



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney  
Legal Department  
Direct Dial: 215-684-6164  
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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 Motion to Request an In-Person Hearing, 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

A handwritten signature in blue ink, appearing to read "Graciela Christlieb", is written over the typed name. The signature is fluid and cursive.

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 MOTION FOR IN-PERSON HEARING**

The Philadelphia Gas Works (PGW) hereby files its Reply to the Complainant's Response to PGW's Reply to the Complainant's Motion for In-Person Hearing dated May 28, 2017.

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

On May 12, 2017, the Complainant filed her Motion for In-Person Hearing. The Complainant's Motion included a Certificate of Service dated May 12, 2017, attached hereto as exhibit "A", which states "I certify that I have electronically served the Respondents with a copy of the Complainant's Request for a LIVE HEARING..." Despite her signature certifying that she served PGW with a copy of her Motion, the Complainant did not serve PGW until May 15, 2017.

On May 15, 2017, Judge David A. Salapa issued an Order wherein he granted the Complainant's request.

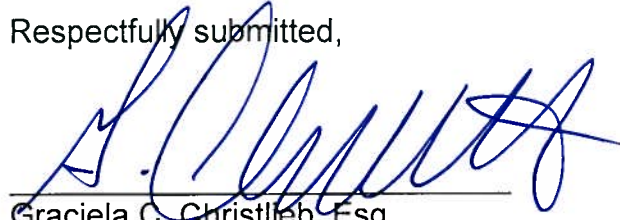
By a Hearing Notice dated May 18, 2017, the parties were informed that the case is scheduled for an in-person hearing on June 15, 2017 at 10:00 a.m. before Judge Christopher P. Pell.

**II. REPLY**

The Complainant's request for an in-person hearing has been granted rendering PGW's objection moot; however, it should be noted that PGW did not receive electronic mail notice from the Pennsylvania Public Utility Commission (Commission) that a document was filed in this case using the electronic filing system. Consequently, PGW

asks that the Court advise the Complainant to refrain from certifying that she has served PGW with documents if she is relying on the Commission to provide electronic mail notice to PGW that a document was filed on the electronic filing system; such certifications are a misrepresentation and potentially misleading to the Commission and the Court.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Graciela C. Christlieb', written over a horizontal line.

Graciela C. Christlieb, Esq.  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

May 30, 2017

**A**

# CORRECTION

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey

v.

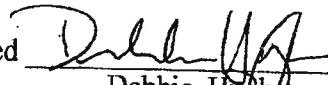
Docket No. C - 2016-2567445

Philadelphia Gas Works (PGW)

## REQUEST FOR LIVE HEARING, INSTEAD OF A TELEPHONIC HEARING

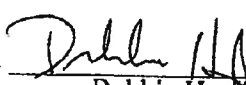
The next Hearing is scheduled on June 15, 2017 at 10:00 am. The Complainant does not want a Telephonic Hearing, and is requesting a **LIVE HEARING** in the City of Philadelphia of the State of Pennsylvania.

Even though, the Respondent's Attorney has expressed her objections, the Complainant is still asserting her rights to a **LIVE HEARING** at the PUC - Public Utility Commission's Downtown Location in Philadelphia, PA.

Signed  Date ~~April~~ <sup>May</sup> 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 a **LIVE HEARING**, instead of a Telephonic Hearing to their Attorney on May 12, 2017.

Signed  Date ~~April~~ <sup>May</sup> 12, 2017  
Debbie Hughey

**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**

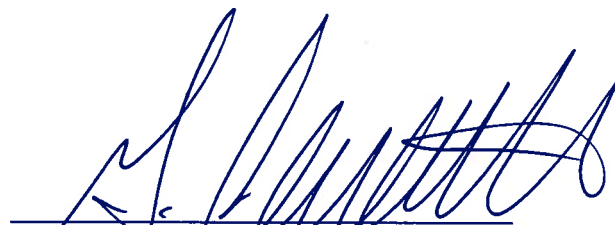
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

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

May 30, 2017

  
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Graciela C. Christlieb, Esq.  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122