



PHILADELPHIA GAS WORKS

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July 1, 2024

VIA ELECTRONIC FILING

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

Re: Robert Adams v. Philadelphia Gas Works, Docket No. F-2024-3048952

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' updated Certificate of Service for its Answer to the Formal Complaint in the above-referenced matter. The original Certificate of Service stated the wrong mailing address for the Complainant. This updated Certificate of Service, along with another copy of the same Answer, was served on the Complainant by First Class Mail and Electronic Mail.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

/s/Anita J. Murray
Anita J. Murray

/awm

encl.

cc (w/encl.): Robert Adams via First Class Mail and Email

CERTIFICATE OF SERVICE

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

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

Robert Adams
5022 Chestnut Street, Apt 2-F
Philadelphia, PA 19139
lcsinternationaladams@gmail.com

/s/ Anita J. Murray
Anita J. Murray, Esquire

Date: July 1, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Robert Adams,	:	
Complainant,	:	
v.	:	Docket No. F-2024-3048952
	:	
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 James Cameron Starr (“Complainant”) that was served by the Secretary of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) on May 10, 2024. In support of this Answer, PGW avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part. Denied in Part. PGW denies that there is an active termination notice for the gas service at 5022 Chestnut Street, 2F, Philadelphia, PA (“Service Address”).

PGW admits that the Complainant seeks a payment agreement for the outstanding balance for gas service at the Service Address.

PGW denies that there are incorrect charges on the Complainant’s bills for gas service at the Service Address.

By way of further answer, the Complainant established gas service at the Service Address as of June 10, 2005. The Service Address has gas heat as well as other appliances and the bills are based on actual meter readings.

PGW records indicate that the Complainant has received multiple PGW-issued payment agreements that remain unsatisfied as well as a PUC issued payment agreement that remains unsatisfied.

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

Graciela Christlieb, Esquire
Attorney I.D. 200760
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
Telephone: (215) 684-6164
graciela.christlieb@pgworks.com

Date: May 30, 2024

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: May 30, 2024

/s/ Graciela Christlieb

Graciela Christlieb, Esquire