

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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November 14, 2018

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Re: Michael G. Deegan, *et. al* v. Knox Energy Cooperative Association, Inc.
Docket No. C-2018-3004165, *et. al*

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Motion for Correction of Caption in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully Submitted,

/s/Dianne E. Dusman
Dianne E. Dusman
Senior Assistant Consumer Advocate
PA Attorney I.D. 38308
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Attachment

cc: Honorable Mary D. Long, ALJ
Certificate of Service

CERTIFICATE OF SERVICE

Michael G. Deegan, <i>et al</i>	:	C-2018-3004165 <i>et al</i>
	:	
Charles E. Spindler	:	C-2018-3004179
	:	
v.	:	
	:	
Knox Energy Cooperative Association, Inc., and	:	
	:	
Utility Pipeline Limited	:	

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate’s Motion For Correction of Caption, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 14th day of November 2018.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

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Respectfully Submitted,

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michael G. Deegan	:	C-2018-3004165
Charles E. Spindler	:	C-2018-3004179
Cherie Roddy	:	C-2018-3004201
Joyce Fedusa and Thomas Fedusa	:	C-2018-3004342
Nancy R. Nail	:	C-2018-3004346
Melvin Bines	:	C-2018-3004354
Norma D. Fritz and James Leach	:	C-2018-3004411
James Hollenbaugh, Complainants	:	C-2018-3004524
	:	
	:	
v.	:	
	:	
	:	
Knox Energy Cooperative Association, Inc.,	:	
Respondent	:	

MOTION FOR CORRECTION OF THE CAPTION
BY THE OFFICE OF CONSUMER ADVOCATE

TO THE HONORABLE MARY D. LONG, ADMINISTRATIVE LAW JUDGE:

The Office of Consumer Advocate (OCA), Intervenor in the above-captioned proceeding, moves to correct the consolidated caption in this proceeding to include United Pipeline, Limited (UPL), an Ohio limited liability corporation, for the following reasons:

1. The Formal Complaints were submitted to the Public Utility Commission on various dates, starting with that filed by Michael G. Deegan on August 16, 2018 and ending with that filed by John Hollenbaugh on September 6, 2018.

2. During the teleconference on October 17, 2018, Administrative Law Judge (ALJ) Long orally ordered the consolidation of all of the Formal Complaints with the exception of that filed by Charles Spindler, who stated that he wished to continue with his Formal Complaint

individually. All other complaints were consolidated, with the Spindler Complaint continuing to run concurrent with the others, per the ALJ's oral order during that same teleconference.

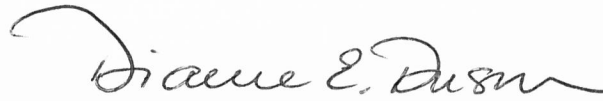
3. The consolidated caption named only Knox Energy Cooperative Association, Inc., as a Respondent. The Formal Complaint submitted by Norma Fritz and James Leach, however, names both Knox Energy and Utility Pipeline, Limited (UPL) as Respondents. The allegations in that Formal Complaint also specifically allege that UPL is responsible for other aspects of poor service, such as leaks and the threatened termination of service in the letter sent under Knox's letterhead on August 2, 2018. The OCA believes that this was an inadvertent omission and hereby requests that this be corrected by adding UPL as a Respondent.

4. As noted in the OCA's Prehearing Memorandum of October 11, 2018, UPL was a signatory party to the Joint Petition for Settlement in the case captioned In Re Application of Orwell Gas Company, Utility Pipeline Ltd. And Knox Energy Cooperative Association, Inc., Docket No. A-2015-2478270, which was determined by Commission Tentative Form Opinion and Order, entered November 23, 2015, (later finalized by Secretarial Letter of) to be in the public interest subject to a series of terms and conditions, as agreed to by the parties.

5. The terms and conditions are highly relevant to these complaint proceedings as several are specific commitments by UPL toward the Knox Cooperative members under the same circumstances as alleged by the members herein.

WHEREFORE, the Office of Consumer Advocate requests that the caption in this proceeding be corrected to include Utility Pipeline, Limited as a Respondent.

Respectfully Submitted,



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Dated: November 14, 2018

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