

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

JENIQUA BRADLEY,

Complainant.
Docket No. F-2024-3052211

RECEIVED

DEC 16 2024

v.

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

UGI Utilities, Inc – Gas Division,

Respondent.

ANSWER TO PRELIMINARY OBJECTIONS OF UGI UTILITIES, INC.

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION :

AND NOW , comes JENIQUA BRADLEY in response to UGI'S Preliminary Objections, pursuant to PA Title 42 § 8103 (g) a consumer credit transaction in which the party to whom credit is offered or extended is a natural person and the money, property or services which are the subject of the transaction are primarily for personal family or household purposes. Complainant would request this Commission let the reference to 15 USC 1666 stand as factual information provided in complaint that the Commission does not have to have jurisdiction over.

1. Admitted. UGI Utilities is also Issuer along with US Bank National Association as trustee, registrar and paying agent
2. Admitted
3. Denied. Truth in Lending requires creditors follow regulations when using the credit of consumers as it pertains to billing, disclosures and requires corporations act in good faith and adhere to the laws of these United States and state where they happen to conduct business.
4. Denied. In Complainant's Informal complaint request was made for documentation from jsaustin@pa.gov, Complainant was given 10 days to provide proof of any and all claims and email was provided on 11/6/24 with BCS Complaint # 4008755 in the subject line. The requester did not respond to emails provided and closed complaint.
5. Admitted.
6. Denied. Sufficient proof was provided by email as requested with the guidelines of Title 66 and all violations therein.
7. Denied. Complainant provided proof by email on 11/6/24 and 11/7/24. See attached (Exhibit A)

8. Denied. Complainant provided proof by email and the laws of the Commonwealth of Pennsylvania, and the PA Public Utility Commission are derivatives of the United States Code and Code of Federal Regulations. See Attached (Exhibit A)
9. Denied. Complainant provided proof by email, and it should be a part of these proceedings to substantiate these proceedings are fair and impartial
10. Denied.
11. Denied. Complainant has referenced PA Title 13 Sections 3 and 8 relating to Negotiable Instruments and Investment Securities and Title 66
12. Denied. Informal Complaint was closed without submitting Complainant's full claim. The Complaint attempted to make a complaint against investigator and immediately filed an appeal in person at the Keystone Building.
13. Denied.
14. Denied. See attached (Exhibit A)
15. Denied.
16. Denied. Documents sent by registered mail to U.S. Bank National Association as trustee, registrar and paying agent of UGI Utilities to request certificated securities be credited to the account as per Title 13 section § 8107
17. Denied. Pursuant to Title 66 § 506 the Commission has full power and authority to investigate these matters by having access to and use of any books, records, or documents in the possession of, any department, board or commission of the Commonwealth, or any political subdivision thereof.
18. Denied.
19. Denied.

WHEREFORE , JENIQUA BRADLEY, respectfully requests that the Pennsylvania Public Utility Commission dismiss the Preliminary Objections of the Respondent.

Respectfully Submitted,
JENIQUA BRADLEY

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CORNELL COURT # 204

, HARRISBURG, PENNSYLVANIA [17111]

EXHIBIT A (PAGE 1 OF 12)

RECEIVED

DEC 16 2024

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BCS 4008755 Fw: UGI letter

From: Jeniqua Bradley (auqinejb@yahoo.com)

To: jsaustin@pa.gov

Date: Wednesday, November 6, 2024 at 11:47 PM EST

Good Evening,

The details below are the responses received from UGI.

Thank You,
Jeniqua Bradley

Yahoo Mail: Search, Organize, Conquer

— Forwarded Message —

From: "Duda, Melissa M" <mduda@ugi.com>

To: "auqinejb@yahoo.com" <auqinejb@yahoo.com>

Sent: Thu, Apr 18, 2024 at 3:41 PM

Subject: UGI letter

Timothy Childress, Esq.

UGI Corporation

460 North Gulph Road

King of Prussia, PA 19406

Post Office Box 858

Valley Forge, PA 19482-0858

ChildressT@oneugi.com

March 12, 2024

VIA CERTIFIED MAIL

Jeniqua Bradley

650 Cornell Ct Unit 204

Harrisburg PA 17111-3672

Re: Your letters to UGI re: Account Number:

Dear Ms. Bradley:

This letter is in response to your above referenced letters that were received by UGI Utilities, Inc. ("UGI" or the "Company") on or around February 8th 2024, and February 26th 2024. UGI understands your letters as a dispute concerning the Company's accepted forms of payment. Furthermore, your letters and "instructions" seem to suggest that you are not responsible for paying for the utility service that UGI has provided to you. To this end, the Company conducted an investigation into your dispute.

To clarify, the Company is a public utility and, more specifically, a natural gas distribution company, as those terms are defined in Sections 102 and 2202 of the Public Utility Code. 66 Pa.C.S. §§ 102 and 2202.

Therefore, the Company is subject to the Pennsylvania Public Utility Commission's ("PUC's") jurisdiction and must comply with the Public Utility Code, the PUC's regulations, orders, and decisions, as well as the Company's PUC-approved tariff. Furthermore, if you seek to name Christopher R. Brown or any representative of the Company as your fiduciary or agent with power of attorney over your account and/or assets, UGI wholly rejects such a notion or designation. More generally, the Company denies any and all allegations stated in your letters and reserves all of its rights under law to challenge any such

allegation before an agency or court of competent jurisdiction.

If, by your dispute, you are attempting to pay your monthly bills for the account in question by an alternative means of payment other than legal currency, UGI refuses to accept any alternative form of payment. The PUC has consistently found that it was reasonable for a public utility to accept only certain types of payment for utility service. See *James Coppedge v. PECO Energy Company*, Docket No. F-2014-2406180 (Opinion and Order entered January 29, 2015); see also *Gregory Kennedy v. PECO Energy Company*; Docket No. C-2015-2471718 (Opinion and Order entered April 9, 2015). Moreover, neither the Public Utility Code nor the PUC's regulations state that a public utility is required to accept alternative forms of payments for services rendered. *Id.* With that said, the Company only accepts payment by cash, certified check, money order, validated check or payments by credit card; no other forms of payment will be accepted. Attempts to make payments by any alternative means (i.e., through methods other than the specific examples provided in the preceding sentence) for the account in question will not be accepted and, instead, will be considered as an attempt to receive utility service without paying for such.

Jeniqua Bradley

March 12, 2024

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To the extent that you allege such, the Company rejects the notion that you are somehow not obligated to pay for your utility service. It appears as if your letters suggest that the Federal Government is responsible for either discharging your utility bills or paying them on your behalf. Efforts seeking to impose the Federal Reserve Act as a basis for non-payment of utility bills "has been heard, addressed, and rejected by other courts." *Michelle Stailey v. UGI Utilities, Inc. (Gas Division)*, Dkt. No. C-2019-

3008847, 2019 SL 7403558, at *10 (Dec. 17, 2019). Furthermore, "[p]ayment for utility service cannot be made by reference to an obligation of the federal government when that obligation does not exist in law or fact." Id. Simply put, the Company is entitled to be paid for the service it renders, and it is the account holder's responsibility to pay for his/her utility bills. Id.

Therefore, the Company has completed its investigation and is officially closing your dispute. Should you dispute the conclusion of UGI's investigation, you have the right to file an informal or formal complaint at the PUC, which has the jurisdiction and authority to address your dispute, in order to preserve your rights. To assist you, UGI is enclosing a copy of the PUC's Consumer Complaint Procedures Guide. Your utility service will not be terminated pending completion of the dispute process, including both informal and formal complaints, so long as you comply with all requirements of the PUC. The current outstanding balance for the account in question is \$196.58. This balance was due on March 8, 2024. To avoid the possibility of having your service terminated, you must pay \$196.58 as soon as possible. Please call our Customer Care Center at 1-800-276-2722 to arrange to make a payment or to determine if you are eligible for a payment arrangement. In addition, payments can be made by the acceptable methods as discussed herein, and can be mailed to UGI Utilities, Inc., P.O. Box 15503, Wilmington, DE 19886-5503.

Very truly yours,

Recoverable Signature

X Timothy Childress

Timothy Childress

Signed by: 5e51ed09-5f39-46dc-9701-f21c8fadb91e

Timothy Childress

Associate Counsel

UGI Corporation



Energy to do more®



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BCS: 4008755

From: jeniqua bradley (aujinejb@yahoo.com)

To: jsaustin@pa.gov

Date: Wednesday, November 6, 2024 at 11:55 PM EST

Good Evening,

I have attempted to reach you several times by phone to determine what documents you have so I can send you whatever is missing, In February I contacted UGI and provided a power of attorney document that allows me to operate as agent on behalf of my principal. Along with my power of attorney I have sent in an endorsed negotiable instrument (whether it be governed by Title 13 Section 3 or Title 13 Section 8) and a tender of payment to satisfy my obligation to UGI. These certificates of indebtedness are credits that are owed to my principal and I have made several attempts to have these credits applied to the account. I am of legal age and I have capacity to contract. As a federally protected consumer and owner of this account, UGI is obligated to manage the account as per my instructions. As holder in due course I have accepted the instruments as provided by UGI as payor for my principal as the payee and under Title 13 § 3310 the obligations past, present and future should be discharged. Any attempt to refuse credit to the account by UGI is a violation of my rights and I will seek all remedies available. Under Title 13 § 8107 and §8505, I have sent instruction to Stacy L Mitchell of US Bank N. A. as per the instructions on UGI's trust indenture. All documents have been sent by registered or certified mail. As these transactions with UGI are also considered consumer credit transactions as they are for personal family and household use, any credit balance provided on the statement should be returned to the account holder pursuant to 15 USC 1666. I have given UGI a reasonable amount of time to act in good faith. Any further violations of my rights will be seen as willful and negligent as UGI is subject to the laws of the Commonwealth of Pennsylvania and of these United States.

Thank You,



UGI020824.docx

13.9kB



Trustee Notice.docx

16.7kB

BCS 4008755

From: jeniqa bradley (auqinejb@yahoo.com)

To: jsaustin@pa.gov

Date: Thursday, November 7, 2024 at 07:26 AM EST

Good Morning,

1305. Advance payment of rates; interest on deposits.

No public utility shall require the payment of rates in advance, or the making of minimum payments, ready to serve charges, or deposits to secure future payments of rates, except as the commission, by regulation or order, may permit. Any deposit made by any domestic consumer, under the provisions of this section or under any repealed statute supplied by this part, shall be returned with any interest due thereon to the consumer making such deposit when he shall have paid undisputed bills for service over a period of 12 consecutive months.

Yahoo Mail: Search, Organize, Conquer

BCS 4008755 PA Title 66 Definition

From: jeniqua bradley (auqinejb@yahoo.com)

To: jsaustin@pa.gov

Date: Thursday, November 7, 2024 at 07:29 AM EST

Rate." Every individual, or joint fare, toll, charge, rental, or other compensation whatsoever of any public utility, or contract carrier by motor vehicle, made, demanded, or received for any service within this part, offered, rendered, or furnished by such public utility, or contract carrier by motor vehicle, whether in currency, legal tender, or evidence thereof, in kind, in services or in any other medium or manner whatsoever, and whether received directly or indirectly, and any rules, regulations, practices, classifications or contracts affecting any such compensation, charge, fare, toll, or rental.

Yahoo Mail: Search, Organize, Conquer

BCS 4008755 Title 66 Accounts

From: jeniqa bradley (auiqnejb@yahoo.com)

To: jsaustin@pa.gov

Date: Thursday, November 7, 2024 at 07:32 AM EST

1701. Mandatory systems of accounts.

The commission may, after reasonable notice and hearing, establish systems of accounts, including cost finding procedures, to be kept by public utilities, or may classify public utilities and establish a system of accounts for each class, and prescribe the manner and form in which such accounts shall be kept. Every public utility shall establish such systems of accounting, and shall keep such accounts in the manner and form required by the commission. The accounting system of any public utility also subject to the jurisdiction of a Federal regulatory body shall correspond, as far as practicable, to the system prescribed by such Federal regulatory body. The commission may require any such public utility to keep and maintain supplemental or additional accounts to those required by any such regulatory body.

Yahoo Mail: Search, Organize, Conquer

BCS 4008755 Title 66 - Chapter 19 Securities

From: jeniqua bradley (auqinejb@yahoo.com)

To: jsaustin@pa.gov

Date: Thursday, November 7, 2024 at 07:35 AM EST

<https://www.legis.state.pa.us/cfdocs/legis/LI/consCheck.cfm?txtType=HTM&ttl=66&div=0&chpt=19>

Yahoo Mail: Search, Organize, Conquer

BCS 400-8755 Title 66 - Violations and Penalties

From: jeniqua bradley (auqinejb@yahoo.com)

To: jsaustin@pa.gov

Date: Thursday, November 7, 2024 at 07:41 AM EST

<https://www.legis.state.pa.us/cfdocs/legis/LI/consCheck.cfm?txtType=HTM&ttl=66&div=0&chpt=33>

Yahoo Mail: Search, Organize, Conquer

RCVD PUC SEC BUR
DEC 16 2024 PM 3:09

JENIQUA BRADLEY

: PUBLIC UTILITY COMMISSION

v.

: DOCKET NO: F-2024-3052211

UGI UTILITIES, INC.

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing documents upon the person(s) and in the manner indicated below, which service satisfies the requirements of Pa.R.Crim.P. 576(B)(4):

IN PERSON

Service ~~by certified mail~~ as follows:

400 North Street - Floor 2 E 17 N 2nd St. 12th Floor
Harrisburg PA 17120 Harrisburg PA 17101

Dated: 12/16/24

Jeniqua Nicole Bradley
Pro Se ALL RIGHTS RESERVED

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Submitted By: Jeniqua Nicole Bradley Name: Jeniqua Nicole Bradley

Signature: Jeniqua Nicole Bradley Attorney # (if applicable): _____

RCVD PUC SEC BUR
DEC 16 2024 PM 3:02