

Before the Pennsylvania Public Utility Commission

Jeniqua Bradley, Complainant

v.

UGI Utilities, Inc., Respondent

Docket No.: F-2024-3052211

Complainant's Response to UGI Utilities, Inc.'s Answer to Petition for Reconsideration

I. Introduction

Complainant, Jeniqua Bradley, respectfully submits this Response to UGI Utilities, Inc. ("UGI") and its Answer opposing reconsideration. UGI asserts that Complainant does not meet the Duick standard. That assertion is incorrect. The Petition for Reconsideration identifies overlooked and unaddressed issues of law central to the Commission's prior order—specifically: (1) the legal treatment of the billing and payment instruments under Title 13 (UCC); and (2) the need to stay collection/termination activity to protect consumer rights and prevent coerced payments during an active dispute.

II. The Petition Satisfies *Duick v. Pennsylvania Gas & Water Co.*, 56 Pa. P.U.C. 553 (1982)

Under *Duick*, reconsideration is appropriate where the Commission overlooked or misapprehended material law or facts, or where new or novel issues warrant review. The Petition establishes:

1. Overlooked Commercial Law (Title 13, UCC).

The prior decision did not analyze whether UGI's billing/collection instruments are governed by 13 Pa.C.S. § 3101 et seq. (Article 3), including issuance, negotiation, and enforcement requirements. Endorsing collection on instruments not evaluated for legal compliance is a material oversight of law directly affecting enforceability.

2. Overlooked Consumer-Protection and Due-Process Concerns.

The Petition details that ongoing collection pressure and termination threats during an unresolved dispute risk payment under duress, contrary to consumer-protection principles. A temporary stay preserves due process and prevents irreparable harm while the Commission addresses the legal issues.

3. Novel and Unaddressed Arguments.

These commercial-law and anti-coercion issues were not substantively addressed in the initial determination. They are not mere re-argument; they are new and material considerations squarely meeting *Duick*.

III. Reconsideration and Temporary Stay Serve the Public Interest

Granting reconsideration and staying collection/termination ensures the Commission's orders conform to governing commercial law and that consumers are not coerced into paying disputed amounts to avoid loss of essential service. This approach aligns with the Commission's duty to ensure just and reasonable practices.

IV. Relief Requested

Complainant respectfully requests that the Commission:

1. Reject UGI's claim that the Petition fails under Duick;
2. Grant reconsideration to address the overlooked legal issues described above; and
3. Stay all collection and termination activity on Complainant's account pending final disposition.

Respectfully submitted,



Jeniqua Bradley

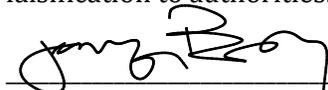
650 Cornell Court #204

Harrisburg, Pennsylvania

Date: _November 5, 2025_____

Verification (52 Pa. Code § 1.36)

I, Jeniqua Bradley, verify that the statements made in the foregoing filing are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



Jeniqua Bradley

Date: __November 5, 2025_____

Certificate of Service

I hereby certify that I have this day served a true and correct copy of the foregoing Complainant's Response to UGI Utilities, Inc.'s Answer to Petition for Reconsideration upon the persons listed below, in the manner indicated, in accordance with 52 Pa. Code § 1.54:

Via eService/eFiling and First-Class Mail:

Counsel for UGI Utilities, Inc.

Post & Schell, P.C.

One Oxford Centre

301 Grant Street, Suite 3010

Pittsburgh, PA 15219

Pennsylvania Public Utility Commission
Secretary's Bureau
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

Date: November 5, 2025



Jeniqua Bradley