

Dr. Napoleon Vaughn 4627 Spruce Street, Philadelphia, PA 19139-4542
215.472.3333 | 267.973.7681 drnnvaughn@netscape.com

January 16, 2014

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3205

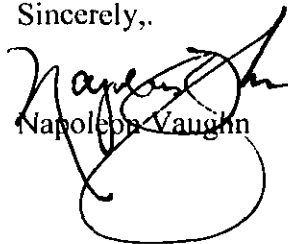
Re: Napoleon Vaughn v. PGW . Docket No. F - 2013 - 2397263

Dear Secretary Chiavetta:

Complainant Napoleon Vaughn files this Answer to the Philadelphia Gas Works ("PGW") Preliminary Objections to the Complaint in the above captioned matter pursuant to 52 Pa. Code §5.101.

In case you desire more information, please expect my full cooperation in providing same. Thank you for your courtesy concerning this matter.

Sincerely,.


Napoleon Vaughn

Enclosures

RECEIVED

JAN 16 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Napoleon Vaughn

v.

Philadelphia Gas Works

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Docket No. F - 2013- 239763

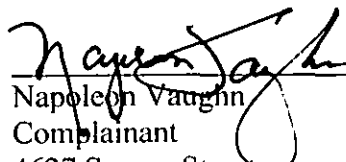
RECEIPT OF NOTICE TO PLEAD

To: Laureto Farinas, Esquire,

This acknowledges receipt by regular mail on January 8, 2014 of your NOTICE TO PLEAD pursuant to 52 Pa. Code §5.101. A written response within ten (10) days of service is hereof made to your enclosed Preliminary Objection.

Respectfully submitted,

January 16, 2014



Napoleon Vaughn
Complainant
4627 Spruce Street
Philadelphia, PA 19139
(215) 472-3333

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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BEFORE THE
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Napoleon Vaughn

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v.

Docket No. F - 2013- 239763

Philadelphia Gas Works

Answer To Philadelphia Gas Works Preliminary Objection

Pursuant to 52 Pa. Code §5.101, Complainant Napoleon Vaughn hereby challenges the Philadelphia Gas Works (“PGW”) Preliminary Objections to the complaint filed in the above captioned matter. The Commission long has had jurisdiction over complaints and continues to do so with this Complaint by PGW as the instant matter.

To the contrary, PGW fails to provide sufficient grounds to support its preliminary objection and motion for the Commission to no longer decide gas service matters that pertain to the Landlord Cooperation Program (LCP). LCP in its practices reeked with countless flaws. E-mails do not always get through to LCP due to glitches at lcp@pgworks.com. See exhibits.

Repudiation of the legitimacy of untold decisions by the Commission going back to at least 2008 for the Complainant and going forward would put landlords at the mercy of PGW with no place to file a complaint and redress a wrong. In way of a further answer, PGW is a utility company and belongs under the jurisdiction of the PUC to investigate the LCP.

1. Agreed in part. Denied in part. Rather than a cursory complaint filed by the Complainant against PGW with the Commission under the above captioned matter regarding a debt for gas service at 5032 Spruce Street, 3rd floor rear, Philadelphia, Pennsylvania on or about January 2, 2014, Complainant filed a formal complaint on December 9, 2013, a full twenty-five (25) days

earlier than January 2, 2014 stated erroneously in the PGW Complaint. See enclosure.

2. Agreed.

3. Agreed in part. Denied in part. PGW wrongly assigned the Complainant as the Customer of Record based allegedly on an e-mail from LCP, according to the May 29, 2013 letter, after waiting thirty-four days, from Mr. Tom Coyle, Dispute Resolution Unit of PGW. The vastly questionable e-mail was never received by the Complainant. Highly unlikely did PGW in a mere two days, after what was supposed to have been a LCP e-mail on June 12, 2012 with no 10-day response by the Complainant as of June 20, 2012, would quickly on June 22, 2012 cause the account to be in the Complainant's name. Fact is, no reasonable man believes PGW could make such a fast 2-day transaction for a utility with multiple thousands of customers. See exhibits.

This Complaint with a final gas service date of April 8, 2013 is incorrect. Mr. Coyle provided the Specific Service of Agreement Statement of Account that had the last day of gas service as May 29, 2013 in the enclosure to his letter of the same date. Selection of April 8, 2013 in the Complaint is not by accident but a cover for double billing by PGW. Fact is, Ms. Linda Roberts became a new tenant on April 8, 2013 paying for gas usage at the same time PGW billed the Complainant through May 17, 2013. See exhibits.

For 272 days, Complainant had no notice or service of PGW bills for gas usage. They were mailed to 5032 Spruce Street, not the Complainant's address known to PGW, but that of his tenants. Some PGW bills were found there long afterwards in a far corner on the first floor hall along with discarded mail, that of former tenants, old flyers, and several handbills rather than to the Complainant's address at 4627 Spruce Street. During all this time, Mr. Davis, the tenant, had free gas service never paid by him, after being told by PGW it had no account in his name. The account unknown to the Complainant had already been established in his name.

The total owed at close of service as stated in the Complaint is erroneously listed at \$253.04 for unpaid gas service at the subject property. Again according to Mr. Coyle, the total on the Specific Service Agreement Statement of Account is indicated as \$284.62 instead of \$253.04 wrongly revealed in the Complaint. See exhibit.

In citing PGW records, often unreliable and without merit, came from PGW for the Complaint but cannot be relied upon for accuracy. As in this Complaint, they consistently lack accuracy, and that has significant bearing in this matter. They debunk the Complaint.

Fact is, PGW records cannot be depended upon in this particular case. The Complainant earlier presented the Affidavit By Property Manager For 5032 Spruce Street wherein Property Manager Valeria Berry refuted averments in the PGW Complaint. See exhibit.

4. Denied. The correct amount the Complainant wants removed by the Commission is \$284.62 instead of \$253.04, what with this latter as a careless and erroneous amount in the PGW Complaint. Accurate is the Specific Service Agreement Statement. See exhibit.

5. Denied. After overwhelming evidence to support the position of the Complainant in both the Informal and Formal Complaints, PGW suddenly resorted to preliminary objections with the end result that the Commission will invalidate a long history of jurisdiction over complaints that originated in Philadelphia concerning the Landlord Cooperation Program (LCP). If PGW were to prevail, such action would be against the Commission and invalidate a long history of decisions by numerous Commissioners. PUC must investigate the LCP and clouds over its practices.

Failure to include a copy of the cited document (*Paul W. Fricker v. PECO Energy Company*), or enough of a material part, and with a copy not available, the matter had not been fully set forth in the Complaint. With the document unavailable there remains the need for more substance. Its merit, if any, is unknown so the Complainant rejects the document.

6. Denied. Further to the contrary, rather than “Complainants” this matter only has one Complainant and not more than one.

7. Complainant lacks sufficient information to determine the truth of the averment concerning the Commission and Landlord Disputes over the Landlord Cooperation Program as being beyond PUC’s jurisdiction. Therefore, Complainant denies this averment.

8. Denied. For PGW to prevail all applicable matters that have been decided in the past by the Commission quite likely will have to be heard again. This would cause a tremendous burden upon the entire system and in particular landlords in LCP.

By way of further answer, no landlord would have recourse to ever seek relief while participating in PGW’s LCP. The bigger question is where could a landlord file a complaint? Loss of rights looms if the Commission sustains PGW’s preliminary objections to the Complaint and dismiss the Complainant’s complaint for lack of jurisdiction. This sets up PGW to engage in an abuse of power against landlords and to their detriment.

New Matter

Since filing the formal complaint, Complainant has been bombarded by countless PGW robocalls, both day and night, as well as weekends including Sundays, by a recorded voice advising a PGW service technician was scheduled to be at an unidentified property, none of which had anything to do with this Complainant. Some calls came as often as five times a day.

On several occasions a service technician would also call from in front of a property to shut off gas service that had nothing to do with a property known to this Complainant. Only then could an address be obtained for the record. One call was considered about a gas leak.

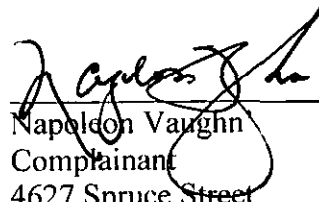
The thought, whether true or not, for having been targeted by PGW for filing a complaint, resulting in revenge, became a consideration after the nuisance calls continued at length despite

speaking to the service technicians, PGW employees on the telephone, letters to the company's Correspondence Unit, and two in-person PGW visits to the 5000 block of Chestnut Street office. Threatening to contact the PUC may have led finally to cessation of the calls but not before anxiety about answering the phone. Sadly, too, Complainant's bedridden wife from a slip/fall accident had repeatedly gotten up to answer our land phone in another room, since the calls came on it instead of the mobile phone. Such inconvenience was inexcusable. See enclosures.

Wherefore, Complainant requests that the Commission strike PGW's preliminary objections to the Complaint and decide in favor of the Complainant.

Respectfully submitted,

January 16, 2014



Napoleon Vaughn
Complainant
4627 Spruce Street
Philadelphia, PA 19139
(215) 472-3333

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBITS

Note: The exhibits are arranged in order of mention in the Answer.

1. Complainant's file is replete with numerous instances of flawed practices by the Landlord Cooperation Program (LCP). Cited herein is only a few.
2. The Verification on page 6 of the Formal Complaint by the Complainant attests to the fact that the date was December 9, 2013 and not January 2, 2014 as erroneously indicated in the PGW Complaint.
3. The May 29, 2013 letter with several enclosures from Mr. Tom Coyle, Dispute Resolution Unit of PGW, attests to the date of the claimed e-mail from LCP not received by the Complainant and the account put in the Complainant's name within a mere two days.
4. The Specific Service Agreement Statement of Account SA- 6201194632 supplied by Mr. Coyle therein provides the date of May 29, 2013, last day for gas service yet the bill was May 17, 2012 rather than April 8, 2013 as erroneously claimed in the Complaint.
5. In the Specific Service Agreement SA- 6201194632 from Mr. Coyle, the gas bill amount is shown as \$284.62 rather than \$253.04 erroneously in the Complaint.
6. Property Manager Valeria V. Berry for 5032 Spruce Street in an Affidavit dated June 19, 2013 revealed the 3rd floor apartment had been vacant since former tenant, Mr. Allen Davis, vacated the premises on about February 1, 2013, whereupon Ms. Linda Roberts, the new tenant, occupied the apartment on April 8, 2013.
7. A copy of letters by the Complainant to PGW indicates futile efforts to stop the borage of nuisance robocalls and service technicians from phone contacts concerning properties that have nothing to do with the Complainant.

Dr. Napoleon Vaughn 4627 Spruce Street, Philadelphia, PA 19139-4542
215.472.3333 | 267.973.7681 drnnvaughn@netscape.com

January 14, 2014

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3205

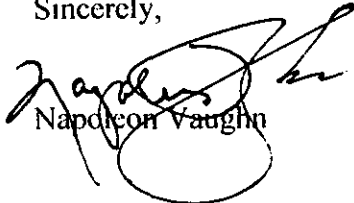
Re: Napoleon Vaughn v. PGW . Docket No. F - 2013 - 2397263

Dear Secretary Chiavetta:

Complainant Napoleon Vaughn files this Answer to the Philadelphia Gas Works ("PGW") Preliminary Objections to the Complaint in the above captioned matter pursuant to 52 Pa. Code §5.101.

In case you desire more information, please expect my full cooperation in providing same. Thank you for your courtesy concerning this matter.

Sincerely,

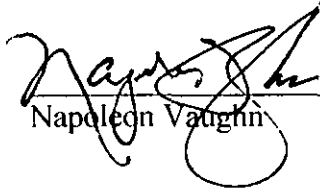

Napoleon Vaughn

Enclosures

VERIFICATION

I, Napoleon Vaughn, hereby declare that I am the Complainant and make the verification in this matter. The facts set forth in the Answer To Philadelphia Gas Work Preliminary Objection are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa .C.S. §4904, concerning false statements to authorities.

January 16, 2014



Napoleon Vaughn

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JAN 16 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

lcp@pgworks.com

Subject: Second request for information

Sent: July 10, 2012

Orlando Rosario--

For some unknown reason, you have deliberately refused to provide me with information that, in my view, should, if not in actuality, is public information, and it disappoints me that you are so uncooperative. Why...is baffling. And this makes mockery of "cooperative" in PGW's program involving landlords.

Mr. Rosario, this is not an exercise in game playing, but an attempt to call attention to a program with built-in flaws, especially since there are penalties attached to it, although there is a genuine question of due process.

That having been said, you are requested, again, as in my last e-mail "to whom a complaint can be made other than you." And in addition to this request, please provide me with the name and title, plus specific address, that my complaint can be made at the PUC.

Please do not ignore my request as you did on July 9, 2012.

Thank you for your courtesy.

Napoleon N. Vaughn

Re: Response to LCP e-mail 10-1-12 7030 Woodland Avenue, 2F

Date: October 4, 2012

On September 7, 2012, Demetrius Freeman, current tenant at 7030 Woodland Ave., 2F, Philadelphia, PA 19142, presented at Philadelphia GasWorks, 52nd and Chestnut Streets and spoke to C.Haynes in customer service who completed an application for gas service at 7330 Woodland Avenue, 2F.

I, Valeria Berry, telephoned customer service on October 3, 2012 and spoke to a representative named Tamika who confirmed that service was indeed in Mr. Freeman's name. She also noted the account, for the record, that I made such inquiry.

To repeat and contrary to LCP, Demetrius Freeman, did, in fact, complete a PHILADELPHIA GASWORKS APPLICATION FOR GAS SERVICE, which, for your added information, contained the signature of C. Haynes. And a copy of that application is in my possession, which was obtained as proof from Mr. Freeman. **Why LCP has no record of the application is a mystery.** You should check with the appropriated section of PGW since the application was actually accepted by C. Haynes.

In view of the above, please inform me that you have corrected your error.

Valeria V. Berry
For Napoleon N. Vaughn, Owner

Received October 4, 2012 8:38 AM

I will have our IS department check into this error, thanks...

*Frank Pacitti
Philadelphia Gas Works
Landlord Cooperation Program Project Manager
Email: lcp@pgworks.com
Fax # 215-684-6770*

This message is intended for the exclusive use of the intended addressee and may contain information that is privileged or confidential or otherwise legally exempt from disclosure. If you have received this message in error and/or are not the intended addressee or his/her authorized agent, please notify us immediately by e-mail. Disregard any paper copies and delete all electronic files of this message.

LCP@pgworks.com

Sent: May 23, 2013

Subject: 4627 Spruce Street, 2FR

Frank Pacitti--

In response to your e-mail dated May 21, 2013, there is not now nor has there been a tenant in the above referenced apartment, since the tenant moved on September 4, 2012.

This former tenant, Marcus Twillie, had gas and electric service transferred when he started them again at another of my properties, 5032 Spruce Street, where he is still lives.

While at PGW yesterday, May 22, 2013, he was told that even though he requested service to be transferred on September 4, 2012, PGW never requested he make any arrangements to cut off services; therefore, no one is being billed because the apartment remains vacant.

Philadelphia Electric Company also elected to transfer service and it, too, never terminated service. There is no electric bill coming to that apartment since no electric is being used.

Napoleon N. Vaughn
drnnvaughn@netscape.com

LCP@PGWorks.com
Sent: May 19, 2013
Subject: 4627 Spruce Street, 2FR

Dear Sir/Madam:

This is the second, not the first time, that Ms. Judiene Gordon, tenant at 4627 Spruce Street, 2FR has been wrongly accused of being delinquent in paying her gas bill.

Also false is your assertion that the gas had been cut off for that apartment and some mysterious person since then has started using the gas. Nothing could be farther from the truth. For the record, Ms. Gordon continues to be the tenant, without interruption, for more almost seven years. So, you are sadly mistaken in your allegation.

Fact is, as a result of your latest fiasco, she unnecessarily had to take time out of her work day and personally go directly to PGW on 12th & Chestnut Streets where she spoke to Ms. Matthews at approximately 11:00 AM on Friday, May 17, 2013, and who apologized for the mix-up, but the Customer Service Representative had no explanation as to why the Landlord received a notice asking for access to shut off service. Here again, this is contrary to your claim.

At your earliest convenience, please let me know why Ms. Gordon must be inconvenienced by poor record keeping that causes LCP to sound false alarms of non-payment for the tenant and to me.

Of added concern is whether it will happen again.

Thank you for your courtesy.

Napoleon N. Vaughn
Owner
/s/
NNV:vvv

cc: Judiene Gordon

LCP@PGWorks.com

Sent: May 19, 2013

Subject: 4928 Walnut Street, 3F

Dear Sir/Madam:

With reference to the above unit, 4928 Walnut Street, 3F, please schedule shut off for May 30, 2013, 8AM - Noon.

For your added information, the tenant is waiting to be approved for a Low Income Home Energy Assistance Program (LIHEAP) grant.

Please contact me at (267) 973-7681 at least one hour before your serviceman arrives because the maintenance man with keys for access to the meter in the basement does not live on the premises.

The above appointment time was sought, as available, through your website, however, it was impossible to be locked in.

And this is not the first time your system was down or subject to an error that made recent connecting with you impossible. Fact is, as indicated previously, the Mail Delivery System on both May 10, 2013 and May 11, 2013 indicated "a temporary error occurred...451 All MX services are unavailable for lcp@pgyworks.com,"

Thank you for your courtesy.

Sincerely,

/s/

Napoleon N. Vaughn

Owner

NNV:vvv

Verification:

I Napoleon D. Janga, hereby state that the facts above set forth are true and correct (or 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).

Napoleon D. Janga
(Signature of Complainant)

December 9, 2013
(Date)

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification must be signed by an authorized officer or authorized employee. If the Formal Complaint is not signed by one of these individuals, the PUC will not accept it.

10. Filing

You may electronically file your Formal Complaint with the PUC. To do so, you need to establish an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

If you do not electronically file your Formal Complaint, mail the completed form (along with any attachments) to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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Note: Formal Complaints sent by fax or e-mail will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.

NAPOLEON N. VAUGHN

4627 Spruce Street
University City
Philadelphia, PA 19139-4542
drnnvaughn@netscape.com
215.472.3333|267.973.7681

June 18, 2013

Tim Coyle
Dispute Resolution Unit
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

Re 5032 Spruce Street 3R:

Dear Mr. Coyle:

This is in regard to my first letter dated 04/25/2013 and again another on 05/18/2013, after having had no response from PGW for approximately 34-days. A reply was requested within 10 days, however.

Mindful of the above, your letter finally as of 05/29/2013 had contents that were found to have been unsatisfactory, because several serious mistakes therein were shockingly glaring. Fact is, such information sadly disappointed me in being so pervasive. Seemingly deliberate, it surprised me you did know of instances of PGW's double-billing and more.

To reiterate, no notice was provided to me on 06/20/2012 to "contact PGW with (sic) (ten) days" leading to a bogus bill of \$284.62 from 07/18/2012 for almost one year of nearly 365-days until 06/11/2013, the last transaction due date.

An informal complaint with several exhibits has already been filed with the Pennsylvania Public Utility Commission, and it, hopefully as requested, should thoroughly investigate the Landlord Cooperation Program with or without a class action lawsuit.

Sincerely,

Napoleon N. Vaughn
Owner

NNV:vvv

Philadelphia Gas Works



800 W. Montgomery Ave., Philadelphia, PA 19122
Telephone: 215-787-1288

Telephone 215-978-5963
Fax 215-684-6996

May 29, 2013

NAPOLEON VAUGHN
4627 SPRUCE ST
Philadelphia, PA 19139-4542

Re: Account Number 875660140
5032 SPRUCE ST 3R

Dear Mr. Vaughn:

We are in receipt of your inquiry regarding the service being placed into your name at 5032 Spruce St, 3R.

As a registered landlord in the Landlord Cooperation Program (LCP) you failed to comply with the terms and conditions in which you agreed to when you enrolled this property 04/07/2008.

On 06/12/2012 you received an email notification to contact PGW with (ten) 10-days. No response was received therefore as per the program conditions; an account was established in your name effective 06/22/2012.

If you have a tenant currently residing at this property, inform them to contact PGW to apply for service or you can contact the LCP administrator at lcp@pgworks.com for further assistance.

To assist you in your review of our findings we are including the following documents:

1. A statement of account that covers your entire PGW account history at the property
2. Dispute options

As of 06/19/2013 this account will become delinquent and subject to collection action. To avoid collection action you can contact us and if eligible, enter into a payment agreement or you can file an informal complaint (see attached). While your dispute is pending we will not take any collection action on the disputed balance nor will we terminate service for the disputed portion of your bill. However, you must pay all bills not part of this dispute.

Philadelphia Gas Works



800 W. Montgomery Ave., Philadelphia, PA 19122
Telephone: 215-787-1288

Please contact us at 215-978-5963 to discuss this matter further. We thank you for this opportunity to serve you. PGW remains committed to providing the best possible service at the best possible price.

Sincerely,

Tim Coyle
Dispute Resolution Unit

If you do not agree with this report, you may file an informal complaint with the Pennsylvania **Public Utility Commission**. To assure preservation of your rights, an informal complaint must be filed within ten (10) days of the mailing date of the report.

Additional information may be obtained by calling, writing or visiting our office at:

P.O. Box 3500 Philadelphia PA 19122 Telephone #: 215-787-1288

Payment may be mailed at the office indicated above or at any of our (6) convenient Customer Service Centers, any authorized payment center, by mail or by phone (215-235-1000). Information regarding Customer Service Centers and authorized collection agencies is available upon request.

The nearest regional office of the Commission, where an informal complaint may be filed is located at:
P.O. Box 3265 Harrisburg Pa 17105-3265 Telephone #: 1-800-692-7380

OR

801 Market Street, 4th floor, Philadelphia, PA 19107

OR

<http://www.puc.state.pa.us>

When you file an informal complaint, the Public Utility Commission will need to know the following:

1. The name of the ratepayer (your name).
2. You're mailing address and, if different, the address at which service is provided.
3. Your Account number.
4. The name of the utility with which you have the dispute.
5. A brief statement of the dispute.
6. Whether the utility has investigated and reported to you on the matter being disputed.
7. Whether the dispute has been subject of the previous complaint filed with the Commission.
8. The date, if any, of proposed termination.
9. What you would like the Commission to do.

Specific Service Agreement Statement of Account SA- 6201194632

Customer Name NAPOLEON VAUGHN	From Date 6/22/2012	To Date 5/29/2013
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Service address 5032 SPRUCE ST Apt 3R PHIL, PA 191394149	Account Number 875660140	SA Number 6201194632	Meter 2066441	Rate GS
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STATEMENT

Transaction Date	Type	Reading	Reading Code	# of Days	CCF Usage	Average CCF/Days	Heating DDD's	Payment Type	Due Date	Transaction Amount	Current Balance	Actual Balance
07/18/2012	BILL	358	R	25	3	0.12	0		08/10/2012	\$17.35	\$17.35	\$17.35
08/16/2012	BILL	362	R	29	4	0.14	0		09/11/2012	\$18.82	\$36.17	\$36.17
09/18/2012	LPC					0.00				\$0.54	\$36.71	\$36.71
09/18/2012	BILL	366	R	33	4	0.12	0		10/11/2012	\$18.95	\$55.66	\$55.66
10/17/2012	LPC					0.00				\$0.82	\$56.48	\$56.48
10/17/2012	BILL	375	R	29	9	0.31	112		11/09/2012	\$26.85	\$83.13	\$83.13
11/16/2012	LPC					0.00				\$1.22	\$84.35	\$84.35
11/16/2012	BILL	386	R	30	11	0.37	382		12/12/2012	\$29.66	\$114.01	\$114.01
12/18/2012	LPC					0.00				\$1.67	\$115.68	\$115.68
12/18/2012	BILL	397	R	32	11	0.34	651		01/15/2013	\$30.02	\$145.70	\$145.70
01/18/2013	LPC					0.00				\$2.12	\$147.82	\$147.82
01/18/2013	BILL	411	R	31	14	0.45	781		02/13/2013	\$35.03	\$182.85	\$182.85
02/19/2013	LPC					0.00				\$2.64	\$185.49	\$185.49
02/19/2013	BILL	421	R	29	10	0.34	914		03/14/2013	\$28.73	\$214.22	\$214.22
03/19/2013	LPC					0.00				\$3.07	\$217.29	\$217.29
03/19/2013	BILL	425	R	31	4	0.13	798		04/12/2013	\$19.46	\$236.75	\$236.75
04/17/2013	LPC					0.00				\$3.37	\$240.12	\$240.12
04/17/2013	BILL	428	R	29	3	0.10	492		05/10/2013	\$17.94	\$258.06	\$258.06
05/17/2013	LPC					0.00				\$3.63	\$261.69	\$261.69
05/17/2013	BILL	434	R	29	6	0.21	200		06/11/2013	\$22.93	\$284.62	\$284.62



MONTHLY STATEMENT

From Apr 08, 2013 thru Apr 16, 2013 (8 Days)

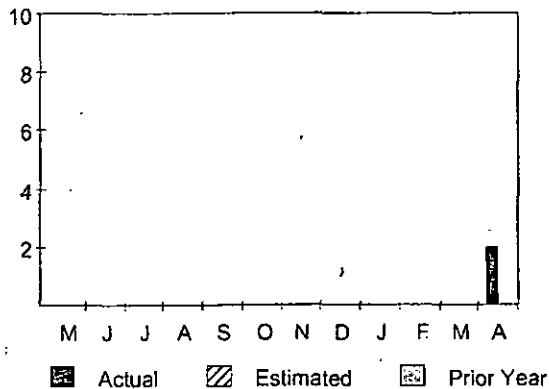
LINDA ROBERTS
 5032 SPRUCE ST, 3FR
 PHILA PA 19139-4149

Billing Summary

Current Charges \$3.08

Total Amount Due By May 10, 2013	\$3.08
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Energy Usage Information



- Average daily temperature 59.5 °F.
- Your average daily cost is \$0.39 compared to \$0.00 last year.
- For the last 12 months:
 - Your total usage is 2 Ccf.
 - Your average monthly usage is 0.17 Ccf.

Spring into savings. Welcome spring and find new ways to save time, energy and money. Here are some 'be green' tips:
 - Go paperless. Log on to My Account at www.pgworks.com and sign up for an electronic bill.
 - Visit www.PGWEnergySense.com for available conservation programs and rebates.

Helpability - If you struggle to pay your PGW bill, don't wait another day. Text **ABILITY** to 95997 for assistance.

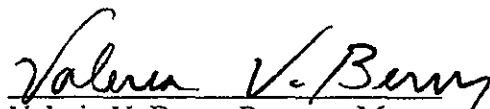
Questions or Complaints about your bill? Please call us before the due date at 215-235-1000, or write to: PGW P.O. Box 3500, Phila., PA 19122-0050

AFFIDAVIT BY PROPERTY MANAGER FOR 5032 SPRUCE STREET

1. I, Valeria V. Berry, am the Property Manager for the properties owned by Napoleon N. Vaughn, which includes 5032 Spruce Street, Philadelphia, PA.
2. In my capacity as Property Manager over more than 15 years, I knew Allen Davis as a former tenant at 5032 Spruce Street, who with a month-to-month lease lived on the third floor rear of the property.
3. Mr. Davis always timely paid his rent, but early this year when he lost his job, and with no source of employment as income, he chose to vacate the premises on or about February 1, 2013 so as not to damage his credit, according to him.
4. Mindful that no 30-day advance notice was going to be given, and perhaps in a sense of fairness, Mr. Davis opted to forego his entire security deposit.
5. The apartment unit remained vacant until it was occupied by Linda Roberts, the new tenant, during April of this year, and continuing as a tenant in good standing, who like our other tenants provided proof for gas service in her name, which she presented to me in the form of her first Monthly Statement: "from Apr 08 2013 thru Apr 16, 2013 (8 days)" for \$3.08, while still on the premises.
6. Upon questioning PGW on the telephone about not getting a bill earlier for him in his name, Mr. Davis indicated being told that "there was no account for that apartment," obviously for him, since the bill had been transferred to Mr. Vaughn and continued for almost 365-days.
7. In addition to my responsibilities as property manager, I handle most of our PGW-LCP accounts, including emails to LCP, more specifically, lcp@pgworks, that is a separate entity under PGW, and seldom is contact ever made by me or the Ratepayer directly to PGW.
8. Within five days and not 10-days are time limits for landlords to act regarding a tenant not having paid for gas service, and this is through LCP, not PGW, as has always been done exclusively through lcp@pgworks, since we participated in LCP.
9. Difficulties repeatedly ensue with LCP because it often makes so many errors.

VERIFICATION

I, Valeria V. Berry, declare that the facts set forth above are true and correct to the best of my knowledge, information, and belief. I understand that false statements if made herein are subject to the penalties of 18 Pa. C/S.A Section 404 relating to unsworn falsification to authorities.


Valeria V. Berry, Property Manager

6-19-13
Date

Napoleon N. Vaughn
4627 Spruce Street
Philadelphia, PA 19139
drnnvaughn@netscape.com
215.472.3333 | 267.973.7681

December 9, 2013

Philadelphia Gas Works
800-3 W. Montgomery Avenue
Philadelphia, PA 19122
Attention: Customer Service

Dear Sir/Madam:

For some unknown reason, my home telephone number, 215.472.3333, has been repeatedly and wrongly associated with properties that I do not own. Fact is, such messages, all automatic recordings like robot calls, have been received both day and night, but never with reference to a specific property--just as a heads up concerning a schedule appointment. They have nothing to do with me. So, please stop such inconvenience that may happen several times in a matter of a few minutes.

In addition to the above, on three separate occasions, technicians have called to let me know they are outside and want access to turn off service or to gain entry because of a suspected gas leak. Here are the addresses for which mechanics have wrongly contacted me:

1212 North 24th Street
2306 Mercer Street
434 N. 32nd Street

I have called PGW, physically went to the your office at 5230 Chestnut Street, and in person reported the nuisance phone calls. No one over the phone at (215) 235-2050 or in person is able to explain why such annoyance continues to happen.

Please straighten out this mess. It is terribly inconvenient. And my bedridden wife must get up and go to another room where there is the house phone, since the calls do not come to our cell phone.

Thank you for your courtesy.

Napoleon N. Vaughn
Owner

NNV:vvv

Napoleon N. Vaughn
4627 Spruce Street
Philadelphia, PA 19139
drnnvaughn@netscape.com
215.472.3333 | 267.973.7681

December 20, 2013

Philadelphia Gas Works
800-3 W. Montgomery Avenue
Philadelphia, PA 19122
Attention: Customer Service

Dear Sir/Madam:

Again, today, December 20, 2013, at 8:50 AM, PGW's robot telephone call notification, a reminder of an appointment for service, had absolutely nothing to do with me. As you know, the mechanical voice on the phone never states, as always, which property.

No more than three hours later, a service technician phoned to gain access to 10768 Jeans Street, 2F in the northeast section of Philadelphia to shut off service. Here again, this had absolutely nothing to do with me. Your technician discovered while on the phone that the aforesaid property is owned by Lawncrest Realty, 6221 Rising Sun Avenue also located in northeast Philadelphia.

After explaining to him of my failed attempts to rectify this problem, he was baffled that no one has been able to straighten out this fiasco. He indicated now passing on to a supervisor what continues to be a serious intrusion in my household for what has become nuisance calls. They even come on Sundays. Add some during both day and night. And to date. there have more than a dozen of such instances. This makes no sense--especially after making complaints in person to Ms. Browner and another employer at booth number two, your PGW office on Chestnut Street. Understand, one of the past calls was about a leak for which another technician sought entry to a particular property. Whether he corrected the problem is unknown.

Worse for me is the fact that my wife, while still bedridden from a slip/fall accident at a store must get up to answer the inexcusable calls, since they come to the house phone and not our mobile phone.

Please see my letter sent on December 9, 2013. And why PGW refuses to take care of this matter remains a mystery, particularly since you have been repeatedly made aware of such headaches.

Thank you for your courtesy.

Napoleon N. Vaughn
Owner

NNV:vvv

Enclosure

Faxed To: PGW Dispute Resolution - 215-684-6996
Mailed To: PGW 800-3 W. Montgomery Avenue
e-mailed to lcp@pgworks.com Attention: Mr. Pacitti
Re: Harassing PGW Calls
Sent: December 30, 2013

Mr. Pacitti---

The automatic robocalls, as repeated irritants have often occurred multiple times during the course of a day. They never leave a specific address.

Below are some of the actual addresses that we started recording, after talking with service technicians who indicated being outside properties and requested entry to shut off service.

There have been several other nuisance calls. After they did not stop, despite personally going to the PGW office on Chestnut Street, not once but twice with a complaint, we believed the problem would be taken care of rather than continuously and repeatedly calling again.

Once the calls did not let up, both robocalls and service technicians, we began keeping a record of them such as follows:

1212 North 24th Street
2306 Mercer Street
434 N. 32nd Street
513 N. 61st Street

This morning, Monday, December 30, 2013, after sending the exact same letter to PGW, its Dispute Resolution Unit, and LCP concerning robocalls, a service technician, Andrew, Badge Number 9777, telephoned at 9:20 A.M. seeking entry to 513 North 61st Street 1F, while my latest letter had already been dropped in the mail box, U.S. Postal Service. .

I am fed up with such bogus intrusions, especially since my telephone number is on the do-not-call-list, and no respect is given to my privacy by PGW with calls that have nothing to do with me.

Napolcon N. Vaughn

lcp@pgworks.com
Mailed To PGW
Faxed To PGW Dispute Resolution Unit 215-684-6996

Napoleon N. Vaughn
4627 Spruce Street
Philadelphia, PA 19139
drnnvaughn@netscape.com
215.472.3333 | 267.973.7681

December 30, 2013

Philadelphia Gas Works
800-3 W. Montgomery Avenue
Philadelphia, PA 19122
Attention: Dispute Resolution Unit

Dear Sir/Madam:

A few minutes ago on Monday at 8.02 A.M. here on December 30, 2013, the PGW robocall of a female voice advised me that one of your service technicians would be at my property as per an arrangement from this end. But here again, no such arrangement was made.

Not only that, on yesterday Sunday, December 29, 2013 there was another of the nonsense robocalls at 4:00 P.M. for service not arranged by me yet it was just like numerous others.

This must be a continued effort on the part of PGW to make my life miserable, because of my having earlier filed a complaint with the PUC. To me, PGW has engaged in some kind of retaliation. Quite frankly, no other reason seems logical for your repeatedly harassing me and my handicapped wife who must get out of bed in order to answer the telephone during my absence. Such antics of yours must be deliberate. No other conclusion can be reached after my letters (December 9, 2013 and December 20, 2013) to you about this matter, several telephone calls, even in personal visits to your Chestnut Street facility, and a complaint, at length, to an actual service technician on the telephone. He indicated reporting to his supervisor.

It's now reached a point that my wife and I shutter whenever the telephone rings in anticipation that we are receiving another irritating call from POW.

Much earlier, we sucked up the robocals, countless ones of them, until taking action in the hope of stopping. But nothing seems to make them go away. And PGW can better monitor its service program if it wants to do so.

Please stop it!

Napoleon N. Vaughn
Owner

NNV:vvv

Napoleon N. Vaughn
4627 Spruce Street
Philadelphia, PA 19139
drnnvaughn@netscape.com
215.472.3333 | 267.973.7681

December 31, 2013

Philadelphia Gas Works
800-3 W. Montgomery Avenue
Philadelphia, PA 19122

Dear Sir/Madam:

Enclosed or attached below is a copy of my complaint, an e-mail to Mr. Pacitti at lcp@pgworks.com Attention: Mr. Pacitti, re: Nonsense PGW Call, sent December 31, 2013

Mr. Pacitti---

Here again, this morning, Tuesday, December 31, 2013, another robocall came at 8:02 A.M. which is the exact time as another the other day.

Needless to say, it was the same message as before, and further attests to harassment by PGW.

What's wrong with you people at PGW? It must be more than a matter of incompetence for repeatedly targeting me with junk phone calls for a couple months. This, quite likely, is not by accident, because somebody programmed my name into some kind of a system. And of all the millions of PGW customers, the possibility of others receiving irritating robocalls is highly unlikely.

At this point, since PGW flatly refuses to stop the nonsense, no recourse is afforded me except to file a complaint with the PUC.

Now, my household wonders whether a service technician will telephone like Andrew, Badge Number 9777, that he is waiting outside a property that has nothing to do with me.

Napoleon N. Vaughn

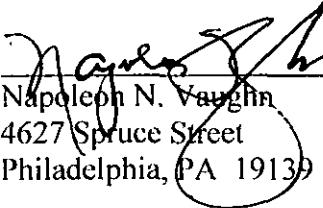
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participant listed below in accordance with the requirements of 52 PA Code §1.54 to service by regular mail.

For Philadelphia Gas Works:

Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

January 16, 2014

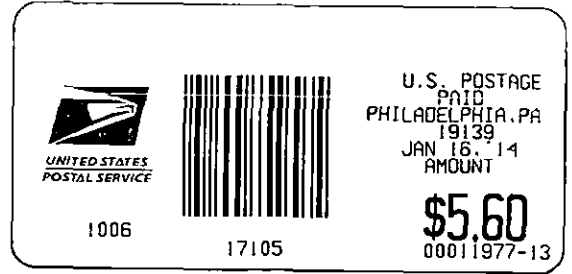


Napoleon N. Vaughn
4627 Spruce Street
Philadelphia, PA 19139

RECEIVED

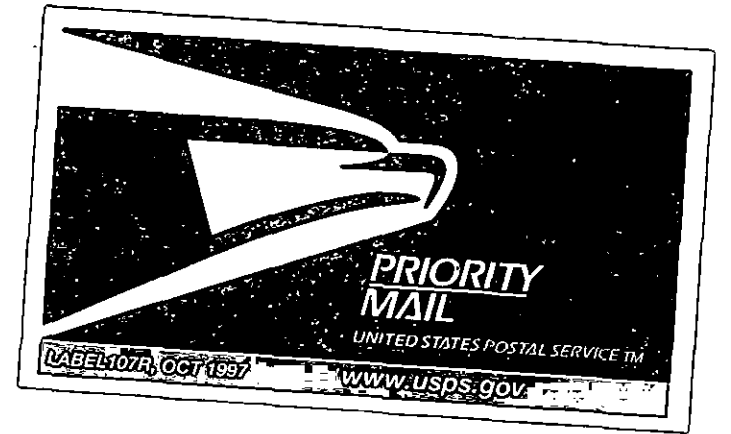
JAN 16 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



JAN 17 2014

Secretary Rosemary Cheavetta
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3205



RECEIVED

JAN 16 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU