

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

v.

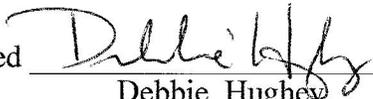
Docket No. C - 2016-2567445

Philadelphia Gas Works (PGW),
Respondents

REQUEST FOR SANCTIONS AGAINST THE RESPONDENTS - PGW

On April 19, 2017, the Complainant requested of PGW to answer and supply requests as directed in the Complainant's Resubmissions and Additions - Motion to Compel Documents, Records, and Questions Answered by PGW (Exhibit A). It has been over 20 days, since the Respondents have been served on April 19, 2017, and the Respondents still refused to supply the Complainant with the requested information and documentation as of May 12, 2017 at 06:08 am.

Thus, the Complainant is seeking sanctions against the Philadelphia Gas Works as well as a ruling in her favor that not only does the Complainant do not owe PGW or the City of Philadelphia the amounts in question, and that the bills/amounts listed in the court records as Satisfied, and the Liens be removed as well as the Complainant receives a full refund, along with interest and penalties, of all of the monies that have been paid since 2006 to present. Also, a ruling in favor of the Complainant that PGW is responsible for all reconNECTIONS fees, lawyer fees, costs, expenses, collections fees, and any other financial charges, and anything else that the Complainant is entitle to by law. In addition, that PGW be required to replace the Digital Gas Meter free of charge.

Signed  Date April 12, 2017
Debbie Hughey

CERTIFICATE OF SERVICE

I certify that I have electronically served the Respondents with a copy of the Complainant's Request for sanctions to their Attorney on May 12, 2017.

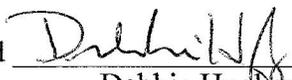
Signed  Date 04/12/17
Debbie Hughey

Exhibit A

THE PENNSYLVANIA'S PUBLIC UTILITY COMMISSION

RESUBMISSIONS AND ADDITIONS

Debbie Hughey, Complainant

vs.

Docket No. C - 2016-2567445

PGW - Philadelphia Gas Works, Public Utility

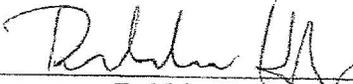
MOTION TO COMPEL DOCUMENTS, RECORDS, AND QUESTIONS ANSWERED BY PGW

The Complainant is requesting the following from PGW:

1. A copy of the alleged agreement that PGW claimed was made with Complainant prior to PGW turning on the Gas Service at 1629 Newport Place in Philadelphia, PA 19122 in November, 2014.
2. Why was the Complainant forced to give a copy of the Deed to said property; in order, to have the gas turned on, in November, 2014 ?
3. Is it a standard practice to require Customers to submit a copy of their Deed; in order, to obtain Gas Services, and if so, when did this practice started and why ?
4. What were the determining factors and requests as to why the Gas Service was turned on by PGW in November, 2014 ?
5. What were the amounts of the Deposits/Down Payments that the Complainant was required to pay, and why ?
6. Was any Deposits or Down Payments ever returned to the Complainant, and if so, when, and if not, why not ?
7. Was any Deposits or Down Payments applied to any Gas Bills, and if so, when and why ?
8. Need an itemization of what happened to the Deposits/Down Payments that the Complainant paid ?
9. Why were Deposits/Down Payments required to start new Gas Service under the Complainant's Name ?
10. Why are there higher charges for Gas Services during the Spring and Summer Months; whereas, less Gas was used during those times ?
11. Need copies of All Gas Bills from 2014 to present.
12. Why is it that page numbered two is missing from ALL PGW's Gas Bill ?

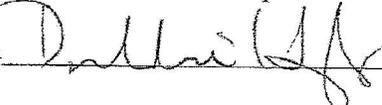
13. Why is it that we never received a Lien Notice for the year of 2006 ?
14. Verify and supply copies of all Liens that have been placed on said Property by the City of Philadelphia and or by PGW.
15. Why are we being denied the ability to submit a Defendant's Affidavit on the Court's (Common Pleas) Records ?
16. Need a copy of Work Order for June, 2016 as to why PGW's Work Men came back out to our house to allegedly turn the gas off again that was already turned off ?
17. Need a copy of the Gas Meter Reading when the gas was shut-off in April, 2016 ?
18. Need a copy of what the gas reading was prior to as well as after the Gas Service was turned off again in June, 2016 ?
19. Need a copy of the Work Order as to why two different PGW's Work Men were at said property on the same day and same time, to place Digital Gas Meters in the house at 1629 Newport Place in Philadelphia, PA in 2014?
20. Need copies of the two PGW's Work Men's Identification Cards (with their names, titles, and faces clearly shown) that came to place the Digital Gas Meters in the Complainant's House in November, 2014.
21. Need copies of the two PGW's Work Trucks along with the Truck's Vehicle License Tags and Vehicle ID Numbers that were driven to said property in 2014 on the day that the Digital Gas Meters were placed.
22. Need copies of the PGW's Worker who was assigned to place the new Digital Gas Meter.
23. Need the name, title, and a copy of the PGW's Supervisor's ID Card that came out, after we again called PGW about the Black PGW Worker's weird behaviors, still constantly refusing to tell the Complainant and her family his name, and etc...
24. Copies of all call logs to and from PGW (and etc...) pertaining to the Complainant and/or said property located at 1629 Newport Place in Philadelphia, PA.
25. Copies of ALL Emergency Calls and Reports made for Gas Leaks/Gas Smells at said property.
26. Copies of the Medical necessary Certificates that were obtained for James Hughey's physician; in order, to keep the Gas Service on.
27. Copies of ALL PGW's Bills from 2014 to present.
28. Copies of the Gas Reading before Gas Service was turned on in 2014 as well as Gas Reading when the Gas Service was cut off in 2016, and Gas Reading on the day that the PGW's Work Men came out to cut the Gas Service off again (later in 2016).

29. Need a copy of the serial numbers and model numbers of both Digital Gas Meters that were sent to the property at 1629 Newport Place on the day of insertion, and which Gas Meter was finally placed in the house, and by whom, and the name of the PGW's Worker who brought which Gas Meter into said house.
30. The Digital Gas Meter that was placed in the house of 1629 Newport Place in 2014, was it used somewhere else prior to placing in said house ?
31. How many complaints to have there been about PGW's Digital Gas Meters, and exactly what are the complaints ?
32. Why was Mr. Hughey charged for the prior Gas Digital Meter Placement (prior to 2014), and how much was he or a member of his household charged, and when, and why ?
33. How many Digital Gas Meters have been placed in the house located at 1629 Newport Place in Philadelphia, PA, and when were they done, and why were they needed.
34. How many NEW Digital Gas Reading Meters do PGW obtain each year ?
35. Who manufactured the Digital Gas Meters that PGW uses ?
36. What type and how often do PGW do quality control checks on their Digital Gas Meters ?
37. What type of indications are displayed when the Digital Gas Meters are not working effectively ?

Sign  Date April 19, 2017
 Debbie Hughey, Pro se

PROOF OF SERVICE

I, Debbie Hughey, stated that I electronically serve a copy of this RE-Submission and Addition Motion to Compel PGW's via their Attorney on April 19, 2017.

Sign  Date April 19, 2017