

***STEPHANIE M. SAWYER***

6802 Lawnton Avenue  
Philadelphia, PA 19102  
Tel: (267) 250-9413  
Email: smsesq1@gmail.com

RECEIVED  
2016 FEB -2 AM 9:58  
PA PUC  
SECRETARY'S BUREAU

January 18, 2016

**VIA FAX (215-560-3133) and REGULAR MAIL**  
Administrative Law Judge Eranda Vero  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

**RECEIVED**

**JAN 21 2016**

**PUBLIC UTILITY COMMISSION  
PHILADELPHIA OFFICE  
ADMINISTRATIVE LAW JUDGE**

**Re: *Sawyer v. PGW - Docket C-2015-2504851***

Dear Judge Vero:

As you probably know, the above referenced matter is currently scheduled for an initial hearing on Wednesday, February 3, 2016 before Your Honor. The purpose of the instant correspondence is to respectfully seek a sixty (60) day continuance in light of the below stated set of circumstances.

On January 12, 2016, I filed two motions - Motion to Compel and Motion to Deem Admission Requests Admitted. Although it appears that the Respondent has already served its answers to both motions on or about Friday, January 15, 2016, as Respondent was advised on January 8th, I was out of town on business from the 10th thru 16th; therefore I will need a couple of days to review them and determine whether or not a response to said answers is appropriate. Thereafter, assuming the Respondent does not supplement its answer, Your Honor would need a reasonable time to consider both parties' positions and issue an order. Thus, by the time this discovery dispute is decided there will only be a few, *if any*, days left before the currently scheduled initial hearing.

Given this reality, I respectfully submit that the requested continuance is essential because regardless of whichever decision is made, the case will not reasonably be ready to be heard. This is true because either the Respondent will need time to supplement its non-substantive responses and accompanying document requests along with giving me time to digest the supplements or I will need time to either serve different discovery request or otherwise prepare how to properly present my case without the requested information. Consequently, I must strongly urge you grant the requested additional time.

It must be specifically noted that after emailed communications with counsel for the Respondent, I understand that PGW unequivocally objects to the instant request believing that this matter can be fairly heard in fifteen (15) days and not knowing the outcomes to the two (2)

pending discovery motions. I must admit that I am particularly uncomfortable with Respondent's predictably uncooperative position. Aside from the fact that every effort at *any* type of informal problem-solving is consistently met with unnecessary opposition (see exhibits to pending motions), PGW's current position indicates either clairvoyance or bad faith. This is true because maintaining the position that the now pending discovery motions do not reasonably suggest a need for more time to fairly hear this matter either presume that Your Honor will rule in its favor OR that the allegedly not tracked information was in fact tracked as to be immediately available upon an issuance of an order unfavorable to PGW.

Notwithstanding the insight PGW seems to have concerning the outcome of these pending motions, Complainant will unequivocally need more time to fairly present this case. Should Your Honor grant in part or in total the motions, additional information must be reviewed to determine if further discovery, documents, or witnesses (motions for subpoenas require time) will become necessary. Further, even if Your Honor decides to be fully persuaded by PGW's position, Complainant will not be able to decipher an alternative methods of presenting the matter without the requested additional time. Thus, Complainant makes the instant request notwithstanding the opposition by PGW.

Thank you for your kind attention.

Very truly yours,



Stephanie M. Sawyer, Esquire

cc: Graciela Christlieb, Esq (via email [graciela.christlieb@pgworks](mailto:graciela.christlieb@pgworks) and fax 215-684-6798)

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SECRETARY'S BUREAU

**Vero, Eranda**

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**From:** Christlieb, Graciela C <Graciela.Christlieb@pgworks.com>  
**Sent:** Tuesday, January 19, 2016 11:10 AM  
**To:** Vero, Eranda  
**Cc:** Stephanie Sawyer  
**Subject:** Sawyer request for continuance

Dear Judge Vero,

PGW objects to a continuance in this matter. The Complainant has known about the hearing date in this matter since the Prehearing Order. Everything filed by the Complainant has been responded to promptly.

The rules do not allow for the Complainant to respond to answers to motions, so the motions mentioned by the Complainant are ripe.

Nothing the Complainant has presented warrants a continuance, certainly not one as lengthy as the one requested.

Thank you,  
Grace Christlieb

Sent from my iPhone

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2016 FEB -2 AM 9:58  
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SECRETARY'S BUREAU

***STEPHANIE M. SAWYER***

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Philadelphia, PA 19102  
Tel: (267) 250-9413  
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January 21, 2016

VIA FAX (215-560-3133) and REGULAR MAIL  
Administrative Law Judge Eranda Vero  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

**RECEIVED**

**JAN 26 2016**

**PUBLIC UTILITY COMMISSION  
PHILADELPHIA OFFICE  
ADMINISTRATIVE LAW JUDGE**

Re: *Sawyer v. PGW* - Docket C-2015-2504851

Dear Judge Vero:

Since the normal mediation procedures are predicated upon both sides agreeing to participate and PGW chose not to participate, this matter went straight from a non-substantive resolution conference to the initial hearing phase where we stand today. For the reasons stated below, the purpose of the instant correspondence is to request that an assisted settlement conference be required in this matter.

On October 15, 2015 an Interim Order was issued by Chief Administrative Law Judge, Charles Rainey, Jr. requiring that the parties have a resolution conference and assigning a mediator if the conference was unsuccessful and the parties agreed to mediate. It is my belief that this Order envisioned that a genuine attempt to resolve this matter would occur; however, I must say that this never actually happened. In the instant matter *both* parties agree that PGW is owed something however since no real conference took place resolution was impossible. As I suspect you know, I just began a new job and this transition is keeping me quite busy; thus, I truly wish to resolve this matter so I can move forward. In fact, I have been seeking resolution since June of 2015 following the issuance of the March 19, 2015 Order.

While I have an unwavering belief that PGW treats customers who avail themselves to the protections offered by this Commission vastly different from those who do not, I am willing to put this issue to the side for purposes of achieving finality. However, beyond being told that PGW's records reveal a particular balance which include some disputed months, I have *never* been provided a clear understanding of the charges which PGW claims. Thus, there is currently no chance the parties alone can reach a negotiated resolution. It is my earnest hope that PGW will act in good faith by engaging in a *real dialogue* aimed at resolution; however, I unfortunately do not believe this will happen on a voluntary basis.

Given the above, I am requesting that Your Honor facilitate an assisted in-person settlement conference to expedite a resolution which can serve to obviate the need to expend additional time and energy on hearing(s) and/or appeal(s). Further, I respectfully request that this occur on February 3, 2016 as that is the currently scheduled date of the initial hearing. If Your Honor grants the instant request, I ask that the time on the 3rd be moved to mid-afternoon to avoid the need for me to miss work.

Thank you for your attention.

Very truly yours,



Stephanie M. Sawyer, Esquire

cc: Graciela Christlieb, Esq (via email [graciela.christlieb@pgworks](mailto:graciela.christlieb@pgworks) and fax 215-684-6798)



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney  
Legal Department  
Direct Dial: 215-684-6164  
FAX: 215-684-6798  
E-mail: [graciela.christlieb@pgworks.com](mailto:graciela.christlieb@pgworks.com)

January 22, 2016

Administrative Law Judge Eranda Vero  
Pennsylvania Public Utility Commission  
801 Market Street  
Suite 4063  
Philadelphia, PA 19107

**RE: Stephanie Sawyer v. Philadelphia Gas Works, Docket No. C-2015-2504851**

Dear Judge Vero:

Please accept this as the response to Stephanie Sawyer's request for an assisted in-person settlement conference before Your Honor.

Ms. Sawyer's request is predicated on the notion that the settlement conference mandated by the Interim Order dated October 15, 2015 did not occur as PGW chose not to participate. In turn, Ms. Sawyer's belief that PGW chose not to participate is due to the fact that she did not get what she wanted out of the discussion. In fact, the settlement conference mandated by the Interim Order issued on October 15, 2015 occurred, as scheduled, at the time agreed to by both parties, which was 4:00 pm on November 11, 2015. The time was selected specifically by Ms. Sawyer to accommodate her work schedule. During the settlement conference, PGW was represented by the undersigned. Also present were Tyra Jackson, Director of Regulatory Compliance and the Customer Revue Unit, and Laureto Farinas, PGW Senior Attorney. The issue raised in the Complaint was discussed and any questions Ms. Sawyer posed regarding the way in which PGW complied with the Commission's Final Opinion and Order entered on March 19, 2015 were answered by Ms. Jackson. Ms. Jackson also authorized the settlement offer that was made to Ms. Sawyer and answered the questions posed by Ms. Sawyer regarding the reasoning behind the offer that was made. Ms. Sawyer rejected the offer and, in no uncertain terms, expressed her desire for a hearing in the matter. PGW agreed that a hearing was the next logical step and informed Ms. Sawyer that a letter would be sent to the assigned mediator indicating that the settlement conference was unsuccessful and asking that the matter be set for a hearing date. Ms. Sawyer was informed that she would be cc'd on the letter. Said letter, which is attached hereto, was sent to Mediator Tiffany A. Hunt as well as Ms. Sawyer on November 13, 2015. Ms. Sawyer's instant request for an assisted in-person settlement conference is the first indication that PGW has received that Ms. Sawyer found the settlement conference in any way deficient. Given that the settlement conference **did** occur and PGW **did** participate, the only problem Ms. Sawyer actually has with the settlement conference is that it did not result in a favorable outcome for her, which is certainly not a reason to have another settlement conference (assisted or otherwise) as PGW's



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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position as expressed during the settlement conference held on November 11, 2015 has not changed.

For the reasons expressed above, PGW feels that further settlement discussions would neither assist the parties in reaching points for stipulation nor result in a settlement and, as such, do not agree to an assisted in-person settlement conference before Your Honor.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Christlieb', is written over a large, faint, circular watermark logo that resembles a flame or a stylized 'G'.

Graciela Christlieb

cc: Stephanie Sawyer (Email & Regular Mail)

## Vero, Eranda

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**From:** Stephanie Sawyer <smsesq1@gmail.com>  
**Sent:** Monday, January 25, 2016 3:16 PM  
**To:** Vero, Eranda  
**Cc:** Graciela C Christlieb  
**Subject:** Sawyer v. PGW

Dear Judge Vero:

While I still seek an in-person assisted conference to at least streamline a hearing or at best resolve the entire case I must request the following to also augment my prior continuance request. First, let me state that despite PGW's attorney's belief that no settlement can result, I whole-heartedly disagree even knowing PGW's inflexible demeanor. *This is true because my agenda for finality transcends my desire for reasonable and cordial conduct from PGW's counsel.* However, any potential resolution must be predicated upon a clear understanding of the charges PGW seeks. Thus, to deny my request for assistance in a settlement procedure will require additional time for discovery to decipher the meaning of the 72 June 25, 2015 entries on the account history received on or about January 15, 2016 and dated January 13, 2016.

This request is just a pragmatic way to reach finality where any ruling which does not appear to be based on clearly understandable grounds will not produce the finality that hopefully both parties want. I argue that judicial economy suggest that Your Honor require productive substantive interaction wherein a neutral 3rd party can at worst streamline the issues at hearing or at best resolve the matter outright.

Thank you,

Stephanie M. Sawyer

Sent from my iPhone

## Vero, Eranda

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**From:** Stephanie Sawyer <smsesq1@gmail.com>  
**Sent:** Monday, January 25, 2016 12:44 PM  
**To:** Vero, Eranda  
**Cc:** Graciela C Christlieb  
**Subject:** Sawyer v. PGW

Dear Judge Vero:

To be clear, the actual event which occurred that resulted in the letter to Ms. Hunt was a recitation of numbers arrived at by PGW. At no point did this recitation of numbers include an explanation the basis of those numbers. Specifically, I was advised that "recalculation" were done upon my request in June of 2015 which caused the balance to go from over \$14,000.00 to the approximately \$10,000.00 they now seek. Indeed, the records I have on my PGW account show 129 entries from 1/16/13 until 9/15/15 with 72 separate entries for 6/25/15. The "conference" began by me explaining where my calculations came from and PGW's attorney informing me that she was aware of my temporary appointment on or about June 30, 2014 and thereafter the PGW employee stating only numbers from their records.

While I will agree that I was not pleased with PGW's clear message that no compromises would be made on the numbers they recited, it must be crystal clear that no negotiations and/or explanations ever took place. Instead, it was a 5 or 10 minute telephone call that took place and PGW's attorney made no effort to accommodate my schedule. In fact, PGW's counsel took more than 2 weeks to return my calls and when a conversation was had to schedule the "conference" (as well as any other written and/or verbal communication) the tone was clearly uncooperative.

For all of the above stated reasons in conjunction with my prior letter, I still feel an in-person assisted substantive conference will AT LEAST streamline a hearing if not completely obviate the need for it and subsequent appeals to occur.

Thank you,

Stephanie M. Sawyer

Sent from my iPhone

## Vero, Eranda

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**From:** Christlieb, Graciela C <Graciela.Christlieb@pgworks.com>  
**Sent:** Monday, January 25, 2016 12:59 PM  
**To:** Stephanie Sawyer; Vero, Eranda  
**Subject:** RE: Sawyer v. PGW

Dear Judge Vero,

The Complainant's description of the settlement conference is grossly inaccurate and should only serve to further illustrate why PGW feels that nothing short of a full hearing before a judge and stenographer will be productive at this point. PGW does not agree to an assisted in-person settlement conference.

Thank you,

Graciela Christlieb

Graciela Christlieb  
Senior Attorney  
Legal Department  
Philadelphia Gas Works  
800 W. Montgomery Ave.  
Philadelphia, PA 19122  
Phone: 215.684.6164  
Fax: 215.684.6798

-----Original Message-----

**From:** Stephanie Sawyer [<mailto:smsesq1@gmail.com>]  
**Sent:** Monday, January 25, 2016 12:44 PM  
**To:** Vero, Eranda ([evero@pa.gov](mailto:evero@pa.gov))  
**Cc:** Christlieb, Graciela C  
**Subject:** Sawyer v. PGW

Dear Judge Vero:

To be clear, the actual event which occurred that resulted in the letter to Ms. Hunt was a recitation of numbers arrived at by PGW. At no point did this recitation of numbers include an explanation the basis of those numbers. Specifically, I was advised that "recalculation" were done upon my request in June of 2015 which caused the balance to go from over \$14,000.00 to the approximately \$10,000.00 they now seek. Indeed, the records I have on my PGW account show 129 entries from 1/16/13 until 9/15/15 with 72 separate entries for 6/25/15. The "conference" began by me explaining where my calculations came from and PGW's attorney informing me that she was aware of my temporary appointment on or about June 30, 2014 and thereafter the PGW employee stating only numbers from their records.

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Thank you,

Stephanie M. Sawyer

Sent from my iPhone

## Vero, Eranda

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**From:** Christlieb, Graciela C <Graciela.Christlieb@pgworks.com>  
**Sent:** Monday, January 25, 2016 4:24 PM  
**To:** Stephanie Sawyer; Vero, Eranda  
**Subject:** RE: Sawyer v. PGW

Dear Judge Vero,

As I am sure you are aware (though this clarification is not really for you), PGW is not the Complainant; we are not the moving party and we are not "seeking" anything.

Thank you,

Graciela Christlieb  
Senior Attorney  
Legal Department  
Philadelphia Gas Works  
800 W. Montgomery Ave.  
Philadelphia, PA 19122  
Phone: 215.684.6164  
Fax: 215.684.6798

-----Original Message-----

**From:** Stephanie Sawyer [<mailto:smsesq1@gmail.com>]  
**Sent:** Monday, January 25, 2016 3:16 PM  
**To:** [evero@pa.gov](mailto:evero@pa.gov)  
**Cc:** Christlieb, Graciela C  
**Subject:** Sawyer v. PGW

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