

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 27, 2018


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

Re: Rosemary Scott v. UGI Utilities, Inc.
Complaint Dockets Nos. C-2018-3000451 and C-2018-2647571

Dear Ms. Chiavetta:

Enclosed is a Motion for Consolidation of the above Dockets. A copy of this document has been served on the Complainant.

Sincerely,


Larry R. Crayne

cc: Rosemary Scott
8071 Evelyn Street
Hummelstown, PA 17036

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

In the Matter of:

Rosemary Scott,
Complainant,

Complaint Dockets
Nos. C-2018-3000451 and
C-2018-2647571

VS.

UGI Utilities, Inc.,
Respondent.

Motion for Consolidation

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

1. On or about February 27, 2018, Complainant filed the above-captioned Formal Complaint (the “Second Complaint”) at Docket No. C-2018-3000451 concerning her natural gas service. (see attachment to the complaint - **Exhibit A**).
2. The Second Complaint was electronically served on UGI on March 14, 2018.
3. On March 27, 2018, UGI filed an Answer to the Second Complaint with the Secretary of the Commission.
4. On or about February 8, 2018, Complainant filed a previous almost identical Formal Complaint docketed at Docket No. C-2018-2647571 (the “First Complaint”) also concerning her natural gas service. (see attachment to the earlier complaint – **Exhibit B**).
5. The First Complaint was electronically served on UGI Utilities, Inc. on February 15, 2018.
6. On January 24, 2018, UGI Utilities, Inc., filed an Answer, New Matter and Preliminary Objections to the First Complaint because of legal insufficiency and lack of jurisdiction.
7. The two Complaints involve allegations of claimed damages and contain almost identical averments of fact that may or may not be relevant or material.

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

Notice to Plead

To: Rosemary Scott:

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:

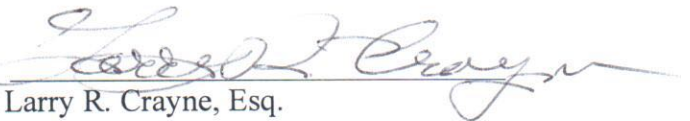
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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 Utilities, Inc.

By: 
Larry R. Crayne, Esq.

March 2017

I heard voices and noises outside my house. I went out the side door onto the carport, a gentleman named Brian showed me his identification and told me they were there to do work for UGI. He said they had to take the gas meter out of the basement and put it outside.

I asked where they were going to put it. He explained, they were going to put it on the front of my house under my bay window. I was shocked and said "You are kidding me? "I don't think so." Brian then asked where I would suggest they put it. I said, "Let it where it is." I could not understand why it had to be out front. He explained they must be able to drive by on the street and get a reading from the meter (Evelyn Street). I said, "Unreal". He then said he would call the supervisor, Mr. Anderson. A half hour later, Mr. Anderson arrived.

They spoke in my driveway. Brian said he, Brian, suggested they would put the meter at the end of the carport and Mr. Anderson was ok with that decision. Knowing all this work that needed to be done, digging from the street to my carport, I was heartbroken. I looked out a couple times and in my head I kept saying, why? Now part of my front yard, my driveway macadam, and part of my carport cement have big holes up to my house. By this time, it is lunch time.

I'm in my kitchen and I hear a sound like metal, I quick went out and said "STOP", I asked what they were doing. This guy is drilling with a large drill into my living room of my house. He said, "I am drilling a place to bring the pipe out of your basement. I said, "That is not my basement, it is my living room." He replied, "Mam, this is the basement" and he continued drilling when he was done, I said as I was crying, "Now come with me, and I'll show you where you drilled." He followed me into my living room. I moved my rocker and I showed him how he drilled into my living room. The guy said, "How can that be?"

We headed back outside and I heard one of the guys say, "Is there a problem?" I waited for him to answer, he didn't, so I did. I said, "He doesn't know my living room from my basement."

Now where they were going to put it, the oil man can't leave oil. Where they did put it, we can't use our outside spigot. So now it's at the end of my driveway, closest to my house. They then completed putting in the meter from hell. All concrete and macadam dug out, hole in my house and my front yard is dug up. Brian said, "I'll put something to block the holes in your house. They will send someone to landscape your grass and put new concrete and new macadam to fix what we dug up".

He put a metal like piece in the hole outside and a socket plate over the hole in my living room wall. This was in March.

Exh. A.
Pg 2 of 2

Before they left, I asked if they would help me with my pilot lights and they did. They were fine with the stove. I had to tell and show them how to do the gas logs in my rec-room and sun porch.

So March is over, I'm still waiting for somebody to come and fix the holes. Rain in my basement, due to the holes in the macadam and concrete, there was nothing to stop the rain going right into my basement because of where they put the holes, right at the corner of the front of my house. This forced me to make a call to UGI. I had to leave a message for Mark Anderson.

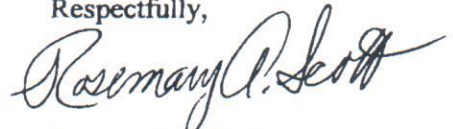
Now, April is over, calls and messages left over the months of May, June, July, August, and September all left unanswered. Now I feel I have to get very serious so I left a nasty message. A week or so later, two older men showed up at my house pouring concrete into the hole at the side of my house on the carport area. When they were gathering up to leave, I asked when they were coming back. The one man said they were done. I was shocked; you had to see the mess to believe it.

I called and left a message regarding how terrible the concrete job was. Two days later a young man named Andy came. His first thing was a smile followed by, "Mrs. Scott, this is not acceptable, not at all." He then was kind enough to explain that he would take over and get concrete fixed and completed, then the macadam and the grass and dirt repair would follow. He explained that as far as the hole in the wall, He could not help with the hole. He said, "You will have to talk to Mr. Mahoney." Andy kept his word and within a few weeks all was done, but the hole in my wall.

I called Mr. Mahoney a few times, with no return call, which caused me to have to call the PUC. The PUC, led me to this, so here it is. A meter on my carport, I keep a chair there so a car can not hit it. I guess it is funny to some. When the guy from UGI came to do my pilots, when all was done, the service man said, "Is this the house the guy drilled a hole into the house?" I said, "Yes", He said, "Can I see it?" I said, "Sure", he took his phone out and took a picture.

The Story of "THE METER FROM HELL"

Respectfully,



Rosemary A Scott
Homeowner

Exh. A
Pg 2 of 2

C-2018-2647571

March 2017

I heard voices and noises outside my house. I went out the side door onto the carport, a gentleman named Brian showed me his identification and told me they were there to do work for UGI. He said they had to take the gas meter out of the basement and put it outside.

I asked where they were going to put it. He explained, they were going to put it on the front of my house under my bay window. I was shocked and said "You are kidding me? "I don't think so." Brian then asked where I would suggest they put it. I said, "Let it where it is." I could not understand why it had to be out front. He explained they must be able to drive by on the street and get a reading from the meter (Evelyn Street). I said, "Unreal". He then said he would call the supervisor, Mr. Anderson. A half hour later, Mr. Anderson arrived.

They spoke in my driveway. Brian said he, Brian, suggested they would put the meter at the end of the carport and Mr. Anderson was ok with that decision. Knowing all this work that needed to be done, digging from the street to my carport, I was heartbroken. I looked out a couple times and in my head I kept saying, why? Now part of my front yard, my driveway macadam, and part of my carport cement have big holes up to my house. By this time, it is lunch time.

I'm in my kitchen and I hear a sound like metal, I quick went out and said "STOP", I asked what they were doing. This guy is drilling with a large drill into my living room of my house. He said, "I am drilling a place to bring the pipe out of your basement. I said, "That is not my basement, it is my living room." He replied, "Mam, this is the basement" and he continued drilling when he was done, I said as I was crying, "Now come with me, and I'll show you where you drilled." He followed me into my living room. I moved my rocker and I showed him how he drilled into my living room. The guy said, "How can that be?"

We headed back outside and I heard one of the guys say, "Is there a problem?" I waited for him to answer, he didn't, so I did. I said, "He doesn't know my living room from my basement."

Now where they were going to put it, the oil man can't leave oil. Where they did put it, we can't use our outside spigot. So now it's at the end of my driveway, closest to my house. They then completed putting in the meter from hell. All concrete and macadam dug out, hole in my house and my front yard is dug up. Brian said, "I'll put something to block the holes in your house. They will send someone to landscape your grass and put new concrete and new macadam to fix what we dug up".

He put a metal like piece in the hole outside and a socket plate over the hole in my living room wall. This was in March.

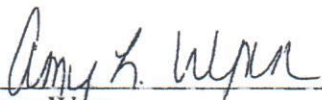
Exh. B

#1

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: 3-27-2018



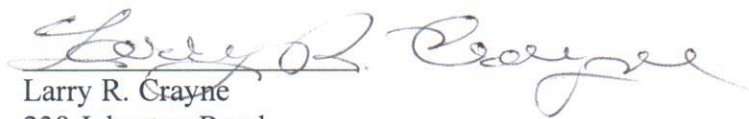
Amy Wynn
Senior Compliance Representative
UGI Utilities, Inc.

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).

Rosemary Scott
8071 Evelyn Street
Hummelstown, PA 17036

Dated this 27th day of NOV, 2018


Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Utilities, Inc.