



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney
Legal Department
Direct Dial: 215-684-6164
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May 16, 2016

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

Re: El ease Slaughter v. PGW, Docket No. C- 2016 - 2541771

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.102, the Philadelphia Gas Works (PGW) hereby files the original Motion for Summary Judgment in the above captioned matter.

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

Sincerely,


Graciela Christlieb

Enclosure

cc: El ease Slaughter (Regular Mail)
Wendy Vacca (PGW Mail)

RECEIVED

MAY 16 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Elease Slaughter

v.

Philadelphia Gas Works

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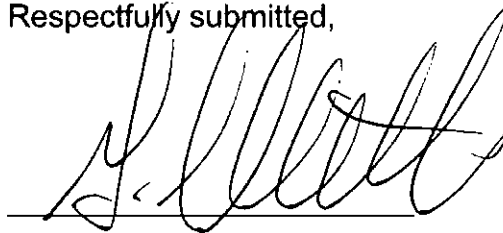
Docket No. C – 2016 – 2541771

NOTICE TO PLEAD

To: Elease Slaughter,

Pursuant to 52 Pa. Code § 5.102, you are hereby notified to file a written Answer or other response to the enclosed Motion for Summary Judgment, within twenty (20) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted and a judgment may be entered against you.

Respectfully submitted,



May 16, 2016

Graciela Christlieb, Esquire
Attorney I.D. 200760
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6164

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MAY 16 2016

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Elease Slaughter

v.

Philadelphia Gas Works

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Docket No. C – 2016 – 2541771

**Philadelphia Gas Works'
Motion For Summary Judgement**

Pursuant to 52 Pa. Code § 5.102, the Philadelphia Gas Works (PGW) hereby moves for a summary judgment dismissal of the above captioned matter on the grounds of legal insufficiency under the doctrine of res judicata and 66 Pa.C.S. § 316.

In support of this motion, PGW hereby avers the following:

1. The Complainant maintained service at 7039 Ardleigh Street from September 26, 2002 to March 24, 2008. PGW has no record of the Complainant requesting to discontinue her service at 7039 Ardleigh Street. The Complainant's service was finalized when a new applicant established service at the property.
2. On March 28, 2008, PGW generated the closing bill for service at 7039 Ardleigh Street in the amount of \$2,354.90.
3. As of November 21, 2008, the Complainant established service at the Service Address.
4. The balance of \$2,354.90 remained on the Complainant's account.
5. On November 2, 2009, the Complainant filed an informal complaint under BCS No. 2614603 claiming that she had moved out of 7039 Ardleigh Street two years prior and had contacted PGW to shut off her gas and that PGW had failed to do so, which resulted in her being incorrectly billed for service at that address.
6. On November 12, 2009, the Bureau of Consumer Services issued a decision that stated that the Complainant is responsible for the final bill for service from 7039 Ardleigh Street.

7. On January 4, 2010, the Complainant filed a Formal Complaint at Docket No. C-2010-2152309, attached hereto as Exhibit "A," disputing the amount owed from service at 7039 Ardleigh Street. The Complainant again stated that she had contacted PGW and requested a shut off when she moved out of 7039 Ardleigh Street. She alleged that PGW failed to complete the shut off, which resulted in in her being charged for service at that address instead of the person who lived there during that time.

On February 3, 2010, PGW filed an answer denying the material allegations of the complaint.

A Hearing Notice dated March 2, 2011 notified the parties that an initial hearing on the complaint was scheduled for the morning of April 11, 2011 in Philadelphia. It also notified them that they should be present when their case was called.

A Prehearing Order dated March 3, 2011 advised the parties of the date and time of the scheduled hearing and applicable procedural rules. It also advised the parties that a request for a change of the scheduled hearing date must be submitted in writing no later than five business days before the hearing, and that the case could be dismissed if they failed to obtain a continuance or failed to appear for the hearing.

On April 1, 2011, the Respondent requested a continuance of the April 11, 2011 hearing. The request was granted.

A new Hearing Notice dated April 5, 2011 notified the parties that an initial hearing on the complaint was scheduled for May 16, 2011 in Philadelphia. On the date of this hearing, the Complainant failed to appear; Laureto A. Farinas, Esquire, appeared on behalf of PGW. He moved to dismiss the complaint with prejudice for lack of prosecution.

On June 17, 2011, the Commission issued the Initial Decision, which granted PGW's motion to dismiss the matter with prejudice. The Initial Decision was accompanied by a Secretarial Letter, attached hereto as Exhibit "B," which outlined the procedure for filing Exceptions.

No Exceptions were filed and, on July 20, 2011, the Commission issued a Final Order in the matter, which is attached hereto as Exhibit "C."

8. On April 27, 2016, the Commission served PGW with the instant Complaint under Docket No. C-2016-2541771 wherein the Complainant once again contests the

amount owed from 7039 Ardleigh Street and states that she called to have PGW shut off her service, which she claims PGW failed to do.

9. 66 Pa.C.S. § 316 states, in relevant part, that:

Whenever the commission shall make any rule, regulation, finding, determination or order, the same shall be prima facie evidence of the facts found and shall remain conclusive upon all parties affected thereby, unless set aside, annulled or modified on judicial review.

This section of the Public Utility Code precludes a collateral attack upon a Commission order that has not been reversed upon appeal; it operates to preclude litigants from pursuing the same claims that have been previously resolved by the Commission.

10. The Commission views dismissal with prejudice as disposing of the claimant's rights to pursue any further remedy on a claim, being the equivalent of an action on the merits of the case. *Roy Winston v. Philadelphia Gas Works*, Docket No. C-2010-2181504 (Final Order entered April 16, 2012).

Under 66 Pa.C.S. § 316, the Commission's dismissal with prejudice of the complaint at Docket No. C-2010-2152309 is binding on all parties unless set aside, annulled, or modified on judicial review.

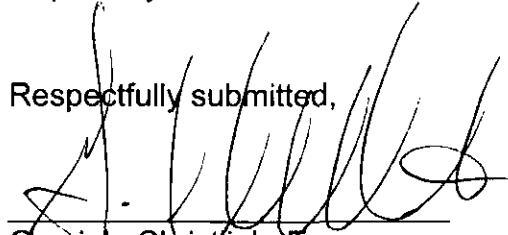
In this case, the Complainant seeks to re-litigate the same complaint that had already been filed in 2010. The Complainant was afforded the opportunity to have her day in court, but, instead, failed to appear for the scheduled hearing.

10. The doctrine of res judicata reflects the refusal of the law to tolerate the relitigation of a matter decided by a court of competent jurisdiction and is applicable here. The essential inquiry is whether the ultimate and controlling issues have been decided in a prior proceeding where the parties had an opportunity to appear and to be heard. *Stevens Painton Corp. v. First State Ins. Co.*, 746 A.2d 649 (2000).

WHEREFORE, PGW respectfully requests that pursuant to the doctrine of res judicata as well as under 66 Pa.C.S. § 316, the Commission dismiss the instant complaint as a matter previously decided by a court of competent jurisdiction.

May 16, 2016

Respectfully submitted,



Graciela Christlieb, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

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MAY 16 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

A

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

C-2010-2152309

Please print in ink or type.

1. CUSTOMER (COMPLAINANT) INFORMATION

ORIGINAL

Your name, mailing address, county, telephone number, utility account number and service address:

Name Elease Slaughter

Street/P.O. Box 3745 N. HOLM ST Apt # _____

City Philadelphia State PA Zip 19140

County Philadelphia

Daytime Telephone Number Where We Can Contact You: (267) 977-1491

E-mail Address (optional): Invest@z@aComcast.net

Utility Account Number _____
(from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name Elease Slaughter

Street/P.O. Box 7039 Ardleigh St

City Philadelphia State PA Zip 19119

2. FULL NAME OF UTILITY COMPANY (RESPONDENT):

PGW (Philadelphia Gas Works)

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER

(e.g., taxi, moving company, limousine)

TELEPHONE
(local, long distance)

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4. **COMPLAINT** (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- XX There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other (explain).

B. State the facts of your complaint.

Include any specific dates, times or places that may be important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

I was no longer living in the property after 9/26/2006. Prior to that date, I contacted all the utility companies and request shut off. Your rep. Linda Gagnon told me she spoke with someone who verified that I contacted the other ones for shut off. Why would I not call the gas company? Linda also told me she had pulled my credit report (without my permission) stating where I lived. Linda also stated that I'm not responsible for the bill. Then I received the letter stating that I'm responsible. I called Linda back who recanted her statement and stated that she should have called me back to let me know about the change. This was very unprofessional and I deserved to receive a call regarding the changes prior to the letter going out; she called me for everything else; why not that also. Where is the consistency?

5. **RELIEF**

How do you want your complaint to be resolved? Use additional paper if you need more space.

To make the person who falsely used my name and gas account fraudulently pay the bill because I called the gas company however, the gas company employee did not complete my request. This is not my fault. I feel that you are bias in this decision to hold me responsible and I am not treated fairly, I don't feel I should be paying for someone's mistakes.

In closing, I would like to say that I am a full-time student and work part-time 1 day a week @\$6.00 an hour for 6 hours; weekly gross is \$36.00 and monthly gross is \$144.00. I am not in a position to take on someone's responsibilities. I'm struggling to keep up with bills as it is. This is a hardship.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility **AND** your complaint is about a billing problem, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety or welfare?

YES
NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES (includes appeals of BCS determinations)
NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

9. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification: Elease Slaughter, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that 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. § 4904 (relating to unsworn falsification to authorities).

Elease Slaughter (Signature) 12/28/09 (Date)

Title of authorized employee or officer

10. FILING

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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Facsimiles and/or electronic filings of the complaint will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

RECEIVED

MAY 16 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print in ink or type.

1. CUSTOMER (COMPLAINANT) INFORMATION

Your name, mailing address, county, telephone number, utility account number and service address:

Name Elease Slaughter
Street/P.O. Box 3745 N. 16th St Apt # 2nd floor
City Phila, State PA Zip19140

County Philadelphia

Daytime Telephone Number Where We Can Contact You: (267)977-1491

E-mail Address (optional): _____

Utility Account Number _____
(from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name Elease Slaughter

Street/P.O. Box 7039 Ardleigh Street _____

City Phila, State PA Zip 19119 _____

2. FULL NAME OF UTILITY COMPANY (RESPONDENT):

Philadelphia Gas Works

3. TYPE OF UTILITY (check one)

ELECTRIC

GAS

WATER

TELEPHONE

(local, long distance)

STEAM HEAT

WASTE WATER

MOTOR CARRIER

(e.g., taxi, moving company, limousine)

8. **LEGAL REPRESENTATION (IF ANY)**

If you are represented by a lawyer in this matter you must provide your lawyer's name, address, telephone number, and e-mail address, if known.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

E-mail Address (If Known) _____

9. **VERIFICATION AND SIGNATURE**

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:

I, Eliese Slaughter, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that 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. § 4904 (relating to unsworn falsification to authorities).

Eliese Slaughter
1/12/10 _____
(Signature) (Date)

Title of authorized employee or officer

10. **FILING**

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service service: _____ If using overnight delivery service: _____

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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B



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

June 17, 2011

C-2010-2152309

TO ALL PARTIES:

Elcase Slaughter
v.
Philadelphia Gas Works

TO WHOM IT MAY CONCERN:

Enclosed is a copy of the Initial Decision of the Office of Administrative Law Judge.

If you do not agree with any part of this decision, you may send written comments (called Exceptions) to the Commission. An original and nine (9) copies of your signed Exceptions to the decision, if any, **MUST BE FILED WITHIN TWENTY (20) DAYS OF THE ISSUANCE DATE OF THIS LETTER**, WITH THE SECRETARY OF THE COMMISSION, 2ND FLOOR, KEYSTONE BUILDING, 400 NORTH STREET, HARRISBURG, PA; OR, MAILED TO P.O. BOX 3265, HARRISBURG, PA 17105-3265; OR DOCUMENTS MAY BE E-FILED ACCORDING TO THE E-FILING PROCEDURES.

IN ADDITION, **BY THE SAME DATE AND TIME INDICATED ABOVE**, A COPY OF EXCEPTIONS MUST BE IN THE HANDS OF THE OFFICE OF SPECIAL ASSISTANTS, 3RD FLOOR, KEYSTONE BUILDING, 400 NORTH STREET, HARRISBURG, PA; AND, A COPY IN THE HANDS OF EACH PARTY OF RECORD. 52 Pa. Code §1.56(b) cannot be used to extend the prescribed period for the filing of Exceptions or Replies to Exceptions.

Parties are also requested to provide the Commission's Office of Special Assistants with a copy of the Exceptions or Replies to Exceptions on CD-ROM or DVD, in Microsoft Word 2007 format. If Word 2007 is not available, any Microsoft Office compatible format is acceptable including PDF.

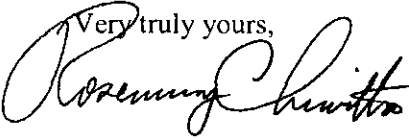
Replies to Exceptions, if any, must be served on the Secretary of the Commission, Office of Special Assistants, and each party of record, in the manner described above, **WITHIN TEN (10) DAYS OF THE DATE THAT THE EXCEPTIONS ARE DUE**.

It is your responsibility to serve all the parties with your Exceptions and Replies to Exceptions. Failure to do so may render your filing unacceptable. A certificate of service shall be attached to the filed Exceptions or Replies to Exceptions.

Exceptions and Replies to Exceptions shall obey 52 Pa. Code 5.533 and 5.535 particularly the 40-page limit for Exceptions and the 25-page limit for Replies to Exceptions. Exceptions should clearly be labeled as "EXCEPTIONS OF (name of party) - (protestant, complainant, staff, etc.)". Any reference to specific sections of the Administrative Law Judge's Initial Decision shall include the page number(s) of the cited section of the decision.

If no Exceptions are received, the decision of the Administrative Law Judge may become final without further Commission action. You will receive written notification if this occurs.

JF
Encls.
Certified Mail
Receipt Requested

Very truly yours,


Rosemary Chiavetta
Secretary

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Elease Slaughter

v.

Philadelphia Gas Works

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C-2010-2152309

INITIAL DECISION

Before
Ky Van Nguyen
Administrative Law Judge

HISTORY OF THE PROCEEDINGS

On January 4, 2010, Elease Slaughter (Complainant) filed a complaint with the Pennsylvania Public Utility Commission (Commission) against Philadelphia Gas Works (Respondent) alleging a billing dispute. The Respondent filed an answer dated February 3, 2010 denying the material allegations of the complaint.

A Hearing Notice dated March 2, 2011 notified the parties that an initial hearing on the complaint was scheduled for the morning of April 11, 2011 in Philadelphia. It also notified them that they should be present when their case was called.

A Prehearing Order dated March 3, 2011 advised the parties of the date and time of the scheduled hearing and applicable procedural rules. It also advised the parties that a request for a change of the scheduled hearing date must be submitted in writing no later than five business days before the hearing, and that the case could be dismissed if they failed to obtain a continuance or failed to appear for the hearing.

On April 1, 2011, the Respondent requested a continuance of the April 11, 2011 hearing because counsel for the Respondent had to meet with the Chief Administrative Law Judge to discuss general procedural issues on the administration of formal complaints. The request was granted.

Another Hearing Notice dated April 5, 2011 scheduled a hearing for May 16, 2011. On the date of this hearing, the Complainant failed to appear; Laureto A. Farinas, Esquire, appeared on behalf of the Respondent. He moved to dismiss the complaint with prejudice for lack of prosecution. This motion will be granted in the ordering paragraph below.

The record closed at the conclusion of the hearing on May 16, 2011.

FINDINGS OF FACT

1. The Complainant lives at _____, Philadelphia, PA.
2. The Complainant was provided a proper notice of the hearing.
3. The Complainant failed to appear at the hearing.

DISCUSSION

Section 332(a) of the Public Utility Code, 66 Pa. C.S. §332(a),¹ provides that the party seeking relief from the Commission has the “burden of proof.” “Burden of proof” is a duty to establish a fact by a “preponderance of the evidence.” The term “preponderance of the evidence” means that one party has presented evidence which is more convincing, by even the smallest amount, than the evidence presented by the other party. Se-Ling Hosiery v. Margulies, 364 Pa. 45, 70 A.2d 854 (1950). In other words, “preponderance” is not dependent on the

¹ Section 332(a) of the Public Utility Code provides:

(a) Burden of Proof. – Except as may be otherwise provided in section 315 (relating to burden of proof) or other provisions of this part or other relevant statute, the proponent of a rule or order has the burden of proof.

number of witnesses testifying on either side but rather on the credibility of the testimony in the light of all the evidence in a case. Burch v. Reading Co., 240 F.2d 574 (3d Cir. 1957) cert. denied, 353 U.S. 965 (1957). The Pennsylvania Supreme Court has characterized a preponderance of the evidence as tantamount to a “more likely than not” inquiry. Commonwealth v. \$6,425 Seized From Esquilin, 583 Pa. 544, 555, 880 A.2d 523, 529 (2005).

Under these principles the Complainant has the burden of proving by a preponderance of the evidence that the Respondent was responsible for the problems described in her complaint. The Complainant could not sustain the burden of proof because she did not appear at the hearing.

The Commission has ruled that a lack of compliance with an administrative law judge’s order or the Commission’s procedural requirements provides justification for the Commission to act against the non-complying party. It has dismissed a complaint without a hearing when a complainant corporation failed to have counsel file a notice of appearance by a certain date, Snyderville Community Development Corporation v. Philadelphia Gas Works, Docket No. C-20055032, 2006 Pa. PUC LEXIS 64 (July 31, 2006), when a complainant failed to participate in a settlement, Treffinger v. PPL Electric Utilities Corp., Docket No. C-20027978, 2003 Pa. PUC LEXIS 3 (March 3, 2003), or a protest when a corporate protestant failed to be represented by counsel. Application of Black Diamond Cab Co., Inc., Docket No. A-00122566 (Pa. PUC December 1, 2006).

Further, the Commission satisfied the requirement of giving administrative due process to the Complainant by providing timely notice of the hearing and the opportunity to be heard. Schneider v. Pa. PUC, 479 A.2d 10 (Pa. Cmwlth. 1984). The Commission’s Hearing Notice of April 5, 2011, which informed the parties of the day, date and time of the hearing in this case, was mailed to the Complainant at the address provided on the formal complaint form. The Commission’s Hearing Notice has not been returned by the United States Postal Service. Therefore it is presumed that the Complainant received the Commission’s notice of the hearing. Berkowitz v. Mayflower Securities, Inc., 317 A.2d 584 (Pa. 1974); Meierdierck v. Miller, 147 A.2d 406 (Pa. 1959); Judge v. Celina Mutual Ins. Co., 449 A.2d 658 (Pa. Super. 1982); Samaras v. Hartwick, 697 A.2d 71 (Pa. Super. 1997).

Once timely notice of a hearing and the opportunity to be heard have been provided, it is then the responsibility of the parties to be present and participate in the hearing. Craig Sentner v. Bell Telephone Co. of Pennsylvania, Docket No. F-00161106 (Pa. PUC October 25, 1993). The Commission has held that when a complainant fails to be present at a scheduled hearing, then the complaint is to be dismissed, with prejudice. Darling v. Philadelphia Electric Company, Docket No. F-00161139 (Pa. PUC November 16, 1993).

CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the parties and the subject matter of this proceeding. 66 Pa. C.S. §701.
2. The Complainant has failed to carry her burden of proof.

ORDER

THEREFORE,

IT IS ORDERED:

1. That the Respondent's Motion to Dismiss the complaint with prejudice is granted.
2. That the complaint filed by Eleese Slaughter against Philadelphia Gas Works at Docket No. C-2010-2152309 is dismissed with prejudice.

Date: May 18, 2011

Ky Van Nguyen
Administrative Law Judge

C

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265

Elease Slaughter

v.

Philadelphia Gas Works

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C-2010-2152309

FINAL ORDER

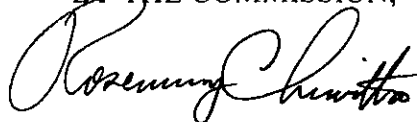
In accordance with the provisions of Section 332(h) of the Public Utility Code, 66 Pa. C.S. §332(h), the decision of Administrative Law Judge Ky Van Nguyen dated May 18, 2011, has become final without further Commission action;

THEREFORE,

IT IS ORDERED:

1. That the Respondent's Motion to Dismiss the complaint with prejudice is granted.
2. That the complaint filed by Elease Slaughter against Philadelphia Gas Works at Docket No. C-2010-2152309 is dismissed with prejudice.

BY THE COMMISSION,



Rosemary Chiavetta
Secretary

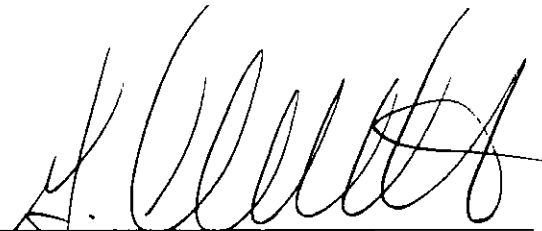
(SEAL)

ORDER ENTERED: July 28, 2011

VERIFICATION

I, Graciela Christlieb, 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.

May 16, 2016



Graciela Christlieb, Esq.

RECEIVED

MAY 16 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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).

Service List

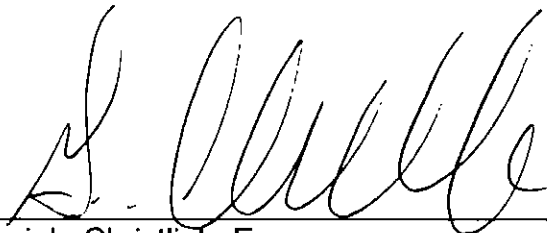
Ms. Elease Slaughter
3745 N. 16th Street
2nd Floor
Philadelphia, PA 19140

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May 16, 2016



Graciela Christlieb, Esq.
Philadelphia Gas Works
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215-684-6162