

LARRY R. CRAYNE, PC
Attorney at Law

238 Johnston Road
Pittsburgh, PA 15241

lrcrayne@comcast.net

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

ELECTRONICALLY FILED

March 13, 2018

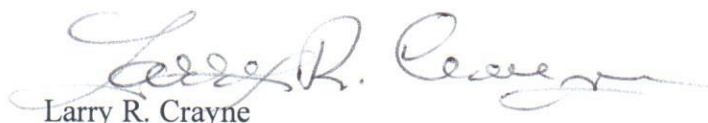
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Lamar Lex v. UGI Penn Natural Gas, Inc. and UGI Utilities, Inc.
Complaint Dockets Nos. C-2018-2641179 and C-2018-2641169

Dear Ms. Chiavetta:

Enclosed is a Motion for Consolidation of Docket Nos. C-2018-2641179 and C-2018-2641169.
A copy of the document has been served on the Complainant and the Administrative Law Judge.

Sincerely,



Larry R. Crayne

cc: Lamar Lex
5213 Rush Creek Court
Keller, TX

Hon. Elizabeth H. Barnes
PO Box 3265
Harrisburg, PA 17105

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, Inc.,
Respondent.

Motion for Consolidation

And Now comes Respondent, UGI Penn Natural, Inc. (Penn Natural), pursuant to 52 *Pa. Code*, Section 5.103 (a) and (b) and files the following Motion for Consolidation:

1. On or about January 2, 2018, Complainant filed the above-captioned Formal Complaint concerning his “electric service” with the Commission. (see attached Pages 1, 2 and 3 of the complaint - **Exhibit A**).
2. The Complaint was electronically served on Penn Natural on January 5, 2018.
3. On January 24, 2018, Penn Natural filed preliminary objections to the complaint because Penn Natural, a licensed natural gas distribution company, does not provide electric service to Complainant.
4. On March 5, 2018, the Penn Natural preliminary objections were denied, and Penn Natural was directed to file an answer to the Complaint.
3. On March 13, 2018, Penn Natural filed an Answer to the Complaint with the Secretary of the Commission.
4. On or about January 3, 2018, Complainant also filed a second almost identical Formal Complaint docketed at Docket No. C-2018-2641169 also concerning his “electric service” with the Commission. (see attached Pages 1, 2 and 3 of the complaint – **Exhibit B**).
5. The second Complaint was electronically served on UGI Utilities, Inc. on January 5, 2018.
6. On January 24, 2018, UGI Utilities, Inc., filed an Answer to the previously filed Complaint with the Secretary of the Commission.

7. The two Complaints involve similar allegations of incorrect charges and contain similar averments of fact that may or may not be relevant or material. To the best of Penn Natural's knowledge and belief and because of the designation of electric service by Complainant in Paragraphs 3 of the two Complaints, Penn Natural believes that the two Complaints concern electric service by UGI Utilities, Inc., to 135 E. Ridge Street, Nanticoke, PA 18634.

8. A hearing on the complaint docketed at C-2018-2641169 previously filed against UGI Utilities, Inc., is scheduled for March 26, 2018.

Wherefore, Penn Natural moves that these two Complaints be consolidated for the purpose of one telephonic hearing before the Commission.

Notice to Plead

To: Lamar Lex:

You are hereby notified to file a written response to the above Motion for Consolidation within twenty (20) 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:

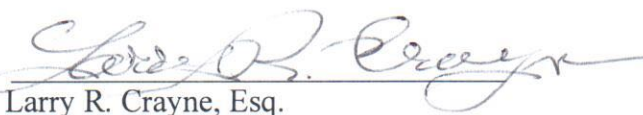
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Hon. Elizabeth H. Barnes
PO Box 3265
Harrisburg, PA 17105

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, 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: 3-13-2018

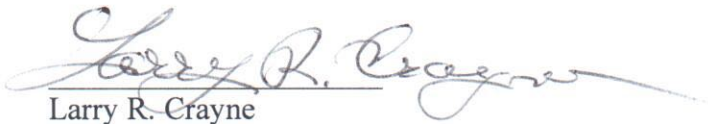
Amy L. Wynn
Amy Wynn
Senior Compliance Representative
UGI Utilities, Inc.

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 76244

Dated this 15th day of MAR, 2018



Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Penn Natural Gas, Inc.

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

Filing this form begins a legal proceeding and you will be a party to the case. If you do not wish to be a party to the case, consider filing an informal complaint.

To complete this form, please type or print legibly in ink.

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Lamar Lex

Street/P.O. Box 5213 Rush Creek Ct Apt #

City Keller State TX Zip 76244

County Tarrant

Telephone Number(s) Where We Can Contact You During the Day:

(817) 680-4727 (home) (817) 609-7406 (mobile)

E-mail Address (optional): nwjetplt@aol.com

Utility Account Number (from your bill) 411007182115

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

Name Lamar Lex

Street/P.O. Box 135 E. Ridge St.

City Nanticoke State PA Zip 18634

2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

UGI JAN 7 2016

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Exh. A Pg 1 of 3

3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- | | |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> WASTEWATER/SEWER |
| <input type="checkbox"/> GAS | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance) |
| <input type="checkbox"/> WATER | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |
| <input type="checkbox"/> STEAM HEAT | |

4. Reason for Complaint

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. **Your complaint may be dismissed without a hearing if you do not provide specific information.**

The utility is threatening to shut off my service or has already shut off my service.

I would like a payment agreement.

Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.

I recently remodeled the home at 135 E. Ridge St. Due to the upcoming holidays, I have not found an immediate renter. The house is vacant with no utilities operating, not even a refrigerator or stove clock. Since this is before the cold weather, the heat was turned off. I somehow got a \$91.06 bill and charged for usage. This is an impossibility. Now with the arrival of the cold weather I only keep 2 registers on in the bathroom and kitchen on set at 45 degrees, to prevent broken pipes, that alone cost me over \$127. I have been asking to have the meter checked, calibrated, changed, whatever it takes, but UGI refuses to do anything but keep charging me.

I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.

Other (explain).

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

I have spent hours on the phone with UGI requesting a meter change as well as credit for overages, as well as an explanation of why they are charging me when no electricity is on in the house. The bills keep going up every month. I have asked UGI for a meter read over 2 months ago, I have asked for the meter to be changed, nothing. Still to this date nothing has been accomplished. I have been hollered at by UGI employees, told to shut up and then hung up on. No meter reading, no meter changing, no solution, no resolution, no credit whatsoever.

1. I would like the meter to be changed.
2. I want a credit for overcharging.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

EXH A
Pg 30/3

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

*Filing this form begins a legal proceeding and you will be a party to the case.
If you do not wish to be a party to the case, consider filing an informal complaint.*

To complete this form, please type or print legibly in ink.

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Lamar Lex

Street/P.O. Box 5213 Rush Creek Ct Apt # _____

City Keller State TX Zip 76244

County Tarrant

Telephone Number(s) Where We Can Contact You During the Day:

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E-mail Address (optional): nwjetplt@aol.com

Utility Account Number (from your bill) 411007182115

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

Name Lamar Lex

Street/P.O. Box 135 E. Ridge St.

City Nanticoke State PA Zip 18634

2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

UGI RECEIVED
JAN - 9 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

*Exn B
Pg 1 of 3*

3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- | | |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> WASTEWATER/SEWER |
| <input type="checkbox"/> GAS | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance) |
| <input type="checkbox"/> WATER | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |
| <input type="checkbox"/> STEAM HEAT | |

4. Reason for Complaint

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. **Your complaint may be dismissed without a hearing if you do not provide specific information.**

The utility is threatening to shut off my service or has already shut off my service.

I would like a payment agreement.

Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.

I recently remodeled the home at 135 E. Ridge St. Due to the upcoming holidays, I have not found an immediate renter. The house is vacant with no utilities operating, not even a refrigerator or stove clock. Since this is before the cold weather, the heat was turned off. I somehow got a \$91.06 bill and charged for usage. This is an impossibility. Now with the arrival of the cold weather I only keep 2 registers on in the bathroom and kitchen to prevent broken pipes and that alone at 45 degrees cost me over \$127. I have been asking to have the meter checked, calibrated, changed, whatever it takes, but UGI refuses to do anything but keep charging me.

I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.

Other (explain).

EXH B
Pg 2 of 3

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

I have spent hours on the phone with UGI requesting a meter change as well as credit for over a year of overcharges relating to this address. This is a half of a double and the bills are almost 2x that of the same size house adjoining to the left, same number of occupants, same type of furnace and same type of water heater. Basically a mirror image. The bills keep going up every month. I have asked UGI for a meter read over 2 months ago, I have asked for the meter to be changed, nothing. Still to this date nothing has been accomplished. I have been hollered at by UGI employees, told to shut up and then hung up on. No meter reading, no meter changing, no bill adjustment.

1. I would like the meter to be changed.
2. I want a credit for 1 year of overcharging.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

Exh B
Pg 3 of 3