



7235 Elmwood Ave • Philadelphia, Pa 19142  
Phone: 215.365.1626  
info@vnslanes.com • www.vnslanes.com

October 24, 2023

**VIA ELECTRONIC FILING**

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

Re: Steven Fred Sr./V&S Elmwood Lanes, Inc., v. Philadelphia GasWorks; Docket No.  
C-2023-3042898

Dear Secretary Chiavetta:

Enclosed for electronic filing please find V&S Elmwood Lanes answer with New Matter to Formal Complaint with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

A handwritten signature in black ink, appearing to be 'Steven Fred Sr.', written over a horizontal line.

Sincerely,

Steven Fred Sr.  
Owner\Operator  
V&S Elmwood Lanes Inc.

Enclosure  
cc: Cert. of Service w/enc.



7235 Elmwood Ave • Philadelphia, Pa 19142  
Phone: 215.365.1626  
info@vnslanes.com • www.vnslanes.com

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of V&S Elmwood Lanes answers with new matter 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

Graciela Christlieb  
Esquire Philadelphia Gas Works  
[Graciela.Christlieb@pgworks.com](mailto:Graciela.Christlieb@pgworks.com)

Date: October 24, 2023

A handwritten signature in black ink, appearing to read 'Steven Fred Sr.', written over a horizontal line.

Steven Fred Sr.  
Owner\Operator  
V&S elmwood Lanes Inc.



7235 Elmwood Ave • Philadelphia, Pa 19142  
 Phone: 215.365.1626  
 info@vnslanes.com • www.vnslanes.com

V&S Elmwood Lanes answers to PGW:

1. On September 11, 2023, I Steven Fred Sr. on behalf of V&S Elmwood Lanes filed the instant complaint, identical to the complaint at Docket No. C-2021-3026266 because I believe PGW misrepresented findings and related data presented in the previous case noted.
2. In the previous case as noted in document: 1735085;
  - a. #8 PGW personnel discovered leaks in the inlet pipes and service extension piping leading to the meter when visiting the service address on August 4, 2021. (PGW Exhibit 5; Tr. 23).
  - b. #9 Any leaks discovered on the inlet side of the meter would not result in higher usage measurements. (PGW Exhibit 5).

I disagree with this PGW assessment in that there where 2 leaks temporarily patched, and subsequently replaced with a new meter and piping. (see attached pictures old & new meter)

3. Also in the previous case, PGW noted in item #13 below the higher degree days increased the need for heating or a rise in consumption via (Exhibit 3) below:

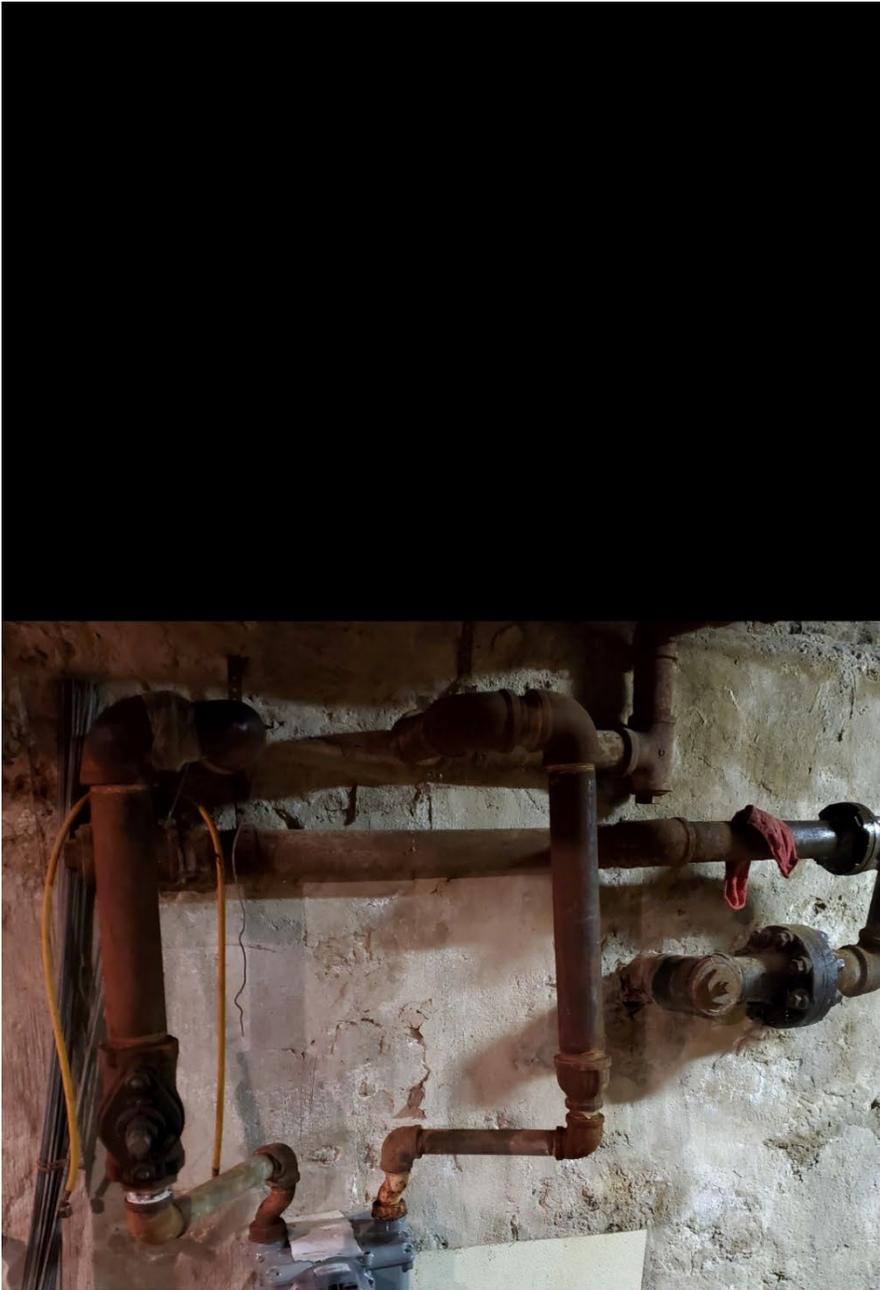
Month	Degree days	Bill dollar amount	Usage CCF
January 2019	783	888.97	697
January 2020	832	1009.74	800
January 2021	891	1645	1,292
February 2019	972	1305	1043
February 2020	803	1077.16	786
February 2021	866	1788	1361
March 2019	808	1076.91	845
March 2020	756	859.93	633
March 2021	893	1792	1424



7235 Elmwood Ave • Philadelphia, Pa 19142

Phone: 215.365.1626

info@vnslanes.com • www.vnslanes.com





7235 Elmwood Ave • Philadelphia, Pa 19142  
Phone: 215.365.1626  
info@vnslanes.com • www.vnslanes.com





7235 Elmwood Ave • Philadelphia, Pa 19142

Phone: 215.365.1626

info@vnslanes.com • www.vnslanes.com





7235 Elmwood Ave • Philadelphia, Pa 19142

Phone: 215.365.1626

info@vnslanes.com • www.vnslanes.com





7235 Elmwood Ave • Philadelphia, Pa 19142  
 Phone: 215.365.1626  
 info@vnslanes.com • www.vnslanes.com

Upon investigating PGW’s claim of “higher degree days” I’d like to present data from the Pennsylvania State Climatologist

<https://climate.met.psu.edu/data/state/degreedays.php?station=KPHL>

**Heating Degree Days**

Year	January	February	March	April	May
2021	891\788	866\794	893\524	308	83
2020	832\708	803\620	756\453	380	166
2019	783\833	866\690	808\666	184	85

- Highlighted numbers are what PGW noted in their item#13
- Non highlighted numbers are reported from Pennsylvania State Climatology for Philadelphia at KPHL the same source that PGW uses
- 2650 degree days reported by PGW : 2106 degree days reported by same source PGW uses
- That’s a 544 degree day higher difference that PGW charged us for

Therefor we believe that PGW’s billing during that period is in error resulting in high charges than normal. All that we are requesting is that PGW adjust the billing accordingly so that we can move forward.

Steven Fred Sr.  
 Owner\Operator  
 V&S Elmwood Lanes  
 Philadelphia, PA 19142  
 Telephone: 856-723-2633  
[Steve@vnslanes.com](mailto:Steve@vnslanes.com)

Date: October 24, 2023