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2015 APR -6 AM 11: 06

PA P.U.C.
SECRETARY'S BUREAU

April 3, 2015

By Certified Mail, Return Receipt Requested

The Honorable Angela T. Jones
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
801 Market Street, 4th Floor
Suite 4063
Philadelphia, PA 19107

Re: *Sandra C. Laws v. Philadelphia Gas Works*
Docket No. F-2014-2426789

Dear Judge Jones:

Enclosed please find the Reply Brief of Complainant to Philadelphia Gas Works.

Thank you for your attention.

Respectfully,



Sandra C. Laws

Enclosure

cc: Laureto Farinas, Esquire (w/enc., by Certified Mail, Return Receipt Requested)
Secretary Rosemary Chiavetta (w/enc., by First-Class U.S. Mail)

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION 2015 APR -6 AM 11:06

SANDRA C. LAWS

PA P.U.C.
SECRETARY'S BUREAU

Vs.

Docket No. F-2014-2426789

PHILADELPHIA GAS WORKS

REPLY BRIEF OF COMPLAINANT
TO PHILADELPHIA GAS WORKS

I. INTRODUCTION

Sandra C. Laws, Complainant, hereby submits this Reply Brief in response to the Main Brief of Philadelphia Gas Works ("PGW").

The questions raised in the Complaint and at the hearings before Administrative Law Judge Angela T. Jones, is under which PUC-approved tariff is PGW allowed to charge 148% of a customer's usage as a "distribution charge" and why there was no cap on this charge. The "distribution charge" is described on PGW's bill as "the charge for delivery of natural gas from the city gate to the consumer." PGW maintained at the Initial Hearing on September 17, 2014, that Complainant was confusing the "distribution charge" with the DSIC charge. At the Further Hearing of the case, Judge Jones clearly stated that Complainant was not confused and the issue was why there was no cap as there are with other charges billed to the customer. PGW's Statement of the Case states "...Complainant further stated that the remaining issue with the case is the ability to understand her bill." At no time was it stated that the problem was the inability to "understand" the bill.

In its Brief, PGW has spent a great deal of time detailing the setup of its bills. Nowhere in the Brief does it explain its justification for the distribution charge's surcharges. Neither the Complaint nor the Complainant ever mentions the billing methodology of PGW.

II. ARGUMENT

PGW Has Not Provided the PUC-Approved Tariff Permitting the Imposition of the Surcharges Contained Within the Distribution Charge

The main question at hand is where is PGW allowed to charge the customer for delivery and include "Other Post-Employment Benefit Surcharge," "Efficiency Cost Recovery


Surcharge,” Universal Service and Energy Conservation Surcharge,” and “Delivery Charge?” These surcharges are neither listed nor explained on PGW’s bill. In her Order #2, Judge Jones states “I find it reasonable to open the record for information about the surcharges that make up the distribution charge.” Her Honor further states, “The Respondent should be prepared to explain the distribution charge in the tariff compared to the distribution charge on the Complainant’s January 19, 2014 bill.” Instead, PGW goes into great detail regarding its bills’ format with no explanation as to how it arrived at the surcharges and by what authority.

In its Main Brief, PGW argues that “Even if some violation is perceived with the PGW bill format (again, not the issue at hand), the Commission should not assess a civil penalty....” It also states, “If the billing format is perceived in violation of the PGW Tariff, it is unintentional.”

III. CONCLUSION

In conclusion, Complainant respectfully requests that PGW show where the Commission has approved the surcharges contained within the distribution charge.

Respectfully Submitted,



Sandra C. Laws
5214 Webster Street, 1st Floor
Philadelphia, PA 19143

Date: April 3, 2015

CERTIFICATE OF SERVICE

I, Sandra C. Laws, hereby certify that a true and correct copy of the Reply Brief of Complainant to Philadelphia Gas Works was sent on April 3, 2015, addressed as follows:

By Certified Mail, Return Receipt Requested

The Honorable Angela T. Jones
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Office of Administrative Law Judge
801 Market Street, 4th Floor
Suite 4063
Philadelphia, PA 19107


-and-

Laureto Farinas, Esquire
PHILADELPHIA GAS WORKS
4th Floor
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By First-Class U.S. Mail

Secretary Rosemary Chiavetta
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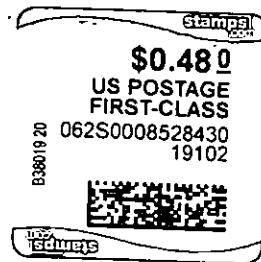


Sandra C. Laws

Date: April 3, 2015

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