

LARRY R. CRAYNE, PC
Attorney at Law

238 Johnston Road
Pittsburgh, PA 15241

lrcrayne@comcast.net

(412) 831-5462
(412) 425-4029

ELECTRONICALLY FILED

September 13, 2010

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Marilyn Marie Smith v. UGI Utilities, Inc.
Complaint Docket No. C-2010-2195084

Dear Ms. Chiavetta:

Enclosed is an electronically filed copy of UGI Utilities, Inc.'s Preliminary Objections to Formal Complaint. A copy of the document has been served on the Complainant.

Sincerely,



Larry R. Crayne

cc: Marilyn Marie Smith
3154 N. 6th Street
Harrisburg, PA 17110

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

In the Matter of:

Marilyn Marie Smith,
Complainant,

Complaint Docket
No. C-2010-2195084

VS.

UGI Utilities, Inc.
Respondent.

Preliminary Objections

AND NOW comes Respondent, UGI Utilities, Inc. (UGI), pursuant to 52 *Pa. Code*, Section 5.101 (a) (3), and files the following Preliminary Objections:

A. Insufficient Specificity of Pleading

1. Complainant filed a formal complaint with the Commission in this proceeding on or about August 18, 2010. The complaint was served on UGI by Secretarial letter dated August 24, 2010.

2. Paragraphs 4. A. and 4. B. of the complaint contain no averments related to Complainant's gas utility service. To the contrary, Paragraphs 4. A. and 4. B. reference, *inter alia*, "Defense Finance", "sexual harassment" and Title VII of the Civil Rights Act of 1964. Further, Complainant has attached to her complaint a total of fifty-two (52) pages of material that is unrelated and therefore irrelevant to anything having to do with her gas utility service.

3. Paragraph 5. of the complaint contains a number of disjointed, illogical and incomplete references to matters totally unrelated to Complainant's gas utility service, including, *inter alia*., Queen Elizabeth II.

Wherefore, UGI moves that Complainant be directed to file a proper complaint specifying in numbered paragraphs and utilizing the Commission's format for a formal complaint, the particular matters related to her gas utility service about which she may be concerned, or, in the alternative, if Complainant has no complaint about her gas utility service, that Complainant withdraw the complaint filed at this docket number.

Notice to Plead

To: Marilyn Marie Spencer:

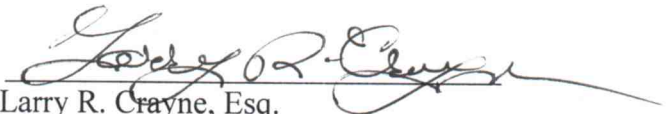
You are hereby notified to file a written response to the above Preliminary Objections within ten (10) days from service hereof or a judgment may be entered against you. The response must be mailed to the Secretary of the Public Utility Commission:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

A copy of your response must also be mailed to the undersigned.

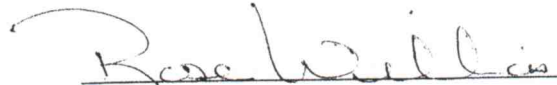
Respectfully submitted,

UGI Utilities, Inc.

By: 
Larry R. Crayne, Esq.

VERIFICATION

I, Rose Williams, Regulatory Compliance Supervisor UGI Utilities, Inc. - Gas Division, hereby state that the facts set forth above 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).



Rose Williams

9-13-2010

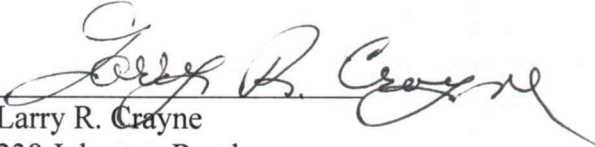
Date

Certificate of Service

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participant, listed below, in accordance with the requirements of Sec. 1.54 (relating to service by a participant).

Marilyn Marie Smith
3154 N. 6th Street
Harrisburg, PA 17110

Dated this 13th day of SEP, 2010


Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Utilities, Inc.