

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Marisa Willis-Diaz, :
Complainant, :
v. : Docket No. F-2023-3 045048
Philadelphia Gas Works, :
Respondent. :

DATE OF DEPOSIT

FEB 24 2024

**MARISA WILLIS'
RESPONSE TO PGW'S PRELIMINARY
OBJECTION TO THE FORMAL COMPLAINT**

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Marisa Willis (or "Complainant") submits the following Answer to the Preliminary Objection to the Formal Complaint of Marisa Willis-Diaz ("Complainant") served by the Secretary of the Pennsylvania Public Utility Commission ("Commission" or "PUC") on December 20, 2023 ("Complaint"). Pursuant to 52 Pa. Code § 5.61 and 5.101(d) of the Commission's regulations, PGW filed an Answer with New Matter to the Complaint on this same date. In support of this Preliminary Objection, PGW states as follows:

I. INTRODUCTION

The counsel for PGW is making an incorrect assertion as to the issue being brought forth in this Complaint. The issue is the gas bill for the service address is incorrect and inflated.

II. Denied. Not applicable.

III. Denied. Not applicable.

A. Dismissal Based on Lack of Commission Jurisdiction

6. Denied.

7. The statute of limitations doesn't apply to this complaint, BCS #3 919005 was filed on 6/23, which was filed because of the unsubstantiated increasing gas bills received. Therefore, the complaint was filed within three years that this problem arose.

8. Denied.

9. Denied.

10. Denied.

11. Denied.

IV. CONCLUSION

WHEREFORE, Marisa Willis respectfully requests that this Commission grants Marisa Willis' Objection to dismiss the Complaint and grant any other relief to Marisa Willis that is deemed to be reasonable and appropriate.

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 52 Pa. Code §1.54 (relating to service by a party).

VIA ELECTRONIC MAIL

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Rosemary Chiavetta
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FEB 27 2024

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