

PENNSYLVANIA PUBLIC UTILITY COMMISSION

M arisa Willis-Diaz, :
Complainant, :
v. : Docket No. F-2023-3045 048
Philadelphia Gas Works, :
Respondent. :

MARISA WILLIS'
RESPONSE TO PGW'S ANSWER TO FORMAL COMPLAINT
AND ANSWER TO NEW MATTER WITH NEW MATTER

Pursuant to 62 Pa. Code §5.61, Philadelphia Gas Works ("PGW" or "Respondent") hereby submits this Response to the Answer to the Formal Complaint ("Complaint") of Marisa Willis ("Complainant") that was served by the Secretary of the Pennsylvania Public Utility Commission ("Commission" or "PU C") on December 20, 2023. In support of this Response, PGW avers as follows:

Marisa Willis states the following as factual information:

- 1. N/A
- 2. N/A
- 3. N/A
- 4. A PGW call center representative said that a shut-off notice for the Service

Address had been issued prior to the PU C Complaint being filed.

Marisa Willis denies that the purpose of the Complaint is solely to seek a payment agreement for the outstanding balance for gas service at the Service Address. Marisa Willis is primarily seeking adjustments to the incorrectly inflated bills and then a payment agreement for the adjusted amount.

Marisa Willis denies PGW's incorrect statement as there are erroneous charges in the outstanding balance for gas service at the Service Address. After careful review of the gas bills for the Service Address, the charges have increased by 100% for some months over a three year period, with excessive charges for Weather Normalization, Distribution System Improvements, and double charges for some months for Distribution and Supply charges.

DATE OF DEPOSIT

FEB 24 2024

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Although Marisa Willis received payment agreements in the past that were kept for extended periods of time, but because of the consistently increasing inflated bills, the payment arrangements became increasingly difficult to keep, with bills as high as \$900.00 for one month.

In spite of the meter being tested by PGW instead of an independent third party, the results of the test are not reliable, such as the incorrect evaluation by the PGW service person who didn't even turn on the gas and still determined that my inflated gas bill was due to my electric clothes dryer. PGW has a biased position in the outcome of the test.

5. Denied.
6. Denied.
7. Denied.

ANSWER TO NEW MATTER

8. Admitted.
9. Denied. This information is incorrect. The service address was my childhood family home since 1964. I moved out of the home when I left for college in 1977. I never moved back into my family home until after my mother's passing on August 16, 2019. My husband and I rented and owned other properties during those decades. My name was not financially linked to the service address in 1989. The fact that the decision to make me responsible for my mother's past due balance was based on incorrect information puts that balance in question.
10. Although the said Complaint included my objections to inheriting my mother's past due balance, the primary purpose was to receive a fair payment arrangement because PGW was demanding a \$800 deposit until I filed the Complaint.
11. Admitted.
12. Admitted.
13. Admitted.
14. Admitted. Marisa Willis was satisfied with the reasonable payment arrangements that were the result of the Complaint.
15. Marisa Willis kept the payment arrangement for one year – Oct, 2019 through Oct. 2020, but was unable to continue as family businesses and work were severely impacted by

Covid.

16. This current complaint is not contesting the balance transfer but instead is contesting the drastic increase in bills for gas service at the service address. Marisa Willis does reserve this issue to be brought as a New Matter.
17. Denied. This statute of limitations doesn't apply as this Formal Complaint is separate from the original complaint filed in 2019.
18. Denied. This statute of limitations doesn't apply as this Formal Complaint is separate from the original complaint filed in 2019.

NEW MATTER

19. As stated in Section 9 of PGW's New Matter, PGW ran an Experian credit check which linked the Complainant to the Service Address since 1989. That information is incorrect as that was not my place of residence nor did I have any financial obligation with my family childhood home. My mother, Gail Willis, had that outstanding bill since 1989 as she was on the CRP program. The incorrect decision to encumber Marisa Willis with her mother's past due balance was unfair and unjust.
20. This information regarding the credit check and the decision process was just disclosed in the New Matter filed by PGW's counsel on January 10, 2024.
21. Marisa Willis seeks relief for the original transferred balance of \$2049.09 from the current gas bill for the Service Address.

Respectfully Submitted,

Marisa Diaz

Marisa K. Willis
509 Westview Street
Philadelphia, PA 19119
Telephone: 215-852-5040
marisakdiaz@comcast.net

VERIFICATION

I, Marisa Willis, hereby state that the facts set forth in the foregoing Response, Answer to New Matter and New Matter 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 a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Dated: February 22, 2024

Marisa Diaz

Marisa Willis

DATE OF DEPOSIT

FEB 24 2024

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Marisa K. Willis
509 Westview Street, Philadelphia, PA 19119
215-852-5040

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Marisa Willis' Answer to Preliminary Objection upon the persons listed below in the manner indicated in accordance with the requirements of 2 Pa. Code §1.54 (relating to service by a party).

VIA ELECTRONIC MAIL

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