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ELECTRONICALLY FILED

March 22, 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 Order to Disconnect Service at 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
484.544.4077kT
tricia817@ptd.net
Accepts eService

Administrative Law Judge Darlene Heep, at
sdelvillar@pa.gov

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 Order to Disconnect Service

And Now comes Respondent, UGI Utilities, Inc. (UGI), pursuant to 52 *Pa. Code*, Section 5.103 (b), *et seq.*, and files the following Motion for Order to Disconnect Service:

1. On or February 4 and 26, 2021, UGI sent Complainant Mezzacappa letters of notification of the need to disconnect her service and connect her service to a new gas main recently installed on the 800 block of Ridge Street, West Easton, PA. See **Attachments A and B**.
2. UGI must disconnect Complainant's service for about two hours in order to connect Complainant's service to the new gas main. After disconnection of the service from the existing gas main and before the connection of Complainant's service to the new gas main, UGI must perform a safety inspection of Complainant's gas fired appliances and relight the appliances.
3. Complainant has refused UGI access to her appliances for the necessary safety inspection. Consequently, Complainant will be without natural gas service until the necessary safety inspection is able to be performed.
4. The safety inspection of Complainant's appliances may be performed by UGI. The safety inspection may also be performed by a certified plumber approved by UGI at Complainant's expense. A certified plumber must coordinate with UGI personnel the turn on of Complainant's service
5. The disconnection of Complainant's service is necessary because UGI has installed a new gas main in Ridge Street. All of the area customers except Complainant have been disconnected and connected to the new gas main. Complainant is the only customer left on the existing gas main whose service has not been transferred to the new gas main. Complainant has not been transferred because of her refusal to allow UGI to disconnect her service and to perform the necessary safety inspection.

6. The new gas main in Complainant's street was installed in compliance with UGI Tariff Rule 19, Rider I, the Commission mandated Distribution and System Improvement Charge (DSIC). The purpose of the DISC is to accelerate the replacement of aging distribution infrastructure, to comply with evolving regulatory requirements and to develop and implement solutions to regional supply problems. Complainant's refusal to allow UGI to disconnect her service from the existing gas main, perform the necessary safety inspection and reconnect her service to the new gas main is preventing UGI from deenergizing and abandoning the existing gas main.

7. While there is a potential safety hazard in not promptly disconnecting the existing gas main and retiring it from service, the hazard is not imminent. That is the reason UGI has elected to not immediately disconnect Complainant's service pursuant to UGI Tariff Rule 9.1 and the Commission's regulation at 56 *Pa. Code*, Section 56.71, which would have left Ms. Mezzacappa without service in the winter. However, bare steel mains are more prone to leaking and can at times experience hazardous conditions requiring more immediate attention. If a hazardous condition is found during a leak investigation, UGI can elect to disconnect service pursuant to the Commission's regulations and the UGI Tariff rules which would leave Ms. Mezzacappa without service.

8. The existing main being replaced in this project area is bare steel and has experienced hazardous leaks. Only five weeks previously, an unrepairable hazardous leak was found on the existing main. UGI was required to cut off a portion of the existing main in this project area, leaving 3 customers temporarily out of service until they were connected to the new main. As soon as Ms. Mezzacappa's service is transferred to the new main, the existing main will be deenergized and abandoned.

9. If UGI is delayed in retiring the existing main and tying the Complainant's service over to the new main, the condition of the existing main could degrade, necessitating UGI to exercise its authority under Section 56.71 to retire the existing main and disconnect Complainant's service. If the retirement of the existing main on a date certain, under planned, deliberate, and customer-coordinated conditions is further delayed, UGI may be required to exercise its right to disconnect Complainant upon the manifestation of a hazardous condition. If this transpires, it will constitute an injury to UGI due to the inefficient mobilization of specific personnel to respond to the hazard and potentially an injury to the Complainant, who will suffer from an unplanned service disconnection.

Wherefore, UGI requests that it be allowed to disconnect Complainant's service. If UGI is allowed to perform the necessary safety inspection at that time, her service will be connected to the new gas main. In the alternative, if Ms. Mezzacappa does not wish to allow UGI to perform the necessary safety inspection, after disconnection of her service from the existing gas main Ms. Mezzacappa may hire a UGI certified plumber to perform the necessary safety inspection of her appliances and turn her gas on at the meter in coordination with UGI personnel.

Notice to Plead

To: Tricia Mezzacappa:

You are hereby notified to file a written response to the above Motion for Order to Disconnect Service 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

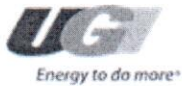
A copy of your response must also be emailed to:

Administrative Law Judge Darlene Heep, at
sdelvillar@pa.gov

Larry R. Crayne, PC, at
lrcrayne@comcast.net

Respectfully submitted,
UGI Utilities, Inc.

By: 
Larry R. Crayne, Esq.



Ms. Tricia Mezzacappa
817 Ridge Street
West Easton, PA

February 4, 2021

Dear Ms. Mezzacappa:

This letter notifies you that work will be performed on your natural gas service tying it into a newly installed gas main before retirement of the old gas main. Since this will interrupt your service for a period up to 2 hours, please contact me (610) 807-3124 to schedule a time you are available for UGI to enter your home and restart your appliances. The work must be completed on Monday, February 8th or Tuesday, February 9th prior to UGI retiring the old main. If UGI is not able to gain access to your residence prior to the old main being retired, retirement of the main will leave you without service.

Thank you for your time and attention to this notification letter.

Sincerely,

David J. Amory
Senior Operations Manager
UGI Utilities, Inc.

ATTACHMENT A



Ms. Tricia Mezzacappa
817 Ridge Street
West Easton, PA 18042

February 26, 2021

Dear Ms. Mezzacappa:

Due to the recent weather pattern our area has experienced, we were unable to complete the tie over of your service to the newly installed main as previously planned and communicated in a letter sent to you on February 4th. We have also had additional internal discussions regarding your concerns. As a result, you should have received the attached letter from Matthew Irizarry providing you with an option to resolve an issue possibly found when UGI reactivates your service and relights your appliances.

This letter is to notify you that work will now be performed on Tuesday, March 9th. Since this will interrupt your service for a period up to 2 hours, please contact me at (610) 807-3124 to schedule a time you are available for UGI to enter your home and restart your appliances. If UGI is not able to gain access to your residence prior to the old main being retired, retirement of the main will leave you without service.

Thank you for your time and attention to this notification letter.

Sincerely,

David J. Amory
Senior Operations Manager
UGI Utilities, Inc.

ATTACHMENT B

VERIFICATION

I, Amy Wynn, Senior Compliance Representative for UGI Utilities, Inc., hereby state that the facts set forth above are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at any hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. C. S., Section 4904 (relating to unsworn falsification to authorities).

Date: 3-22-2021

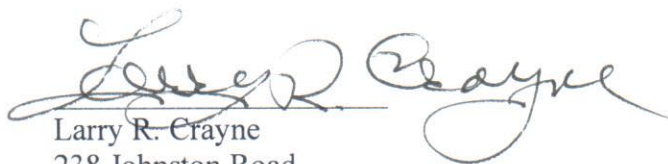
Amy K. Wynn
Amy Wynn
Senior Compliance Representative
UGI Utilities, Inc.

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
484.544.4077kT
tricia817@ptd.net
Accepts eService

Dated this 22nd day of MAR, 2021



Larry R. Crayne
238 Johnston Road
Pittsburgh, PA 15241

Counsel for
UGI Utilities, Inc.