

Before the  
Pennsylvania Public Utility Commission

Harry Larry Bierley

C 2016-25539.88

National Fuel Gas  
Distribution Corp

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JUL 28 2017

Traverse to Brief

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

And now comes Complainant Bierley  
before the Honorable Court to correct many  
errors in the July 17, 2017 NFGDC Brief.

the following mistakes were noted:

Pg 4 No 5 - this service location has a  
smoke alarm and carbon monoxide  
detector, NOT two smoke alarms.

Page 4 - No 15 - Superfluous as Bierley was  
well aware he could purchase smoke  
alarms or C.O. detectors. This was already  
previously discussed. The original detectors  
possibly failed because the gas leak was  
apparently confined to the basement, 98%  
sprayed on insulation and a closed cellar  
door did not allow enough gas into the  
living area to set off the original alarms.  
There could have been a very heavy con-  
centration of gas that might have set off  
a massive tragedy.

Pg 8 - v H 3 - Second ... the company has  
not sufficiently reluked the need for

organized and regular gas line inspections, esp. on old houses and when there is a customer changeover.

Pg 8 at A # 1 - As explained - last phrase should read: the Company nevertheless should have inspected the inside of service location to determine if a gas leak might be likely or possible in the near future.

Pg 9 - VI A # 3 - this paragraph completely overlooks the common sense requirement that a service providing a dangerous or explosive product must be proven to be reasonably safe to the actual point of use. For example, the Pinto car was required to be revamped and made safer to protect from gas tank explosions on rear impact. Then, NFGDC is responsible for safety to the point of actually being used.

Pg 10 - Line 10 - WOW! How can NFGDC know it is safe without an inside inspection?

Pg 10 - # 2 at (2) - Claimant NEVER said that medical personnel should have been sent instantly when severe gas usage was first discovered. Claimant said a meter reader, sniffer, or someone should have been dispatched to check things out.

Pg 12 B - Perhaps detection of inside the house problems are at least largely the responsibility of the customer, but, HOW

MANY average customers are know-  
ledgeable enough or well versed enough  
in technical matters? Suggested answer:  
Very, very few, to do it right.

Pg 13 - Leakage of one percent (1%) does not  
correctly compare the very high usage.  
Mr De Santo's statement of 1% leak for  
the huge gas consumption is obviously  
inconsistent, with facts, the high con-  
sumption could easily have been very  
concentrated and thereby set off by such  
natural or normal occurrences such  
as a lightning strike or large fireworks  
ignited nearby. His statement sounds  
very unreasonable and it is a paradox  
in the least.

Wherefore, Claimant Bierley does  
move the Honorable Court to require  
reimbursement of \$294.70, the com-  
bination of both bills in question

It Is So Prayed

Respectfully,  
Adam L Bierley  
HARRY LARRY BIERLEY  
242 E. 32<sup>nd</sup> St  
Erie, PA 16504-1547  
July 24, 2017

Harry Larry Bierley  
✓

National Fuel Gas :  
Distribution Corp :

Before the Pennsylvania  
Public  
Utility Commission

NO. C-2016-2553988

TO: NFGDC

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

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Harry Larry Bierley

Before the  
Pennsylvania Public Utility Commission

Bierley v NREGDC  
C 2016-2553988

Certificate of Service

I do hereby certify that on July 24, 2017, a copy of the attached three page traverse with Notice to Plead was served upon the following two persons by first class U.S. Mail.

I do not have computer or skills to send E Mail, nor do I have fax capabilities.

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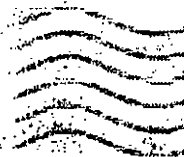
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