

August 8, 2014

Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
Commonwealth Keystone Building, 2 North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company
Late Filed Exhibits of West Penn Power**

Dear Secretary Chiavetta:

Pursuant to the August 5, 2014 Interim Order of the Honorable Mary D. Long, attached for filing are the Late Filed Exhibits 3 and 4 of West Penn Power Company.

A copy of this filing has been forwarded to the Complainant in the manner indicated on the attached Certificate of Service.

If there are any questions, please contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/jmm
Enclosures

cc: The Honorable Mary D. Long, PA Public Utility Commission [w/o encls.]
John L. Munsch, Esquire, FirstEnergy Service Company [w/o encls.]
Rodney M. Temple [w/encls.]

**Re: Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company
Late Filed Exhibits of West Penn Power**


CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s) on the attached service list, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

Via First Class Mail

Rodney M. Temple
120 Iola Avenue
Washington, PA 15301

Dated: August 8, 2014


Margaret A. Morris, Esq



76 S Main St.
A-RPC
Akron OH 44308-1890

August 08, 2013

RO TEMPLE
120 IOLA AVE
WASHINGTON PA 15301 -5702

Re: Account: 100 091 527 190
120 1/2 IOLA AVE
WASHINGTON PA 15301

Dear Ro Temple:

A recent review of your electric account indicates that payments for your electric service are not being made in a timely manner.

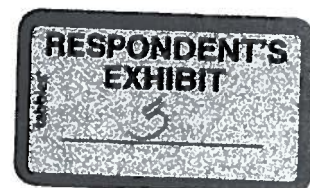
Under state law, West Penn Power is permitted to request a security deposit from existing customers when their payment history with the Company is unsatisfactory.

This letter is not a demand for a security deposit at this time. However, if you continue to pay after the due date, you may be required by West Penn Power to pay a security deposit. The security deposit will be included on your monthly bill and will be in addition to any other amount due on your account.

If eligible, you are encouraged to consider enrolling in our Checkless payment plan program to ensure your payments are automatically deducted from your bank account on the due date. You can enroll in our Checkless payment plan at www.directpaymentplan.com.

If you have any questions or comments regarding this matter, please feel free to call us at 1-800-736-3404.

Sincerely,
West Penn Power



PI 001

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rodney Temple

v.

West Penn Power Company

:
:
:
:
:

Docket No. C-2014-2412337

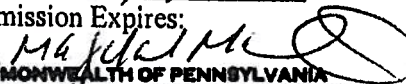
AFFIDAVIT OF DONNA GOUGHNOUR

I, Donna Goughnour, (Affiant) being duly sworn (affirmed) according to law, depose and say that:

1. I am employed by First Energy Corporation as a supervisor in the Reading Contact Center.
2. I have listened to the recording of the December 9, 2013 Customer Service Call of the telephone call between Rodney Temple and the Call Center Representative.
3. This attached transcript is a complete and accurate recitation of the December 9, 2013, telephone conversation between Mr. Temple and the Call Center Representative.
4. My testimony provided at the May 28, 2014 hearing is consistent with, and supported by, the attached transcript.


Donna Goughnour, Affiant

Sworn to and subscribed before me this 9th day of June, 2014.

March 25, 2015
My Commission Expires:

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
MAGDALENE MALDONADO, Notary Public
City of Philadelphia, Phila. County
My Commission Expires March 25, 2015

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rodney Temple

v.

West Penn Power Company

:
:
:
:
:

Docket No. C-2014-2412337

AFFIDAVIT OF DONNA GOUGHNOUR


I, Donna Goughnour, (Affiant) being duly sworn (affirmed) according to law, depose and say that:

1. I am employed by First Energy Corporation as a supervisor in the Reading Contact Center.
2. I have listened to the recording of the March 18, 2014 Customer Service Call of the telephone call between Rodney Temple and the Call Center Representative.
3. This attached transcript is a complete and accurate recitation of the March 18, 2014, telephone conversation between Mr. Temple and the Call Center Representative.
4. My testimony provided at the May 28, 2014 hearing is consistent with, and supported by, the attached transcript.



Donna Goughnour, Affiant

Sworn to and subscribed before me this 9th day of June, 2014.

March 25, 2015
My Commission Expires:


COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
MAGDALENE MALDONADO, Notary Public
City of Philadelphia, Phila. County
My Commission Expires March 25, 2015

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

Rodney Temple: Call 12-09-2013

[To ensure quality service, your call may be recorded or monitored by a supervisor.]

RT: My name's Rodney Temple, service address is 120 Iola Avenue, 7242258037

CSR: Thanks very much I appreciate that and I've got your account coming up here. Iowa Avenue.

RT: Iola. I-O-L-A

CSR: Okay, my fault. I'm sorry.

RT: It's alright.

CSR: That helped me out a lot. Alright. And the only other thing I need to ask you is umm, I have to ask the name on the bill itself.

RT: Oh, it's Patricia, that's my wife name. She was here when you hooked it up.

CSR: Okay. That's okay, it's no problem. Alright, what can I do for you today?

RT: Umm, I'm kind of wondering about the bill here. I mean, you guys tacked on \$246 in miscellaneous charges. What the hell is that?

CSR: Okay, let me take a look at the bill itself. I think I know what it is already, but we'll . . . let me look real quick. Here.

RT: What's this shît down here, security deposit.

CSR: Yeah, well you . . . based on the state of Pennsylvania, if you have an unfavorable payment history which means you've paid late three times in a twelve month period then a security deposit is asked to be paid.

RT: We're not paying you any security deposit. That ain't gonna happen.

CSR: Okay, well you have a, you have a couple of options.

RT: I already just looked at, go ahead. I'm looking at the PA site right now. The Utility Commission.

CSR: This isn't on the Utility Commission website. This is something allowed by the Utility Commission implemented by each individual, yeah it's not.



Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

RT: I'm looking at the guidelines right now. You know, there's no late payments here. I mean you guys get paid every month. My wife and I travel a lot. You know. We're away sometimes two or three weeks and we're back here. You know we have another residence. You guys get paid every month, faithfully, so there's no reason for this. I'm not paying it.

CSR: Okay, sir, you only have a couple options here. I'll be more than happy.

RT: I have a lot of options actually. I'm going to file a formal complaint right now.

CSR: Okay.

RT: You guys have been charging me for a smart meter for about two years that we don't have so I'm going to file a formal complaint against that.

CSR: That's not, that actually is from the Utility Commission, we, that's not for a smart meter, that's for just the implementation of a smart meter.

RT: Well, I'm going to file a formal complaint

CSR: Sure.

RT: Against you guys.

CSR: That's fine.

RT: I'm kind of sick of you.

CSR: Okay. .

RT: We got, we just put up a 800, excuse me, 400 watts worth of solar panels. We got them running this month I can get ready to put another 500 watt up. So we're looking at phasing you guys out anyhow, but we're not going pay your security deposit. If you don't like it well, too bad.

CSR: Okay, I don't know what you want me to say. I can't make, it's not going to, if you pay off your past due balances and.

RT: There is no past due balance. What past due balance is there?

CSR: Let me look and see at the account.

RT: There's no past due balance at all.

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

CSR: There might be right now.

RT: We pay you every freaking month. You know.

CSR: There is a past due balance.

RT: There's no past due balance.

CSR: Okay. Alright. If you want me to tell you.

RT: What's the past due balance?

CSR: Okay.

RT: We just got the bill today. How can there be a freaking past due balance.

CSR: Alright well that's what I'm going to go over with you. The past due balance on the account, let me look and see if you've made a payment since the bill came out.

RT: Yea, we did. We made payment on the internet two days ago. We were just home. I was going to say, you know, we're not home like 24/7 around here 38 months.

CSR: Sure. I mean I understand that. This isn't, I know it feels like you're being picked on or something here, but it's just the way, this has been like this for 20 years.

RT: No, it hasn't been like this for 20 years.

CSR: Yes, it . . .

RT: I've been buying electricity for over 30 years. It's just when you scumbags at FirstEnergy took over and made a mess out of this.

CSR: Sir, you had a security deposit on here before this.

RT: Yeah, I know and I fought that.

CSR: Right, but then we get, after a certain amount of time it gets given back and then if you don't pay the bill on time . . .

RT: Well, I'm not paying it again. It won't happen this time. If I have to, I've got another residence, I own a residence behind it. I'll hook into that meter if I have to for a while until we phase you guys out with panels. We're not paying that, plain and simple. And I'm filing a formal complaint against you again. I think I have had a total of about 14 formal complaints. You guys have screwed up the meter readings here. It's unbelievable. Ever since FirstEnergy's taken over it's just turned into a mess. This time I'm going to

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

put a website up and I'm going to see if I can find other people that you're doing this to. And we're all going to get together and file formal complaints. That way it will cost you way more money by the time we get in front of the judge than you guys will ever collect in complaints. I mean in, in deposits.

CSR: You have every right to do that, sir.

RT: Yeah, I know I have every right to do it and that's exactly what I'm going to do. I'm going to make this a formal complaint. It's going to cost you a couple thousand dollars to even try and collect this and you're never going to get it this time.

CSR: Well, you won't have to. I mean that's fine if you want to do all that. There's no problem with that. It's not going to change though.

RT: That's exactly what I'm going to do.

CSR: I mean, I'm

RT: It's going to change because I'm not going to pay it.

CSR: Sir, you know what, you don't want to talk with me. I mean I'm, all I'm trying to do is . .

RT: No, you slimebags. I ought to come up there and just beat the snot out of someone.

CSR: Alright, I mean, you know.

RT: I'm sick of you guys and this freaking deregulation stuff. All you've done is screw it all up and thieves is all you are nowadays. Nothing but lowlife, slimebag thieves. Plain and simple.

CSR: Okay. Alright. What, since you did pay off the past due balance on the account which we received.

RT: We pay it every month. There is no past due. We pay every freaking month.

CSR: Sir, if you'll look at your bill.

RT: Just because you don't get it on the exact date you want it, 'cause nobody is here on that date.

CSR: Okay.

RT: You understand?

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

CSR: Maybe you can set up an automatic payment or something.

RT: No, I'm not setting up an automatic payment. You're not getting direct access to my account.

CSR: Okay, that's fine.

RT: That's not going to happen.

CSR: Set it up directly through your bank then. Don't set it up.

RT: No, I'm not going to set it up through the bank. You're just going to take it every month like everybody else gives it to you.

CSR: Okay. That's fine, and everybody else has to pay a deposit when they don't pay

RT: Well guess what, we're not paying your security deposit. You can take your security deposit and ram it right up your ass.

CSR: Okay. I already, I already went ahead and waived it because there is no past due balance now anyway.

RT: I'm so sick of you guys. I've got to get some more solar panels up so we can unhook you completely.

CSR: Okay.

RT: This is ridiculous. I'm going to get a battery bank in here and we're going to get some Norembergers and that's it. I can't take it anymore with you idiots.

CSR: I understand. Like you said, you have the right to file an informal complaint.

RT: I'm not filing an informal. I'm filing a formal. That way you have to get a lawyer, you have to drag a lawyer in there and then I won't even show up. That way it'll cost you a couple thousand dollars.

CSR: Sir, that's fine. The Utility Commission phone number is 1-800-692-7380.

[Complainant and CSR speaking simultaneously, indecipherable.]

RT: I'm going to get more people together on Facebook and they're going to do the same thing. File an informal, I mean a formal complaint, wait 'til a judge – and don't even show up. That way they have to pull in a lawyer, that way it'll cost them a couple

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

thousand dollars every time and then you'll quit doing this kind of crap. It's going to cost your four times more or ten times more than it does to try and get a security deposit.

CSR: I've been here ten years and it's been this way ever since I've been here.
RT: It has not been this way ever since

CSR: Yes, it has.

RT: Bullshit.

CSR: You can look at the tariff.

[Complainant and CSR speaking simultaneously, indecipherable.]

RT: Six cents a freaking kilowatt and nobody here. You can pay three months at a time – you know, not for three months and nobody would even care. You know, it's ever since FirstEnergy came and all the crap you guys have pulled, like all this sending out light bulbs and trying to charge people outrageous prices for them and everything else. What the government really needs to get down and get rid of this regulat- I mean deregulation garbage. Ever since it's been deregulated it has been nothing but a joke.

CSR: I don't disagree with that part. I, nobody, nobody really likes deregulation.

RT: And these notices you send out. Oh, your neighbor, you're using too much electricity, more than your neighbor. I looked at my neighbor's and his just the same. Why are you wasting money sending these stupid things out? Nobody wants this garbage.

CSR: Agree.

RT: It's ridiculous.

CSR: I agree with that.

RT: It's nothing but a big lie. I looked at all my other neighbors' they all say the same thing. You've used 85% more than your neighbors. Bullshit.

CSR: Yeah, we fought that. We didn't, we didn't want that. We didn't want that -

RT: It's insane.

CSR: Yes, I agree with you 100%. That was a, that part was a terrible, terrible, uh, terrible decision made. It wasn't made by us, but it doesn't matter. We had to send it out...

RT: Yeah First Energy...

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

CSR: No I mean that was actually put into effect by the Utility Commission, but it was terrible, either way, it was.

RT: Oh no... yeah I know, the corporation always buys- blames it on the government. No, you know, just like I said, the corporation denied my claim, the corporation is charging me a security deposit, the corporation is doing this, then everybody says oh the damn government. Yeah right...

CSR: No. We are charging the security deposit. That doesn't have anything to do with anybody else.

RT: Yeah, I was instrumental in getting together and stopping your transmission line that you tried to put up through here too. I was one of the leaders of that. And now I'm going to put together a little, put up, to uh, stop – put an end to the security deposit stuff. We are going to make it cost you so much money that you'll cry to not – when you have to give somebody a security deposit. So definitely . . .

[Complainant and CSR speaking simultaneously, indecipherable.]

CSR: Many people have tried. I hope you are able to get somewhere with it. I – I hope you're able to get somewhere with it... I already did that so it didn't matter cause that's a part of my job is if there's not a past due balance when we talk to the customer, then we, then we put a waiver on it. It just, like I say, it shows up again if there's more late payments, so that just, I can't do anything about that, but I went ahead and took care of it. It's just a part of my job.

RT: There's never been a late payment. We've never paid, what, maybe 10 days or something like that. Like I said, not everybody is here waiting for your freaking bill to come. You know, who the hell do you people think you are?

CSR: Do you have credit cards? Do you know any credit cards you can pay 10 days late?

RT: Yeah I have credit cards. But you're not getting, you're not getting access to my credit cards, or...

CSR: No, I'm just saying, you can't – there's a lot of things you can't pay without getting penalized for, you pay credit card payments late, you pay \$35 dollar fee or something. If it's a day late, so I mean – it's a uh, I mean I know what you're saying and I'm not arguing with you, but you're paying past the due date, you're paying late. I mean I know it's not convenient for you to pay when it's due, and I understand that. But it – it doesn't stop the fact it is being paid late. I mean, I know you don't like it and I know you don't like the way the rules are, and I understand that. I'm not arguing that part about it.

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

RT: It's a bit different because I know exactly what I'm putting on my credit card and I pay it off per month. I don't know exactly what my electric bill is going to be, so don't even try. You're comparing apples to oranges.

CSR: No I'm just saying, everybody has a due date. If you pay after the due date, it's late. I didn't say it was 3 weeks late, or a month late, or we're sending shut off notices. It's late. If it's paid the day after the bill's due, it's late.

RT: I'm just getting your bill right now. What is today? I got your bill today, what is today?

CSR: Today is the 9th.

RT: Yeah okay, now it's due the what, the 31st. So how many days is that?

CSR: 20 days. 20 days from when we sent it.

RT: Now you know of a credit card that bills in 20 days?

CSR: I think most of them bill 30.

RT: Yeah, at least 30.

CSR: Not any longer than that, but 30 is usually the, you're right. I don't disagree with that. That's something, it's always been 20 days after the bill date. That's just the way, I mean I don't disagree with it being a short period, there's no argument there at all.

RT: Okay, well, I mean this, this is fruitless anyhow.

CSR: Right.

RT: Well...

CSR: I agree. Like I said, I went ahead and waived it, which was your, at least your initial complaint and then you can deal with what you need to deal with on your own.

RT: Yeah, definitely going to this route. We're definitely going to go into uh, administrative law judge again.

CSR: Sure.

RT: I've had this crap with you guys, it's – it's over and over, you're doing this to too many people. It's time that people just got together and stood up again. You know, we're going to stop your transmission lines, we're going to put an end to this too. Alright. Thank you, bye.

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

CRS: Alright, good luck to you. Bye.

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

Rodney Temple: Call 3-18-2014

[To ensure quality service, your call may be recorded or monitored by a supervisor.]

RT: Rodney Temple

CS Agent: How can I help you today?

RT: I'm calling about my bill here.

CS Agent: Okay.

RT: There's a \$280 charge for a security deposit.

CS Agent: Can I have your account number?

RT: The account number is 100091527486. It actually has my wife's name on it – Patricia Temple.

CS Agent: Okay. And the address please?

RT: 120 Iola Avenue, Washington PA.

CS Agent: And the phone number?

RT: 724 225-8037

CS Agent: Would you like to have an alternate number listed?

RT: No.

CS Agent: And I'm sorry, tell me your first name again?

RT: My name is Rodney, on the account is Patricia my wife. She was here when you guys hooked up that day.

CS Agent: Okay. Yeah, these show... um... a request for a security deposit due to late payments.

RT: There's been no late payments. You guys have not sent out any kind of a shut off notices or even second notices. I mean if it's been late, it's been more than a couple of days. I mean, you know... My wife and I work. I work a lot out of town. You know... uh... this... I... I... you know, you can't...

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

CS Agent: We did send out a letter in December that um . . . because it looks like late payments are charged each month to the account...

RT: There's been no late payments. Now what do you guys call late payments? Two days late? I mean Jesus Criminy.

CS Agent: A payment.

RT: We pay every month and like I said, I travel a lot.

CS Agent: A payment.

RT: And I work out of town a lot and so I pay the bills when I get home.

CS Agent: A payment late is if it's not paid on or before the due date.

RT: Well, we're not paying the security deposit. Now I've already talked to the PUC and I've filed a formal complaint already. They're making me call you guys and...

CS Agent: You're welcome . . . you're welcome to do that. I can put you over to the credit department to see if there's anything they can do to help you with the deposit.

RT: Well, there's nothing to help me with the deposit. We're not paying it and I've already . . . I'm gonna . . . I've placed a call to the state Attorney General's office . . . um . . . consumer fraud division. They accept now papers. I'm going to file a fraud complaint against you. I've already been to ripper off reports...

CS Agent: Okay, you're welcome to do that.

RT: And my daughter's putting up a website right now... Now you guys did this to me like 6 or 7 years ago. Now what we did is we put up a website and we got 97 people all together that you guys played this games on...

CS Agent: Now Rodney...

RT: Now what I did is I got all of them to file formal complaints. So what I'm going to do is I'm going to make it cost you like tens of thousands of dollars...

CS Agent: Rodney, like I said, I could put you over to the credit department, who could see if there's any way to get this, uh one-time waiver.

RT: No, he can't - I just filled my requirement with the PUC. You can transfer me over, but if it's more than a couple of minutes, then I'm going to hang up on you.

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

CS Agent: Okay, just a moment.

RT: Cause I'm not paying this. There ain't no way we're going to pay it. It's ridiculous. People need to... we need to get together and file a class action lawsuit against you is what we need to...

CS Agent: Just a moment... Before I transfer you, is there anything else I can check on for you?

RT: Obviously not, barely uh...

CS Agent: Were you satisfied with my protocol?

RT: No, I think you guys are horrible...

CS Agent: Okay –

RT: And I suggest, part of my PUC complaint.

CS Agent: Let me, I have to follow the PUC rules also, so I have to read this to you. If your explanation given does not resolve the matter, you have the right to file an informal complaint to the...

RT: Yeah, I've already filed a complaint...

CS Agent: Let me finish, I'm following the rules of the PUC.

RT: Yeah, yeah, yeah

CS Agent: The informal complaint must be filed within the next 10 days to ensure preservation of your rights.

RT: It's already preserved.

CS Agent: You may file the informal complaint to the Public Utility Commission, by phoning 1-800-692-7380...

RT: No, I'm not going to be bothered

CS Agent: I'm not finished, I'm following the rules of the PUC.

RT: Yeah we...

CS Agent: Let me... let me...

Docket No. C-2014-2412337
Rodney M. Temple v. West Penn Power Company

RT: I've already filed a formal complaint and drag your ass into court and be done with it.

CS Agent: You have a good day.

Call transferred.