

BEFORE
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

vs.

Docket No. C-2016-2567445

Philadelphia Gas Works, Respondent

**FILING OF EXCEPTIONS OF JUDGE SALAPAS' ORDER
SUSTAINING PRELIMINARY OBJECTIONS IN PART**

Due to Previous and Present Injuries, Sickness, Covert Tactics, Lack of Funding Issues, Cyber Attacks, Transportation, Other Legal Cases, and etc..., the Complainant has not been able to submit her Exceptions regarding the Order of Judge David A. Salapas. I write the above and the below statements to displayed what the Complainant has been and continues to be subjected to that necessitate the need for a continuance as well as the ability to finally respond to the Judge's Orders as well as to amend the Complainant's Responses to PGW's Objections.

Since December 05, 2011 to present, the Complainant has been fighting her Employer over her PA's Workers' Compensation (WC) Case; in which, she had a total of four different Attorneys, who have ALL shown their solidarity to the Defendants and the Judges that has forced the Complainant to continue to fight for her rights, benefits, health, her life, and etc... as a Pro se Litigant. On January 28, 2015, while still being represented by Legal Counsels in her WC Case, the Complainant's Bi-weekly Loss Wages were illegally stopped by the Employer, Defendants, Defendant's Attorney, the Judge, and it was done with the Duplicity of the Complainant's own Attorneys because according to the WC Laws and the Rules and Regulations of the WC Act, a Complainant's Loss Wages can not be terminated unless there was new Medical Evidence to prove that the Claimant (Complainant) had fully recovered from her injuries or that the Claimant had returned to work; in which, neither was, the situation with the Complainant. The Complainant stills remains totally and permanently disabled. The judges also allowed the Complainant's own Attorney, Employer, Defendants, Defendants' Attorney, and etc... to violate it's own Rule 314 Judge Order of providing Medical Care, Medical Treatments, and etc... to the Complainant for her Work Related Injuries and Worsening Conditions.

Since November, 2015, the Complainant has been complaining of her Traceha moving in one direction; while, her Cervical Spine going in the opposite direction. The Complainant's Attorneys, Employer, Defendants, Defendant's Attorney, and the Judge refused to make the Defendants pay for further studies, care, treatments, and etc...; while, the WC Case was still under litigation. No Judge's Decisions have been made at that time. Thus, they refused to pay for the Complainant's MRI Studies of her Cervical and Lumbar Spines, and boldly violated the law, the WC Act, and etc... as well as jeopardized the Complainant's health and her life. The MRI Studies were finally done almost a year later via Medicaid due to the Complainant's continual complaints, injuries and worsening conditions, and etc... Also, in May, 2016, Complainant's Spine had shifted for the fifth time, and still nothing was done about it. Finally, in September,

2016, a MRI of the Cervical and Lumbar Spines were done based on abnormalities that were revealed via CT Scan of the Spine. These MRI Studies proved the continual Spinal Damages, continual Herniations, new Herniations, and etc...

Based on the WC's Judge's Abuses of Power, Abuses of Discretions, Biases, Violations, Prejudices, and etc..., the Complainant has been fighting for the Judge's Recusal to the WCAB - Workers' Compensation Appeal Board to the Commonwealth Court of Pennsylvania (CCP) to the Supreme Court of Pennsylvania (SCP), and due to Covert Tactics, Cyber Attacks to Complainant's Computer and Printer, and etc..., they have prevented the Complainant from effectively filing her Writ of Certiorari to the United States Supreme Court in Washington, DC. The Complainant has proven each courts' (WCAB, CCP, and SCP) level of fraud, deceit, violations, and etc...; thus, still proving the Collusion in these cases; instead, of each court performing their own appellate prerogative corrections on the lower courts. While still fighting these cases, the Complainant was fighting another round of Appeals, and etc... as well as presently fighting Appeals again, now to the Commonwealth Court of Pennsylvania.

Then, as of January 17, 2017, a Court of Common Pleas Judge illegally allowed the Complainant's Lawyer in her cases against SEPTA to withdraw his representation of the Complainant based of false, slanderous, and libel statements, and etc..., and verbally ordered the Complainant to take her case on as a Pro se Litigant because she had already denied the Complainant time to obtain another Attorney to further litigate these SEPTA's Cases. The Complainant is not a lawyer. Thus, she is forced to handle all of these cases on her own. As stated previously, a family member (said home owner) became critically ill, and was placed in the Critical Care Unit; in which, we spent the entire days and nights in the hospital. Then, his acute illness continued for a couple of weeks to months. In addition, the Complainant continued to try to deal with these issues and more; while, trying to litigate the Philadelphia Gas Works' Case via PUC. Then, the Complainant's WC Injuries and Worsening Conditions, and etc... started taking additional and continual tolls on the Complainant that it affected the Complainant's ability to effectively handle this PUC Complaint against PGW as to why the Complainant still need more time to fully litigate this case. Please see Exhibit A - Copy of the Letter written to you via email on April 20, 2017.

The Complainant was finally able to file a Formal Complaint Form (form dated September 19, 2016) with the PUC - Public Utility Commission via online services on or about September 19-20, 2016, regarding the violations, bad faith, plans of theft of property, pervasive illegal and fraudulent billing and business practices, inaccurate and fraudulent gas meter readings, and etc... of PGW and the City of Philadelphia. However, a year prior to filing her **Formal** Complaint, the Complainant filed an **Informal** Complaint with the PUC pursuant to the PUC's Regulation 52 Pa. Code 56.162, and nothing was ever done by the PUC - no investigation, and etc...

The Complainant takes exceptions/objects to the following:

1. Gas Services were not in the name of the Complainant from December, 2007 through May, 2008. Poof is demanded.
2. The Complainant is entitled to know the name that Gas Services were in from May, 2008 and November, 2014.

3. Even though the PUC stated that they do not have control over the Liens placed on said property, but the PUC has control over the alleged amount/bills that the Respondents claimed that are owed that led to the Liens being placed on the property at 1629 Newport Place in Philadelphia, PA 19122.
4. Objects to the inaccurate calculations and the violations of denial of the tolling of the Statute of Limitation that is preventing the Complainant from litigating the Liens and Bills that lead up to the Lien for the year of 2006.
5. Take exception as to why the Respondent are allowed to violate the Municipal Claim Tax Lien Law. Even in *Lea Augustin, et. al v. City of Philadelphia - 2016 U.S. Dist. LEXIS 35142 (E.D. Pa. 2016)* the U.S. District Court held that the City of Philadelphia/Philadelphia Gas Works procedure for imposing Liens violates Plaintiffs' due process rights under the Constitution.
6. Disagreed with the alleged amounts that the Respondent claimed that is owed that led to the alleged "outstanding liens".
7. Objects to the Respondent trying to have the Complainant's Complaint dismissed.
8. Disagreed, the PUC does not lack jurisdiction over the subject matter in the complaint, especially pertaining to the Gas Bills as well as the Complaint does involve pertinent matter in it request for relief. The Complainant has listed her requested relief for the fraudulent Gas Bills, fees, fines, and etc...
9. According to the law, Partial Relief is not beyond the commission authority.
10. Also, please see the Complainant's Amended Responses to the Respondent's Preliminary Objections.

Sign  Date April 25, 2017

CERTIFICATE OF SERVICE

I, certify that I serve a true copy of the Complainant's FILING OF
 EXCEPTIONS OF JUDGE SALAPAS' ORDER SUSTAINING PRELIMINARY
 OBJECTIONS IN PART to the Respondent via their Attorney a
 graciela.christieb@^{pgws}pgws.com today.

Signed  Date April 25, 2017
 Debbie Hughey, Pro se

Exhibit A

Emailed to: ~~REDACTED~~
From: Debbie Hughey
To: Judge Salapa of PA Public Utility Commission
RE: Graciela C. Christieb - Attorney for PGW
Docket No. C - 2016-2567445
April 20, 2017

Dear Judge Salapa:

First of all, I am writing you in reference to what Ms. Christieb have written, and emailed to you yesterday. The first time that I had contacted Ms. Christieb about the first hearing postponement, I had to keep calling, and emailing, with no returns. Eventually, I was able to finally get in contact with her. This time, I did not have a chance to contact her before submitting my requests because I was already rushing to attend my doctor's appointment. My Internet Service was even giving me so much delay that I had to try to submit my Motions, while trying to submit a copy to her; however, I was able to finally succeed in my submissions to both the PUC as well as to Ms. Christieb, and I objects to her objects, the truth must come out, and justice needs more time to prevail.

Secondly, I had already faxed you a copy (yesterday) of the motion that I had already emailed her regarding my request for more time. Also, I had already served her with a copy of my Motion to Compel as well as my Re-Submitted and Additions Motion to Compel. Please see attachment.

Thirdly, I did not fully wanted to list most of the things that I had as well as still are being subjected to that still necessities my needs for additional time; especially, additional time to obtain witnesses, documents, answers from PGW, affidavits, evidence, and etc..., but I will list some of them within this letter.

Fourthly, as of December 05, 2011, I remained out of work due to injuries on the job. Some of my injuries were and still are: Bilateral Sacroiliitis; whereas, I can not sit for long or short periods of time; sometimes, without being numbered in the sacral, vaginal, rectal, hips, thighs, legs, feet, ankles, and etc... areas; Myofasciitis, Cervical and Lumbar Herniations; which, affect my ability to urinate and defecate. I am a woman of over 50 years old of age that has been forced to wear diapers due to being incontinence of bowel and bladder based on my Spinal Damages, Neurology Problems, and etc... Also, due to the herniations, I can barely walk sometimes. I walk with a cane or a rollator. I also have Bilateral Shoulder Tears, and etc... My Left Shoulder Tendons are hanging out of it's sock, and surgery still has not been done; Heart and Lungs Issues; Muscle Damages, Muscle Weakness, Muscle Electrocutation, Mytosis, Myglia, and etc... Further proof of worsening Spinal Damages and additional Herniations were finally proven by MRIs of September, 2016. Due to Attorneys' and Judges' Violations, Abuses of Power, and etc..., I was **forced** to handle my WC (Workers' Compensation) Cases Pro se. Also, I have been **forced** to handle my WCAB (Workers' Compensation Appeal Board Bureau) Cases Pro se; likewise, handling my cases to the Commonwealth Court of Pa, Supreme Court of PA as Pro se. I am not a lawyer, and I have to learn as I go. Presently, I am **FORCED** to handle the following cases as Pro se as well: Court of Common Pleas, Commonwealth Court of PA, Superior Court, Supreme Court, Writ of Certiorari to the Untied States of America Supreme Court, back to Workers'

Compensation again, and the PUC Case. Even though my IFP - In Forma Pauperis has been approved in the courts' system, I still do not have enough money to continue to fight all of these entities, living off of \$148.59 per month, but about \$102.00 has already claimed for repayment of loan. Thus, I have been during this all as a Pro se Litigant with less than \$150.00 month and \$194.00 in food stamps. Thus, money needed for copies, mailing, faxing, and etc... I must borrow. Then as of January 17, 2017, the Judge in my SEPTA Cases forced me to functioned as a Pro se Litigant, based on her efforts of duplicity of trying to allow SEPTA to win over the Plaintiff, and as of last week, I had to prepare documents for the Superior Court Battle. Please keep in mind that I had already borrow over \$125.00 at the beginning of the month, just to handle what I had already handled.

Fifthly, if you may recall, we had to handle a family member illness, Mr. James Hughey (owner of said property); whereas, we stayed a couple of days and nights at the hospital; while, he was in the Intensive Care as well as when he was moved to a heart monitoring floor. Then he had to go back and forth for doctors appointments. Then, my injuries continued to take a toll on my body, and started to be even more worst. I had heart issues that needed to be addressed, and yesterday, I obtained the results of my 2D Echo; even though, my follow-up with the Cardiologist would have to be when I obtain additional money for transportation, and the earliest appointment that I could obtain was for May, 2017. Also, additional Heart Study (Stress Test) is pending. Every since November, 2015, I have been complaining about how my Trachea had shifted to one side; while my Cervical Spine has shifted in the opposite direction. My employer as well as the WC's Judge continued to allow my employer to violate the laws by refusing to provide me with Medical Care and Treatments for my Work Related Injuries and Worsening Conditions. Also, my employer as well as the WC Judge continued to violate the laws by illegally terminating my WC Indemnity Checks, since January 19, 2015; whereas, my injuries did not and have not improved, and my doctor kept me out of work due to being totally and permanently disabled. Due to the Herniations in my Cervical and Lumbar Spines, I am not able to do a lot of work on my computer. It takes me a while to produce the necessary documents. My hands, fingers, arms, wrists, and etc... still becomes numbed, fatigued, swollen, and etc... that it takes me a long time; in order, to submit a document or two. I have been juggling all of this, and that is why, I never had the opportunity to effectively response to the judge or PGW's previous objectives; even though, I obtained a great deal of research that proved PGW's illegal moves of violating the laws, but due to my **FORCED** Pro se Status, my injuries as well as other issues, I continue to do my best, and hold my head above water. I feel as though with my other medical and legal scheduling, I will be able to litigate this PUC, if the hearing of April 25, 2017 is post pone, just one last time, by rescheduling the hearing for 60 days from now, pending PGW's willingness to honor discovery, and provide the requested documents, questions, and etc..., and as stated, please see attachment of Motion to Compel that was recently filed.

Recently, within the last two weeks, I started having more problems; whereas, I started feeling pressure and pain anteriorly and posteriorly on my Aorta, Neck, Throat, and thyroid, but it took over a week and a half before evening receiving a denial of medical treatment/studies from my Medicaid Insurance. However, because I kept pressuring the issues with problems swallowing, talking, and food keeps coming back up my throat, another doctor finally called the insurance company, and did a peer review; in which, the two studies were finally ordered, and one is pending, and one confirmed what

is pressing on my throat, and I have a follow-up with the medical doctors next week, pending funds for transportation. I barely had enough money to fax a copy of my Motion for additional time, yesterday.

Lastly, I hope that you would please give me enough time of more than 30 days, preferably 60 days or more to continue to effectively litigate our case with the PUC against PGW. In addition to our lives being at stake, our home and property are at stake as well. I look forward to your respond. Thank you.

Respectfully your,



Ms. Debbie Hughey

cc: files

cc: Ms. Christieb

P. S. Please inform me of how to obtain a Subpoena for this case; when, I called the PUC, no one knows how.