

C-2019-3014154
1-29-2020

TO: PUC

I HAVE ATTACHED MY ANSWERS
TO THE NEW MATTER FILED BY
MET-ED AND MY ORIGINAL FORMAL
COMPLAINT THAT I FILED.

CORDIALLY,

Jeff Manzi
JEFF MANZI

Jeff Manzi 2-15-2020

RECEIVED

JAN 30 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED

FEB 18 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

4. Denied that the residential service was unlawfully terminated. The Respondent specifically avers that at all times relevant to this proceeding, the Company's actions have been reasonable and performed in accordance with all applicable laws, as well as the Company's Commission-approved tariff, the Pennsylvania Public Utility Code (Code), Commission regulations and orders.

The Complainant checked the box "other" on the formal complaint form and handwrote that service was unlawfully terminated under the Residential Account and as a result, damage was sustained at the Service Location and the adjoining house. The Respondent specifically denies the Complainant's recitation of facts.

By way of background, service was in the name of a Prior Customer under Account No. 100088713324 (Prior Non-Residential Account) for the period November 17, 2011 to May 19, 2019.¹ The Prior Customer had residential service in his name for the period April 16, 2009 to May 23, 2019 under Account No. 100078509625 (Prior Residential Account).² On May 17, 2019, the Customer requested service into her name for the non-residential service

effective May May 20, 2019. *NOT TRUE! THE SERVICE WAS SUPPOSED TO BE PUT INTO THE NAME OF CAROL MANZI FOR BOTH ACCOUNTS WHEN SHE CALLED INTO NOTIFY MET-ED OF OUR SON STEVEN LIPPINCOTT'S DEATH. HE WAS IN THE HOSPITAL AND PASSED AWAY ON MAY 8, 2019.*

The Respondent specifically denies that the termination of service of the Prior Customer's residential service was not lawful. Consistent with the Code³ and Commission regulations,⁴ the requisite 10-day notice, dated May 2, 2019, was mailed to the Service Location

¹ The mailing address for the Prior Non-Residential Account was the Service Location.

² The mailing address for the Prior Residential Account was the Service Location.

³ 66 Pa. C.S. § 1406(b)(1)(i).

⁴ 52 Pa. Code § 56.91.

RECEIVED

FEB 18 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED

JAN 30 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

advising the Prior Customer that his service was subject to termination on or after May 16, 2019 for a delinquent amount of \$568.72. Consistent with the Code⁵ and Commission regulations,⁶ the requisite 3-day notice was satisfied on May 9 and 10, 2019. Consistent with the Code⁷ and Commission regulations,⁸ the field representative attempted contact with an adult occupant at the Service Location. Service was lawfully terminated on May 22, 2019. Consistent with the Code⁹ and Commission regulations,¹⁰ the requisite post-termination notice was left at the Service

Location. *OUR SON STEVEN LIPPINCOTT WAS IN THE HOSPITAL DURING THIS SUPPOSED NOTIFICATION PERIOD, AND PASSED AWAY ON MAY 8, 2019. NO ONE WAS AT THE HOUSE LOCATION TO RECEIVE MAIL OR ANSWER, THE DOOR OR THE PHONE.*

5. To the extent the allegations contained within this paragraph are construed to purport allegations of fact, rather than requests for relief, any such allegation of fact is denied. By way of further response, this paragraph contains a prayer for relief to which no response is required. The Respondent specifically denies that Complainant is entitled to the relief requested.

The Respondent specifically denies that the Complainant is entitled to the monetary relief requested. The Code does not confer jurisdiction upon the Commission to award monetary damages. The Commission possesses no jurisdiction to consider any implied request for reimbursement for property damage. *DeFrancesco v. Western Pennsylvania Water Co.*, 499 Pa. 374, 453 A.2d 595 (1982); *Feingold v. Bell of Pa.*, 477 Pa. 1, 383 A.2d 791 (1977); and *Elkin v. Bell of Pa.*, 491 Pa. 123, 420 A.2d 371 (1980).

⁵ 66 Pa. C.S. § 1406(b)(1)(ii).

⁶ 52 Pa. Code § 56.93.

⁷ 66 Pa. C.S. § 1406(b)(1)(iv).

⁸ 52 Pa. Code § 56.94.

⁹ 66 Pa. C.S. § 1406(c)(2).

¹⁰ 52 Pa. Code § 56.96.

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL



1007



17120

U.S. POSTAGE PAID
PME 1-Day
BANGOR, PA
19013
FEB 18, 20
AMOUNT

\$26.35
R2305K141008-31

**PRIORITY
★ MAIL ★
EXPRESS™**



**PRIORITY
MAIL
EXPRESS®**



EE 371 611 471 US

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) **JEFF MANZI** PHONE: **610-659-6624**
3514 RIVER ROAD
MT-BETHEL, PA.
18343

PAYMENT BY ACCOUNT (if applicable)

USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

ORIGIN (POSTAL SERVICE USE ONLY)

1-Day 2-Day Military DPO

PO ZIP Code 18013	Scheduled Delivery Date (MM/DD/YY) 02/19-20	Postage \$ 26.35	
Date Accepted (MM/DD/YY) 02/18-20	Scheduled Delivery Time <input type="checkbox"/> 10:30 AM <input type="checkbox"/> 3:00 PM <input checked="" type="checkbox"/> 12 NOON	Insurance Fee \$	COD Fee \$
Time Accepted 1:46 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	10:30 AM Delivery Fee \$	Return Receipt Fee \$	Live Animal Transportation Fee \$
Special Handling/Fragile \$	Sunday/Holiday Premium Fee \$	Total Postage & Fees \$ 26.35	
Weight <input type="checkbox"/> Flat Rate lbs. 2.30 ozs.	Acceptance Employee Initials hc		

DELIVERY OPTIONS (Customer Use Only)

SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

Delivery Options

No Saturday Delivery (delivered next business day)

Sunday/Holiday Delivery Required (additional fee, where available)

10:30 AM Delivery Required (additional fee, where available)

*Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT) **COMMONWEALTH OF PA.** PHONE ()
PENNSYLVANIA PUBLIC UTILITY COMM.
400 NORTH STREET
HARRISBURG, PA.

ZIP + 4® (U.S. ADDRESSES ONLY)
17120-

For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.
 \$100.00 insurance included.

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)	Time	Employee Signature
	<input type="checkbox"/> AM <input type="checkbox"/> PM	
Delivery Attempt (MM/DD/YY)	Time	Employee Signature
	<input type="checkbox"/> AM <input type="checkbox"/> PM	

LABEL 11-B, JULY 2018 PSN 7860-02-000-6906

CMPC

PUC MASTER

Agency: PUC
Floor:

External Carrier: EXPRESS

2/19/2020 10:04:28 AM



EE371611471US

EP13F July 2013 OD: 12.5 x 9.5

PEEL FROM THIS CORNER