

**Colleen C. Parry**

220 Lori Road  
Gibsonia, PA 15044

*cparry@dmclaw.com*

724-713-5535 – C  
724-444-4757 – H

F-2019-3014894

December 10, 2019

Secretary  
Penna. Public Utility Comm.  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

RE: BCS 3676400

Dear Secretary:

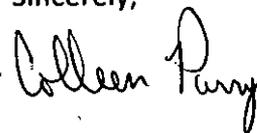
This past weekend, I postal mailed (via certified mail – return receipt requested) a formal complaint appealing a decision of the Bureau of Consumer Services.

Unfortunately, I noticed a couple of days later that a page was inadvertently left on the printer and not included with the other paperwork. Upon calling your office, I was instructed to mail the page to this address.

Enclosed please find the correct "Attachment 1" to be inserted with my Formal Complaint.

Thank you very much for your time and assistance. Please contact me at 724-713-5535 should there be any questions.

Sincerely,



**Attachment** [Faint, mostly illegible text]

RECEIVED  
2019 DEC 13 AM 9:53  
PAPUS  
SECRETARY'S BUREAU

RE: Pennsylvania Utility Commission Formal Complaint  
BCS 3676400 – Duquesne Light Company  
Complainants **Todd R. and Colleen C. Parry**  
Utility Account No. 6590-310-000

**4. Reason for Complaint: Incorrect charges are on my bill.**

PARAGRAPH 3 of the PUC's investigation indicating that I was advised by Duquesne Light Company (hereinafter "DLC") that I would be billed taxes is **INCORRECT**.

PARAGRAPH 6 of the PUC's investigation indicating that I did not contact DLC is **INCORRECT**. To the contrary, I telephoned DLC on 9/21/2004 immediately after the sales closing of our residence at 602 Greenspring Drive (hereinafter "602") advising them that said property had been sold and that service was no longer to be billed under our name. I was informed that DLC had already been contacted by the prospective new owners and that the account had previously been updated with the new information – at which time DLC was providing service to only ONE residence in our name. Regardless of DLC's inaccurate statement, DLC admits to removing our name from said residence. This update should have immediately alerted the DLC representative that there were no longer multiple service addresses associated to 724-444-4757. **DLC is the party who activated the tax selection, and they are the ones who should have de-activated it. Just as their telephone system detects two properties associated to one phone number, their service software should indicate the number of properties linked to the same ratepayer.**

9/5/2017: I contacted DLC via phone and email to advise that I had purchased a second property (124 Second Street, Aspinwall, PA 15215, hereinafter "124") and submitted at that time the Penna. Sales and Use form (attached). DLC explained that I would be taxed at 124 since it was not my main residence. At that time, upon DLC looking up my 220 Lori Road account (hereinafter "220"), they advised that I currently was inaccurately being taxed at 220 and that I would be receiving a sales tax letter that needed completed and returned – which I took care of immediately by hand delivering to their downtown Pittsburgh office where bill payments are received (the sales tax letter contained no address indicating where it was to be delivered). **This was the FIRST time I was made aware that I was inaccurately being taxed on 220 since the completion of its construction in December of 2003 and prior to the sale of my previous residence at 602. There is no mention of this date's communication in the PUC's investigation.**

PARAGRAPH 7 of the PUC's investigation indicating DLC's statement that "no one informed the company that the prior residence was sold" is **INCORRECT**. As stated above, I phoned DLC on 9/21/2004 advising them that we were no longer to be billed for 602. Additionally, DLC admittedly advised in ¶ 6 that "the company records show on 09/08/2004, service was taken out of your name when another ratepayer applied for service at Greenspring Drive."

RECEIVED  
2019 DEC 13 AM 10:18  
SECRETARY'S OFFICE  
PUC

DLC did not send "the tax-form information to her to have the tax removed from the account" with regard to 220. Rather, they sent the form regarding service at 124 which is why we contacted DLC yet again due to still being taxed on 220. The 2/26/2018 call did not generate another form being sent to us. DLC's statement to us from an agitated supervisor Samantha was that it takes "a lot of time to get things changed" and that I "needed to wait longer."

**PARAGRAPH 8** lacks important details. As seen from the attached document, **the DLC form provides no contact information** for returning a completed sales tax-exempt form for 220 – no physical address for hand delivery; no postal address for mailing; no email address; no telephone number; no fax number. Therefore, I used the address provided on the Request for Continuance of Service form for 124 and hand delivered it to DLC's headquarters at 411 Seventh Ave, Pittsburgh, PA 15219 (also the location of their tax department). Upon hand delivering the tax form, the security guard phoned a DLC representative who came down to the lobby and met me. I informed the representative as to the envelope's contents, and he assured me that he would personally delivery it to the appropriate party.

The PUC's Statement of Complaint fails to address the following dates:

2/27/2019: I called DLC again to get the address to which DLC said the form must be received via postal mail and was given the following address: Duquesne Light Co., Tax Dept. Mail Drop 7-1, 411 Seventh Avenue, Pittsburgh, PA 15219. On this date, I both postal mailed and hand delivered the form to the provided address. I personally handed the document to DLC employee Chris Campbell from the mailroom who assured me that he was immediately delivering it to the tax department secretary. I recognized him as the person I had hand delivered the previous form to, however that envelope did not have "Tax Dept. Mail Drop 7-1" on it as I was not provided that information with the previous form.

3/29/2019: During a phone call with DLC, I was informed by "Melanie" that "**Margaret of the tax department did note in my file that the sales tax form had been received by DLC.**" Also on this date, a "Miss Grant" (DLC supervisor) phoned me apologizing for DLC's incompetent handling of our account since DLC had received all of the necessary paperwork from us and said that she would handle the refunding of the taxes charged back to January and ensured that the state taxing to my account would be stopped. **It's been nine months, and we are still being charged state taxes and have received no reimbursement for the unlawful taxation to our account.**

The above two facts alone are indicative of DLC's heinous mishandling of our account. Yet, to date, we continue to be taxed on our main residence at 220 Lori Road (attached is December's bill).

**Dickie McCamey**

DICKIE, McCAMEY & CHILCOTE, P.C.  
TWO PPG PLACE, SUITE 400 | PITTSBURGH, PA 15222-5402

neopost<sup>SM</sup> FIRST-CLASS MAIL  
12/10/2019  
**US POSTAGE** \$000.50<sup>00</sup>



ZIP 15222  
041L12203790

Secretary  
Penna. Public Utility Comm.  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

1712030093 0000

