

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, **Complainant**

v.

Docket No. C - 2016-2567445

Philadelphia Gas Works,
Respondents

COMPLAINANT'S **SECOND** REPLY TO THE PHILADELPHIA GAS
WORKS' (PGW) REPLY TO COMPLAINANT'S RESPONSE TO THE
PGW'S REPLY TO THE COMPLAINANT'S MOTION FOR IN-PERSON
HEARING

Ms. Christieb is being redundant as it related to the In-Person Hearing. Ms. Christieb continues to create a financial hardship and create undue distress and duress by her continual writing for the same requests/issues pertaining to the Complainant's Request for an In-Person Hearing, and the Complainant is seeking sanctions, pain and suffering, and etc... for her continual Malicious Tactics.

Ms. Christieb continues to inform the PPUC - PA Public Utility Commission that she was not served; however, she did not mentioned this until after the order was already granted. At first, she was blaming the Complainant for not being served, and now she is blaming the PPUC for allegedly not being served, and is **asking the PPUC NOT to honor the law !** This is **UNACCEPTABLE**, unprofessional, very unprofessional, very very unprofessional, and **ILLEGAL**.

In Ms. Christieb's Document of May 30, 2017, stated that, "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." How can filing be a misrepresentation of certification, and misleading to the Court and to the PUC; whereas, the LAWS stated otherwise. It makes you wonder how

many times has she complained/claimed that the Commission has not served her a notice, and what did she and the PPUC have done about it ? By serving the Respondent twice (by different means), creates a further financial hardship; since, **Ms. Christieb accepts E-service**. Also, the Complainant is smelling some sort of fraud is involved. Again, the Complainant is informing Ms. Christieb of the law that she has chosen to ignore; which is, according to 52 Pa. Code § 1.54, the Respondent via their Attorney, Ms. Graciela Christieb, Esquire was **properly served**, and served in a timely fashion. 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) - Electronic
4. §1.54(b)(4) - Telefacsimile

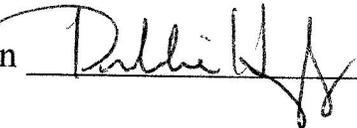
52 Pa. Code § 1.54(b)(3)(i) stated that "Documents not filed with the Commission. Service may be made electronically to those parties who have agreed to accept service in that manner."

52 Pa. Code § 1.54(b)(3)(ii) 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.**", and again, since **Ms. Christieb accepts E-Service**, she has been SERVED ! Therefore, AGAIN, the **Respondent was served via their Attorney, Ms. Christieb.**

Even Section 1.54(b)(3)(ii)(B), 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.

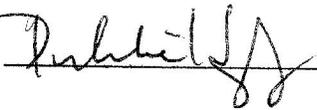
WHEREFORE, according to the above listed laws, the Complainant has the right to serve the Respondent and Ms. Christieb via the PPUC's electronic server, since the Respondent's Attorney, **Ms. Christieb accepts E-**

Service, and the Complainant is seeking Sanctions for this unnecessary tactics of duress, distress, malicious redundancy and etc... for the same In-Person Hearing Issues. Thank you.

Sign  Date June 05, 2017

VERIFICATION

I, Debbie Hughey, Complainant, hereby declare that the statements made in the Complainant's second reply to the PGW's Reply to Complainant's Response to the PGW's Reply to the Complainant's Motion for In-Person Hearing are true and correct to the best of my knowledge, information, and belief. This verification is made subject to the penalties of 18 Pa. C.S. 4904, concerning false statements to authorities.

Signed  June 05, 2017

CERTIFICATE OF SERVICE

I, certify this day that I served a true copy of the Complainant's second reply to the PGW's Reply to Complainant's Response to the PGW's Reply to the Complainant's Motion for In-Person Hearing, has been served to their counsel Ms. Graciela Christlieb via the PPUC's Server, Ms. Christlieb accept E-Service.

Signed  Date June 05, 2017
Debbie Hughey, Pro se
Complainant