

LARRY R. CRAYNE, PC
Attorney at Law

238 Johnston Road
Pittsburgh, PA 15241

lrcrayne@comcast.net

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

ELECTRONICALLY FILED

January 24, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Lamar Lex v. UGI Penn Natural Gas, Inc.
Complaint Docket No. C-2018-2641179

Dear Ms. Chiavetta:

Enclosed is an electronically filed copy of UGI Penn Natural Gas, Inc.'s Preliminary Objections to Formal Complaint. A copy of the document has been served on the Complainant.

Sincerely,



Larry R. Crayne

cc: Lamar Lex
5213 Rush Creek Court
Keller, TX

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

In the Matter of:

Lamar Lex,
Complainant,

Complaint Docket
No. C-2018-2641179

VS.

UGI Penn Natural Gas, Inc.
Respondent.

Preliminary Objections

AND NOW comes Respondent, UGI Penn Natural Gas, Inc. (Penn Natural), pursuant to 52 *Pa. Code*, Section 5.101 (a) (3), and files the following Preliminary Objections:

A. Insufficient Specificity of Pleading

1. Complainant filed a formal complaint with the Commission in this proceeding on or about January 3, 2018. The complaint was served on Penn Natural by Secretarial letter dated January 5, 2018.
2. Penn Natural is a natural gas distribution utility providing retail natural gas distribution service to the public
3. Paragraphs 3, 4 and 5 of the Complaint contain averments related to electric service at 135 E. Ridge Street, Nanticoke, PA 18634.
4. Penn Natural does not provide electric service to Complainant. The service location has electric heating and, therefore, PNG has no role in providing heat to 135 E. Ridge Street. Therefore, Penn Natural avers that the Complaint is ambiguous and does not provide sufficient specificity in order for Penn Natural to file an answer and provide a response.

Wherefore, Penn Natural moves that Complainant be directed to file a proper complaint specifying in numbered paragraphs and utilizing the Commission's format for a formal complaint, the particular matters related to his gas utility service about which he may be concerned, or, in the alternative, if Complainant has no complaint about his gas utility service, that Complainant withdraw the complaint filed at this docket number.

Notice to Plead

To: Lamar Lex:

You are hereby notified to file a written response to the above Preliminary Objections within ten (10) days from service hereof or a judgment may be entered against you. The response must be mailed to the Secretary of the Public Utility Commission:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

A copy of your response must also be mailed to:

Larry R. Crayne, PC
Attorney at Law
238 Johnston Road
Pittsburgh, PA 15241

Respectfully submitted,

UGI Penn Natural Gas, Inc.

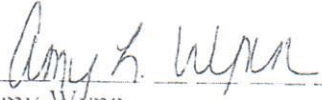
By:


Larry R. Crayne, Esq.

VERIFICATION

I, Amy Wynn, Senior Compliance Representative for UGI Utilities, Inc., hereby state that the facts set forth above 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 any hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C. S., Section 4904 (relating to unsworn falsification to authorities).

Date: 1-24-2018




Amy Wynn
Senior Compliance Representative
UGI Utilities, Inc.

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 (b) (1) (relating to service by a participant).

Lamar Lex
5213 Rush Creek Court
Keller, TX

Dated this 24th day of JAN, 2018


Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Penn Natural Gas, Inc.