

July 23, 2014

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

Re: Jerry Woodfield v. PGW, Docket No. C – 2014 – 2426778

Dear Secretary Chiavetta,

I am hereby filing the original Response to Philadelphia Gas Works ("PGW") Preliminary Objections in the above captioned matter. If any additional information is needed, please do not hesitate to contact me.

As has been the case from the first day I have contacted PGW in 2010, I would like to reiterate my desire, to resolve any and all issues associated with this complaint by simply providing access, when I am home at an agreed upon time, to my house to PGW to perform the actions they requested relating to the gas pipe/meter in my house. Providing access to my house to PGW to perform the actions they requested is on the written stipulation that once the actions they would like to perform within my house occur, they remove and strike from the record the lien against my residence, drop any current and future charges associated to my residence and close the account associated with my residence. Should this occur, I will gladly close this complaint. I have been told over the phone with PGW's various departments that I've spoken to these past 4 years that all of the things I have requested (the removal of the lien, all charges associated with my residence dropped, closure of the account associated to my residence) will be granted once they have access to my residence to perform the actions they would like performed, but they have been unwilling to come to my home to perform these actions when I am there, instead only coming to my home while I am at work.

Sincerely,



Jerry Woodfield

Cc: Laureto Farinas, Esquire (PGW)

RECEIVED

JUL 24 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE

RECEIVED

JUL 24 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

JERRY WOODFIELD :
: Docket No. C-2014-2426778
Vs. :
: PHILADELPHIA GAS WORKS :
:

I, Jerry Woodfield, Complainant in the above captioned matter, hereby respond to PGW's Preliminary Objections as follows:

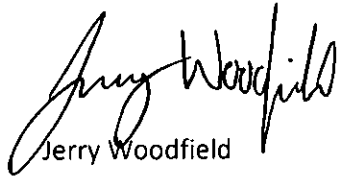
1. Admitted in part and denied in part. I, the Complainant, partially agree with this. I did file a formal complaint on or around May 14, 2014, but it was not regarding unpaid debt for gas service at my residence, 1533 E Hewson St, Philadelphia, PA. It was for invalid charges to this address. Gas has NEVER been provided to this address since I have owned the home (May 2010). I requested that PGW close the account at my address when monthly statements, addressed to another person, with a "bill" for \$0 were sent to my address after I moved in. They refused to close the account and eventually, after roughly 2 years, began charging a monthly \$12 "Customer Charge", while providing zero gas to the residence. This charge to my residence is completely unsubstantiated as I had not requested to be a customer of PGW and in fact, years prior, had requested they close the account.
2. Admitted.
3. Admitted.
4. Admitted in part. As stated in point 1 above, I purchased my home in May 2010 and soon after moving in, received a monthly statement, sent to Eva Ruckle at my address. Within these statements, the amount of gas provided at my residence was 0 and the charges were \$0. Soon thereafter, I contacted PGW about closing the account at my residence and requested they stop sending these statements as I do not want or need gas. Eventually, they began charging a "Customer Charge" even though they were not providing gas to my residence and I had not requested being a PGW customer and in fact, I had specifically requested not being a PGW customer by requesting closure of the account. The \$345.56 is not for unpaid gas service, but for invalid charges for simply being a customer of PGW, which I am not and I specifically requested I not be, by closing the account.
5. Denied. Their statement is inconsequential and does not hold bearing as, again, this is not for unpaid gas service, but for invalid charges associated with simply being a customer of PGW, which I am not nor have I ever asked to be at my residence. Seeing as how these charges are invalid, a lien should have never been filed.
6. Denied. I would like the lien removed, the account associated with my residence closed and for PGW to end their harassment of my residence. Through the numerous conversations I have had over the years with customer service at PGW, they have requested to enter my house for various reasons (verifying that gas is not hooked up, the meter needs to be closed, removal of

the meter, etc) and I have tried to set up appointments for them to enter my house, as they requested. But PGW has only sent servicemen to my house during the work day on weekdays when I specifically told them I would not be there as I am working. I have requested, on numerous occasions, an appointment on a weekend or weekday evening, but they have refused to set up an appointment with me at these times. As of this day, I am still more than willing to have PGW come into my house and perform the actions they have requested as long as I have, *in writing, a statement from PGW that once they perform these actions, the lien will be removed and stricken from the record, any current and future charges dropped and the account associated with my residence be closed.*

7. I am without information or knowledge sufficient to form a belief as to the truth of this paragraph.
8. Admitted in part and denied in part. The first sentence is true. The second is false. I am stating that the customer charges are completely invalid as I have never requested being a customer of PGW and have specifically asked to not be a customer, by closing the account associated with my residence.
9. Denied. This is not pertinent to my situation as I am claiming that the charges associated with my residence are invalid and as such, a lien should have never been filed in the first place.
10. Denied. This is not pertinent to my situation as I am claiming that the charges associated with my residence are invalid and as such, a lien should have never been filed in the first place.
11. Denied. This is not pertinent to my situation as I am claiming that the charges associated with my residence are invalid and as such, a lien should have never been filed in the first place. In addition, this point does not apply to this situation as gas service was never provided to my residence.
12. Denied. This does not apply in any way to this situation. I purchased my home in May 2010, requested closure of the account associated with my residence soon after and then PGW began charging my residence in approximately March 2012 (as they state in point 4 of their Preliminary Objections and Motion to Strike) with these invalid "Customer Charges". The account had a \$0 balance when I moved into my home and stayed at \$0 until approximately March 2012. There were no charges that were incurred before I owned the residence. Since I specifically requested to not be a customer of PGW, any charge for being a customer is completely invalid.
13. Denied. This is not pertinent to my situation as I am claiming that the charges associated with my residence are invalid and as such, a lien should have never been filed in the first place.

As an aside, I would like to point out that within the "Answer of the Philadelphia Gas Works" document; Mr. Laureto Farinas falsely claimed that the invalid "Customer Charge" has been incurred on my property since December 2009 to current, which is in direct disagreement with the "Preliminary Objections and Motion to Strike" document, which states in point 4 that the charges were assessed from March 2012 to March 2014. Further evidence of this false claim is that a customer charge of \$12 from December 2009 to April 2014 would result in cumulative unpaid charges of \$636 (before any late fees, etc. associated with the account), which is significantly more than the lien of \$345.56 filed in April 2014.

Sincerely,

A handwritten signature in black ink that reads "Jerry Woodfield". The signature is written in a cursive style with a large, looping initial "J".

Jerry Woodfield

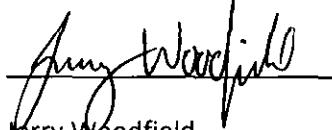
1533 E Hewson St.

Philadelphia, PA 19125

(302)740-0266

Verification

I, Jerry Woodfield, hereby declare that the facts set forth in the foregoing Response are true and correct to the best of my knowledge, information and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.


Jerry Woodfield

July 23, 2014

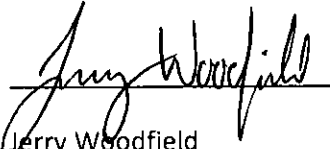
RECEIVED
JUL 24 2014
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Certificate of Service

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

For Philadelphia Gas Works:

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


Jerry Woodfield

July 23, 2014

RECEIVED

JUL 24 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

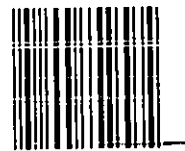
Jerry Woodfield
1533 E Hewson St
Phila, PA 19125



7013 1710 0000 3724 1063



1000



17105

U.S. POSTAGE
PAID
FORT WASHINGTON, PA
19034
JUL 24, '14
AMOUNT

\$4.00

00056504-97

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

17105\$3265

