

CAPTION SHEET

CASE MANAGEMENT SYSTEM

REPORT DATE: 00/00/00 :  
 BUREAU: ALJ :  
 SECTION(S): : 4. PUBLIC MEETING DATE:  
 APPROVED BY: : 00/00/00  
 DIRECTOR: :  
 SUPERVISOR: :  
 PERSON IN CHARGE: : 7. DATE FILED: 01/08/07  
 DOCKET NO: C-20077262 : 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: LUTZ, JANET

RESPONDENT/APPLICANT: PHILADELPHIA GAS WORKS

COMP/APP COUNTY: PHILADELPHIA UTILITY CODE: 125042

ALLEGATION OR SUBJECT

COMPLAINANT STATES THAT SHE PAID \$823.13 TO HAVE THE GAS TURNED ON. SHE FEELS THERE IS NO WAY THAT SHE OWED THAT AMOUNT OF MONEY. SHE IS REQUESTING ADJUSTED CHARGES AND READINGS FOR THE THREE MONTH PERIOD THE GAS WAS ON IN HER HOME AND A REFUND FOR THE DIFFERENCE.

**DOCKETED**  
JAN 11 2007

DOCUMENT  
FOLDER

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

C-20077262

Please print or type.

ORIGINAL

1. CUSTOMER NAME (COMPLAINANT)

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

Name Janet Lutz
Street/P.O. Box 4014 Meridian St. Apt #
City Phila., State PA Zip 19136
County Phila.,
Area Code/HOME Phone 215-338-1805
Area Code/WORK Phone 215-338-1805
Utility Account Number (from your bill) 4122087790

RECEIVED
2007 JAN -8 11:19:19
SECRETARY'S BUREAU

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

Name Janet Lutz
Street/P.O. Box 11326 Wilt St.
City Phila., State PA Zip 19125

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: Phila. Gas Works

3. TYPE OF UTILITY (check one)

- ELECTRIC
GAS
WATER
TELEPHONE (local, long distance)
STEAM HEAT
WASTE WATER
MOTOR CARRIER (taxi, moving company, limousine)

91

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. letter attached  
(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.

Letter and copy of documents attached

5. **RELIEF**

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

Refund - overpayment

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 Janet Lutz, 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).

Janet Lutz  
(Signature)

1-4-07  
(Date)

**Janet R. Lutz**  
4014 MERIDIAN STREET  
PHILADELPHIA, PENNSYLVANIA 19136  
PHONE (215) 338-1805 FAX (215)338-7880

## **PGW History**

**Reference: 1132 E. Wilt Street**

**Wilt Street is a rental property where the tenant had to be evicted. The gas had been turned off and I called PGW sometime in December and requested that it be turned on and the bills be forwarded to me. I did not get the name of the person I originally spoke to but it was a women.**

**On December 27<sup>th</sup> I called PGW again and spoke to Steven. There was an error on my house bill that needed to be corrected. At that time I again requested all bills for Wilts Street be sent to my house. He told me there was no record of my earlier request but he would take care of the bill.**

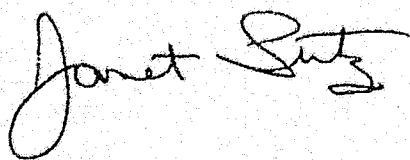
**In January and February, I was receiving bills for my home saying that I owed \$0.00. I was on a budget so even though these bills indicated nothing due, I still sent in \$131.00 payments. Still I received no bills for Wilt Street. I called PGW several more times requesting a bill.**

**The first thing I ever received from PGW in reference to Wilt Street was that the gas had been shut-off. I never received a bill or a shut-off notice. From the time the gas was turned on and than shut-off was three months. I find this whole situation incredible. When I call PGW and told them that I couldn't pay a bill that I never received, I was told that was my problem to find out what I owed. I called requesting bills on many occasions but no bill was ever received. They also claimed that the bills went to Wilt Street but no bills were ever received there either. As I said before, the only mail I ever received regarding Wilt Street was that the gas had been shut-off.**

In order to rent the property again, I paid PGW \$823.13 to have the gas turned on. There is no way that I owed that amount of money. The house is a small two bedroom row home. The property was vacant and the heat was kept at 50 degrees. I am request actual charges and readings for the three month period the gas was on in my name and a refund for the difference. I should not be penalized because PGW did not bill me after many requests. I paid my house bills even when PGW, in error, said nothing was due. I am enclosing copies of these bills as proof. I certainly would not have ignored bills that were due on Wilt Street and paid bills that stated \$0.00 was due.

Please correct this error.

Thank you,

A handwritten signature in cursive script that reads "Janet Lutz". The signature is written in black ink and is positioned above the printed name.

Janet Lutz



**PHILADELPHIA GAS WORKS**  
 800 W. MONTGOMERY AVENUE PHILADELPHIA, PA 19122-0050

Page: 1 of 2  
 Billing Date: 01/19/06  
 Account Number: 4122087790

**MONTHLY STATEMENT**

From 11/29/05 thru 12/30/05  
 Billing Cycle Number: 11

Account for:  
**JANET LUTZ**  
 4014 MERIDIAN STREET  
 PHILADELPHIA PA 19136

Payments Summary

12/30/05 Check \$131.00

Total Amount Due By	131.00
Feb 13, 2006	<del>50.00</del>

**GENERAL INFORMATION**

CONTACT US

Gas Leaks & Emergencies	215 235-1212
Billing & General Information	215 235-1000
Appliance Service	215 235-2050
Theft of Gas	215 684-6383
Foreign Language Assistance	215 235-1000
Hearing impaired TTY Line	215 236-4646
Representantes Que Hablan Espanol	215 235-2175

Web Site - [www.pgworks.com](http://www.pgworks.com)

CUSTOMER SERVICE CENTERS

(Hours 9 a.m. - 5 p.m.)

Center City	1137 Chestnut St. (M, T, TH, F)
Germantown	210 W. Chelton Ave. (T, W, F)
S. Philadelphia	1601 S. Broad St. (M, W, TH)
Frankford	4410 Frankford Ave. (T, TH, F)
N. Philadelphia	1337 W. Erie Ave. (M, W, TH)
W. Philadelphia	5230 Chestnut St. (M, T, W, F)

*Handwritten:*  
 Paid  
 T-30-06  
 \$131.00

Questions or complaints about your bill? Please call us before the Due Date at 215-235-1000.  
 Or write to: PGW P.O. Box 3500, Phila., PA 19122-0050

**Message Center**

Your Easy Way budget plan has been canceled. Please pay the full amount of your bill each month. Thank you.



**PHILADELPHIA GAS WORKS**  
800 W MONTGOMERY AVENUE PHILADELPHIA, PA 19122-0050

Page: 1 of 2  
Billing Date: 02/17/06  
Account Number: 4122087790

**MONTHLY STATEMENT**

From 12/30/05 thru 01/31/06  
Billing Cycle Number: 11

Account for:  
**JANET LUTZ**  
4014 MERIDIAN STREET  
PHILADELPHIA PA 19136

Payments Summary

02/03/06 Check \$131.00

Total Amount Due By Mar 15, 2006	<b>\$0.00</b>
-------------------------------------	---------------

**GENERAL INFORMATION**

CONTACT US

Gas Leaks & Emergencies	215 235-1212
Billing & General Information	215 235-1000
Appliance Service	215 235-2050
Theft of Gas	215 684-6383
Foreign Language Assistance	215 235-1000
Hearing impaired TTY Line	215 236-4646
Representantes Que Hablan Espanol	215 235-2175

Web Site - [www.pgworks.com](http://www.pgworks.com)

CUSTOMER SERVICE CENTERS

(Hours 9 a.m. - 5 p.m.)

Center City	1137 Chestnut St. (M, T, TH, F)
Germantown	210 W. Chelton Ave. (T, W, F)
S. Philadelphia	1601 S. Broad St (M, W, TH)
Frankford	4410 Frankford Ave. (T, TH, F)
N. Philadelphia	1337 W Frie Ave (M, W, TH)
W. Philadelphia	5230 Chestnut St. (M, T, W, F)

*Handwritten:*  
P-9  
3-6-06  
\$ 131.00

Questions or complaints about your bill? Please call us before the Due Date at 215-235-1000.  
Or write to: PGW P.O. Box 3500, Phila., PA 19122-0050



4-19-06  
talk to mark

PUC  
A T C m

1800-  
782-  
1110

PHILADELPHIA GAS WORKS  
800 W. MONTGOMERY AVENUE  
PHILADELPHIA, PA 19122-0050

04/17/2006  
Account Number: 461709712  
Customer Name: LUTZ, JANET  
Premise Address: 1132 E WILT ST/PHILA,PA  
191253432

Delivered To Carmella

Case # 2062850

### YOUR GAS HAS BEEN SHUT-OFF

Delivered To Dorise 4-24-06  
no bill ever rec'd from PGW

#### WE SHUT OFF YOUR GAS BECAUSE:

- You did not pay your past due bill.
- You did not pay your security deposit.
- You did not give us access to your meter.
- You did not meet the requirements and/or complete the application for service process.
- Theft of service or tampering with utility equipment.
- Rejected payment.
- Fraud/Material misrepresentation.

- If your income is above 150% but does not exceed 250% of the federal poverty guidelines, we will not shut off your service if:
  1. Someone in your household is 12 or younger or 65 or older; or
  2. You have paid at least one-half of your last two monthly gas bills; or
  3. If over the last two months you have paid at least 15% of your income toward the gas bills.

#### TO HAVE YOUR SERVICE TURNED BACK ON YOU MUST DO ALL OF THE FOLLOWING:

- Arrange to pay your overdue bill of \$ 543.15.
- Pay a Turn On Charge of \$123.23 (Plus \$372.00 if we must dig up the street to shut off the gas).
- Pay a Deposit (if required) of \$ 300.00
- Other: \_\_\_\_\_

Federal Poverty Guidelines : 2006

Household Size, Including Children	Your income is 150% of the FPG or below if it is:	Your income is between 151-250% of FPG if it is:
1	\$1,225 or less	\$1,226-\$2,042
2	\$1,650 or less	\$1,651-\$2,750
3	\$2,075 or less	\$2,076-\$3,458
4	\$2,500 or less	\$2,501-\$4,167
Each Additional Person	Add \$425	Add \$426- \$708

- You must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premises.

#### MEDICAL EMERGENCY NOTICE

Let us know if someone living in your home is seriously ill or has a medical condition. WE MAY RESTORE YOUR SERVICE provided you:

1. Have your licensed physician or nurse practitioner certify in phone and in writing that such an illness exists and that it may be aggravated if your service is not restored.
2. Make arrangements to pay this bill. You must provide us with household income and occupant information to determine your payment terms while protected under the medical certification. Call us at 215-235-1777.

#### IMPORTANT TO KNOW

If you have questions or need more information, please call us at 215-235-1777. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC will attempt to help you with your problem. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.

#### WINTER SHUT-OFF PROVISIONS (Dec. 1-Mar. 31)

- We will restore your service within 24 hours of your meeting all requirements to have service reconnected. Where street digging is required, it may take up to 7 days.
- If you are low-income, there are special rules about whether we may shut off your gas in the winter. Add together the monthly income for the household and look at the chart below to determine your group.
- If your income is 150% of the federal poverty guidelines or below, we must first ask the PUC for permission to shut off your service. If you did not receive notification that we obtained permission from the PUC, call us immediately.

- If you have a valid Protection From Abuse order from a court, there are some additional protections available to you. Call us immediately at 215-235-1777. (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. Call 215-235-1777 right away to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- If your landlord pays your utility bill you have other legal protections. Please call us at 215-235-1777.
- If you have trouble understanding or speaking English please call us at 215-235-1777 for free interpretation.
- All adult occupants of the premise, whose names are on the mortgage, deed, or lease are considered the customer and are responsible for payment to restore service.
- ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.
- To get service on as soon as possible, you must contact us after your payment has been made to be sure you've met all conditions to have the service turned back on and to arrange access to your premises.

#### IMPORTANT SAFETY INFORMATION

- For heating purposes use only equipment that is made for home heating. Use all types of heaters carefully and follow all directions for safe use. NEVER use your oven, grill or clothes dryer to heat your home. This could cause a fire or dangerous carbon monoxide gas.
- Please be aware that using candles, portable heaters, or generators may also be dangerous.

11-15-w

732-15  
123-

First mail ever rec'd from PGW for Wilt St.



**PHILADELPHIA GAS WORKS**  
800 W. MONTGOMERY AVENUE, PHILADELPHIA, PA 19122-0050

Page: 1 of 2  
Billing Date: 04/22/06  
Account Number: 0461709712

**MONTHLY STATEMENT**

*Final Notice*

**GENERAL INFORMATION**

From 03/17/06 thru 04/17/06  
Billing Cycle Number: 13

CONTACT US

Account for:  
**JANET LUTZ**  
4014 MERIDIAN ST  
PHILADELPHIA PA 19136

Gas Leaks & Emergencies	215 235-1212
Billing & General Information	215 235-1000
Appliance Service	215 235-2050
Theft of Gas	215 684-6383
Foreign Language Assistance	215 235-1000
Hearing impaired TTY Line	215 236-4646
Representantes Que Hablan Espanol	215 235-2175

Web Site - [www.pgworks.com](http://www.pgworks.com)

Billing Summary

Past Due Amount	\$722.45
Current Charges	\$104.68

CUSTOMER SERVICE CENTERS

(Hours 9 a.m. - 5 p.m.)

Center City	1137 Chestnut St. (M, T, TH, F)
Germantown	210 W. Cheltenham Ave. (T, W, F)
S. Philadelphia	1601 S. Broad St. (M, W, TH)
Frankford	4410 Frankford Ave. (T, TH, F)
N. Philadelphia	1337 W. Erie Ave. (M, W, TH)
W. Philadelphia	5230 Chestnut St. (M, T, W, F)

Total Amount Due By May 16, 2006	<b>\$827.13</b>
-------------------------------------	-----------------

*Handwritten notes:*  
Mrs. Burton  
4-28-06  
Debbie - pac  
6-1-06

*Handwritten note:*  
Paid 4-28-06  
ck # 4253

To avoid Finance Charges please pay total amount due by the due date. Finance Charge is calculated at 1.5% monthly. (18% yearly)

The above statement shows an unpaid final billing. Prompt payment will be appreciated. If payment has been rendered, please accept our thanks.

*Handwritten note:*  
1st bill rec'd for will

Questions or complaints about your bill? Please call us before the Due Date at 215-235-1000.  
Or write to: PGW P.O. Box 3500, Phila., PA 19122-0050

Avg Daily Cost

00.00

00.00

AMJJASUNDJFMA

Estimated

*Handwritten question:*  
How could there be any current charges when the gas was turned off in March?



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

IN REPLY PLEASE  
REFER TO OUR FILE

DATE SERVED: JANUARY 12, 2007

C-20077262

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 JANET LUTZ. 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.

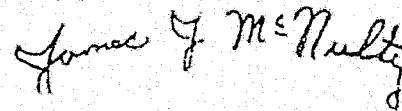
Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

JANUARY 12, 2007

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 typed name.

James J. McNulty  
Secretary

jih

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: JANUARY 12, 2007

JANET LUTZ

Complainant

v.

PHILADELPHIA GAS WORKS

Respondent

Complaint Docket

No: C-20077262

DOCUMENT  
FOLDER

---

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

---

TO: PHILADELPHIA GAS WORKS

**DOCKETED**  
JAN 11 2007

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).

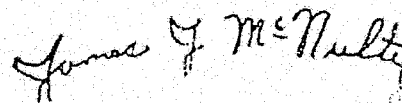
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. 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) 624-6230  
Fax: (215) 624-6798  
E-mail: [mary.chan@pgworks.com](mailto:mary.chan@pgworks.com)

February 1, 2007

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

**ORIGINAL**

**RE: Janet Lutz v. PGW, Docket No. C-20077262**

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,

  
Mary M. Chan

**DOCUMENT  
FOLDER**

Enclosure

cc: Janet Lutz  
Anne Marie Cromley

**RECEIVED**

FEB 01 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BTL

97

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT  
FOLDER

Janet Lutz

v.

Philadelphia Gas Works

:  
:  
:  
:  
:  
:  
:  
:

Docket No. C-20077262

Answer of the Philadelphia Gas Works

ORIGINAL

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) Admitted in part; denied in part. PGW lacks sufficient information to determine the truth of the averment that 1132 E. Wilt Street, Philadelphia, PA (Service Address) was a rental property. PGW therefore denies this averment.

It is admitted that the Complainant established gas service at the Service Address on December 2, 2005.

It is admitted that on December 27, 2005, the Complainant contacted PGW and requested a separate account number for the Service Address as the Complainant has two gas accounts.

PGW denies the averments that the Complainant was receiving bill amounts of zero.

**DOCKETED**  
FEB 06 2007

RECEIVED

FEB 01 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

PGW further denies the remaining averments concerning the allegation that the Complainant did not receive bills for gas usage at the Service Address. PGW records indicate that bills were sent to the Service Address since December 27, 2005.

It is admitted that the Complainant paid \$827.13 in May 2006. PGW denies the averment that this amount represents the full amount for restoration. This amount represents the outstanding balance on the Complainant's account at that time.

PGW denies the averment that the Complainant do not owe this amount.

PGW lacks sufficient knowledge to determine the truth of the averment concerning the temperature the Complainant keeps the thermostat.

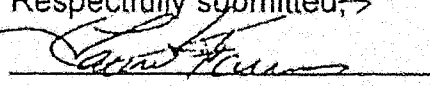
The remaining averments are requests for relief to which no response is required. PGW therefore denies the remaining averments.

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 dismiss the Complaint.

February 1, 2007

Respectfully submitted, →




---

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: February 1, 2007



Laureto Farinas, Esquire

RECEIVED

FEB 01 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

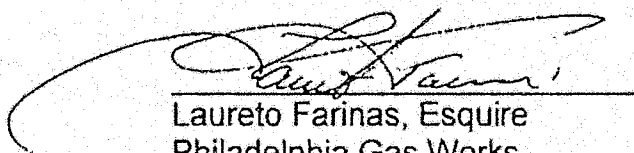
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

*Janet Lutz*  
4014 Meridian Street  
Philadelphia, PA 19136

Dated: February 1, 2007



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

RECEIVED

FEB 01 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU