

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

vs.

Docket No. C - 2016-2567445

Philadelphia Gas Works, Respondent

**COMPLAINANT'S RESPONSE/ANSWER TO THE PHILADELPHIA GAS WORKS'
REPLY TO COMPLAINANT'S MOTION FOR IN-PERSON HEARING**

The Respondent and Ms. Christieb's Reply to the Complainant's Request for a In-Person Hearing are invalid on two levels.

The First Level is that Judge Salapa had already made his ruling to approve the Complainant's Request for the In-Person Hearing on May 15, 2017, and Ms. Christieb's Reply is dated (May 16, 2017) after the Judge's Decision.

The Second Level, Ms. Christieb's Reply is also INVALID because she is **falsely** trying to claim that the she was not timely served.

The Complainant's Request for an In-Person - a "Live Hearing" was submitted to both the PUC and Ms. Christieb. Thus, Ms. Christieb was timely served via the PUC Online Service, since she accept E-Service, and according to 52 Pa. Code § 1.54, the Respondent via their Attorney, Ms. Graciela Christieb, Esquire was properly served. The 52 Pa. Code § 1.54(b) stated that service may be made by one of the following methods:

1. §1.54(b)(1) - First Class Mail
2. §1.54(b)(2) - Personal
3. §1.54(b)(3)(ii) Electronic. The PUC further stated that "Documents filed with the Commission. Service may be made electronically to filing users who have agreed to receive electronic service. Filing users who have agreed to receive electronic service shall be served with an electronic mail notice stating that a document was filed on the electronic filing system. **The notice constitutes service.**" Therefore, AGAIN, the Respondent was served via their Attorney, Ms. Christieb. Section 1.54(b)(3)(ii)(B), even stated that "When a filing user becomes aware that the electronic mail notice was not transmitted successfully, the filing user shall resend the electronic mail notice or serve the document by another method authorized by this subpart." Thus, the Complainant even complied with this law. Once she knew that her email server did not inform her of the error until days later (which is one of the Covert Tactic that the Complainant has been subjected to), the Complainant, resent the email, but irregardless, the Respondent was already served via the PUC's Electronic Server, since their Attorney accepted E-Service from the Pennsylvania Public Utility Commission.

I. COMPLAINANT'S HISTORY OF PROCEEDINGS

First of all, the History that the Respondent, PUC, and some of Judge Salapa's Documentation are not correct.

Secondly, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (PUC) against PGW, and filed an **Informal** Complaint a year prior to the Formal Complaint, but the PUC has done nothing about Complainant's Informal Complaint. The Complainant's Formal Complaints dated September 19, 2016 against PGW are about:

1. "PGW has pervasive illegal and fraudulent business practices of trying to **steal our property**".
2. PGW falsely and fraudulently claiming that an agreement was made for services
3. PGW fraudulently obtaining additional funds under false pretends, and etc... Please review the Complainant's Formal Complaint (**15 pages**) that has been deleted from the PUC's Online Records.
4. The Utility is threatening to shut of my service or has already shut of service.
5. In correct charges are on my bill.
6. I am having reliability, safety, or quality problems with my utility service.
7. PGW has pervasive illegal and fraudulent business practices of trying to steal our property - see Certified Letter #7014 2120 0000 4339 4202, and etc...

Complainant's Second Continuance was granted for about 45 days and not 60 days. Judge Salapa informed the Complainant that there will be no further delays, and Ms. Christieb threaten sanctions, if the June 15, 2017 Hearing is not conducted !

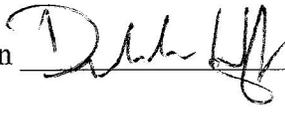
II. RESPONSE TO MOTION TO REQUEST A LIVE HEARING

PGW's Objections were already stated to the Complainant via Telephone (days before filing her In-Person/Live Hearing) as well as via email, but the Complainant still asserted her rights to have an In-Person Hearing. The Complainant did not have "ample time and opportunity" to address the form of Hearing because the Complainant was not given a choice of a Telephonic Hearing vs. an In-Person Hearing. The Complainant was not aware that the PUC even had Live Hearings/In-Person Hearings. The Complainant was not even aware that the Pennsylvania Public Utility Commission houses a location in Center City Area nor was the Complainant informed that the PUC holds Hearing at this location. The Complainant did not discover these issues until recently. The Complainant does not see why PGW is so opposed to the location change; whereas, their location is in the County of Philadelphia, just like the Complainant's location is in the County of Philadelphia, and as a matter of fact, PGW is just a couple of blocks from said property.

In addition to the above, the Complainant did not like how the Telephonic Pre-Hearing was conducted, and even now, she is seeking the removal of Judge Salapa off of the case based on his prejudicing this case; based on his biases; based on his Abuses of Power; Abuses of Discretions, Slander, Libel, Manipulations; His planned violations of the Law, and etc... Given the Complainant's Injuries, Illnesses, and Disabilities, the Complainant is not participating in a "Dilatory (lazy) Tactic" as Ms. Christlieb has alleged. Furthermore, the Complainant objects to the Ms. Christieb's name calling, assassination of the Complainant's Character, Libelous and Defamatory Statements, and etc... The Complainant sited more than just health issues; like, lack of funds (having less than \$25.00 to try to conduct this case as well as other cases), and etc... **Judge Salapa as well as the Respondent and Ms. Christieb do not have the right to decide what is best for the Complainant.** Thus, The Complainant would still need to sit for a Telephonic

Hearing; just like, an In-Person Hearing. The Complainant wants to see who she is dealing with, and need a Face to Face Hearing/In-Person Hearing. "A new wave of requests for more time will crash upon this case and the undertow pull it further out into 2017" is based on the Respondents and Ms. Christlieb delaying Tactics.

WHEREFORE, The Complainant stills assert her rights right to an In-Person Hearing, and request that the PUC continues to honor Judge Salapa's Order of granting the Complainant's Request for a "Live Hearing/In-Person Hearing. Thank you.

Sign  Date May 28, 2017

CERTIFICATE OF SERVICE

I, certify this day that I served a true copy of the foregoing document, Complainant's Response/Answer to the Philadelphia Gas Works' Reply to Complainant's Motion for In-Person Hearing, upon the parties (Ms. Graciela Christlieb) listed below, in accordance with the requirements of 52 Pa Code § 1.54 (Relating to service by a Party) via the PUC Electronic Filing System, since Ms. Graciela Christlieb, the Respondent's Attorney, accepts E-Service.

Signed  Date 05/28/17
Debbie Hughey, Pro se
Complainant