



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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May 30, 2017

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

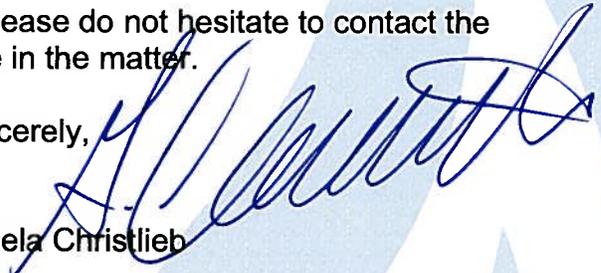
**Re: Debbie Hughey v. Philadelphia Gas Works, Docket No. C-2016- 2567445**

Dear Secretary Chiavetta:

The Philadelphia Gas Works ("PGW") hereby files the original Response to the Complainant's Reply to PGW's Response to Complainant's Request for Sanctions, 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

cc: Debbie Hughey  
Tyra Jackson

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Debbie Hughey**

**v.**

**Philadelphia Gas Works**

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**Docket No. C – 2016 – 2567445**

**PHILADELPHIA GAS WORKS'  
REPLY TO COMPLAINANT'S RESPONSE TO PHILADELPHIA GAS WORKS'  
REPLY TO COMPLAINANT'S REQUEST FOR SANCTIONS**

The Philadelphia Gas Works (PGW) hereby files its Reply to the Complainant's Response to PGW's Reply to the Complainant's Request for Sanctions dated May 28, 2017.

**I. HISTORY OF PROCEEDINGS RELEVANT TO REPLY**

On May 12, 2017, the Complainant filed her Request for Sanctions.

On May 15, 2017, Judge David A. Salapa issued an Order wherein he stated that the Motion to Compel filed by the Complainant on April 19, 2017, should be treated as a request for answers to interrogatories and for production of documents and that the Request for Sanctions should be treated as a motion to compel that information. Given that PGW was not directed to treat the Complainant's April 19, 2017 Motion as a request until May 15, 2017, PGW had 20 days from that date to produce the information.

However, in order to avoid further delay, PGW did not wait for the Court to rule on the Complainant's Motion to Compel Discovery, instead opting to voluntarily furnish the information sought through the Motion to Compel Discovery, dated April 19, 2017.

On May 10, 2017, PGW served the Complainant, via FedEx, with the information she sought through her April 19, 2017 Motion.

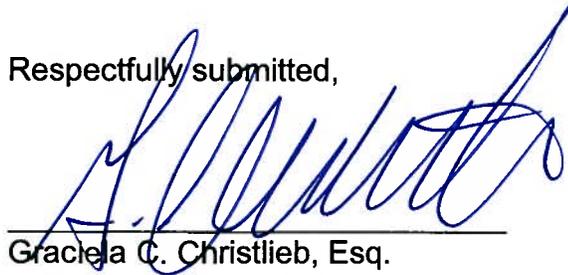
Judge Salapa's May 15, 2017 Order declined to address the request for sanctions noting that PGW's time to respond had not yet run.

II. REPLY

The Court, in its May 15, 2017 Order, could have denied the Complaint's April 19, 2017 Motion to Compel on the grounds that the Complainant failed to serve a request for interrogatories or production of documents on PGW. The Court, however, chose to convert the Motion into a request for answers to interrogatories and production of documents. The change gives PGW twenty days from May 15, 2017 to comply with 52 PA.Code § 5.342, which is June 4, 2017.

May 30, 2017

Respectfully submitted,



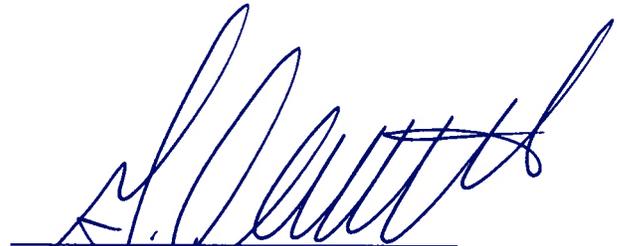
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Gracieja C. Christlieb, Esq.  
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**VERIFICATION**

I, Graciela Christlieb, hereby declare that I am counsel for the Philadelphia Gas Works. I am authorized to make this verification on its behalf. The facts set forth in the foregoing Reply are true and correct to the best of my knowledge, information and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

May 30, 2017



Graciela Christlieb, Esquire

**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 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Ms. Debbie Hughey  
P.O. Box 41842  
Philadelphia, PA 19101

May 30, 2017



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