



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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April 5, 2016

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Verdell Reese v. PGW, Docket No. F - 2015 - 2508207**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.102, the Philadelphia Gas Works ("PGW") hereby files its response to the Complainant's exceptions filed on March 23, 2016.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,

A handwritten signature in blue ink that reads "Danielle Leva". The signature is fluid and cursive, written over a large, light blue graphic of a flame that occupies the right side of the page.

Danielle Leva

Enclosure

cc: Verdell Reese  
Office of Special Assistants  
Wendy Vacca

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Verdell Reese,</b>	:	
Complainant	:	
v.	:	<b>Docket No. F– 2015 – 2508207</b>
	:	
<b>Philadelphia Gas Works,</b>	:	
Respondent	:	

**Philadelphia Gas Works’ Response to  
Complainant’s Exceptions Filed Out of Time**

Pursuant to 52 Pa. Code §5.102, the Philadelphia Gas Works (“PGW”) hereby responds to the Complainant’s document entitled, “Exceptions of Verdell Reese...” filed on March 23, 2016, (“Exceptions document”) one day after the Commission entered its final order in the matter. PGW requests that the Commission disregard the Complainant’s Exceptions document and leave undisturbed its final order entered on March 22, 2016.

In response to the Complainant’s exceptions document, PGW states the following:

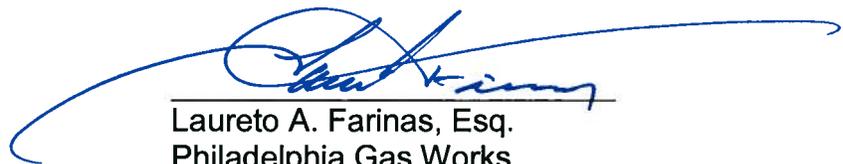
1. On October 12, 2015, the Complainant filed a formal complaint with the Commission against PGW under the above captioned Docket No. C– 2015 – 2512918 seeking a more affordable payment arrangement for gas service at 5809 Osage Avenue, Philadelphia, Pennsylvania. This was an appeal of the decision of the Bureau of Consumer Services, Case No. 3381445
2. On November 3, 2015, PGW filed an Answer to the Complaint, averring that the Complainant’s gas service was terminated for nonpayment. The account was finalized on or about April 1, 2015. The final balance is \$24,650.05.
3. By Hearing Notice dated November 13, 2015, the Commission scheduled the matter for an Initial Hearing on January 12, 2016 at 10:00 a.m. at the Commission Philadelphia Offices.
4. The Initial Hearing was commenced as scheduled on January 12, 2016. The Complainant failed to appear to prosecute her complaint. PGW moved that the matter be dismissed for failure to prosecute pursuant to 52 Pa. Code §5.245 and in accordance with Commission policy.

5. On January 28, 2016, the Commission issued the Initial Decision, granting PGW's motion to dismiss the complaint for failure to prosecute.
6. The Complainant did not file exceptions by February 17, 2016, which was the time provided by Commission regulation and the Secretary's Letter of January 28, 2016.
7. By letter dated February 19, 2016, the Commission acknowledged that the Complainant had moved from the Service Address without notifying the Commission and that the Complainant did not have sufficient time to review and file exceptions to the Initial Decision. Thus, the Commission extended the time in which Complainant had to file exceptions to March 10, 2016 and the time to file reply to exceptions to March 21, 2016.
8. The Complainant failed to file exceptions to the Initial Decision to the by March 10, 2016.
9. By Final Order entered March 22, 2016, the Commission granted PGW's motion and dismissed the complaint with prejudice for failure to appear and prosecute.
10. On March 23, 2016 the Complainant filed the Exceptions document with the Commission who, in turn, served a copy upon PGW.
11. The Exceptions document fails to state the reason for the Complainant's failure to attend and prosecute the Initial Hearing of the Complaint on January 12, 2016. It merely complains about the size of the final balance of the account for gas services including unpaid balances for gas service incurred prior to 2007. The Exceptions document attaches the original complaint and restates the request for complete forgiveness of the outstanding balance on the account and the restoration of gas service.

**WHEREFORE**, PGW respectfully requests that the Commission disregard the Complainant's Exceptions document and leave undisturbed its final order entered on March 22, 2016.

April 5, 2016

Respectfully submitted,



Laureto A. Farinas, Esq.  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

**VERIFICATION**

I, Laureto Farinas, hereby declare that I am counsel to the Philadelphia Gas Works; and that as such, I am authorized to make this verification on its behalf, that the facts set forth in the foregoing Answer are true to the best of my knowledge, information and belief, and that I expect to be able to prove these at a hearing held in this matter. I make this verification subject to the penalties of 18. Pa. C.S. §4904, pertaining to false statements to authorities.

Date: April 5, 2016

  
Laureto Farinas

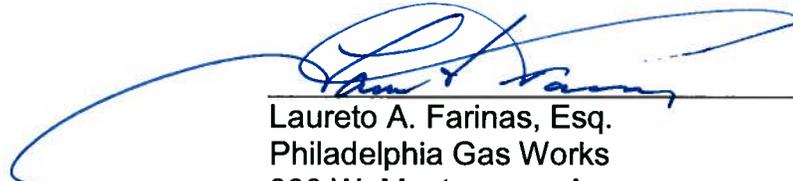
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF § 1.54 (RELATING TO SERVICE BY A PARTICIPANT).

For Complainant:

Ms. Verdell Reese  
7001 Calvin Court  
Fort Washington, MD 20744

April 5, 2016

  
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