



PHILADELPHIA GAS WORKS

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January 31, 2023

VIA ELECTRONIC FILING

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

Re: Mary Ayom v. Philadelphia Gas Works; Docket No. C-2022-3036975

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' Answer to Formal Complaint with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

Enclosure

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Answer to Formal Complaint upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

Via Email Only

Mary Ayom

maryayom5656@gmail.com

Date: January 31, 2023

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Ayom,	:	
	:	
Complainant,	:	
v.	:	Docket No. C-2022-3036975
	:	
Philadelphia Gas Works,	:	
	:	
Respondent.	:	

PHILADELPHIA GAS WORKS' ANSWER TO FORMAL COMPLAINT

Pursuant to 52 Pa. Code §5.61, Philadelphia Gas Works (“PGW” or “Respondent”) hereby submits this Answer to the Formal Complaint (“Complaint”) of Mary Ayom (“Complainant”) that was served by the Secretary of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) on January 11, 2023. In support of this Answer, PGW avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. PGW admits that the Complainant seeks a payment agreement for the service at 5619 Rosehill Street, Philadelphia, PA (“Service Address”).

By way of further answer, the Complainant established gas service at the Service Address as of April 30, 2008. The Service Address is listed as residential gas heat and other domestic usage. The property is equipped with an automatic meter reading device and bills are based on actual meter reads.

PGW records indicate that the Complainant has had multiple broken PGW-issued payment agreements and one broken PUC-issued payment agreement.

On May 23, 2022, PGW terminated the gas service due to non-payment.

5. Denied. The averments contained in this paragraph are a prayer for relief to which no response is required.
6. Admitted.
7. Admitted.

WHEREFORE, PGW respectfully requests that the Commission deny all relief requested in the Complaint, dismiss the Complaint, and grant any other relief in favor of PGW as deemed appropriate.

Respectfully submitted,

/s/ Graciela Christlieb

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Date: January 31, 2023

Counsel for PGW

VERIFICATION

I, Graciela Christlieb, hereby state that I am counsel for the Philadelphia Gas Works, the facts set forth in the foregoing Answer are true and correct to the best of my knowledge, information, and belief, and 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).

Date: January 31, 2023

/s/ Graciela Christlieb

Graciela Christlieb, Esquire