

Valerie J. Williams
816 N. 21st Street
Philadelphia, PA 19130

March 19, 2015

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

RECEIVED
2015 MAR 23 AM 12:12
PA. P.U.C.
SECRETARY'S BUREAU

Re: Valerie J. Williams v. PGW. Docket No. F - 2014-2456937

Dear Secretary Chiavetta:

In regard to the above referenced complaint against PGW, I believe that I previously addressed in my formal complaint, Section 5, some of the reasons why the PGW counsel's defense that the statute of limitations has passed should not prevail in this dispute.

In response to my complaint, PGW counsel appears to deny that I contacted PGW on several occasions requesting help in determining what I suspected was overpayment for gas and services while I was enrolled in the CRP program with that company.

This inquiry began on the very day I applied for and was accepted in the program. The representative had a computer and records we could have accessed in determining whether or not I would benefit from the CRP program but was not willing.

In 2007, after moving to N 21st Street and receiving an unsolicited credit, on usage from my Woodstock address, I again called and spoke to a representative who informed me that I could be reimbursed for any overpayment (by check) at any time I chose to dispute my usage.

Apparently no notation of these conversations were made by PGW representatives in the company logs/files. However, counsel does note my conversation with a supervisor on March 22, 2010. A conversation which unlike the other two was apparently documented to some extent in PGW files

Much of the information in PGW's Preliminary objections either concurs with information I have also supplied or that I do not object to in terms of the basic facts. However, I again respectfully maintain that I did question and object to the charges previously incurred (while enrolled in CRP), on a call in 2007 and attempted to get the appropriate assistance from the PGW representative on December 9, 2005, at the time of my application; this in an effort to make an informed decision in making my application.

On my March 22, 2010 call with the supervisor, (which is noted by counsel), I was not given the opportunity to formally dispute the charges, nor was I informed of a time limit affecting my concern. When I again phoned on March 11, 2014, my approach was the same: I told the representative that I believed I was paying for more gas than I was using and that I had phoned before.

However in stark contrast, on this call, I did not have to dispute the charges by other means, and the representative did not further delay the process or try to side-step the problem. Her

response was to tell me that she would file a complaint (or dispute) on my behalf immediately. I thanked her and that began what has now turned into a yearlong process.

This statute of limitations which is cited by counsel for PGW as the company's defense turns out to be pertinent information which was not conveyed by anyone at PGW until I questioned the credit issued by PGW in April of 2014. This disclosure was after a determination had been made. It therefore appears that this information was willfully omitted until this point. As it occurred: Based on the amount credited in 2014, I questioned how far back the company went in determining my credit. This happened on a phone call to PGW with yet another PGW supervisor. At that time, I was told of the policy by this representative and that I would have to file a complaint with the PUC to have the case re-opened and the full time period considered.

With all due respect for the effectiveness of the legal system and given the history of my Complaint, this statute appears to be in place only to protect the gas company. If the company's representatives, especially the supervisors, do not make such policy known when inquiries that could lead to disputes arise, then the interactions lend themselves to deception and become dishonest by this omission. In light of this, and the outcome as noted, it sadly amounts to theft from the very people the program is meant to benefit. Please keep in mind though as stated above that I did indeed raise concern at the time of application in 2005 and contact PGW about this issue in 2007 and again in 2010.

PGW's website says of the CRP program that the average participant will save about 50% on their gas bill. This is misleading. Even if my experience is atypical, the means of determining payment, which is calculated as a percentage of the participant's income, is faulty. As it stands, a person with a three story house in the program, could be paying less to heat their home than an individual such as myself who resides in a one bedroom apartment on a single floor.

I respectfully maintain that 1) the program system is inherently flawed; 2) I repeatedly made honest attempts to determine whether or not the program was beneficial and in my best interests; 3) this, especially my attempts to rectify any oversight are enough to validate that my situation warrants reimbursement going back to 2007 if not for the entire time I was enrolled in the program. Due to the fact that this earlier period involves and should include significant LIHEAP grants that would have been credited to my account had I been appropriately advised, the potential reimbursement will be at least twice what has already been credited. This is a significant amount of money for me and I am certain that this is not the kind of situation that legislators had in mind when passing the law providing a statute of limitations.

Thank you for your consideration in this matter. As a first party in this concern I attest to the accuracy of the information and respectfully request that the Commission consider all the circumstances of the Complaint and award a reimbursement which is honest, fair, has moral integrity and includes all grants and monies constituting the overpayment.

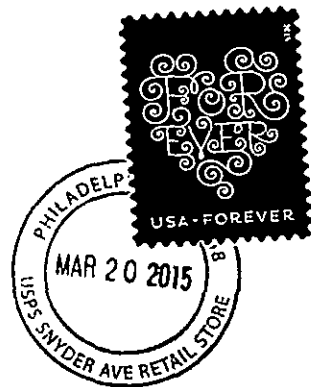
Respectfully submitted,



Valerie J. Williams

cc: ALJ Ember S. Jandebour
PGW Counsel, Graciela Christlieb, Esquire

Valerie J. Williams
816 N 21st Street
Philadelphia, PA 19130-1402



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

171053265 8099

