCURATE ACCOUNT OF THE FUNDS WHICH WERE RECEIVED AND HAVE BEEN OR WILL BE DISBURSED BY THE UNDERSIGNED AS PART OF THE SETTLEMENT OF THIS TRANSACTION.

Trident Land Transfer Company
Settlement Agent

WARNING: IT IS A CRIME TO KNOWINGLY MAKE FALSE STATEMENTS TO THE UNITED STATES ON THIS OR ANY SIMILAR FORM. PENALTIES UPON CONVICTION CAN INCLUDE A FINE AND IMPRISONMENT. FOR DETAILS SEE: TITLE 18 U.S. CODE SECTION 1001 & SECTION 1010.



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

IN REPLY PLEASE
REFER TO OUR FILE

DATE SERVED: SEPTEMBER 29, 2006

C-20066853

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

**DOCUMENT
FOLDER**

Dear Mr. Farinas:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by RAMZE GOLDSMITH. 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.

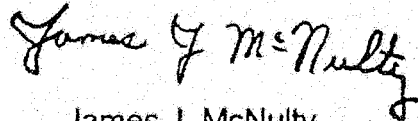
Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

SEPTEMBER 29, 2006

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,

A handwritten signature in cursive script that reads "James J. McNulty". The signature is written in dark ink and is positioned above the printed name and title.

James J. McNulty
Secretary

SS

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: SEPTEMBER 29, 2006

RAMZE GOLDSMITH
Complainant

v.

PHILADELPHIA GAS WORKS
Respondent

Complaint Docket
No: C-20066853

DOCKETED

SEP 29 2006

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: PHILADELPHIA GAS WORKS

**DOCUMENT
FOLDER**

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).

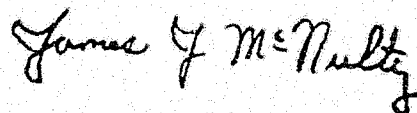
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. 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

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



Mary M. Chan, Paralegal
Legal Department
Direct Dial: (215) 684-6630
Fax: (215) 684-6708
E-mail: mary.chan@pgworks.com

ORIGINAL

October 19, 2006

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

RECEIVED

OCT 19 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Ramze Goldsmith vs PGW, Docket No. C-20066853

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 required, please do not hesitate to contact the undersigned. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Mary M. Chan".

Mary M. Chan

DOCUMENT
FOLDER

DOCKETED

OCT 24 2006

Enclosure

cc: Ramze Goldsmith
Anne Marie Cromley

BTL

74

RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION OCT 10 2008

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Ramze Goldsmith

:
:
:
:
:

v.

Docket No. C-20066853

Philadelphia Gas Works

Answer of the Philadelphia Gas Works

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

1. Admitted.
2. Admitted.
3. Admitted.
4. (a-b) Denied. It is admitted that the Complainant sold the property of 5931 N. Norwood Street, Philadelphia, PA (Service Address) in August 2005. PGW records does not indicate that the Complainant contacted PGW to inquire about the total account balance on the day of settlement. PGW therefore denies this averment.

It is admitted that the Complainant had a zero balance on the account at the Service Address at the time of settlement.

It is admitted that five months after the date of settlement, someone initiated gas service in the name of the Complainant.

It is also admitted that late payment charges were placed on the Complainant's credit report.

It is admitted that the Complainant contacted PGW on several occasions to rectify the credit issue.

It is admitted that PGW informed the Complainant that PGW will remove the balance owed from the Complainant's credit and that it will take 30-60 days to update.

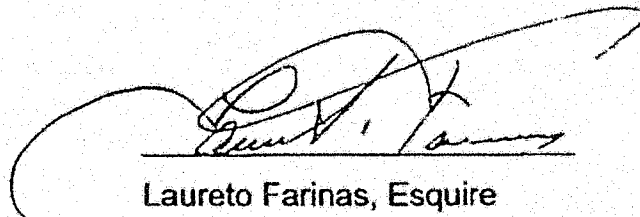
PGW is investigating the update of the Complainant's credit. After completion of investigation, PGW will file an amended Answer to the Complainant's Complaint.

5. Denied. The averment in Paragraph 5 of the Complaint is a request for relief to which no response is required. PGW therefore denies the averments in this paragraph.
6. Admitted.
7. Admitted.

Wherefore, PGW respectfully requests that this Commission find against the Complainant, and affirm the decision of the BCS in this matter.

Respectfully submitted,

October 19, 2006

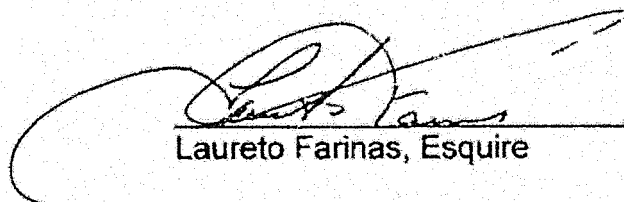


Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982

VERIFICATION

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

Dated: October 19, 2006


Laureto Farinas, Esquire

RECEIVED

OCT 19 2006

PA PUBLIC UTILITY COMMISSION
REGULATORY BUREAU

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 52 PA CODE
§1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

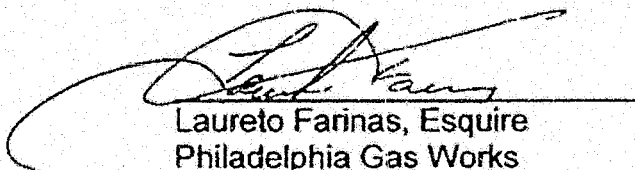
Ramze Goldsmith
1632 E. Wynsam Street
Philadelphia, PA 19138

Dated: October 19, 2006

RECEIVED

OCT 19 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE



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