

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DATE OF DEPOSIT

OCT 10 2024

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Winston Banks,

Complainant

v.

Philadelphia Gas Works,

Respondant

F-2024-3050882

Docket No. ~~F-2024-305882~~

REPLY TO NEW MATTER

1. Complainant, Winston Banks, raises my challenge to the calculations and "book-keeping" by PGW to the accuracy of any meter readings except for two particular instances.

a. 1/22/2022 bill reading 1166 that resulted in PGW bill for \$888.82

b. 4/22/2022 bill reading 1166 that resulted in PGW bill for \$428.08

2. Apart from those two readings, the Complainant did not raise challenges to the billing for more than three (3) years at the time of my 2024 Complaint that is the issue now, because I was unaware and unable to discern the problem until or about 2022.

3. In 2022 the Complainant noticed the discrepancy between my payment log and the balance due supposedly by PGW.

4. Furthermore, in 2020 and throughout the majority of the year, the Complainant paid **\$100.00** per month to avoid shut-off of services from

PGW as publically announced from the utility company via the City of Philadelphia during the **COVID-19 pandemic**.

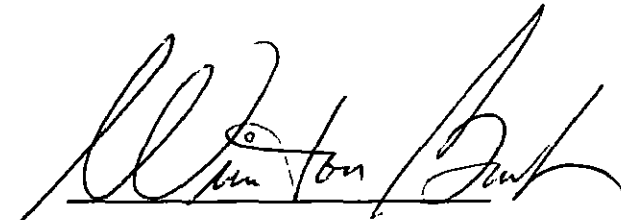
5. Through 2020 and 2021 the Complainant did not see any problem nor discrepancies between my payment log and the "previous amounts due" issued by PGW regarding the billing.

6. At some point in 2022 the Complainant noticed there were significant discrepancies between my payment log and the amount past due from PGW.

7. Thus the Complainant challenges the accuracy of PGW's "book-keeping" of any and all of the previous payments.

8. From December-2020 through July 2024 according to the Complainant's payment log I have paid **\$14,105.33** towards the total billing of **\$15,828.77** during that period of time (an Exhibit is attached).

9. The Complainant would make available by phone one witness to testify to the accounting of his payment-log to PGW. The witness is Accountant Urell Spain of Spain's Book keeping & Tax Preparation Services Plus, P.O. Box 11705, Philadelphia PA 19133. Telephone number 267-235-7658.



Winston Banks, Pro Se
P.O. Box 13417
2001 Kinsey St.
Philadelphia, PA 19124
215-800-3525
winstonbanks59@gmail.com

October 10, 2024

Date:

DATE OF DEPOSIT

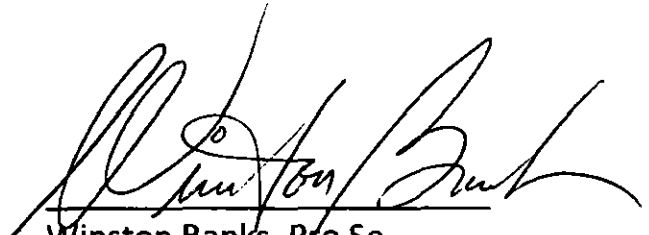
OCT 10 2024

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VERIFICATION

I, Winston Banks, hereby state that I am representing myself Pro Se in this Formal Complaint against the Agency, Philadelphia Gas Works. I am presenting the facts of this matter in a foregoing manner of the response to the **New Matter** filed by the Respondant. The Claimant statements are true and correct to the best of my knowledge. The information provided to the Agency is accurate and 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. S 4904 (relating to unsworn falsification to authorities).

Date: October 10, 2024



Winston Banks, Pro Se

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EXHIBIT-A

DATE OF DEPOSIT

OCT 10 2024

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

Spain's

Bookkeeping & Tax Prep Services Plus
4720 Salisbury Rd. Jacksonville FL 32256 904-370-3602
PO Box 17705 Philadelphia, PA 19135 267-235-7658
Fax 867-878-9128

Dear PGWorks Customer Service,

September 30, 2024

Re: Account Number 0001-8335-7780

I am writing to express my concerns and seek clarification regarding recent charges on my gas bill, specifically the LPC (Lost and Unaccounted for Gas Charge) and inconsistencies in my monthly charges.

1. **Unexplained LPC Charges:** I have noticed LPC charges on my recent bills but find the explanation for these charges unclear. Could you please provide:
 - o A detailed explanation of what the LPC charge covers
 - o How this charge is calculated
 - o Why this charge is necessary
 - o Any relevant regulations or policies that govern this charge
2. **Inconsistent Monthly Charges:** I have observed significant fluctuations in my monthly charges that do not seem to correspond with my usage patterns. Specifically:
 - o 01/22/2022 Reading 1166 that resulted in a bill of \$888.82
 - o 04/22/2022 Reading 2281 that resulted in a bill of \$428.08
 - o The average usage is not that significant.
 - o Also 10/20/21 bills are significantly low.
 - o Please explain LPCWVE.

Could you please explain?

The reasons for these fluctuations

How my gas usage is measured and billed

Whether there have been any recent changes in pricing or billing methods

I kindly request a thorough review of my account and a detailed written response addressing these concerns. If any errors are found, I would appreciate prompt correction and, if applicable, a refund or credit.

Please provide this information within 14 business days of receiving this letter. If you need any additional information from me to address these questions, please let me know.

Thank you for your attention to this matter. I look forward to your response and resolution of these issues.

Sincerely,


Winston Banks

2001 Kinsey St. Phila. PA 19124
215-800-3525

EXHIBIT-B

DATE OF DEPOSIT

OCT 10 2024

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

6,51157 June 15, 2024

	PAID	MONTHLY USAGE
7/12/24	125	(27 ⁹⁹)
6/12/24	250	(108 ³⁹)
5/11/24	200	(333 ⁶⁹)
4/3/24	300	(439 ⁰⁷)
3/12/24	200	(524 ⁵²)
2/2/24	300	(571 ²³)

PAID	Billed
24 1,375	2004 ⁸⁹

12/27/23	225	(378 ⁴⁰)
12/2/23	125	(235 ⁹³)
11/10/23	75	(49 ³⁴)
10/23/23	50	(27 ⁰⁰)
9/22/23	125	(246 ³)
5/12/23	125	(403 ⁷⁰)
1/6/23	125	(762 ⁶⁹)
3/14/23	150	(871 ³⁸)
4/12/23	157	(Part Due notice)
4/12/23	125	(672 ⁸⁷)
7/11/23	125	(40 ⁵⁶)
8/24/23	125	(27 ⁵⁸)

1532 / 3494⁵⁸

DEPOS

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

8/		
9/14/22	100	(30 ¹⁵)
11/19/22	243 ⁵⁷	(Part Due notice)
12/10/22	130	(59 ⁻)
7/6/22	125	(33 ⁶⁹)
4/12/22	100	(35)
6/24/22	100	(35)

2,465⁹⁷ / 908⁸³

PAID/Billed

3/18/22 300 (35)
 1/4/22 383 (35) END of YEAR 2021 BAL = 507
 5/23/22 — (2659) - 1.
 2/7/22 400 (35)
 11/26/22 —
 10/28/22 204⁹⁹ (204⁹⁹)
 10/6/22 29⁹⁸ (29⁹⁸)
 10/18/22 349⁴³ (349⁴³) collections bill

PRECISE

A PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

2/24/21 ~~400~~ (800⁷⁹) ✓
 4/24/21 500 (841⁴⁶) ✓ x 517⁷³
 8/14/21 364 (329) 357 ✓
 9/14/21 364 (329) 357 ✓
 10/23/21 364 (329) ✓
 11/17/21 364 (383) ✓
 12/13/21 383 (383) ✓
 7/14/21 357 (~~357~~ 332) ✓
 6/2/21 357 (322) ✓

1/21 500 (810⁷⁹) ✓
 3/21 517⁷³ (590⁹⁵) ✓
 5/21 357 (123³¹)

4,827⁷³ / 5,583⁶¹

1/20 400 (477²¹) ✓
 2/20 500 (554⁴⁵) ✓
 3/20 195²³ (661⁷⁶) ✓
 4/20 800 (466³⁶) ✓
 5/20 800 (337⁷⁵) - 2.
 6/20 100 (203⁸⁴) ✓

2,904⁶³ / 3,836⁹⁶

	PAID	Billed	
7/20	100	(23 ⁰⁰)	✓
8/20	100	(24 ⁵¹)	✓
9/20	100	(24 ⁶⁹)	✓
10/20	159	(80 ⁸¹)	✓
11/20	230	(358 ⁹⁹)	✓
12/20	400	(623 ¹⁸)	✓

+ 11/25/20 = \$250

amt paid to PGW
 14,105³³
~~14,105³³~~

Amount billed by PGW Due to Agreement
 OR DURING Investigation
 \$15,828⁷⁷

15,828⁷⁷
 - 14,105³³
~~1,723⁴⁴~~

<1,723⁴⁴>
 I owe PGW

Winston Bank

2001 Kinsey St.
 Phila. PA. 19124
 Acct # 1
 215-800-3525
 Winstonbank59@gmail.com

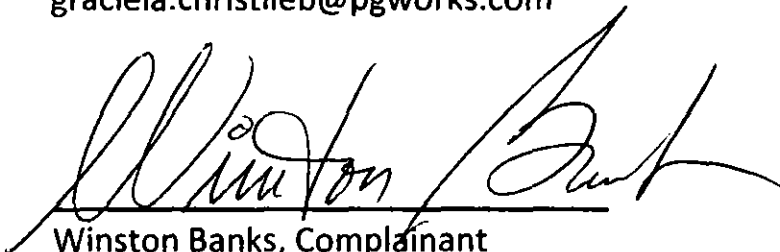
CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true copy of **Respondant's Reply to New Matter**, PGW. This document was emailed to Respondants's Attorney who is listed below in the requirement indicated in accordance with 52 Pa. Code S 2.54 (relating to service by a party).

VIA FIRST CLASS MAIL AND ELECTRONIC FILING

Graciela Christlieb, Esq
Philadelphia Gas Works
800 W. Montgomery Ave.
Philadelphia, PA 19122
215-684-6164
graciela.christlieb@pgworks.com

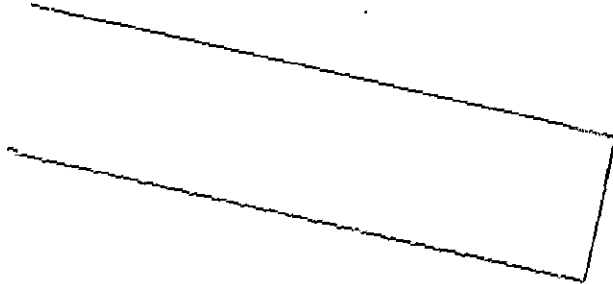
Date: October 10, 2024

A handwritten signature in black ink that reads "Winston Banks". The signature is written in a cursive style and is positioned above a horizontal line.

Winston Banks, Complainant
P.O. Box 13417
2001 Kinsey St.
Philadelphia, PA 19101
215-800-3525
winstonbanks59@gmail.com



Winston Banks
 PO Box 13417
 Philadelphia, PA 19101



CMPC

717-705-1952

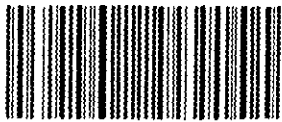
To: PUC SECRETARY BUREAU

Agency: PUC

Floor:

External Carrier: PRIORITY

10/15/2024 7:55:05 AM



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Retail



17120

U.S. POSTAGE PAID
 FCM LG ENV
 PHILADELPHIA, PA 19124
 OCT 10, 2024

RDC 99

\$10.99

S2324D501303-80

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
 OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



7019 2280 0000 2169 2159

SECRETARY
 PUC
 400 North St.
 Harrisburg, PA 17120

RECEIVED

OCT 15 2024

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 SECRETARY'S BUREAU