

From:

Dennis J. Vicario
312 Ridgeway Place
Philadelphia, Pa. 19116

December 27, 2010

To:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, Pa. 17105-3265

Re: Dennis Vicario v. PGW
Docket No. C-2010-2213955

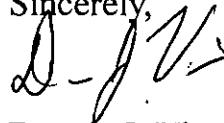
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Dear Secretary Chiavetta:

Enclosed is my written response to PGW's Preliminary Objections and Motion to Strike Impertinent Matter.

If additional information is required, please let me know and I will provide it as best I can. I apologize for not being a lawyer but I will make my best effort to be clear and explain my points.

Sincerely,



Dennis J. Vicario

Written Response

In response to the Preliminary Objections and Motion to Strike, I feel that I must first point out that in addressing #2 on page 2, I do realize that for the period July 2006 through June 2007 that I owed \$1758.48. My contention is that, as I contacted PGW in June 2008, PGW through customer service representatives not only assured my wife and I that we did not owe any back money anymore. The PGW customer service representative then went on even further to then explain to us how LIHEAP monies go into a fund to pay off old "written off" accounts. We made every effort to address the matter at that time. However, at that time in June 2008, as PGW never sent me any paperwork regarding the lien. I was unaware of the lien so I could not try at that time to get it removed. PGW's customer service representative told my wife and I that the debt had been satisfied so we thought that was the end of it.

Second, in addressing #7 on page 3, it is a fact that after being told by PGW that I did not owe the money in June 2008, that I did not receive any paperwork at all concerning the matter. If I had known of the lien at that time then I could have addressed it then. As PGW admits now on my behalf, on page 2 of their Answer of the Philadelphia Gas Works, when I did find out, over three years later, I called PGW immediately on October 14, 2010. I again had to contact them to try and resolve the matter.

In addressing #10 on page 4 of PGW's Preliminary Objections and Motion to Strike, I am not disputing the imposition of the lien in June 2007, I am disputing the imposition of the lien now as I feel the debt was satisfied sometime prior to June 2008.

In addressing #12 of PGW's Preliminary Objections and Motion to Strike, I feel the Commission can most certainly determine that the lien should be removed if the debt no longer exists. I feel the Commission could determine the debt has been satisfied for any number of reasons. I feel that this matter must be heard impartially by the PUC as to determine who at PGW is correct.

In PGW's Answer of the Philadelphia Gas Works, PGW states multiple times that PGW itself lacks sufficient information on the actions and statements of PGW's own customer service representatives to know what they said or did. PGW can show in June 2007 that I owed \$1758.48 and then they say that they did not send out any other paperwork on it. However, I have submitted a notice with my original filing dated August 2010 for \$9.05. Why send notice on \$9 and not \$1758 ? I do not feel PGW can prove my facts or my position are incorrect or they would have in their answer. PGW's right to file a lien is not the issue. I feel it is PGW's responsibility to remove the lien as the debt no longer exists.

December 27, 2010

Respectfully submitted,



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