

Gregory Crossey
20 Oregon Avenue
Pittsburgh PA 15205

December 28, 2017

Via Federal Express, Overnight

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Bldg. 2nd Floor W
400 N. Street Harrisburg, PA 17120

RECEIVED

DEC 28 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Gregory Crossey v. Duquesne Light Company

Docket No. F-2017-2634991

Dear Secretary Chiavetta:

Enclosed please find my Written Response, Answers, to Duquesne Light Company's Response and New Matter to Formal Complaint that I have filed. A copy of this document has been served upon Respondent in accordance with Commission regulations.

Sincerely,


Gregory Crossey

Enclosure

cc: Paul Shane Miller (with enclosure)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Gregory Crossey
Complainant,

vs.

No: F-2017-2634991

DUQUESNE LIGHT COMPANY
Respondent

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ANSWERS TO NEW MATTER IN FORMAL COMPLAINT

Pursuant to 52 Pa Code. 5.101, Gregory Crossey files Answers to New Matter to the Formal Complaint:

Introduction

1. Admitted
2. Admitted
3. Admitted
4. Formal Complaint is legally sufficient and should be heard as the Pennsylvania Public Utility Commission does have oversight regarding balance and billing disputes and the request for payment arrangement is related directly to billing dispute.

Complaint is based on Duquesne Light's Customer Assistance Program's calculation of a monthly payment on a service balance that we believe is inaccurate and will show comparative electric usage to support claim that monthly billing statements are and have been inaccurate, therefore the budget amount which the Customer Assistance Program uses to calculate the CAP payment is incorrect and should be adjusted accordingly.

The CAP amount originally set was \$375 per month which is not 85% of budget bill per month.

Complainant has raised the issue of incorrect billing 4 times in the past two years. Duquesne Light's billing and collections system and procedures does not have a mechanism in place to address incorrect billing questions when the costumer is on a CAP payment plan.

When a consumer is on a CAP payment plan, questions regarding billing are answered by collections team whose responses are to pay the catch-up amount to avoid termination. This removes any protection for the customer to question billing or usage amounts as additional

payment plan changes are not possible, per the Collections Team, once the consumer is enrolled in CAP. Subsequently, when a customer's financial situation changes, no opportunity for adjustment in the CAP plan or request of a more financially appropriate payment plan exists.

Usage is incorrect. This was originally brought to the customer's attention by a Duquesne Light employee in 2015 who suggested we participate in a Smart Energy program and to review actual usage. This came about after inquiring why our usage appeared to be high based on our own comparisons of houses of similar square footage. In May of 2015, we began receiving Home Energy Reports showing our usage compared to similar homes. (examples, exhibit B) After moving forward with an informal and then formal complaint, we have not received any more Home Energy Reports from Duquesne Light by way of email.

Complainant requested a minimum three-month review of usage after the new meter was installed to compare to previous usage at similar time of year. Duquesne Light installed a new meter in September of 2017 and to date, our usage is lower. KWh usage for meter read on 9/18/17 was 1,236.93. KWh usage for meter reading on 11/16/17 is 754.32, representing a substantial difference, 60% change, since the new meter was installed. (exhibit A att) This further supports Complainant's request to compare actual readings and usage over a 6-month period to compare to similar time of year.

Concerning comparative usage to similar houses in the area and Duquesne Light's assertion that there is no sufficient knowledge of information to support the complainant's allegation, (exhibit B) Home Energy Reports published by Duquesne Light and sent via email provides comparative usage to similar homes, three comparisons are included in exhibit B. These Home Energy reports generated by Duquesne Light, confirms complainant's assertion that usage is 2 to 3 times higher than similar houses in area. Again, after Complainant filed informal and formal complaint against Duquesne Light, the Home Energy Reports were no longer sent to Complainant by way of email.

Complainant is entitled to relief for the reasons given in the answers set forth above.

5. Complainant is entitled to a review of the reasonable investigation that Duquesne Light performed.
6. No response
7. No response
8. No response

NEW MATTER

10.

11. As expressed in the Complainant's response to Duquesne Light's Preliminary Objections, the formal complaint is legally sufficient.

12. The commission is not barred from establishing a payment arrangement or hearing a billing dispute. The customer's rights as a consumer and the protection under the Responsible Utility Protection Act are not surrendered in cases of dispute over the balance on which a CAP payment arrangement has been based upon. The Commission does have authority to establish a payment arrangement when a customer has CAP arrears if the customer's CAP arrears are part of a billing and usage dispute.

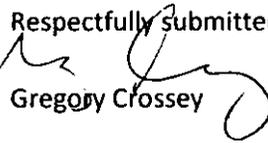
13. Complainant is enrolled in Duquesne Light's CAP Program, the balance of which is in dispute and the methodology used to determine the monthly CAP payment.

14. For the reasons, stated above and the ANSWERS in the preceding, the Commission is requested to establish a payment arrangement between the Complainant and Duquesne Light.

15. The Commission does have oversight of billing and usage disputes and consumer rights and protections, given the amount used to determine the CAP monthly payment is in dispute, the CAP payment amount should be reset at least during a 6-month period to compare usage to similar time of year. Further, considering the CAP amount was based on a balance that has been disputed, it is requested the CAP payment amount be reset with consideration of the household size of 6 and that household income falls within the 250% Federal Poverty Threshold due to loss of income of Gregory Crossey.

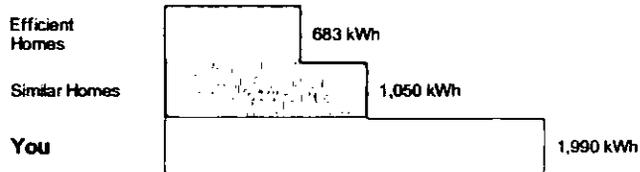
WHEREFORE, Claimant Gregory Crossey respectfully requests that the Pennsylvania Public Utility Commission approve request for a payment arrangement and review of inaccurate usage reflected in billing.

Respectfully submitted,


Gregory Crossey

Area # 1112060000

You used 89% more than similar homes.



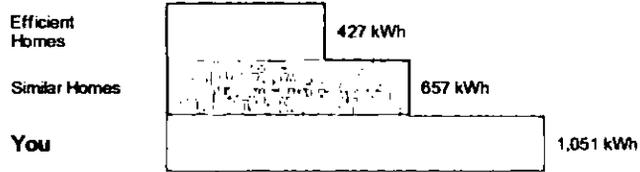
Jun 19, 2017 - Jul 18, 2017

This comparison is based on approx. 90 nearby homes that are most similar to yours.

[Learn more.](#)

Acct # ****2000000

You used 60% more than similar homes.



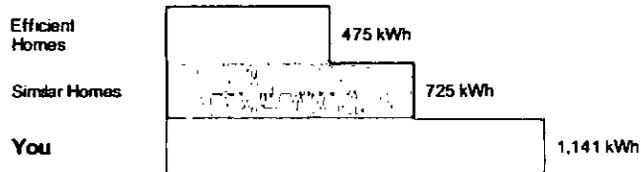
Mar 20, 2017 - Apr 18, 2017

This comparison is based on approx. 100 nearby homes that are most similar to yours.

[Learn more.](#)

Acct # ***2000000

You used 57% more than similar homes.



Feb 19, 2017 - Mar 19, 2017

This comparison is based on approx. 60 nearby homes that are most similar to yours.

[Learn more.](#)

Date	Transaction	Premise ID	Bill Due Date	Meter Read Date	Days in Billing Period	Meter Reading	kWh Usage	Bill, Payment, Adjustment Amount	Amount Due	Actual Amount	Account Balance
8/20/17	CAP Discount							\$0.00	\$8,395.40	-\$32.00	\$12,937.71
9/19/17	Bill - Actual	2312	10/10/17	9/18/17	30	323.73	1,236.93	\$183.00	\$8,578.40	\$172.90	\$13,110.61
9/19/17	CAP Discount							\$0.00	\$8,578.40	-\$33.00	\$13,077.61
10/5/17	Dispute							-\$8,559.56	\$18.84	\$0.00	\$13,077.61
10/5/17	Current w/payoff balance							-\$18.84	\$0.00	\$0.00	\$13,077.61
10/18/17	Bill - Actual	2312	11/8/17	10/17/17	29	1,638.62	1,314.88	\$183.00	\$183.00	\$183.67	\$13,261.28
10/18/17	CAP Discount							\$0.00	\$183.00	-\$33.00	\$13,228.28
10/20/17	Dispute - Cancel Transaction							\$8,559.56	\$8,742.56	\$0.00	\$13,228.28
10/20/17	Current w/payoff balance							-\$18.84	\$8,761.40	\$0.00	\$13,228.28
11/16/17	Bill - Actual	2312	12/7/17	11/15/17	29	2,392.93	754.32	\$183.00	\$8,944.40	\$111.91	\$13,340.19
11/16/17	CAP Discount							\$0.00	\$8,944.40	-\$33.00	\$13,307.19
11/22/17	Dispute							-\$8,789.14	\$155.26	\$0.00	\$13,307.19
11/22/17	Current w/payoff balance							-\$155.26	\$0.00	\$0.00	\$13,307.19
11/22/17	Payment							-\$183.00	\$0.00	-\$183.00	\$13,124.19

