



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Laureto A. Farinas, Senior Attorney
Legal Department
Direct Dial: 215-684-6982
FAX: 215-684-6798
E-mail: laureto.farinas@pgworks.com

April 7, 2014

RECEIVED

Administrative Law Judge Marta Guhl
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
Suite 403
801 Market Street
Philadelphia, PA 19107

APR 08 2014

PUBLIC UTILITY COMMISSION
PHILADELPHIA OFFICE
ADMINISTRATIVE LAW JUDGE

RE: *Marcus Love v. Philadelphia Gas Works, Docket No. F – 2013 – 2355580*

Dear Judge Guhl:

Pursuant to your Order Reopening the Record of the above referenced matter, dated March 6, 2014, you requested additional information in the form of late filed exhibits.

PGW's late filed exhibits in response to your need for additional information are enclosed. These are PGW Exhibits 7, 8 and 9. These exhibits were prepared by Lamonda Burke, Customer Review Officer – PGW and Tiffany Higgins, Manager, Customer Review Unit – PGW.

If you need additional information about this matter, please contact me at my direct-dial number above. Thank you.

Sincerely,

Laureto Farinas

cc: Service List
Tiffany Higgins (PGW Mail)
Lamonda Burke
Linda Pereira
Wendy Vacca

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2014 DEC 16 AM 8:37
PA 11-0
SECRETARY GENERAL AS

Marcus Love v. Philadelphia Gas Works, Docket No. F-2013-2355580

PGW Exhibit – 7

The attached exhibit shows the meter testing results for the mechanical portion of the meter from the Service Address (1376 Dyre Street) exchanged on September 20, 2012.

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SECRETARY'S OFFICE

Customer Requested Meter Test

Date 4-3-14

The Philadelphia Gas Works tested the meter removed from the premises of:

CUSTOMER: Marcus Love

ADDRESS: 1376 Dike Street

ON APPLICATION NO. 24142117 GIVES THE FOLLOWING RESULTS:

Meter No. <u>1536791</u>		PROOF [] ACCURACY []				
Size <u>S-250</u>	Index <u>0000</u>	Meter Test Results			Percentage	
		Temperature	Open 100%	Check 20%	Fast	Slow
Meter Received <u>9-20-2012</u>			<u>99.2</u>	<u>98.8</u>	<u>-1.2</u>	
Meter Tested <u>11-26-2012</u>						
		Average of Results				

Roland See

PGW REPRESENTATIVE

PGW Exhibit - 7
Page 1 of 2

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Find_Meter_Number

<i>Mtr_Nbr</i>	<i>DATE</i>	<i>Mtr_Index</i>	<i>Proof_Check</i>	<i>Proof_Open</i>	
1536791	01/03/1996	8355	99.310	99.103	A1
1536791	11/27/2007	2064	98.807	98.989	
1536791	03/10/2009	0000	99.841	99.847	
1536791	11/26/2012	0000	98.774	99.197	

PGW Exhibit - 7
 Page 2 of 2

PGW Exhibit – 8

PGW's Comment on adjustments to the Complainant's account.


Based upon the usage analysis completed for the property (PGW Exhibit – 4, page 1 of 4) for usage that took place prior to the meter ceasing to record, the average cubic feet of gas per degree day is slightly higher than the cubic feet per degree day that Mr. Love was billed in the make-up bill calculated indexes.

Therefore, the Complainant had been beneficially billed and is not entitled to a reduction in the make-up billing amount.

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PGW Exhibit – 9

The attached information, PGW's Zero Usage Procedure, (Effective July 2012) represents documentation of PGW efforts to modify internal practices and procedures to address the conduct at issue in this matter.

	<p>Operations</p> <p>POLICY AND PROCEDURE</p> <p>ZERO USAGE PROCEDURE</p> <p>Tracking and Investigation</p>	<p>Policy No.:</p> <p>Effective: July 2012</p> <p>Revised:</p> <p>Supersedes: June 2003</p>
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OBJECTIVE:

In order to maintain the integrity of PGW's billing system, support customer satisfaction and remain in compliance with the Pennsylvania Public Utility Commission's (PUC) regulations, it is essential that the company receives accurate monthly meter readings via PGW's automated meter reading system. In order to maintain billing accuracy, the following policy has been developed to identify the process that PGW will complete when an Automatic Meter Reading device (AMR) on an active account has recorded multiple consecutive zero readings each month.

POLICY:

This policy was designed to outline the process which Operations performs in order to identify and address zero usage accounts that are currently linked to PGW customers. This investigation process will commence with any linked account where PGW has received three or more consecutive months of zero readings.


Identification of Accounts

In 2012, an enhanced reporting system was implemented which identifies all accounts where zero usage has recorded on the meter. Contained within this reporting system PGW identifies the following types of accounts:

- Residential zero usage
- Commercial and industrial zero usage
- Service last left off by the company
- RPU tilt/magnetic counts
- Active LCP and active LCP with magnetic/tilt counts
- Soft off zero usage

This reporting system allows Operations to track and produce reporting that is real-time and refreshed daily in order to ensure that the most recent data is reflected to filter out properties where visits were completed, the zero usage was confirmed valid, or usage restarted on the meter. This report also provides the company with information pertaining to how long the AMR has recorded zero usage.

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 PGW Exhibit - 9
 Page 1 of 3

	Operations POLICY AND PROCEDURE ZERO USAGE PROCEDURE Tracking and Investigation	Policy No.: Effective: July 2012 Revised: Supersedes: June 2003
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Initial Access Attempt

- An investigation on an account prompts after the **third consecutive month of zero usage** is recorded at the meter.
- When this occurs, a meter access “nice” letter will be sent to the customer.
- During month four, if no action is taken by the customer, the account will receive a 10-day meter access notice.
- If no contact is made by the customer to schedule access, a 72-hour notice will be issued (in phone and/or in person).
- By month five, if there is still no actions made by the customer, the path will continue leading up to termination.
- Once the customer enters into month six, if the company is unable to gain access, the service will be terminated.

***All attempts made by the company to gain access will be documented on the customer’s account.**

Non-Access Procedures

- If the shut-off cannot be completed by the Field Services Department (FSD) due to no curb valve and the account is a single family dwelling or all other accounts are unlinked in a multi meter dwelling, the account will be escalated to Distribution to complete the shut off order.

*** A separate path will commence during the Cold Weather Interim Period (CWIP).**

Timothy Sullivan
Superintendent, RPU (Policy Owner)

Raymond Welte
Director, Field Operations

PGW Exhibit - 9

Page 2 of 3



Operations

POLICY AND PROCEDURE

ZERO USAGE PROCEDURE Tracking and Investigation

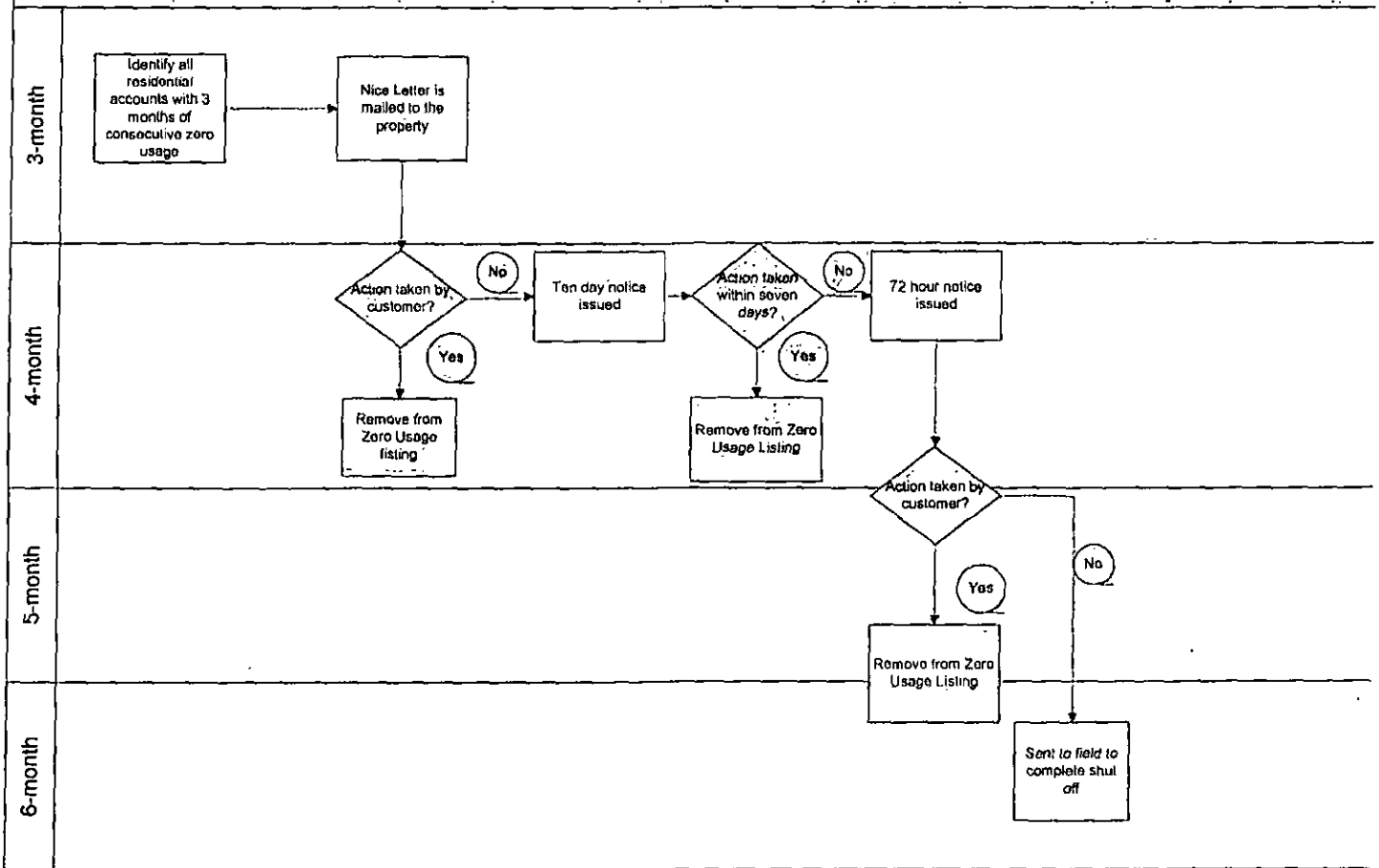
Policy No.:

Effective: July 2012

Revised:

Supersedes: June 2003

Zero Usage Access Path



Marcus Love
1376 Dyre St.
Philadelphia PA. 19124

Laureto Farinas, Esquire
Philadelphia Gas Works
4th Floor
800 W. Montgomery Ave.
Philadelphia PA 19122

CC: PPUC
Administrative Law Judge
Marta Guhl

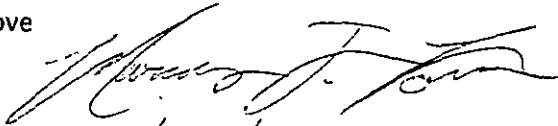
RE: F-2013-2355580

This is my official objection to PGW being granted more time to produce records from the faulty meter test. I strongly oppose the decision for more time, is my belief that PGW is now currently engaging in deceitful unfair practice, trying to cover up the fact they "installed" a dead meter that never worked. Law states PGW can back bill for a meter that stopped recording or was tampered with. Again none of the above in my case. The meter PGW installed April 2009 could have never worked because when PGW worker & manager Mr. Figurella removed the meter I was present it read 00000000, at that time Mr. Figurella examined the meter and ruled out any tampering he explained something was wrong with the meter. PGW was negligent in the install of the meter. I strongly believe PGW knows the meter never worked but they are trying to cover that fact up.

PGW being a huge company own by the City they are full aware of the proper testing and documentation. PGW didn't produce such things because the meter reading was zero. I would like to make a "Motion to Dismiss this case and remove ALL back bill & late charges from 1376 Dyre St. This is a complete misuse of services provided & power, PGW is a powerful entity that operates with impunity. I still don't understand how PGW was able to place a fraudulent lien on my property for 6,534.47 when this issue is unresolved and still in litigation that in itself is illegal and outrageous.

In closing I would like to state PGW installed a broken meter, the technician obviously didn't follow proper procedures in testing after install to make sure the meter was reading properly after install. PGW waited four years to back bill over six thousand dollars they included late fees which now totals over eight thousand. PGW sent worker to my house accusing me of criminal mischief treating to shut off my gas if I don't allow him immediate access in my home. This case should be dismissed and all back billed charges dropped. I sincerely hope that you will take all of the above into consideration.

Thanks
Marcus Love



04/09/2014

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PUBLIC UTILITY COMMISSION
PHILADELPHIA OFFICE
ADMINISTRATIVE LAW JUDGE

Find_Meter_Number

Mtr_Nbr	DATE	Mtr_Index	Proof_Check	Proof_Open	
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1536791	03/10/2009	0000	99.841	99.847	
1536791	11/26/2012	0000	98.774	99.197	

Page 2 of 2

PGW Exhibit -

This can't be right, since a new Meter was installed in April of 2009. Yet the Meter number is the same from 1996-2012

Customer Requested Meter Test

Date 4-3-14

The Philadelphia Gas Works tested the meter removed from the premises of:

CUSTOMER:

Marcus Love

ADDRESS:

1376 Duke Street

ON APPLICATION NO.:

GIVES THE FOLLOWING RESULTS:

24142117

Meter No.		PROOF [] ACCURACY []				
Size	Index	Meter Test Results			Percentage	
S-250	0000	Temperature	Open 100%	Check 20%	Fast	Slow
Meter Received	9-20-2012		99.2	98.8	-1.2	
Meter Tested	11-26-2012	Average of Results				

Roland See

PGW REPRESENTATIVE

PGW gave sworn testimony that when they removed the Meter from my home it had a reading. This test document completely contradicts their testimony.

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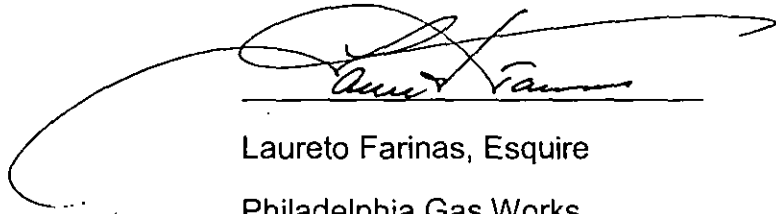
CERTIFICATE OF SERVICE

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 Complainant:

Mr. Marcus Love
1376 Dyre Street
Philadelphia, PA 19124

April 7, 2014

A handwritten signature in black ink, appearing to read "Laureto Farinas", is written over a horizontal line. The signature is stylized and includes a large, sweeping flourish that extends to the left and then curves back under the line.

Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982