



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Leva, Paralegal
Legal Department
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December 23, 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Rosine Pollack v. PGW, Docket No. F – 2019 – 3014732

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §§ 5.61 and 5.101, the Philadelphia Gas Works ("PGW") hereby files the original Preliminary Objections to the Complaint in the above captioned matter.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,


Danielle Leva

Enclosure

cc: Rosine Pollack

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rosine Pollack

Complainant

v.

Philadelphia Gas Works

Respondent

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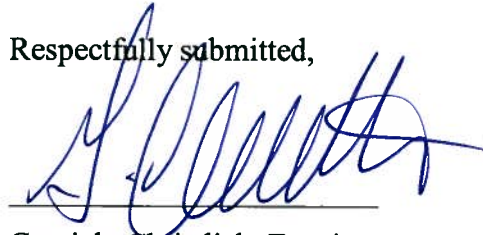
Docket No. F-2019-3014732

NOTICE TO PLEAD

To: Rosine Pollack,

Pursuant to 52 Pa. Code §5.101, you are hereby notified to file a written response to the enclosed Preliminary Objections, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted and a judgment may be entered against you.

Respectfully submitted,



Graciela Christlieb, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6164

December 23, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rosine Pollack	:	
<i>Complainant</i>	:	
	:	
	:	
v.	:	Docket No. F-2019-3014732
	:	
Philadelphia Gas Works	:	
<i>Respondent</i>	:	

**PRELIMINARY OBJECTIONS OF
RESPONDENT PHILADELPHIA GAS WORKS**

Pursuant to 52 Pa. Code § 5.101, the Philadelphia Gas Works (PGW) hereby files its Preliminary Objections to the Complaint filed in the above captioned matter on the grounds that the Commission lacks jurisdiction over the subject matter of the Complaint as the issues raised in the Complaint are beyond the statute of limitations at 66 Pa.C.S. § 3314 and arise out of the Complainant’s participation in PGW’s Landlord Cooperation Program (LCP).

In support of its preliminary objections and motion to strike, PGW hereby avers the following:

1. City of Philadelphia records indicate that Richard Pollack is the owner of the Service Address since 1992.
2. Philadelphia Gas Works Records indicate that the Service Address was registered in LCP under the name Richard/Rosine Pollack on March 28, 2015.
3. On September 11, 2015, the gas service at the Service Address was placed in the Complainant’s name pursuant to the terms of participation in LCP.
4. The initial PGW bill sent to the Complainant after the service was placed into her name, attached hereto as Exhibit “A,” shows that, due to a typographical error, the address it was sent to was written as 157 Pine Grove Road, Yardley, PA 19067.
5. PGW records indicate that, despite the error, the Complainant received the PGW bills that were being issued in her name for gas service at the Service Address; a Customer Contact generated as a result of a call placed to PGW on October 29, 2015,

attached hereto as Exhibit “B,” shows that the customer of record/landlord (cor/LL), i.e. the Complainant, contacted PGW on that day and was told that the service was placed into her name as part of LCP. The Complainant also corrected the mailing address, which was then updated.

6. The next bill issued after October 29, 2015, attached hereto as Exhibit “C,” shows that it was mailed to 157 Pine Lane, Yardley, PA 19067.

7. 157 Pine Lane, Yardley, PA 19067 is where, in her Complaint, the Complainant states she has been living since 2004.

8. PGW records indicate that, between October 29, 2015 and March 20, 2016, the Complainant called PGW three (3) more times in reference to the gas service at the Service Address being placed in her name; the Customer Contacts generated by those calls, attached hereto as Exhibit “D,” show that the Complainant was having a dispute with her tenant at the Service Address regarding the tenant placing the service in their name.

9. On March, 20, 2016, the gas service at the Service Address was taken out of the Complainant’s name pursuant to the terms of participation in LCP because a tenant at the Service Address made application for service.

10. The statute of limitations at 66 Pa.C.S. § 3314 provides that no action for recovery of penalties or forfeitures, or any prosecution, may be maintained unless brought within three years from the date the liability arose.

11. The statute of limitations at 66 Pa.C.S. § 3314 divests the Commission of jurisdiction to hear an action brought more than three years from the date the liability arose.

12. The Complainant has lost her right to pursue litigation regarding PGW placing the gas service at the Service Address in her name, as any cause of action falls outside the statute of limitations, which ran out on September 11, 2018.

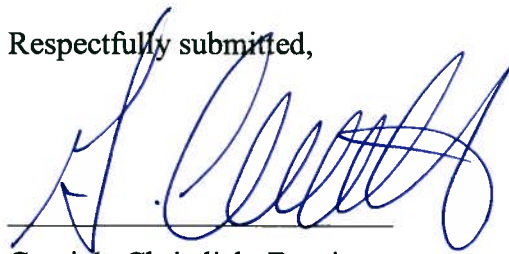
13. Additionally, In *Fisher v. Philadelphia Gas Works*, Docket No. F-2010-2215047 (Order entered July 31, 2012), the Commission held that enrollment in LCP is a contract between PGW and a landlord for private services that only supplement the public services provided by PGW.

14. The Commission has further held that any rights or obligations in connection with LCP do not arise from the obligations imposed by the Public Utility Code, but from the terms of the private contract between PGW and the landlord and that disputes arising out of participation in LCP do not involve a law, regulation, or order that the Commission has jurisdiction to administer; they constitute private disputes, which fall beyond the scope of the Commission's jurisdiction. *Ovrutsky v. Philadelphia Gas Works*, Docket No. C-2012-2321385 (Order entered December 19, 2012); *McCastle v. Philadelphia Gas Works*, Docket No. F-2013-2345223 (Order entered May 21, 2013).

15. As a matter of law, the Complainant is not entitled to relief from the Commission with respect to issues raised in this Complaint as the Commission lacks jurisdiction to adjudicate disputes that arise as a result of participation in LCP.

Wherefore, PGW respectfully requests that this Commission sustain PGW's preliminary objections and dismiss the Complaint.

Respectfully submitted,



Graciela Christlieb, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6164

December 23, 2019

A



PHILADELPHIA GAS WORKS

Gas Leak Emergencies: 215-235-1212
Billing & General Information (English & Espanol): 215-235-1000
Access Your Account Online: www.pgworks.com

Page: 1 of 3

Billing Date: Sep 29, 2015

Account Number:

MONTHLY STATEMENT

From Sep 11, 2015 thru Sep 25, 2015 (14 Days)

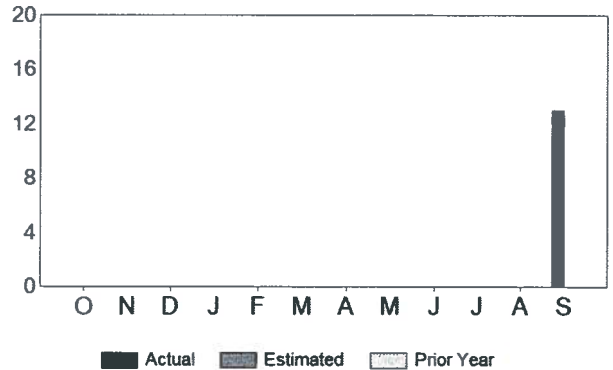
**ROSINE POLLACK
157 PINE GROVE RD
YARDLEY PA 19067**

Billing Summary

Current Charges **\$16.98**

**Total Amount Due By
Oct 22, 2015 \$16.98**

Energy Usage Information



- Average daily temperature 71.2 °F.
- Your average daily cost is \$1.21 compared to \$0.00 last year.
- For the last 12 months:
 - Your total usage is 13 Ccf.
 - Your average monthly usage is 1.08 Ccf.

Call 811 before you dig - Have a project that requires digging? Call 8-1-1 before you begin so utility service lines can be marked, ensuring your safety and the safety of others. Remember, it's the law.

We're Social! Like us on Facebook & follow us on Twitter @MyPGW

Questions or Complaints about your bill? Please call us before the due date at 215-235-1000, or write to: PGW P.O. Box 3500, Phila., PA 19122-0050

Please return this portion with your payment.

Write your account number on your check or money order made payable to Philadelphia Gas Works



Place "X" in box for address corrections. Print corrections on reverse side.

Account Number:
Due Date: **Oct 22, 2015**
Please Pay: **\$16.98**

Amount Enclosed:

\$

ROSINE POLLACK
157 PINE GROVE RD
YARDLEY PA 19067

**Philadelphia Gas Works
P.O. Box 11700
Newark, NJ 07101-4700**

8000000000016988

GENERAL INFORMATION

ACCESS YOUR ACCOUNT ONLINE
www.pgworks.com

CONTACT US BY PHONE
Gas Leaks & Emergencies (24/7) 215-235-1212
Billing & General Information (8am to 6pm, M-F) 215-235-1000
Appliance Service 215-235-2050
Report Theft of Gas 215-684-6383
Hearing Impaired TTY Line 215-236-4646

VISIT A CUSTOMER SERVICE CENTER
(9AM TO 5PM)

Center City 1137 Chestnut St. (M, T, TH, F)
Germantown 212 W. Chelton Ave. (T, W, F)
S. Philadelphia 1601 S Broad St. (M, W, TH)
Frankford 4410 Frankford Ave. (T, TH, F)
N. Philadelphia 1337 W. Erie Ave. (M, W, TH)
W. Philadelphia 5230 Chestnut St. (M, T, W, F)

EXPLANATION OF TERMS

BUDGET PLAN – This plan is available to all residential customers who are not in arrears. It spreads your payments over a 12 month plan. You may start the Budget Plan at any time. To do so, or for more information, call 215 235-1000 or visit any of our Customer Service Centers.

CCF - 100 cubic feet of gas. This is a measure of gas usage. **DEKATHERMS (DTH)** - A measure of the heat content value of gas. Gas usage is determined by multiplying the MCF used by the heat content value of the gas. One DTH equals approximately nine hundred seventy cubic feet. **MCF** - 1,000 cubic feet of gas.

COMMODITY CHARGE – The charge for basic gas supply service which is sold either by volume (ccf or mcf) or heating value (dekatherms).

CUSTOMER CHARGE – A monthly charge to cover NGDC costs such as maintaining the lines, meter reading and billing.

DISTRIBUTION CHARGES – The charge for delivery of natural gas from the city gate to the consumer.

DISTRIBUTION SYSTEM IMPROVEMENT CHARGE – The charge for the increased replacement of infrastructure (e.g. pipes) which is calculated by applying the same percentage to both the customer charge and the distribution charge.

GAS COST ADJUSTMENT – Amount billed or credited each month to account for differences between projected and actual gas supply costs of the Natural Gas Distribution Company.

METER READING INFORMATION – PGW shall use its best effort to obtain an actual meter reading regularly, and at least every six months for customers without automatic meter reading devices. When the meter is not read, we estimate your gas use. To avoid estimates, you may read your own meter and tell us the reading by calling 215 232-2244 at any time. We also offer stamped, pre-addressed post cards, which you can use to send us your meter reading by the specified date. To request a supply of these cards, call 215 235-1000, or write us at P.O. Box 3500, Philadelphia, PA 19122.

MIGRATION RIDER – Applies to customers switching to an alternative gas supplier or interruptible service. Credits or surcharges a customer's bill for gas costs that the company paid during the time that the customer bought gas from PGW but which have not yet been fully recovered from or paid back to customers.

NATURAL GAS DISTRIBUTION COMPANY (NGDC) – A state regulated natural gas utility which owns the gas lines and equipment necessary to deliver natural gas to the consumer.

PAYMENT AGREEMENT PLANS – If you are behind and cannot pay your full bill, PGW offers special payment plans. Call our Collection Department at 215 235-1777 or visit any of our Customer Service Centers.

STATE SALES TAX – An approximate amount of your bill that is used to pay taxes to the Commonwealth of Pennsylvania.

WEATHER NORMALIZATION ADJUSTMENT (WNA) – An adjustment approved by the Pennsylvania Public Utility Commission as a way to help PGW stabilize its income and operate more efficiently within its budget during the heating season.

NATURAL GAS SUPPLIER

If you have selected a Natural Gas Supplier other than PGW, the Natural Gas Supplier is responsible for the billing of Natural Gas Supplier charges. PGW will bill for gas delivery according to the tariff for your rate class. Commodity prices and charges are set by the Natural Gas Supplier you have chosen. The Public Utility Commission regulates the distribution prices and services.

RIGHTS & OBLIGATIONS

A summary of your rights and obligations as a PGW customer will be made available upon request. A Rate Schedule and an explanation of how to verify the accuracy of a bill and an explanation of the various charges will be made available upon request.

Electronic Check Recovery Authorization

When you pay by check, preauthorized bank draft, ACH, or by a telephone authorized transaction you expressly authorized PGW, if your check is dishonored or returned for any reason, to electronically debit your account for the amount of the check plus a processing fee not to exceed the state maximum legal limit (plus all applicable sales tax). The use of a check for payment is your acknowledgement of this policy and its terms.

Mailing Address

Name _____
Street _____
City _____ State _____ Zip _____
Telephone (____) _____

Service Location (Address of Property)

Street _____
City _____ State _____ Zip _____
Telephone (____) _____



ROSINE POLLACK
157 PINE GROVE RD
YARDLEY PA 19067

Page: 3 of 3
Billing Date: Sep 29, 2015
Account Number:

Meter Detail Meter #: 02095673 Cycle #: 19 Next Meter Read: Oct 26, 2015
Service Point ID: 9972555444

From			To			Difference	Usage (Ccf)	Conversion Factor	Total Therms
Date	Reading	Type	Date	Reading	Type				
09/11/2015	2868	Initial	09/25/2015	2881	Actual	13	13.00	1.045	13.58

Current Basic Charges

SA ID# 3910583532, 499 PARLIN ST, 1F
Residential Heat & Domestic

Supply Charges

Commodity Charge 13 Ccf @ \$0.44932 \$5.84

Total Supply Charges \$5.84

Delivery Charges

Customer Charge @ \$12.00 \$0.00

Distribution Charge 13 Ccf @ \$0.76673 \$9.97

Distribution System Improvement Charge 1.64% \$0.16

Gas Cost Adjustment @ -\$0.01902 -\$0.25

Total Delivery Charges \$9.88

CITY SALES TAX 1% OF \$15.72 \$0.16

STATE/CITY SALES TAX 7% OF \$15.72 \$1.10

Total Current Billing Charges \$16.98

Message Center

Effective Sept 1, 2015 PGW rates have changed. Commodity Charge increased to \$0.44932 per ccf. Gas Cost Adjustment decreased to \$(0.01902). Distribution Charge decreased to \$0.76673. The changes will decrease the typical residential heating bill by about \$20.42 a year.

Your estimated gas price to compare is \$0.43038 per CCF. This may change in March, June, September and December.

B

Customer Contact: Collection [X]

Date: 10/29/2015 Time: 11:35:00 AM Source: JetSearch Related Tran: Account Maintenance

CC Type: COLL - Collection Created: 10/29/2015 at 11:35:09 AM by: SWILLIA4

Area: 800 - Residential General Service Changed: at by:

Surveyable Auto Delete Date: 10/29/2019 Class: Inquiry

Comments: Cor / LL called in ref to bills, stating tenants at property, informed svc was placed in name as part of LCP. Tenants will need to apply for svc as of date of lease. updated mailing address c/s

Letter

Status: Print Date: Run Number: Reprint: [v]

Template:

Review List Tickler

Follow Up: [] to Review Group to User

Priority: [] Review Group... [x]

Account: Pollack, Rosine

Premise: 499 Parlin St,1f/Phila,Pa

Person: Pollack, Rosine

[Change] [Cancel]

C



PHILADELPHIA GAS WORKS

Gas Leak Emergencies: 215-235-1212
Billing & General Information (English & Espanol): 215-235-1000
Access Your Account Online: www.pgworks.com

Page: 1 of 3

Billing Date: Nov 28, 2015

Account Number:

MONTHLY STATEMENT

From Oct 26, 2015 thru Nov 25, 2015 (30 Days)

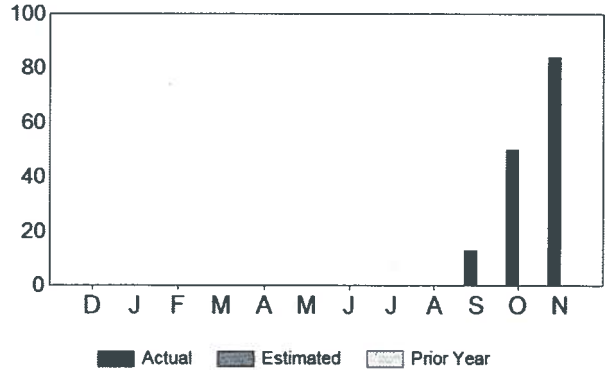
ROSINE POLLACK
157 PINE LN
YARDLEY PA 19067

Billing Summary

Past Due Amount	\$100.46
Current Charges	\$147.94
Adjustments	\$1.50

Total Amount Due By	
Dec 22, 2015	\$249.90

Energy Usage Information



- Average daily temperature 54.6 °F.
- Your average daily cost is \$4.93 compared to \$0.00 last year.
- For the last 12 months:
 - Your total usage is 147 Ccf.
 - Your average monthly usage is 12.25 Ccf.

Questions or Complaints about your bill? Please call us before the due date at 215-235-1000, or write to: PGW P.O. Box 3500, Phila., PA 19122-0050

Please return this portion with your payment.

Write your account number on your check or money order made payable to Philadelphia Gas Works



Place "X" in box for address corrections. Print corrections on reverse side.

Account Number:	0857174986
Due Date:	Dec 22, 2015
Please Pay:	\$249.90

Amount Enclosed:

\$

ROSINE POLLACK
157 PINE LN
YARDLEY PA 19067

Philadelphia Gas Works
P.O. Box 11700
Newark, NJ 07101-4700

8000000000249902

GENERAL INFORMATION

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Billing & General Information (8am to 6pm, M-F) 215-235-1000
Appliance Service 215-235-2050
Report Theft of Gas 215-684-6383
Hearing Impaired TTY Line 215-236-4646

VISIT A CUSTOMER SERVICE CENTER
(9AM TO 5PM)

Center City 1137 Chestnut St. (M, T, TH, F)
Germantown 212 W. Chelton Ave. (T, W, F)
S. Philadelphia 1601 S Broad St. (M, W, TH)
Frankford 4410 Frankford Ave. (T, TH, F)
N. Philadelphia 1337 W. Erie Ave. (M, W, TH)
W. Philadelphia 5230 Chestnut St. (M, T, W, F)

EXPLANATION OF TERMS

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NATURAL GAS SUPPLIER

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RIGHTS & OBLIGATIONS

A summary of your rights and obligations as a PGW customer will be made available upon request. A Rate Schedule and an explanation of how to verify the accuracy of a bill and an explanation of the various charges will be made available upon request.

Mailing Address

Electronic Check Recovery Authorization

When you pay by check, preauthorized bank draft, ACH, or by a telephone authorized transaction you expressly authorized PGW, if your check is dishonored or returned for any reason, to electronically debit your account for the amount of the check plus a processing fee not to exceed the state maximum legal limit (plus all applicable sales tax). The use of a check for payment is your acknowledgement of this policy and its terms.

Name _____
Street _____
City _____ State _____ Zip _____
Telephone (____) _____

Service Location (Address of Property)

Street _____
City _____ State _____ Zip _____
Telephone (____) _____



ROSINE POLLACK
157 PINE LN
YARDLEY PA 19067

Page: 3 of 3
Billing Date: Nov 28, 2015
Account Number:

Meter Detail Meter #: 02095673 Cycle #: 19 Next Meter Read: Dec 28, 2015
Service Point ID: 997255444

From			To			Difference	Usage (Ccf)	Conversion Factor	Total Therms
Date	Reading	Type	Date	Reading	Type				
10/26/2015	2931	Actual	11/25/2015	3015	Actual	84	84.00	1.0521	88.37

Current Basic Charges

SA ID# 3910583532, 499 PARLIN ST, 1F
Residential Heat & Domestic

Supply Charges

Commodity Charge 84 Ccf @ \$0.44932 \$37.74

Total Supply Charges \$37.74

Delivery Charges

Customer Charge @ \$12.00 \$12.00

Distribution Charge 84 Ccf @ \$0.76673 \$64.41

Distribution System Improvement Charge 5% \$3.82

Gas Cost Adjustment @ -\$0.01902 -\$1.60

Weather Normalization Adjustment \$20.61

Total Delivery Charges \$99.24

CITY SALES TAX 1% OF \$136.98 \$1.37

STATE/CITY SALES TAX 7% OF \$136.98 \$9.59

Total Current Billing Charges \$147.94

Adjustment Detail

Adjustments for SA ID # 3910583532

Late Payment Charge \$1.50

Total Adjustments **\$1.50**

Message Center

Your estimated gas price to compare is \$0.43038 per CCF. This may change in March, June, September and December.

D

Customer Contact: Billing [X]

Date: 11/02/2015 Time: 10:00:00 AM Source: JetSearch Related Tran: Account Maintenance

CC Type: BILL - Billing Created: 11/02/2015 at: 10:00:10 AM by: NFAULKS

Area: 800 - Residential General Service Changed: at: by:

Surveyable Auto Delete Date: 11/02/2019 Class: Inquiry

Comments: Cor/LL stated that tenant refuses to put gas in his name because he is not using gas. Landlord stated she does not know what gas appliances are in the home. Informed Landlord that gas is being used. It may only be through hot water but gas is being used. Landlord stated she would call back. C/S.

Letter

Status: Print Date: Run Number: Reprint: [v]

Template:

Review List Tickler

Follow Up: [] to Review Group to User

Priority: [] Review Group... []

Account: Pollack, Rosine

Premise: 499 Parlin St,1f/Phila,Pa

Person: Pollack, Rosine

[Change] [Cancel]

Customer Contact: Service [X]

Date: 11/06/2015 Time: 10:26:00 AM Source: JetSearch Related Tran: Account Maintenance

CC Type: SERV - Service Created: 11/06/2015 at: 10:26:30 AM by: JWAITERS

Area: 800 - Residential General Service Changed: at by:

Surveyable Auto Delete Date: 11/06/2019 Class: Inquiry

Comments: LL says tenant has not been paying for gas service and refuses to put service in his name and stated to have service s/o because he does not use it she he asked how she can have service s/o for his unit I told her she needs to submit Voluntary Relinquishment form she can print off line or I can mail it she requested for me to mail it to 157 Pine lane Yardley 19067 c/s

Letter

Status: Print Date: Run Number: Reprint: [v]

Template:

Review List Tickler

Follow Up: [] to Review Group to User

Priority: [] Review Group... []

Account: Pollack, Rosine

Premise: 499 Parlin St,1f/Phila,Pa

Person: Pollack, Rosine

[Change] [Cancel]

Customer Contact: Billing

Date: 03/08/2016 Time: 4:13:00 PM Source: JetSearch Related Tran: Account Maintenance

CC Type: BILL - Billing Created: 03/08/2016 at: 4:13:16 PM by: DTURNER1

Area: 800 - Residential General Service Changed: at: by:

Surveyable Auto Delete Date: 03/08/2020 Class: Inquiry

Comments: cor called in asking questions about her bill and to see if she is responsible for the tenants gas usage..I informed her that she is because the tenant never called in to have the gas service transfered into their name...cs

Letter

Status: Print Date: Run Number: Reprint:

Template:

Review List Tickler

Follow Up: to Review Group to User

Priority: Review Group...

Account: Pollack, Rosine


Premise: 499 Parlin St,1f/Phila,Pa

Person: Pollack, Rosine

VERIFICATION

I, Graciela Christlieb, hereby declare that I am counsel for the Philadelphia Gas Works. I am authorized to make this verification on its behalf. The facts set forth in the foregoing Preliminary Objections are true and correct to the best of my knowledge, information and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

December 23, 2019



Graciela Christlieb, Esquire

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING PRELIMINARY OBJECTIONS UPON THE PARTICIPANT(S) LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Ms. Rosine Pollack
157 Pine Lane
Yardley, PA 19067

December 23, 2019



Graciela Christlieb, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6164