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ELECTRONICALLY FILED

May 23, 2018

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

Re: Paula Donson v. Columbia Gas of Pennsylvania, Inc.
Complaint Docket No. C-2018-3001673

Dear Ms. Chiavetta:

Enclosed is an electronically filed copy of the Preliminary Objections of Columbia Gas of Pennsylvania, Inc. to the above-captioned Formal Complaint. A copy of the document has been served on the Complainant.

Sincerely,


Larry R. Crayne

cc: Paula Donson
257 Plymouth Circle
Boalsburg, PA 16827

Commonwealth of Pennsylvania

Before the Pennsylvania Public Utility Commission

In the Matter of:

Paula Donson,
Complainant,

Complaint Docket
No. C-2018-3001673

VS.

Columbia Gas of Pennsylvania, Inc.,
Respondent.

Preliminary Objections

AND NOW comes Respondent, Columbia Gas of Pennsylvania, Inc., (Columbia Gas), pursuant to 52 *Pa. Code*, Section 5.101 (a) (4), and files the following Preliminary Objections:

A. Legal Insufficiency of Pleading

1. Complainant has filed a formal complaint with the Commission concerning alleged gas leaks at 257 Plymouth Circle, Boalsburg, PA 16827 and at other unspecified neighbors.
2. Complainant alleges that the gas leaks are the result of work performed by the Contractor and Subcontractors for what is apparently a new residential development (the "Development").
3. While Complainant may be able to file a complaint with certain other governmental agencies, the alleged perpetrators of the cause of Complainant's gas leak and other gas leaks in the Development do not appear to be Commission jurisdictional.
4. Further, Complainant makes no complaint against Columbia Gas, but characterizes Columbia Gas as the "hero in this incident" (Page 2 of the letter attached to the Complaint).
5. Therefore, Complainant fails to set forth any violation by Columbia Gas of the Public Utility Code, any order or regulation of the Commission or the Columbia Gas tariff. Consequently, there are no genuine issues of material fact and Columbia Gas is entitled to judgment as a matter of law.

Wherefore, Columbia Gas moves that this Complaint be dismissed for legal insufficiency.

Notice to Plead

To: Paula Donson:

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:

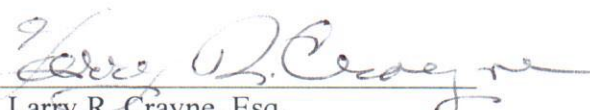
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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,

Columbia Gas of Pennsylvania, Inc.

By: 
Larry R. Crayne, Esq.

VERIFICATION

I, Nicole M. Paloney, 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 a 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: May 23, 2018

Nicole M. Paloney
Nicole M. Paloney
Director, Rates & Regulatory Affairs
Columbia Gas of Pennsylvania, 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 (relating to service by a participant).

Paula Donson
257 Plymouth Circle
Boalsburg, PA 16827

Dated this 23rd day of May, 2018



Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
Columbia Gas of Pennsylvania, Inc.