

BEFORE THE
PENNSYLVANIA'S PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

vs.

Docket No. C - 2016-2567445

Philadelphia Gas Works, Respondent

**COMPLAINANT'S CONTINUAL MOTION FOR SANCTIONS AND MOTION TO
COMPEL RESPONDENT TO FULLY ANSWER THE COMPLAINANT'S
QUESTIONS, STATEMENTS, REQUESTS, AND ETC...**

The Complainant is still seeking sanctions as well as a Continual Motion To Compel the Respondent, PGW, and their Attorney, Ms. Graciela Christieb, Esquire, to completely answer and to provide the Complainant with the requested information, documents, and etc... The Respondent and their Attorney Christieb did not respond to the Complainant's Motion to Compel in a timely fashion of 20 days.

In addition, the Respondent and their Attorney, Ms. Graciela Christieb, Esquire, have violated 52 Pa. Code, section 5.342(a)(6) by not providing a Verification Statement (truth under oath statement) to their responses, according to section 1.36. The Complainant questions the validity of her's and the Respondent's responses to the Complainant's Requests. Complainant is objecting to the Respondent's and Ms. Christieb's responses to the Complainant's Motion to Compel, and still seeking sanctions against them.

The following were the statements, questions, requests, and etc... that the Complainant has made to PGW, and their responses, and the Complainant's objections:

1. Complainant's Request - 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.

Ms. Christieb's Response - Document not provided as there was no agreement made between PGW and the Complainant prior to PGW turning on the gas at the service address in November of 2014.

Complainant's Objections - Complainant is demanding a copy of the agreement that PGW's Worker kept on saying that was made between the Complainant and PGW.

2. Complainant's Request - 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 ?

Ms. Christieb's Response - Answer not provided as the Complainant was not forced to give a copy of the deed to the property to have the gas turned on in November of 2014.

Complainant's Objections - What does Ms. Christieb based that on. She was not present, and the Complainant surely would not have went back home to obtain the DEED; in order, to give it to PGW; in order, for the Gas to be turned on, and the Complainant wants to know why did PGW informed the Complainant that Gas Services will not be turned on, until she come back with a copy of the DEED of said property. AS stated the

Complainant was FORCED to submit her Deed of said property before Gas Service was supplied.

3. Complainant's Request - 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 ?

Ms. Christieb's Response - It is not PGW's practice to require customers to submit a copy of their deeds in order to obtain gas services.

Complainant's Objections - Complainant still wants to know why it was requested her to give a copy of the DEED; in order, to obtain Gas Service.

4. Complainant's Request - What were the determining factors and requests as to why the Gas Service was turned on by PGW in November, 2014 ?

Ms. Christieb's Response - The determining factor and request that prompted PGW to restore gas service to the property in November of 2014 was the Complainant contacting PGW and requesting gas service be restored to the property.

Complainant's Objections - Complainant wants a list of the things that PGW Workers requested from the Complainant before they would even turn on the Gas Services to said Property.

5. Complainant's Request - What were the amounts of the Deposits/Down Payments that the Complainant was required to pay, and why ?

Ms. Christieb's Response - The Complainant was not required to make a down payment. A credit check of he Complainant determined that she was required to put down a deposit of \$190.00, half of which was required before services would be restored

Complainant's Objections - Complainant wants to know who informed her of that, no written proof has been provided.

6. Complainant's Request - Was any Deposits or Down Payments ever returned to the Complainant, and if so, when, and if not, why not ?

Ms. Christieb's Response - The Complainant only paid \$142.50 towards her deposit. That deposit (\$142.50) was applied to her account balance on April 03, 2015.

Complainant's Objections - This is hearsay. Where is the written proof ? The Respondent and Ms. Christieb still have not provided written proof to the Complainant.

7. Complainant's Request Was any Deposits or Down Payments applied to any Gas Bills, and if so, when and why ?

Ms. Christieb's Response - The Complainant's deposit was applied to her account balance on April 0, 2015, due to lack of payments made on the account.

Complainant's Objections - This is hearsay. Where is the written proof ? The Respondent and Ms. Christieb still have not provided written proof to the Complainant. Who gave PGW the authority to due so. Why was the Complainant not given any notification prior to this being done, and the Complainant is seeking a return of ALL monies that has been paid to PGW, along with fines, interest, penalties, and etc...

8. Complainant's Request Need an itemization of what happened to the Deposits/Down Payments that the Complainant paid ?

Ms. Christieb's Response - Answer not provided as the paid portion of Complainant's deposit was applied to her account on April 03, 2015 and there is no further itemization.

Complainant's Objections - Respondent and Ms. Christieb refused to give a list of Deposits/Down Payments.

9. Complainant's Request Why were Deposits/Down Payments required to start new Gas Service under the Complainant's Name ?

Ms. Christieb's Response - A deposit was required pursuant to the results of a credit report.

Complainant's Objections - Respondent and Ms. Christieb refused to fully answer the question.

10. Complainant's Request - Why are there higher charges for Gas Services during the Spring and Summer Months; whereas, less Gas was used during those times ?

Ms. Christieb's Response - Answer not provided as there are no higher charges for gas services during the spring and summer months.

Complainant's Objections - Hearsay. The Respondent and Ms. Christieb still have not provided written proof.

11. Complainant's Request - Need copies of All Gas Bills from 2014 to present.

Ms. Christieb's Response - Copies of the requested gas bills are attached hereto as Appendix "A".

Complainant's Response - Received Gas Bills from December 04, 2014 to May 06, 2016.

12. Complainant's Request Why is it that page numbered two is missing from ALL PGW's Gas Bill ?

Ms. Christieb's Response - Answer not provided as page two (2) is not missing; it is printed on the back of page one (1).

Complainant's Objections - Page two (2) on the PGW's Gas Bills are not listed anywhere on any of the bills. The back of page one (1) is not identified as page two (2) of any of the bills.

13. Complainant's Request Why is it that we never received a Lien Notice for the year of 2006 ?

Ms. Christieb's Response - Answer not provided as the question relates to a period of time that falls beyond the statute of limitations. Answer not provided pursuant to the Court ruling on January 18, 2017, stating that the Commission lacks jurisdiction to entertain an action that challenges the validity of a lien on the Complainant's property.

Complainant's Objections - Respondent and Ms. Christieb refused to answer the question. Even though the Commission may have chosen not to entertain some things as Ms. Christieb has alleged; still does not relieve the Respondent of the duty to answer the Complainant's questions, requests, and etc...

14. Complainant's Request Verify and supply copies of all Liens that have been placed on said Property by the City of Philadelphia and or by PGW.

Ms. Christieb's Response - Answer not provided as the question encompasses periods of time that fall beyond the statute of limitations. Answer not provided pursuant to the Court ruling on January 18, 2017, stating Commission lacks jurisdiction to entertain an action that challenges the validity of a lien on the Complainant's property.

Complainant's Objections - Respondent and Ms. Christieb refused to answer the question. The Respondent has a duty to answer the Complainant's questions, requests,

and etc... THEY HAVE NOT VERIFIED AND SUPPLIED COPIES OF ALL LIENS THAT HAVE BEEN PLACED ON THE PROPERTY OF 1629 NEWPORT PLACE IN PHILADELPHIA, PA 19122.

15. Complainant's Request Why are we being denied the ability to submit a Defendant's Affidavit on the Court's (Common Pleas) Records ?

Ms. Christie's Response - Answer not provided as the instant matter lacks a defendant. Answer not provided as PGW lacks the information necessary to answer questions pertaining to the Court of Common Pleas' Records.

16. Complainant's Request 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 ?

Ms. Christie's Response - Document not provided as PGW work men were not at the property in June of 2016 to terminate gas service.

Complainant's Objections - Complainant objects to the false statements, the Bad Faith, the Covert Tactics, and etc...

17. Complainant's Request - Need a copy of the Gas Meter Reading when the gas was shut-off in April, 2016 ?

Ms. Christie's Response - On April 27, 2016, when the gas service was terminated, the gas meter reading was 2695 CCF. This reading can be found in the last entry on page two of the Specific Service Agreement Statement of Account, attached hereto as appendix "B", in the column marked "Reading".

Complainant's Objections - Appendix "B" has no identifying listing/statements as being from the Philadelphia Gas Works. It is a spreadsheet that can or could have been done by anyone. Complainant question the validity of these documents.

18. Complainant's Request - 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 ?

Ms. Christie's Response - Answer not provided as the gas was not terminated in June of 2016.

Complainant's Objections - Respondent and Ms. Christie refused to answer the question. Complainant did not ask about when the Gas Service was terminated. The Complainant asked for the Gas Readings prior to and after the gas was turned off again in June 2016.

19. Complainant's Request - 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?

Ms. Christie's Response - A copy of the meter exchange work order is attached hereto as appendix "C".

Complainant's Objections - Appendix "C" has no identifying listing/statements as being from the Philadelphia Gas Works. The document does not even have the Complainant name spelled correctly.

20. Complainant's Request - 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.

Ms. Christie's Response - Document not provided for safety and security reasons.

Complainant's Objections - For Complainant and her family safety and concerns, she demands to fully know who PGW alleged who serviced the said property at 1629 Newport Place in Philadelphia, PA. PGW provides ID Tags for Workers to show to the public, and the Complainant needs to know if the alleged person that PGW claimed that they sent to service the house was black or white, and the Complainant needs to be able to identify them. Also, it goes to show that PGW should have called the Police to alert the public of men claiming to be from PGW, and what PGW is going to do about securing the "PUBLIC" safety from people looking like PGW Workers, with PGW IDs, and driving a PGW's Vehicle. Both the Black and the White PGW's Workers were talking outside of said property as if they knew each other as well as the PGW's Supervisor informed us of which worker was going to finish the placement of the Gas Digital Meter to said property. Thus, all three of them knew each other.

21. Complainant's Request 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.

Ms. Christieb's Response - Documents not provided for safety and security reasons.

Complainant's Objections - For Complainant and her family safety and concerns, she demands to know this information to help verify who was at said property.

22. Complainant's Request - Need copies of the PGW's Worker who was assigned to place the new Digital Gas Meter.

Ms. Christieb's Response - Documents not provided due to lack of specificity regarding what information Complainant is requesting.

Complainant's Objections - Complaint needs paperwork of who placed the new Digital Gas Meter and the serial Number of that Gas Meter at said property.

23. Complainant's Request - 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...

Ms. Christieb's Response - Answer not provided as PGW has no record of this incident.

Complainant's Objections - Complainant objects to the false statements, the Bad Faith, the Covert Tactics, and etc...

24. Complainant's Request - 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.

Ms. Christieb's Response - Documents not provided as PGW was not furnished with a telephone number to be the target of the requested call logs.

Complainant's Objections - Complainant objects to the false statements, the Bad Faith, the Covert Tactics, and etc... Both PGW and Ms. Christieb already have Complainant's Telephone Number.

25. Complainant's Request - Copies of ALL Emergency Calls and Reports made for Gas Leaks/Gas Smells at said property.

Ms. Christieb's Response - Copies of the work orders pertaining to the emergency/leak calls made during the time that the Complainant was the customer of record are attached hereto as appendix "C".

Complainant's Objections - Complainant objects to the false statements, the Bad Faith, the Covert Tactics, and etc... Complainant stills objects to the Respondent's Appendix "C" as well as Respondent and Ms. Christieb continuously refused to answer the question and to supply the document. THE COMPLAINANT ASKED FOR COPIES OF ALL EMERGENCY CALLS AND REPORTS MADE FOR GAS LEAKS/GAS SMELLS AT SAID PROPERTY.

26. Complainant's Request - Copies of the Medical necessary Certificates that were obtained for James Hughey's Physician; in order, to keep the Gas Service on.

Ms. Christieb's Response - Copies of the requested Medical Emergency Certification Forms are attached hereto as appendix "E".

Complainant's Objections - Complainant objects to the PGW disclosing to Mr. Hughey's Physician of how much was owed.

27. Complainant's Request - Copies of ALL PGW's Bills from 2014 to present.

Ms. Christieb's Response - Copies of the requested gas bills are attached hereto as appendix "A".

Complainant's Response - Received Gas Bills from December 04, 2014 to May 06, 2016.

28. Complainant's Request - 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).

Ms. Christieb's Response - The meter installed in 2014 when the Complainant requested service was installed with a zero reading (0 CCF). This information can be found in the meter exchange work order attached hereto as appendix "C". On April 27, 2016, when the gas service was terminated, the gas meter reading was 2695 CCF. This reading can be found in the last entry on page two of the Specific Service Agreement Statement of Account, atatched hereto as appendix "B", in the column marked "Reading". After April 27, 2016, PGW did not again visit the property to terminate service.

Complainant's Objections - Complainant objects to Appendix "C" has no identifying listing/statements as being from the Philadelphia Gas Works. It is duplication of documents, and some of the documents do not even have the Complainant name spelled correctly. Complainant questioned the validity of these documents.

29. Complainant's Request - 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.

Ms. Christieb's Response - On November 10, 2014, PGW employee Nicholas King visited the property: he exchanged meter No. 1769076 for meter No. 2161639 and restore the gas services. No other PGW employees brought meters to the property that day. The serial number and model number for meter No. 2161639 are 14Y9256343 and L250, respectively. A copy of the Meter Maintenance information, including the serial and model numbers is attached hereto as appendix "F".

Complainant's Objections - Complainant objects to the false statements, the Bad Faith, the Covert Tactics, and etc... Also, Appendix "F" has no identifying listing/statements as being from the Philadelphia Gas Works.

30. Complainant's Request - 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 ?
Ms. Christieb's Response - No.

31. Complainant's Request - How many complaints to have there been about PGW's Digital Gas Meters, and exactly what are the complaints ?

Ms. Christieb's Response - Answer not provided as the requested information is not complied or tracked.

Complainant's Objections - Complainant objects to the Respondent's and Ms. Christieb's refusal to answer questions. The Respondent should be able to supply Complainant with a list of Customers' Complaints.

32. Complainant's Request - 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 ?

Ms. Christieb's Response - Answer not provided as the question relates to a period of time that falls beyond the statute of limitations. Answer not provided as the question relates to activity pertaining to an account for which the Complainant is not the customer of record.

Complainant's Objections - Complainant objects to the Respondent's and Ms. Christieb's response. The Complainant is a Co-owner; thereby, is entitled for all questions to be answered; irregardless of the date.

33. Complainant's Request 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.

Ms. Christieb's Response - On November 10, 2014, PGW employee Nicholas King visited the property; he exchanged meter No. 1769076 for meter No. 2161639 and restored the gas service. No other gas meters have been installed in the property since that time. The meter is needed to measure the amount of gas being used at the property.

Complainant's Objections - Complainant objects to the false statements, the Bad Faith, the Covert Tactics, and etc... Respondent and Ms. Christieb still have not answered the question.

34. Complainant's Request How many NEW Digital Gas Reading Meters do PGW obtain each year ?

Ms. Christieb's Response - Approximately sixteen thousand (16,000).

35. Complainant's Request - Who manufactured the Digital Gas Meters that PGW uses ?

Ms. Christieb's Response - PGW has used meters manufactured by American, Rockwell, Sprague, and Itron.

36. Complainant's Request - What type and how often do PGW do quality control checks on their Digital Gas Meters ?

Ms. Christieb's Response - PGW conducts meter proofing tests on ten percent (10) for every shipment prior to stocking them for installation.

37. Complainant's Request - What type of indications are displayed when the Digital Gas Meters are not working effectively ?

Ms. Christieb's Response - Answer not provided as the question lacks specificity regarding what is meant by "effectively".

Complainant's Objections - Complainant objects to the Bad Faith, the Covert Tactics, and etc... Respondent and Ms. Christieb still have not answered the question. Ms. Christieb is a lawyer. Thus, she is educated enough to know what the word "effectively" means. According to the definition of "effectively", it means - in such a manner as to achieve a desired result. If Ms. Christieb did not understand what was meant by "effectively", she should have looked it up. Complainant stills does not appreciate the continual tactics of the Respondents.

electronically signed on 05/27/17

/s/Debbie Hughey at 11:28 PM

Sign _____ Date _____
Debbie Hughey, Pro se

PROOF OF SERVICE

I, Debbie Hughey, stated that I electronically serve a copy of the Complainant's Continual Motion For Sanctions and Motion to Compel Respondent to Fully Answer the Complainant's Questions, Statements, Requets, and Etc... via their Attorney on May 27, 2017 via E-Service of the PUC System.

electronically signed on 05/27/17

/s/Debbie Hughey at 11:28 PM

Sign _____ Date _____