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ELECTRONICALLY FILED

February 8, 2021

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Tricia Mezzacappa v. UGI Utilities, Inc.**  
**Complaint Dockets Nos. C-2021-3023697, C-2021-3023725 and C-2021-3023926**

**Dear Ms. Chiavetta:**

Enclosed is a Motion for Consolidation of the above Dockets. A copy of this document has been served on the Complainant.

Sincerely,



Larry R. Crayne

cc: Tricia Mezzacappa  
817 Ridge Street  
West Easton, PA 18042

**Commonwealth of Pennsylvania**

**Before the Pennsylvania Public Utility Commission**

In the Matter of:

Tricia Mezzacappa,  
Complainant,

Complaint Dockets  
Nos. C-2021-3023697,  
C-2012-3023725 and  
C-2021-3023926

VS.

UGI Utilities, Inc.,  
Respondent.

**Motion for Consolidation**

**And Now** comes Respondent, UGI Utilities, Inc. (UGI), pursuant to *52 Pa. Code*, Section 5.103 (a) and (b) and files the following Motion for Consolidation:

1. On or about January 14, 2021, Complainant filed the first above captioned Formal Complaint with the Commission concerning her natural gas service (see Paragraphs 4 and 5 of the complaint).
2. The Complaint was electronically served on UGI on January 14, 2021.
3. On February 2, 2021, UGI filed an Answer to the Complaint with the Secretary of the Commission.
4. On February 4, 2021 the Commission scheduled a telephonic hearing of the formal complaint for March 10, 2021 at 10:00 a.m.
5. On or about January 15, 2021, Complainant filed a second almost identical Formal Complaint at Docket No. C-2021-3023725 with the Commission also concerning her natural gas service (see Paragraphs 4 and 5 of the complaint).
6. The second Complaint was electronically served on UGI on January 15, 2021.
7. On February 3, 2021, UGI filed an Answer to the second Complaint with the Secretary of the Commission.
8. On February 4, 2021 the Commission scheduled a telephonic hearing of the second formal complaint for March 11, 2021 at 10:00 a.m.

9. On or about February 1, 2021, Complainant filed a third formal complaint at Docket No. C-2021-3023926 with the Commission also concerning her natural gas service (see Paragraphs 4 and 5 of the complaint).

10. The third formal complaint was electronically served on UGI on February 1, 2021.

11. On February 5, 2021, UGI filed an Answer to the third formal complaint with the Secretary of the Commission.

12. The three formal complaints involve the towing of Complainant's vehicle from an active UGI work zone on January 13, 2021 on 800 Ridge Street, West Easton, PA. The three formal complaints also involve Complainant's interactions with UGI personnel and contractors. Although the three complaints contain averments of damages, the Commission cannot award Complainant damages. The Commission can only inquire into the adequacy of service provided to Complainant.

14. Because the three complaints involve similar allegations of fact regarding the removal and towing of Complainant's vehicle from an active UGI work zone, UGI believes that the three complaints should be consolidated for the purpose of having one telephonic hearing. In the event separate hearings are held for the three complaints, UGI anticipates using the same witnesses for each of the complaints. Therefore, in the interest of judicial economy and efficient use of the Commission and UGI resources, UGI believes that the three complaints should be consolidated for one hearing.

15. A copy of the operative Paragraphs 4 and 5 of the three Complaints is attached as **Exhibits A, B and C**

**Wherefore,** UGI moves that the three complaints at C-2021-3023697, C-2021-3023725 and C-2021-3023926 be consolidated for the purpose of scheduling one telephonic hearing before the Commission.

## Notice to Plead

To: Tricia Mezzacappa:

You are hereby notified to file a written response to the above Motion for Consolidation within twenty (20) days from service hereof or a judgment may be entered against you. The response must be mailed to the Secretary of the Public Utility Commission:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

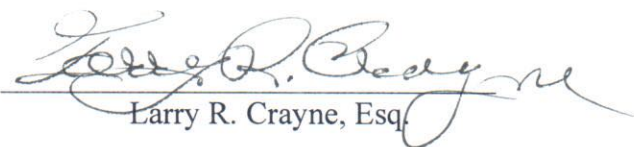
A copy of your response must also be mailed to:

Larry R. Crayne, PC  
Attorney at Law  
238 Johnston Road  
Pittsburgh, PA 15241

Respectfully submitted

UGI Utilities, Inc.

By:

  
Larry R. Crayne, Esq.

and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.

- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.

- Other (explain). Please see below

For the last 3 years West Easton Borough has been subjected to constant noise and parking and traffic disruption because of UGI's never ending gas line replacement project, and more specifically, the 800 block of Ridge Street directly next to my residence. Since this time, I have been subjected to unrelenting noise, sleep disruption and parking disruption because their work site to replace gas lines is next door to my home. Two weeks ago they posted "no parking signs" on Ridge, 9th Street and other areas with no notice to any resident and no communication to any resident whatsoever about their work schedule to open the roads. Last week, they completed replacing gas lines on the 800 block of Ridge Street in front of my home, and moved onto the adjacent street which is 9th Street. Due to the congestion and volume of parked vehicles in this area, numerous people including myself, could not find any available parking. I parked in front of my home on Ridge Street, because they were digging up 9th street, and assumed the patch work on Ridge indicated they had finished working in the 800 block of Ridge. Without any notice, any parking violation, or even a phone call, in the very early morning of January 13, 2021 I was jarred out of sleep by a person banging on my door in a maniacal and wild fashion as to induce fear, anxiety and instant distress. This person persisted to bang on my front door with such persistent force, ornamental glass fell off my window sill and shattered on the floor. While the incessant and maniacal banging continued, I was unable to immediately move my vehicle due to medical problems, fear, and lost car keys. When I was able to move the car, it was too late because Easton Area Auto body mounted my car onto a tow lift, and towed it off the street. It is noted that I sued Easton Area Auto Body in 2017 in a Federal Court for stealing another vehicle I used to own, and giving it away without following any protocols. What I endured next was hard to believe, as the malice and genuine disrespect from 3 customer service reps at UGI occurred throughout the morning. I made at least three phone calls to UGI customer service to attempt to get my car back, and the response I received back was not only disgusting, but also harassing and criminal. These customer service reps that I spoke to not only condoned the theft

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of my vehicle, but spent several minutes over the phone gas lighting me with personal delight, to the point I had a near nervous breakdown. I missed the only interview in the last several years that I was selected for in a job that met my level of education and experience. I was told "too bad," "there isn't anything we can do" and "UGI didn't tow your car"... I was treated in such an ugly and discourteous/ deceitful fashion by these representatives that I called both a State Senator and a State Rep. in disbelief asking for their assistance. They suggested I file this complaint. I also tried speaking directly with a UGI uniformed worker in a UGI truck parked outside my home. I told him that the theft of my vehicle destroyed my interview, that I only had \$24 left in my checking account, could not afford towing and impound fees, and that both my coat and gloves, and other personal materials were in the car. He did nothing at all, and I still do not have my car back. I am seeking damages in excess of \$100,000 for loss of vehicle, job, severe and intentional emotional and physical distress, anxiety, embarrassment, disruption and other punitive damages that may be available through the ALJ.

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. **Requested Relief**

**How do you want your complaint to be resolved?** Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

Get my illegally impounded car out of impound and returned to me (towed at request of UGI sub contractor for gas line replacement ) because UGI and sub contractor never communicated with residents or posted their work schedule/ street closures anywhere in Borough, plus money for loss of job, aggravation, embarrassment and deprivation of my personal property and loss of vehicle, replacement vehicle, etc...

Exh A  
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and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.

I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.

Other (explain). Please see below

I went outside my house this morning at approximately 9:30 am to photograph cars who were parked in no parking areas, but were not subjected to the hostility and towing, as I was in my last complaint filed yesterday. There are many cars still parked in the no parking areas, and none were towed. When I attempted to get the names of the SCODA contractors who violently banged my door to the point of shattered glass, and calling for the illegal tow, they admitted to banging on my door, repeatedly honking horns, and creating a disturbance, but refused to give me their names, despite me showing them what shattered in my home. They were rude and discourteous, and as I left to go back into my house, I fell off the easement owned by UGI in front of the pressure reducing station and almost fell inside the hole. I am injured and have no access to my car to seek medical attention, because they locked it up illegally.

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

**5. Requested Relief**

How do you want your complaint to be resolved? Explain what you

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want the PUC to order the utility or company to do. Use additional paper if you need more space.

Get my illegally impounded car out of impound and returned to me (towed at request of UGI sub contractor for gas line replacement ) because UGI and sub contractor never communicated with residents or posted their work schedule/ street closures anywhere in Borough, plus money for loss of job, aggravation, embarrassment and deprivation of my personal property and loss of vehicle, replacement vehicle, injuries from falling, etc...

**Note:** The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

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3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

<input type="checkbox"/> ELECTRIC	<input type="checkbox"/> WASTEWATER/SEWER
<input checked="" type="checkbox"/> GAS	<input type="checkbox"/> TELEPHONE/ TELECOMMUNICATIONS (local, long distance)
<input type="checkbox"/> WATER	<input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine)
<input type="checkbox"/> STEAM HEAT	

4. Reason for Complaint

**What kind of problem are you having with the utility or company?**

Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. **Your complaint may be dismissed without a hearing if you do not provide specific information.**

The utility is threatening to shut off my service or has already shut off my service. In retaliation for filing 2 previous complaints they are demanding access to my home for the sole purpose of lighting a pilot light. The pilot light will be lit by me and no one else. They are saying they have to inspect the furnace which does not belong to them, and is not serviced by them, and now threatening to red tag the furnace as well. They will never be allowed inside my house for their reckless conduct and destroying my property in the last 2 weeks. Also in 2018 when they moved my meter ( by shutting off my gas service at that time because I would not let them in my house) and destroyed my sidewalks for 9 months with no fix. Had to throw away numerous items in basement to give them access...Water got in house because the sidewalks were dirt, pipes burst, insurance denied coverage. They devalued my home by building a pressure reducing station across from my house. I am done with these people. No access ever again. Its 15 degrees here.

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**How do you want your complaint to be resolved?** Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

I want them to finish their work, connect my outdoor meter to their new line and leave me alone, without shutting down my gas account.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

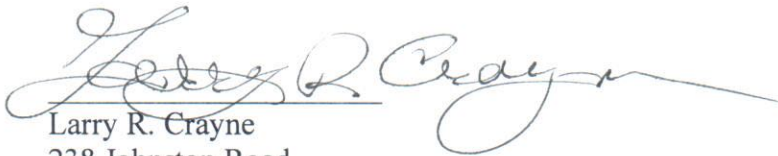
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## Certificate of Service

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participant, listed below, in accordance with the requirements of Sec. 1.54 (b) (1) (relating to service by a participant).

Tricia Mezzacappa  
817 Ridge Street  
West Easton, PA 18042

Dated this 8<sup>th</sup> day of Feb, 2021



Larry R. Crayne  
238 Johnston Road  
Pittsburgh, PA 15241

Counsel for  
UGI Utilities, Inc.