



PHILADELPHIA GAS WORKS

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June 9, 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 hereby files the original Reply to the Complainant's Petition for Reconsideration, 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 PETITION FOR RECONSIDERATION TO PGW'S
PRELIMINARY OBJECTIONS AND MOTION TO STRIKE**

The Philadelphia Gas Works (PGW) hereby files its Reply to the Complainant's Petition for Reconsideration filed on June 8, 2017.

I. HISTORY OF PROCEEDINGS RELEVANT TO REPLY

On September 21, 2016, the Complainant filed her Formal Complaint with the Pennsylvania Public Utility Commission (Commission) against PGW.

On October 11, 2016, PGW filed an Answer with New Matter as well as Preliminary Objections.

By Order dated January 18, 2017, PGW's Preliminary Objections were sustained in part.

On April 25, 2017, the parties convened via telephone before the Court for a pre-hearing conference. At that time, the Complainant attempted to litigate what she called "exceptions" (which she had filed that day) to the Court's January 18, 2017 Order wherein Judge Salapa sustained, in part, PGW's Preliminary Objections. The Court informed the Complainant that a filing addressing the January 18, 2017 Order was not timely and would not be addressed.

On May 15, 2017, the Court issued an Order denying the Complainant's "exceptions" filed on April 25, 2017, stating that the Commission's Rules of Practice and Procedure do not permit the filing of exceptions or objections to an order sustaining preliminary objections.

On June 8, 2017, the Complainant filed this Petition for Reconsideration to PGW's Preliminary Objections and Motion to Strike.

II. **REPLY**

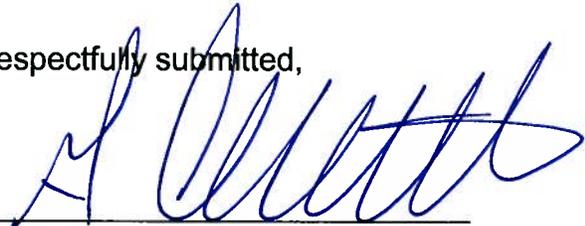
Having been informed by the Court that the Commission's Rules of Practice and Procedure do not permit the filing of exceptions or objections to an order sustaining preliminary objections, the Complainant is now attempting to relitigate the issues decided in the Court's January 18, 2017 Order by filing a petition for reconsideration of the decision contained therein.

While the Commission's Rules of Practice and Procedure do permit the filing of petitions for reconsideration, such petitions may only be filed with respect to a final Commission order.

Wherefore, PGW respectfully requests that this Commission deny the Petition for Reconsideration as it is not ripe.

June 9, 2017

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

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.

June 9, 2017



Graciela Christlieb, Esquire

CERTIFICATE OF SERVICE

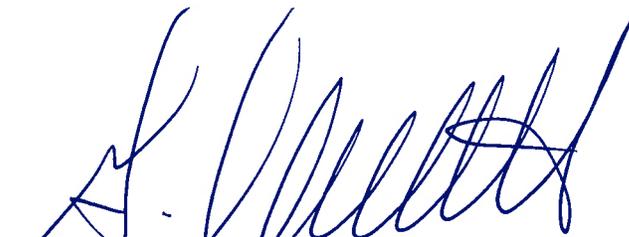
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

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

June 9, 2017



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