

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00	:	
2. BUREAU: ALJ	:	
3. SECTION(S):	:	
5. APPROVED BY:	:	4. PUBLIC MEETING DATE:
DIRECTOR:	:	00/00/00
SUPERVISOR:	:	
6. PERSON IN CHARGE:	:	7. DATE FILED: 01/05/06
8. DOCKET NO: C-20065738	:	9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: JOSEPH, BERNADETTE

RESPONDENT/APPLICANT: PEOPLES NATURAL GAS CO., THE

COMP/APP COUNTY: ALLEGHENY

UTILITY CODE: 122250

ALLEGATION OR SUBJECT

COMPLAINANT STATES SHE CONTACTED THE PUC ON 10/24/05 AND WAS GIVEN CLAIM # 199974. WHEN SHE CALLED TO CHECK THE STATUS OF THE CLAIM IN LATE NOVEMBER, THE FORMS WERE MAILED TO HER. SHE WANTS THE PUC TO HELP HER GET FULL REIMBURSEMENT.

DOCUMENT  
FOLDER

**DOCKETED**

JAN 11 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

RECEIVED  
2006 JAN -5 AM 8:55  
PA.P.U.C.  
SECRETARY'S BUREAU

C-200205738

Please print or type.

122250

1. CUSTOMER NAME (COMPLAINANT)

Your name, mailing address, county, telephone number, utility account number and service address:

Name BERNADETTE JOSEPH

Street/P.O. Box 2949 MANORVIEW CIRCLE Apt # \_\_\_\_\_

City ALLISON PARK State PA Zip 15101

County ALLEGHENY

Area Code/HOME Phone 412-486-6929

Area Code/WORK Phone 412-828-6080

Utility Account Number 2 4610 0385 2102  
(from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name \_\_\_\_\_

Street/P.O. Box \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: DOMINION PEOPLES

3. TYPE OF UTILITY (check one)

- ELECTRIC
- GAS
- WATER
- TELEPHONE  
(local, long distance)
- STEAM HEAT
- WASTE WATER
- MOTOR CARRIER  
(taxi, moving company, limousine)

9

4. **COMPLAINT** (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other. SEE B  
(explain)

B. State the facts of your complaint.

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

Copies attached, Attachment #1

I contacted the PUC on 10/24/05 (Shirley Hartman) and was given Claim # 199974. When I called to check status of claim in late November, this form was mailed to me

5. **RELIEF**

What do you want the Public Utility Commission to do about your complaint? Use additional paper if you need more space.

Help me in getting full reimbursement. The water tank was in very good condition and recommended maintenance was always done. How can the gas company tell me the life of the tanks

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company AND your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

N/A

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES  
(includes appeals of BCS determinations)

See attachment #2

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:

I BERNADETTE JOSEPH hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Bernadette Joseph  
(Signature)

12/30/05  
(Date)

9. **LEGAL REPRESENTATION (IF ANY)**

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Area Code/Phone Number \_\_\_\_\_

10. **FILING**

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 <sup>nd</sup> Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic filings of the complaint form will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

**Keep a copy of your complaint for your records.**

Bernadette Joseph  
2949 Manorview Circle  
Allison Park, PA 15101

September 29, 2005

Dominion Peoples  
Dominion Tower  
Claims Management  
19<sup>th</sup> Floor  
625 Liberty Avenue  
Pittsburgh, PA 15222

Re: Account 2461 0038 52102

Dear Sir or Madam:

Enclosed you will find a receipt for a hot water tank which I had installed on Tuesday, September 27, 2005. This tank was needlessly purchased and I am asking that Dominion Peoples reimburse me for this purchase. The following information substantiates this claim.

After discovering that I had no hot water on Sunday, September 25, on Monday, September 26 I called a plumber. Arrangements were made for him to come to my home on Tuesday morning. Due to the age of the tank (9 years) and because I am in the process of trying to sell my home, I authorized the plumber to install a new tank and then I left for work at 9:20 a.m. At 11:15 a.m. the plumber called me at work to tell me that the tank was installed, but that gas service to my home was disconnected at the meter and I should contact the gas company.

I contacted Dominion Peoples, and learned that on Friday, September 23, the gas service to my home was disconnected. No notification was given to me either by phone or in writing. I could probably write two pages of complaints about the seven people that I spoke to, the misinformation I was given, and the non-service of your Customer Service. I will comment on the two that I found most irritating.

I was told by Sherry, one of your representatives, stated that there is always a notice put on the door and that I just didn't see it. She also stated that my service could be reconnected between the hours 8:00 a.m. and 4:30 p.m. only. She instructed me to call after 2:00 p.m. to place the order for service on the following morning, but with no guarantee that I could be done in the early part of the morning.

When I called at 2:45 p.m. I was told that service was provided as late as 7:00 p.m., and if I called immediately when I got home from work, service could be turned on that evening.

I called at 5:20 p.m. and was told by Cynthia that an order was placed earlier in the day, but that the request was cancelled. Please note that I never ordered the service because I was at work, could not leave work, and no one else had access to my home. Who ordered the service? We'll never know. I was transferred to Mrs. Everett, who took care of entering the order.

As an aside, the gas lines in our neighborhood have been dug up for one month. With curious children around, and the holes just covered with plywood, this is an accident waiting to happen.

Now on a positive note, the serviceman who came to turn on the gas was professional, thorough, informative and kind. Perhaps he should be working in your Customer Service Department.

Sincerely,

*Bernadette Joseph*  
Bernadette Joseph



Don't Go To Bed With That Drip Tonight

INVOICE

**TERRY'S PLUMBING INC.**

No 60702

3227 BABCOCK BOULEVARD PITTSBURGH, PA 15237 412-364-9114 FAX 364 9315

to Mrs. Joseph

Date 9/27 2005

2949 Menorview Circle  
15101

PHONE

ORDER TAKEN BY  
Phil

QUOTED PRICE \$

I have accepted quoted price before work is started

Signature

DESCRIPTION

AMOUNT

Install 40 Gal Rheem Gas water

heater 6 year warranty

467 -

Tax

32 69

Total

499 69

Credit Card

TERMS . . . PAYMENT DUE UPON COMPLETION

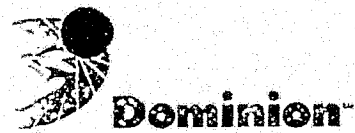
A finance charge of 10% per month will be applied to all invoices not paid within 30 days.

ALL WORK GUARANTEED FOR . . . . . DAYS

\$25.00 CHARGE ON RETURNED CHECKS

All work satisfactory, Owner

Bernadette Joseph



*Attachment #2*

October 25, 2005

Bernadette Joseph  
2949 Manorview Circle  
Allison Park, PA 15101

Dear Ms. Joseph:

Enclosed please find Dominion Peoples' check number 1102 in the amount of \$125.00. This represents full and final settlement of your claim against Dominion Peoples. Please read the release on the back of the draft, when you sign the draft you will release Dominion Peoples from any further responsibility concerning your claim.

If you have any questions, please call me at (412) 497-6888. We are sorry for the inconvenience we may have caused you, and we appreciate your patience concerning this matter.

Sincerely,

Edward Booker, Jr.  
Senior Claims Agent

EB/bam

Enclosure

NOTE TO PUC I did not cash check, as it would signify acceptance. Also Ms. Booker stated the subcontractor did not notify me of shut-off.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: January 11, 2006

BERNADETTE JOSEPH  
Complainant

v.

PEOPLES NATURAL GAS COMPANY  
Respondent

Complaint Docket  
No. C-20065738

DOCUMENT  
FOLDER

DOCKETED

JAN 11 2006

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FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

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TO: PEOPLES NATURAL GAS COMPANY

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if

you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.

James J. McNulty  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

DATE SERVED: January 11, 2006

C-20065738

PEOPLES NATURAL GAS COMPANY  
SUSAN G GEORGE ESQ  
625 LIBERTY AVE  
PITTSBURGH PA 15222-3197

DOCUMENT  
FOLDER

Dear Ms. George:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by BERNADETTE JOSEPH . To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

January 11, 2006

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

**COPY**  
James J. McNulty  
Secretary

ane

Horace P. Payne, Jr.  
Senior Counsel

Dominion Resources Services, Inc.  
625 Liberty Avenue, Pittsburgh, PA 15222  
Phone: 412-497-6889, Fax: 412-497-6838  
E-mail: Horace\_P\_Payne@dom.com



**Dominion™**

ORIGINAL

January 26, 2006

**CERTIFIED MAIL**

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**RECEIVED**

JAN 26 2006

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: Bernadette Joseph v. The Peoples Natural Gas Company  
at Docket No. C-20065738

Dear Secretary McNulty:

On behalf of The Peoples Natural Gas Company, enclosed please find an original and three (3) copies of its Answer filed in the above-referenced matter.

If you have any questions or concerns regarding this matter, please do not hesitate to contact me.

DOCUMENT  
FOLDER

Very truly yours,

Enclosures

cc: Bernadette Joseph, 2949 Manorview Circle, Allison Park, PA 15101  
Edward Booker - Dominion Tower

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COMMONWEALTH OF PENNSYLVANIA  
BEFORE  
THE PUBLIC UTILITY COMMISSION

Bernadette Joseph  
v.  
The Peoples Natural Gas Company

) Complaint Docket  
) No. C-20065738  
) 2006

RECEIVED

JAN 20 2006

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

ANSWER OF  
THE PEOPLES NATURAL GAS COMPANY

1. Admitted.
2. The Peoples Natural Gas Company d/b/a Dominion Peoples  
625 Liberty Avenue  
Pittsburgh, PA 15222-3197  
Horace P. Payne, Jr., Counsel for The Peoples Natural Gas Company
3. Admitted.
4. Dominion Peoples admits that service was interrupted at Complainant's residence on September 23, 2005 due to construction on a line in the vicinity of the property at issue. Prior to starting work on the line, Dominion Peoples' crew knocked on Complainant's door in an attempt to personally contact her to advise of that gas outage, however, no one was home. Later that day, Dominion Peoples completed its work and attempted to restore Complainant's gas service, however, Complainant was still not home and Dominion Peoples could not gain access to residence to relight appliances. A notice was posted on Complainant's door, notifying Complainant that natural gas service was off and to contact Dominion Peoples to relight the appliances. Dominion Peoples did not hear from Complainant until September 27, 2005, at which time she alleged that she unnecessarily had a water heater installed and requesting that natural gas service at the property be restored.

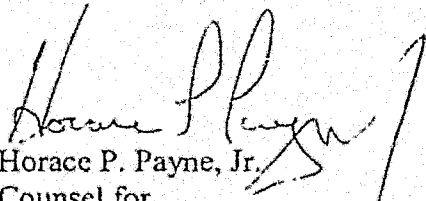
Dominion Peoples believes that Complainant unnecessarily authorized installation of a new hot water heater at her home without first requesting that the plumbing contractor investigate why the old water heater was not working. Furthermore, Complainant acknowledges that she was aware of gas line construction going on in the area of her home, yet still did not consider to check and see if her gas service was out prior to replacing the water heater. Although Dominion Peoples does not admit fault in this matter, Complainant has been offered a check for \$125.00 toward the cost of the new water heater in an attempt to settle the matter. Complainant has refused to accept Dominion Peoples' settlement offer.

DOCUMENT  
FOLDER

DOCKETED  
FEB 7 2006

5. Complainant has failed to state in her claim that there has been a violations of a statute or applicable regulations by Dominion Peoples. Additionally, the subject matter of this complaint is beyond the jurisdiction of the Commission, as Complainant seeks monetary damages, which this Commission is unable to grant. Complainant's concern is more appropriately addressed in a Civil Court of Law. For the above stated reasons, Dominion Peoples respectfully requests that this matter be dismissed.
6. Unknown to Respondent.
7. Admitted.

Respectfully submitted,



Horace P. Payne, Jr.  
Counsel for  
The Peoples Natural Gas Company

VERIFICATION

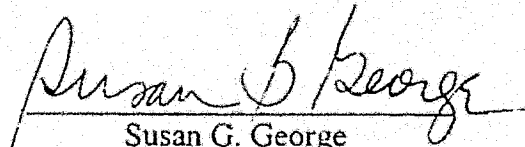
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COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
ALLEGHENY COUNTY )

JAN 26 2006

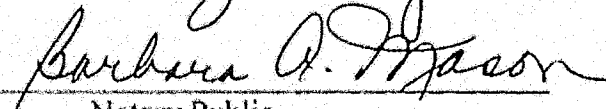
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

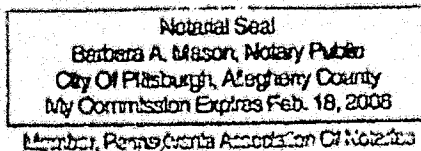
Susan G. George, being duly sworn or affirmed according to law, deposes and says that she is Assistant Secretary of The Peoples Natural Gas Company d/b/a Dominion Peoples; that she is authorized to and does make this verification for it; that the facts set forth above are true and correct to the best of her knowledge, information and belief; and that she expects the said The Peoples Natural Gas Company d/b/a Dominion Peoples to be able to prove the same at the hearing hereof.

  
Susan G. George

Sworn and subscribed before me this

26<sup>th</sup> day of January, 2006.

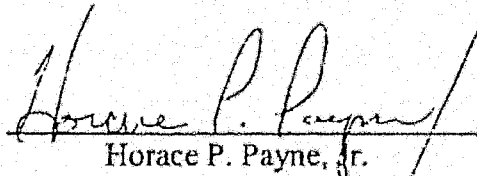
  
Notary Public



CERTIFICATION OF SERVICE

I hereby certify that I have served a copy of the foregoing upon each party to this proceeding.

Done at Pittsburgh, Pennsylvania, this 26<sup>th</sup> day of January, 2006.



Horace P. Payne, Jr.  
Counsel for  
The Peoples Natural Gas Company

RECEIVED

JAN 26 2006

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU