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| IN THE MATTER OF: | : | IN THE COMMONWEALTH OF PENNSYLVANIA |
| PHILIP GEANACOPOULOS, Complainant | : | PUBLIC UTILITIES COMMISSION |
| vs. | : | NO. C-2018-3002953 |
| UGI UTILITIES, INC. Respondent | : | CIVIL ACTION - LAW |

COMPLAINANT'S RESPONSE TO PRELIMINARY OBJECTIONS

AND NOW, comes the Complainant, Philip Geanacopoulos (hereinafter referred to as "Geanacopoulos"), reponds to UGI Utilities, Inc. (hereinafter referred as UGI) therefor avers the following:

1. Admitted.
2. Denied and proof thereof is demanded at hearing. The averments in paragraph two of Respondent's preliminary objections are legal conclusions which do not require response.
3. Denied and proof thereof is demanded at hearing. The averments in paragraph three of Respondent's Preliminary Objections are legal conclusions which do not require response.
4. Denied and proof thereof is demanded at hearing. The averments in paragraph four of Respondent's Preliminary Objections are legal conclusions which do not require response.
5. Denied and proof thereof is demanded at hearing. The averments in paragraph five of Respondent's Preliminary Objections are legal conclusions which do not require response.
6. Denied and proof thereof is demanded at hearing. The averments in paragraph six of Respondent's Preliminary Objections are legal conclusions which do not require response.
7. Denied and proof thereof is demanded at hearing. The averments in paragraph seven of Respondent's Preliminary Objections are legal conclusions which do not require a response.
8. Denied and proof thereof is demanded at hearing. The averments in paragraph eight of Respondent's Preliminary Objections are legal conclusions which do not require response.

WHEREFORE, Complainant prays that this commission deny Respondent's Preliminary Objections.

9. Denied and proof thereof is demanded at hearing. The averments in paragraph nine of Respondent's Preliminary Objections are legal conclusions which do not require response.

10. Denied and proof thereof is demanded at hearing. The averments in paragraph 10 of Respondent's Preliminary Objections are legal conclusions which do not require response.

11. Denied and proof thereof is demanded at hearing. The averments in paragraph 11 of Respondent's Preliminary Objections are legal conclusions which do not require response.

12. Denied and proof thereof is demanded at hearing. The averments in paragraph 12 of Respondent's Preliminary Objections are legal conclusions which do not require response. By way of further answer, Respondent failed to protect its interest by filing a lien against property.

WHEREFORE, Complainant prays that this commission deny Respondent's Preliminary Objections.

I, Philip Geanacopoulos, verify that the facts set forth in this Response are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Date: 7-26-2018

Philip Geanacopoulos
Philip Geanacopoulos

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| IN THE MATTER OF: | : | IN THE COMMONWEALTH OF PENNSYLVANIA |
| PHILIP GEANACOPOULOS, Complainant | : | PUBLIC UTILITIES COMMISSION |
| vs. | : | NO. C-2018-3002953 |
| UGI UTILITIES, INC. Respondent | : | CIVIL ACTION - LAW |

ANSWER TO NEW MATTER

AND NOW, comes the Complainant, Philip Geanacopoulos (hereinafter referred to as "Geanacopoulos"), reponds to UGI Utilities, Inc. (hereinafter referred as UGI) therefor avers the following:

1. Admitted.
2. Denied and proof thereof is demanded at hearing. The averments in paragraph two of Respondent's New Matter are legal conclusions which do not require response.
3. Denied and proof thereof is demanded at hearing. The averments in paragraph three of Respondent's New Matter are legal conclusions which do not require response.

WHEREFORE, Complainant prays that this commission deny Respondent's New Matter.


REQUEST FOR HEARING

Complainant requests a hearing be held and that it not be conducted telephonically.

VERIFICATION

I, Philip Geanacopoulos, verify that the facts set forth in this Response are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

Date: 7-26-2018


Philip Geanacopoulos