

Teresa K. Harrold, Esq.
(610) 921-6783
(330) 315-9263 (Fax)

January 6, 2020

VIA UPS OVERNIGHT DELIVERY AND EMAIL

Administrative Law Judge Mark Hoyer
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
301 5th Avenue, Suite 220
Pittsburgh, PA 15222

Re: Lisa Cartwright v. West Penn Power Company
Docket No. C-2019-3012731

Dear Judge Hoyer:

An initial telephonic hearing has been scheduled for January 14, 2020 at 10:00 a.m. West Penn Power Company ("West Penn") will have one witness available to testify at the hearing.

Additionally, I have enclosed three copies of the Exhibits that West Penn intends to present at the hearing with regard to the above-referenced matter.

Copies have been served on all parties as indicated in the attached certificate of service.

Please contact me if you have any questions.

Very truly yours,


Teresa K. Harrold

kbw
Enclosures

c: Secretary Rosemary Chiavetta (Cover letter and Certificate of Service only via e-filing)
As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LISA CARTWRIGHT

v.

WEST PENN POWER COMPANY

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:
:
:
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Docket No. C-2019-3012731

EXHIBITS OF WEST PENN POWER COMPANY

1. Detailed Statement of Account
2. Usage Comparison
3. Termination Notice August 14, 2019
4. Termination Notice November 12, 2019
5. Payment Arrangement History
6. BCS Opening and Closing Report, Case No. 3565747
7. BCS Opening and Closing Report, Case No. 3603274
8. Formal Complaint F-2018-3002999 Settlement Letter

DETAILED STATEMENT OF ACCOUNT

Customer Name: LISA M CARTWRIGHT

Account Number: 100096067127

Service Address:

213 GOOD ST FRONT
JEANNETTE PA 15644

Entry Date	Read Date	Cons Type	Meter Reading	Cons Usage	Nbr Days	Daily Average	Read Type	FE Billing Amt	Supplier Billing Amt	Total Billing Amt	Budget Billing Amt	Due Date	Payment Amt	Adj Amt	Adj Type	Account Balance
01/29/18	01/26/18	KWH	19,399	1,591	30	53	Est	175.99		175.99	168.00	02/20/18		8.69	LPC	2,745.27
02/26/18	02/26/18	KWH	20,007	608	31	20	Act	71.90		71.90	168.00	03/20/18		11.73	LPC	2,828.90
03/03/18													-500.00			2,328.90
Meter S10319662 removed on 03/06/2018.																
03/26/18													-87.24			2,241.66
03/28/18	03/27/18	KWH	952	952	21	45	Est	135.51		135.51	168.00	04/19/18				2,377.17
	03/06/18	KWH	20,270	263	8	33	Act									
04/24/18	04/24/18	KWH	1,295	343	28	12	Act	43.58		43.58	168.00	05/16/18				2,420.75
05/12/18													-100.00			2,320.75
05/26/18	05/24/18	KWH	2,154	859	30	29	Est	97.96		97.96	146.00	06/19/18		9.09	LPC	2,427.80
06/25/18	06/25/18	KWH	4,097	1,943	32	61	Act	219.69		219.69	146.00	07/17/18		11.80	LPC	2,659.29
06/29/18													-405.68			2,253.61
07/28/18	07/26/18	KWH	5,787	1,690	31	55	Est	189.01		189.01	146.00	08/20/18				2,442.62
08/23/18	08/23/18	KWH	7,203	1,416	28	51		159.48		159.48	146.00	09/17/18				2,602.10
Bill reversed on 09/20/2018.																
Installment plan deactivated on 09/18/2018 - Commission Agreement.																
09/18/18														-49.55	RLPC	2,552.55
09/18/18														-58.66	MA	2,493.89
09/20/18	08/23/18	KWH	7,203	1,416	28	51	Act	159.48		159.48		10/10/18				2,653.37
09/20/18														-159.48	REV	2,493.89
Reversal of 08/23/2018 bill.																
Installment plan started on 09/20/2018 for current + 35.00.																
09/26/18	09/25/18	KWH	8,952	1,749	33	53	Est	182.58		182.58	144.00	10/18/18				2,676.47
10/24/18	10/23/18	KWH	9,969	1,017	28	36	Act	106.70		106.70	144.00	11/15/18		2.69	LPC	2,785.86
11/24/18	11/22/18	KWH	10,879	910	30	30	Act	96.20		96.20	144.00	12/17/18		5.37	LPC	2,887.43
12/26/18	12/25/18	KWH	12,064	1,185	33	36	Act	130.02		130.02	131.00	01/17/19		8.06	LPC	3,025.51
01/15/19													-200.00			2,825.51
01/24/19	01/23/19	KWH	13,122	1,058	29	36	Act	117.89		117.89	131.00	02/19/19				2,943.40
02/25/19	02/24/19	KWH	14,225	1,103	32	34	Act	122.21		122.21	131.00	03/19/19				3,065.61

**LISA M CARTWRIGHT
Billed Account Summary**

Account Nbr	100096067127	Meter Read Unit	W202470
Customer Nbr	08053205700006640152	Meter Constant	1
Customer Acct Id		Voltage Level	120/240 volt single phase
Move in/out Date	03/01/2011 - Active Account	Capacity Peak Load	3.6217
Service Address		Load Profile	RSNH
	213 GOOD ST FRONT	Supplier Name	N/A
	JEANNETTE PA 15644	Supplier Dual Bill	No
Meter Nbr(s)	5001599990	Trans Peak Load Rate	1.9289 WP-RS10F
		EDI Billing	No

CURRENT 12 MONTHS						PREVIOUS 12 MONTHS					
DATE	KVAR	DEMAND	KWH	\$	¢/KWH	DATE	KVAR	DEMAND	KWH	\$	¢/KWH
Dec-19			1,098	122.58	11.16	Dec-18			1,185	130.02	10.97
Nov-19			980	107.23	10.94	Nov-18			910	96.20	10.57
Oct-19			1,236	133.41	10.79	Oct-18			1,017	106.70	10.49
Sep-19			1,398	150.23	10.75	Sep-18			1,749	182.58	10.44
Aug-19			1,671	180.58	10.81	Aug-18			1,416	159.48	11.26
Jul-19			1,728	186.51	10.79	Jul-18			1,690	189.01	11.18
Jun-19			1,365	148.03	10.84	Jun-18			1,943	219.69	11.31
May-19			1,031	112.14	10.88	May-18			859	97.96	11.40
Apr-19			1,006	109.60	10.89	Apr-18			343	43.58	12.71
Mar-19			1,011	110.33	10.91	Mar-18			1,215	135.51	11.15
Feb-19			1,103	122.21	11.08	Feb-18			608	71.90	11.83
Jan-19			1,058	117.89	11.14	Jan-18			1,591	175.99	11.06
TOTAL			14,685	1,600.74	10.90	TOTAL			14,526	1,608.62	11.07

- If you have questions or need more information, please call us today at 1-800-736-3404. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC may delay the shut-off if you file the complaint before the shut-off date. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.
- If you currently have a valid Protection From Abuse order or a court order issued by a court of competent jurisdiction in this Commonwealth, which provides clear evidence of domestic violence against you, your service cannot be terminated during the winter without PUC permission. There are some additional protections available to you. Call us immediately at 1-800-736-3404 (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. Call 1-800-736-3404 right away to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 1-800-736-3404.
- If you have trouble understanding or speaking English or have a disability please call us at 1-800-736-3404 for a free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past due.
- All adult occupants of the premise whose names are on the mortgage, deed, or lease are considered the 'customer' and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premises.
- After all conditions have been met to have the service turned back on, it may take up to three days to have your service restored. Please contact us to discuss the details.

WINTER NOTICE PROVISIONS (between December 1 - March 31)

- If we shut off your service during the winter months (between Dec.1 - Mar. 31) we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected.
- Contact us BEFORE the shut-off date to give us household income and occupant information to see if you qualify for any assistance programs.
- If your income is at or below 250% of the federal poverty guidelines, we must first ask the PUC for permission to shut off your service. Add together the monthly income of the adults in your household. If that number is the same or less than the amount listed in the chart below for your household size, call us immediately at 1-800-736-3404. You may need to provide us with proof of your income.

Monthly Income at 250% of Federal Poverty Level				
(Add \$921 for each additional household member)				
Household Size	1	2	3	4
Monthly Income	\$2,603	\$3,523	\$4,444	\$5,365

- If you have questions or need more information, please call us today at 1-800-736-3404. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC may delay the shut-off if you file the complaint before the shut-off date. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.
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Monthly Income at 250% of Federal Poverty Level				
(Add \$921 for each additional household member)				
Household Size	1	2	3	4
Monthly Income	\$2,603	\$3,523	\$4,444	\$5,365

**FIRST ENERGY
HIERARCHY OF PAYMENT ARRANGEMENTS**

Name: Lisa M. Cartwright

Account Number: 100096067127

**Service
Address: 213 GOOD ST FRONT
JEANNETTE PA 15644**

Type of Arrangement	Date	Arrangement Amount	Income	Arrangement Terms/Remarks
LIPURP	10/6/2015	\$1,203.51	\$371.00	\$25.00 + \$5.00 co-pay beginning 11/12/2015
PCAP	12/13/2015	\$1,320.84	\$371.00	\$80.00 Monthly Credit, \$36.69 Potential Forgiveness
CO PA	9/20/2018	\$2,493.89	\$321.00	Budget bill + \$35.00, beginning 10/18/2018

Remarks: A balance of \$1,063.83 remains eligible for re-deferral in PCAP. To re-enroll in PCAP, a payment of \$3,153.97 would be needed. This amount is valid until the current bill due date of 1/16/2020.

CO PA – Company Payment Arrangement
LIPURP – Low Income Payment and Usage Reduction Program
PCAP – Pennsylvania Customer Assistance Program

Assigned To

Assigned Specialist
Delaney, Charee M
Customer Information

Case Number

3565747

Account Number

100096067127

First Name

LISA

Last Name

CARTWRIGHT

Service Address

Address1

Address2

Service City

Service State

Service Zip

Service Class

Work Phone

Home Phone

Mailing Address

Address1

213 GOOD ST FRONT

Address2

City

JEANNETTE

State

PA

Mail Zip

15644

Family

Family Size

0

Children

0

Age

Adults

0

General

PUC Date Opened

9/26/2017

PUC Date Prepared

9/26/2017

Received Date

9/26/2017

PUC Date Closed

10/12/2017

Case Information

Prior Case Number

3390843

Term Date

9/27/2017

Arrearage

0

Case Origin

Universal Service

Income

PUC WEBSITE

No

Source

Business Name

LISA CARTWRIGHT

Reason For Contact

ON - PAR NEEDED (# 61)

Company	Operating Center	
West Penn Power	Jeannette	
Case Type	Complaint Classification	Root Cause
Straight	Collections	Collections
Responsible Process	Catastrophic Event	Secondary Cause
Contact Center East		
Referred To	Referral Date	Circuit

Misc. Info.

Anticipated Infractions

Sections	Date
----------	------

Employees

Actual Infractions

No Actual Infractions

Status

Status	Is SAP Completed	SAP Completion Date
Closed	<input type="checkbox"/>	

History

Click To Expand

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Is Archived

Customer Information

Case Number

3565747

Customer First Name

LISA

Customer Last Name

CARTWRIGHT

Account Number

100096067127

Service Address

Address 1

213 GOOD ST

Address 2

City

JEANNETTE

Service State

PA

Zip

15644

Home Phone

Work Phone

Mailing Address

Address 1

213 GOOD ST FRONT

Address 2

City

JEANNETTE

State

PA

Zip

15644

Family

Adults

0

Family Size

0

Children

0

Age

General

PUC Date Opened

9/26/2017

PUC Sent Date

10/12/2017

PUC Date Closed

10/12/2017

Case Type

Straight

Assigned To

Assigned Specialist

Delaney, Charee M

Case Information

PUC Violation

NO

PUC Chapter

Section Rule

Balance Date

9/27/2017

Head Date

10/16/2017

Bill Date	PUC Service Continue Date	
Total Balance	PUC Service Restored Pay	PUC Special Budget Amount
2080.83	0.00	185.00
Regular Budget Amount	PUC Service Continue Amount	Arrears Payment Plus
150.00	0.00	35.00
Final Monthly Payment	Current Monthly Payment	End Monthly Payment
0.00	0.00	0.00
Reconnect Amount	Pay Amount	
0.00	0.00	

PUC Terms

NOVEMBER 2017 DUE DATE

Letter Description

EGW STRAIGHT PAR/NO LPCS/BUDGET + FOR LEVEL 1 HOUSEHOLDS

Resolution

DECISION

ISSUED-LEVEL 1, BUDGET 150.00 + 35.00 = 185.00 BEGINNING NOV 2017 DUE DATE.

WAIVE LPCS.

Has Decision Issue	Response Time
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Other Information

Investigator First Name	Investigator Last Name
JOHN	LANGAN
Investigator Area Code	Investigator Phone
717	
Investigator Fax Area Code	Investigator Fax

Intaker First Name	Intaker Last Name
BUTCH	COMSTOCK
Status	

Is SAP Completed	SAP Completion Date
<input checked="" type="checkbox"/>	10/19/2017

History

Click To Expand

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Assigned To

Assigned Specialist
Cottrill, Marilyn F

Customer Information

Case Number

3603274

Account Number

100096067127

First Name

LISA

Last Name

CARTWRIGHT

Service Address

Address1

213 GOOD STREET

Address2

Service City

JEANNETTE

Service State

PA

Service Zip

15644-0

Service Class

Work Phone

Home Phone

(724) 2058616

Mailing Address

Address1

Address2

City

State

Mail Zip

Family

Family Size

0

Children

0

Age

Adults

0

General

PUC Date Opened

4/17/2018

PUC Date Prepared

4/17/2018

Received Date

4/17/2018

PUC Date Closed

5/24/2018

Case Information

Prior Case Number

3524572

Term Date

Arrearage

0

Case Origin

Universal Service

Income

PUC WEBSITE

No

Source

Business Name

Reason For Contact

BILLING DISPUTES (# 18)

Case Problem

KEEP TRYING TO GET BACK ON CAP PROGRAM. THEY PUT ME ON PAYMENT PLAN WHICH HAS SCREWED UP MY AMOUNTS DUE. - RELIEF SOUGHT - TO BE

PAYED UP AND ABLE TO RETURN TO CAP PROGRAM. THE EMAIL ADDRESS INKSLISA1@GMAIL.COM HAS BEEN ALLOWED TO BE SHARED.

Company Position

04/13/2018 I HAVE PAID OVER 600.00 TO CATCH UP IN PAST DUE BALANCE. SO CALLED BACK TO DO CAP APPLICATION AND THEY TOLD ME I HAD AN

ENORMOUS BALANCE THAT I DIDN'T EVEN KNOW I HAD. YET MY SHUT OFF NOTICE WAS ONLY

FOR 80.00 LESS THAN A MONTH AFTER HAVING A 87.00 SHUT OFF I NOW HAVE A 500.00 SHUT OFF, YET I WAS UP TO DATE FEW DAYS AGO AND I HAVE OVER A GRAND BALANCE TO GET ON CAP. I FEEL THEY LEAD ME TO BELIEVE I WAS ALMOST THERE ON MY UP TO DATE PAYMENTS, BUT AS I PAYED A MONTH WENT PAST AND I'M FURTHER IN DEBT.

Related Information

Misc. Info.

Hot Issue

PUC Investigator / Intaker

Investigator First Name	Investigator Last Name	Investigator Phone
BCS	CASE POOL	(717)
Intaker First Name	Intaker Last Name	
DEBRA	BARNHART	
Status		

Status

Closed

History

Click To Expand

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Is Archived

Customer Information

Case Number

3603274

Customer First Name

LISA

Customer Last Name

CARTWRIGHT

Account Number

100096067127

Service Address

Address 1

213 GOOD STREET

Address 2

City

JEANNETTE

Service State

PA

Zip

15644

Home Phone

(724) 2058616

Work Phone

Mailing Address

Address 1

Address 2

City

State

Zip

Family

Adults

0

Family Size

0

Children

0

Age

General

PUC Date Opened

4/17/2018

PUC Sent Date

5/24/2018

PUC Date Closed

5/24/2018

Case Type

PAR with Dispute

Assigned To

Assigned Specialist

Cottrill, Marilyn F

Case Information

PUC Violation

NO

PUC Chapter

Section Rule

Balance Date

5/24/2018

Head Date

5/29/2018

Bill Date	PUC Service Continue Date	
Total Balance 2320.75	PUC Service Restored Pay 0.00	PUC Special Budget Amount 0.00
Regular Budget Amount 0.00	PUC Service Continue Amount 0.00	Arrears Payment Plus 0.00
Final Monthly Payment 0.00	Current Monthly Payment 0.00	End Monthly Payment 0.00
Reconnect Amount 0.00	Pay Amount 0.00	

PUC Terms

Letter Description

Resolution

DECISION ISSUED. COMPLAINT IS DISMISSED. CUSTOMER HAS NOT PAID ENOUGH TO SATISFY THE PART OF THE ACCOUNT BALANCE THAT IS INELIGIBLE TO BE DEFERRED TO GET BACK ON PCAP. SHE HAS NOT PAID ENOUGH TO GET BACK ON THE PUC PAR. THERE IS NO CII. SHE DID PAID A TOTAL OF 587.24 IN 2018 PRIOR TO FILING THIS COMPLAINT.

Has Decision Issue

Response Time

Other Information

Investigator First Name

JULIE

Investigator Last Name

CARLIN

Investigator Area Code

717

Investigator Phone

Investigator Fax Area Code

Investigator Fax

Intaker First Name

DEBRA

Intaker Last Name

BARNHART

Status

Is SAP Completed



SAP Completion Date

5/24/2018

History

Click To Expand

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800 Cabin Hill Drive
Greensburg, PA 15601

John L. Munsch
Attorney

724-838-6210
Fax: 234-678-2370

September 19, 2018

Lisa Cartwright
213 Good Street
Jeannette, PA 15644

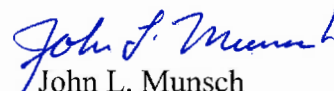
Re: Lisa Cartwright v. West Penn Power Company
Complaint Docket No. F-2018-3002999

Dear Ms. Cartwright:

This letter confirms the agreement that you reached with West Penn Power Company to settle and close the above-captioned complaint that you filed against West Penn with the Pennsylvania Public Utility Commission. The agreement is that the Company will reduce your current balance of \$2,602.10 by the amount of \$108.21, representing late payment charges over the past two years, resulting in a new current balance of \$2,493.89. The agreement is that you will pay the amount of \$35.00 per month, plus your budget bill amount monthly (the budget bill is currently \$146 per month subject to variation depending on usage) for a period of 72 months.

West Penn will file a Certificate of Satisfaction to close the above complaint. A copy of the Certificate of Satisfaction is enclosed. As explained in the Certificate, if you object to the closing of the Complaint you will have ten days to object in writing to the Public Utility Commission.

Very truly yours,


John L. Munsch
Attorney

JLM:dml

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LISA CARTWRIGHT

v.

WEST PENN POWER COMPANY

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Docket No. C-2019-3012731

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Proposed Exhibits of West Penn Power Company upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by USP overnight delivery as follows:

Lisa Cartwright
213 Good Street
Jeannette, PA 15644

Dated: January 6, 2020



Teresa Harrold
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6783
tharrold@firstenergycorp.com

Counsel for West Penn Power Company