

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

123100

Please print or type.

C-20065954

2006 MAR -2 AM 9:12
SECRETARY'S BUREAU

1. CUSTOMER NAME (COMPLAINANT)

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

Name Margaret Shafer

Street/P.O. Box 105 N. Lockwillow Ave Apt # _____

City Hbg. State PA Zip 17112

County Dauphin

Area Code/HOME Phone ~~812~~ 717-671-5318

Area Code/WORK Phone 717-571-4614 - cell phone - no calls @ work.

Utility Account Number 208 420 7100 01
(from your bill)

ORIGINAL

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: UGI Gas

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER
(taxi, moving company, limousine)

TELEPHONE
(local, long distance)

28

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. (explain) GAS leak - high gas costs - due to leak on my side of meter - GAS Co. says NO!

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.

When we moved in in 1999 (Dec) we called UGI the following Spring when we smelled gas outside by meter. Meter was rusted then. Received high bills + UGI stated it was normal - March of 05 - Called UGI again regarding gas leak - UGI came to house + replaced meter. I watched as leaks bubbled from pipes behind meter entering house. These leaks were sealed. (See pictures)

5. RELIEF

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

Again bills extremely high. UGI said Gas leak was on the meter side, however pipes were sealed after meter. 3 weeks ago, I called on account. They said it was a commercial property - Landlord/Tenant - Sent up to check residential vs commercial. Rep stated leak was after meter if they were sealed ^(see pictures) also stated gas price is higher for ~~residential~~ commercial heating vs residential

Want credit for gas leaks. - Only 1st floor + riserment heated by Gas (hotwater.)

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

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)

MANY TIMES

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:

Marge Shafer, 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).

Marge Shafer
(Signature)

2/13/06
(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:

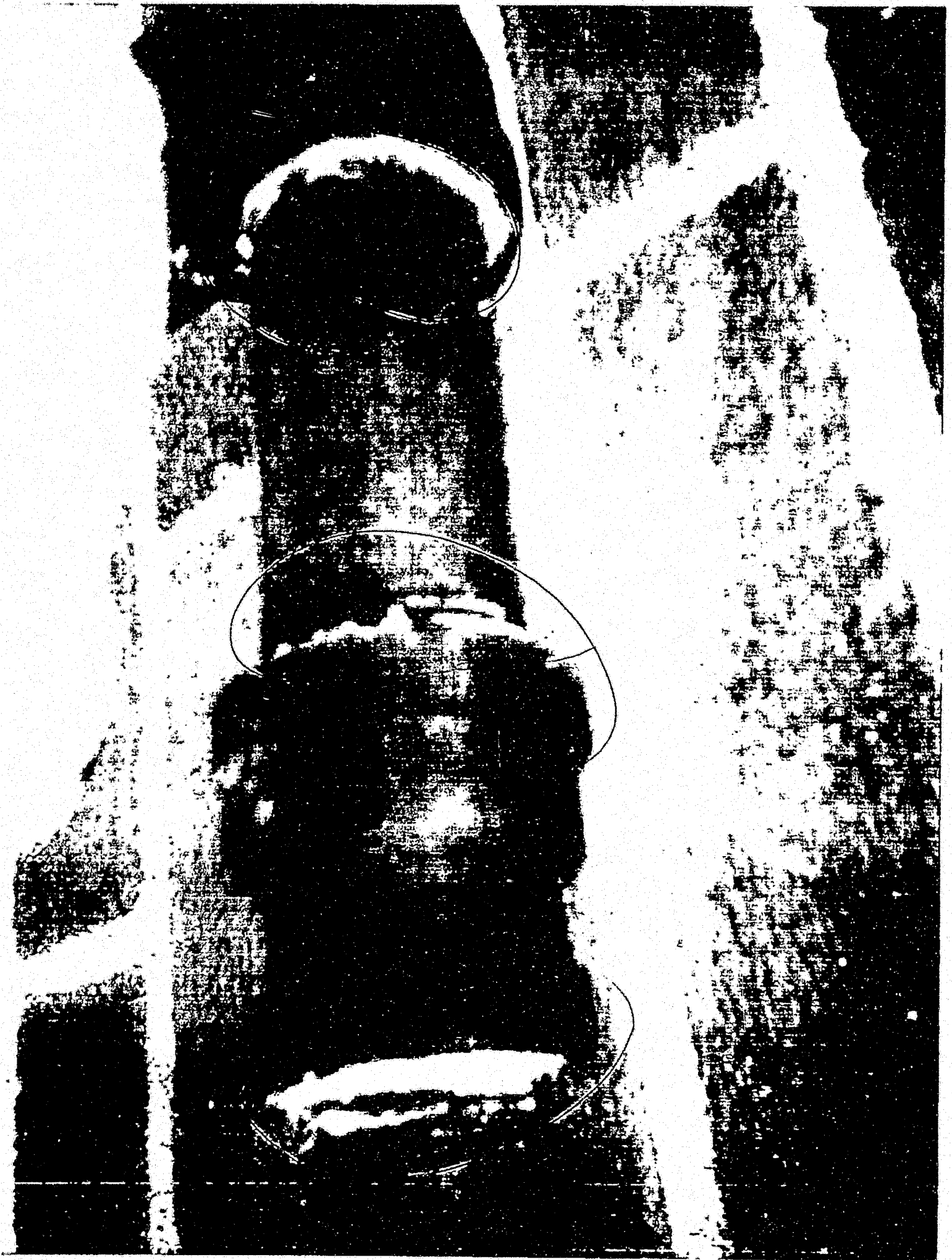
Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic 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.

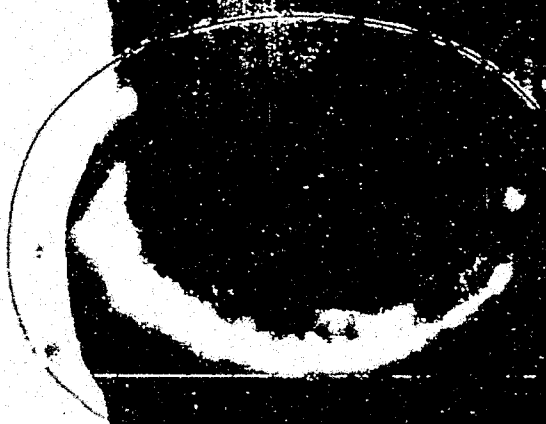
Keep a copy of your complaint for your records.

OVER SIZED DOCUMENTS

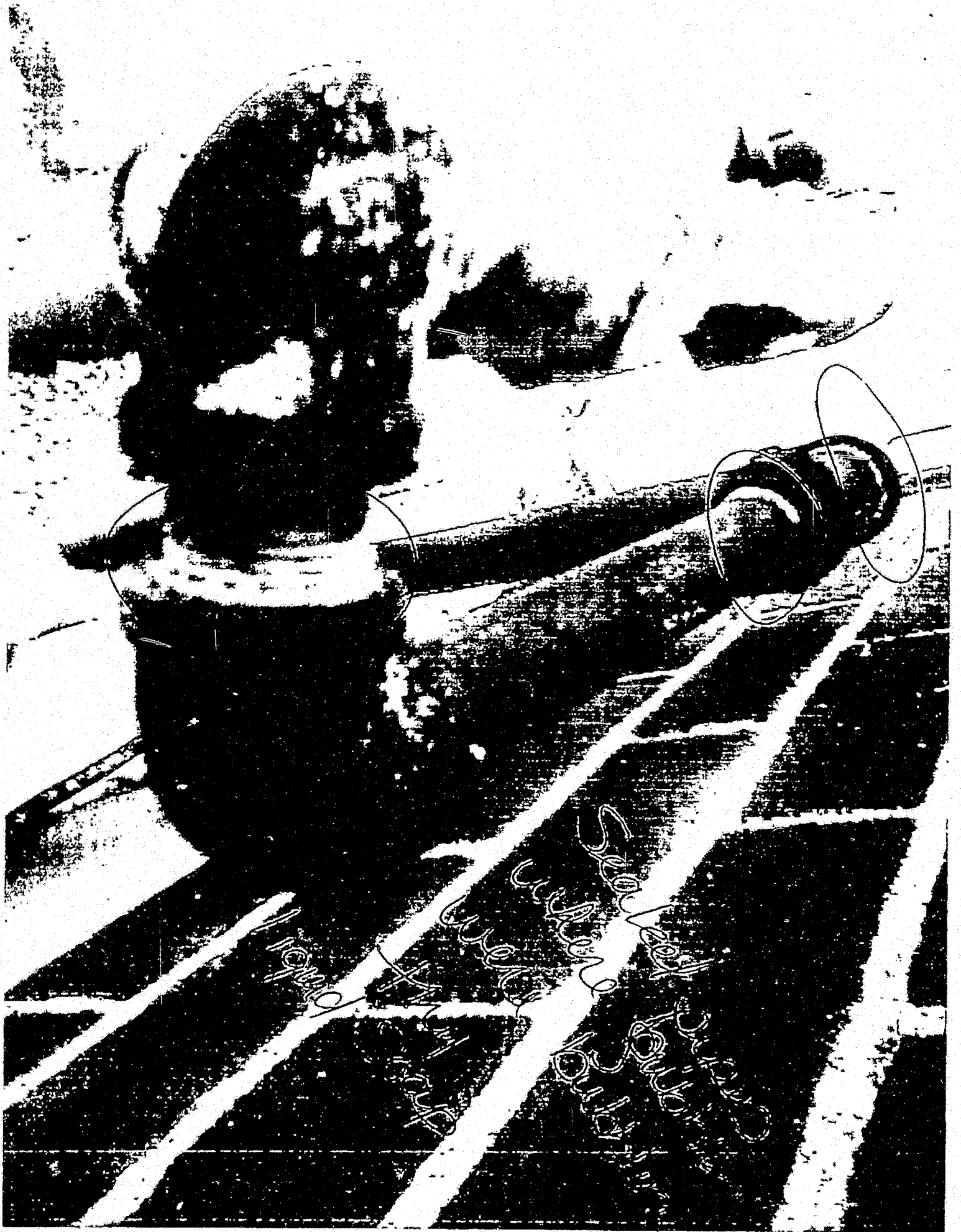


OVER SIZED DOCUMENTS

Pipe going
into house
on side of
meter



OVER SIZED DOCUMENTS



OVER SIZED DOCUMENTS

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: March 6, 2006

DOCUMENT
FOLDER

MARGARET SHAFER
Complainant

v.

UGI CORPORATION
Respondent

Complaint Docket
No: C-20065954

DOCKETED
MAR 6 2006

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: UGI CORPORATION

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: March 6, 2006

C-20065954

UGI CORPORATION
PO BOX 13009
READING PA 19612-3009

DOCUMENT
FOLDER

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by MARGARET SHAFER. 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.

March 6, 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,

James J. McNulty
Secretary

ane

LARRY R. CRAYNE
Attorney at Law

238 Johnston Road
Pittsburgh, PA 15241

lcrayne@adelphia.net

(412) 425-4029 (m)
(412) 831-5462 (h)

March 23, 2006

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

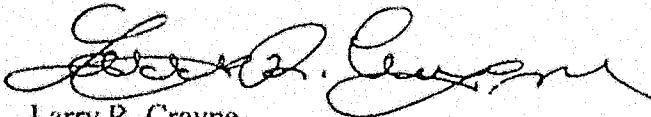
ORIGINAL

**Re: Margaret Shafer v. UGI Utilities, Inc.
Complaint Docket No. C-20065954**

Dear Mr. McNulty:

Enclosed are an original and four copies of UGI Utilities, Inc's Answer to the referenced Formal Complaint. Please file the original and three copies of the Answer and return a date-stamped copy to me in the envelope provided for your convenience. A copy of the document has been served on the complainant.

Sincerely,



Larry R. Crayne

enclosure

cc: Margaret Shafer
105 N. Lockwillow Ave.
Harrisburg, PA 17112

DOCUMENT
FOLDER

RECEIVED

MAR 23 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

666

ORIGINAL RECEIVED

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission
PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

MAR 28 2006

In the Matter of:

Margaret Shafer,
Complainant,

Complaint Docket
No. C-20065954

VS.

UGI Utilities, Inc.
Respondent.

Answer To Formal Complaint

And Now comes Respondent, UGI Utilities, Inc. (UGI), and states and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.

DOCKETED
MAR 30 2006

DOCUMENT
FOLDER

4.A. Admitted that Complainant has expressed a desire to "oppose the company's proposed rate increase." However, Complainant has merely checked the box in Paragraph 4. A. and has made no specific factual averments in Paragraph 4. B. regarding any rates of UGI. Paragraph 4. B. requires Complainant to state the facts of her complaint. Since Paragraph 4. B. contains no factual averments regarding rates, no response is required. Admitted that Complainant has averred a "...Gas leak...". Denied that Complainant has been charged for any leakage of gas.

4.B. Denied that Complainant called UGI in the "...Spring..." of 2000 regarding "...smelling gas outside by the meter." To the contrary, UGI has a record of a call by Complainant on May 30, 2001 inquiring about her gas usage. UGI discussed the prior account usage at that time and a high bill investigation was offered in addition to a meter investigation. Complainant at that time stated she was satisfied with the information and required no further investigation. Complainant did not report any odor of a gas leakage at the time of the call. Further, UGI's meter readers are trained to be alert to odors of gas leakage. In five years of regular meter readings, UGI detected no leakage of gas and Complainant made no complaints to UGI regarding an odor of gas leakage. Admitted that on May 5, 2005, Complainant called UGI and reported an odor of gas. A serviceman was promptly sent to the premises and discovered a gas leak on the UGI side of the meter. Since the leak was on the UGI side of the meter, any gas

leaking to the atmosphere did not pass through Complainant's meter. Therefore, Complainant was not charged for any leakage. On May 5, 2005, the meter was removed, the leak was repaired and a new meter was installed. The removed meter was sent for testing, was tested on May 25, 2005 and found to be measuring consumption within the Commission's accuracy guidelines. UGI avers that based on the regular meter readings, the results of the meter test and historical usage patterns, Complainant's bills are correct as rendered.

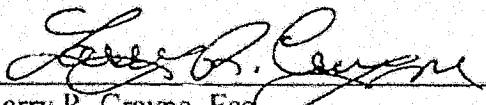
5. Paragraph 5. is a prayer for relief; therefore, no answer is required.
6. No answer required.
7. Admitted.

New Matter
Request For Telephonic Hearing

UGI hereby requests that any hearings to be scheduled in this proceeding be conducted telephonically.

Respectfully submitted,

UGI, Utilities, Inc.

By: 
Larry R. Crayne, Esq

VERIFICATION

I, Peter G. Terranova, Vice President – Operations, UGI Utilities, Inc., hereby state that the facts set forth above 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).

Peter Terranova
Peter G Terranova


Mar 23, 2006
Date
MSJ

Certificate of Service

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

Margaret Shafer
105 N. Lockwillow Ave.
Harrisburg, PA 17112

Dated this 23rd day of Mar, 2006


Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Utilities, Inc.

RECEIVED

MAR 23 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU