

Commonwealth of Pennsylvania
Before the Pennsylvania Public Utility Commission

In the Matter of:

Francene Tearpock-Martini
Complainant
v.

Docket No. C-2023-3038243

UGI Utilities, Inc. - Electric Division
Respondent

CERTIFICATE OF SERVICE

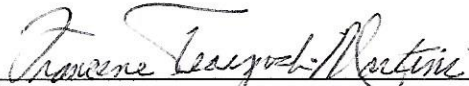
I hereby certify that I have this day served a true copy of the foregoing Answer and New Matter Upon the parties listed below, in accordance with the requirements of 52 PA Code relating to service by a Participant.

VIA ELECTRONIC MAIL AND EMAIL

Timothy K. McHugh (I.D. 317906)
UGI Corporation
460 N. Gulph Road
King of Prussia PA 19406

Devin T. Rvan (I.D. 316602)
Nicholas A. Stobbe (I.D. 329583)
Post & Schell P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101

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


Francene Tearpock-Martini
56 South Main Street
Shickshinny, Pennsylvania 18655
Tel. (570) 542-2346

Date: 03-07-23

Commonwealth of Pennsylvania
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In the Matter of:

Francene Tearpock-Martini
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v.

Docket No. C-2023-3038243

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REPLY TO UGI UTILITIES, INC. - ELECTRIC DIVISION ON MOTION THAT PROCEEDINGS OF COMPLAINT BE DISMISSED.

Complainant is the property owner of 56 South Main Street, Shickshinny, PA 18655 - whose property was violated and trespassed upon by workers of Frontier while attempting to run fiber optic wires on Utility Poles owned and with permission by UGI Utilities, Inc. By UGI UTILITIES lack of responsible ownership and supervision of use of their poles this action took place by renters of their property, i.e. Frontier, et.al.

Complainant filed a Complaint with the PUC naming both parties following procedures outlined by PUC legal department. After filings were submitted, complainant received notification of rejection of Complaint and that separate Complaints must be filed for Frontier and for UGI Utilities, Inc. because they have individual I.D. numbers with the PUC. Complaint was therefore filed within their instructions.

Objection is being made on present filing by UGI Utilities, Inc. in part that Complainant has failed to join necessary parties in this proceeding and should be dismissed when in fact this decision was made by the Public Utilities Commission that filings should be pursued in the present manner and separated.

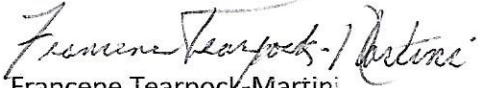
Complainant would like to restate that her property was trespassed upon with no formal notification and or warning being given as was previously stressed by the Public Utility Commission in writing to the UGI Utility, Inc., that due to the historic nature of the property such should be provided when their poles are to be involved. Frontier was using an independent contractor to run their fiber optic cables of which Complainant had no knowledge.

Complainant contacted Frontier Forman for PA via telephone and UGI Utilities, Inc., Corporate Attorney Timothy McHugh, in writing. It appears that parties are not concerned nor communicating what can and cannot be done and where actual ROWs exist. Contractors take it upon themselves to do whatever they want to do and whenever, upon Complainant's property.

Complainant takes great care and has services of Certified Arborists attending to her historic property. The vigorous trimming of the very old, well established Magnolia Tree could succumb to the extreme trimming and it may take several years for the beautiful Magnolia tree to die from this harsh treatment.

For the reasons outlined herein, Complainant pleads for proceedings to continue without dismissal.

Respectfully submitted,



Francene Tearpock-Martini

56 South Main Street

Shickshinny, Pennsylvania 18655

Email: ftm@epix.net

Date: 03-07-23

Francene Tearpock-Martini

From: "Francene Tearpock-Martini" <ftm@epix.net>
Date: Friday, February 10, 2023 4:10 PM
To: "Dickson, Yolanda" <ydickson@pa.gov>
Subject: Re: EFILING#2456606 TWO FORMAL COMPLAINTS AGAINST UGI & FRONTIER

Hello Ms. Dickson: As per your request two separate Formal Complaint filings have been submitted – one for Frontier and another for UGI. Thank you. Francene Tearpock-Martini (570) 542-2346

From: [Dickson, Yolanda](#)
Sent: Friday, February 10, 2023 12:26 PM
To: ftm@epix.net
Subject: EFILING#2456606 TWO FORMAL COMPLAINTS AGAINST UGI & FRONTIER

Hello Francene Tearpock-Martini –

Our office received your multiple E-filings of your FORMAL COMPLAINT. **However, they were rejected as we cannot accept duplicate efiled documents.**

Please file one Formal Complaint for UGI and Frontier separately because they have different utility codes and contacts so the must be efiled individually.

Thank you,

Yolanda Dickson | Legal Assistant
Pennsylvania Public Utility Commission
Secretary's Bureau – C&A
ydickson@pa.gov