

Ms. Debbie Hughey  
P. O. Box 41842  
Philadelphia, PA 19101  
June 06, 2017

RECEIVED

JUN - 8 2017

Ms. Rosemary Chiavetta, Secretary  
Secretary's Bureau  
Pennsylvania Public Utility Commission  
400 North Street, Keystone Building  
Harrisburg, PA 17120  
RE: Copies of Documents Filed and to be Filed  
via this mailing package

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dear Ms. Chiavetta:

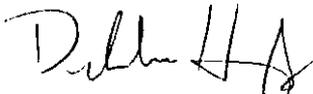
Even though some of these documents were already submitted via the PPUC's Website, I am submitting the following documents, please process these documents, especially the ones that were not able to be fully submitted due to the 10 MB limit with the PUC's Server.

1. Complainant's Request For Reconsideration to the Respondent's - Philadelphia Gas Works - Preliminary Objections and Motion to Strike along with Exhibits A & B.
2. Complainant's Amended Formal Complaint and Amended Relief along with Exhibit A.
3. Complainant's Response/Answer to the PGW's Reply to Complainant's Request for Sanctions.
4. Complainant's Continual Motion for Sanctions and Motion to Compel Respondent to fully Answer the Complainant's Questions, Statements, Requests, and Etc...
5. Complainant's Response to Judge Salapa's Order Denying Exceptions and Granting Request For In-Person Hearing, and New Matter of Judge Salapa's Recusal along with Exhibits A, B, & C.
6. ~~Complainant's Second Reply to the Philadelphia Gas Works' Reply to Complainant's Response to the PGW's Reply to the Complainant's Motion For In-Person Hearing.~~

7. Complainant's Response/Answer to the Philadelphia Gas Works' Reply to Complainant's Motion for In-Person Hearing.

8. A copy of the letter to Ms. Christieb and the Updated Certificate of Service to PGW for Documents that were too big (greater than 10 MB) to be uploaded in the Pennsylvania Public Utility Commission's Online Server.

Respectfully,



Ms. Debbie Hughey

cc: files

cc: Judge Pell

cc: Ms. Christieb

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

JUN - 8 2017

Debbie Hughey, **Complainant**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

v.

Docket No. C - 2016-2567445

Philadelphia Gas Works,  
**Respondents**

COMPLAINANT'S REQUEST FOR RECONSIDERATION TO THE  
RESPONDENT'S - PHILADELPHIA GAS WORKS - PRELIMINARY  
OBJECTIONS AND MOTION TO STRIKE

The Complainant still has not been able to fully litigate this case due to illnesses, injuries, covert tactics, lack of funds, cyber attacks, and etc... as well as based on the responses received from the Respondent as it pertained to the Complainant's Motion to Compel PGW, the Complaint is requesting a Reconsideration. The Respondent's Preliminary Objections and Motion to Strike are listed as Exhibit A. The Complainant's Corrected Response/ Answer is listed under Exhibit B. The Complainant was not able to respond to the Respondent's Preliminary Objections and Motion To Strike, like she really wanted to, and is now requesting a Reconsideration of her responses as follows:

1. **Corrected** - The Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (PUC) regarding the Respondent's pervasive Fraudulent Billing, Covert Tactics, Inaccurate Gas Meter and Gas Meter Readings, and etc... at the service address of 1629 Newport Place in Philadelphia, PA. **The Complainant had also filed an Informal Complaint with the PUC a year prior to filing the Formal Complaint, but the Complainant never received a response from her Informal Complaint from the PUC nor from the City of Philadelphia nor from PGW.** Thus, the PUC violated Pa Code 52 § 56.441 regarding Informal Complaint, by not intervening, by Complaint not being docketed, and not being investigated by the PUC nor was anything done by the Bureau of Consumer Services (BCS), and etc...
2. **Intentionally Misleading and False** - Complainant referred to not only bills and liens of 2006, but of bills and liens for the years of 2015, and 2016.

3. **Updated** - According to the law, **fraud voids any Statute of Limitation**. When the fraud is discovered, it starts the timing for the Statute of Limitation, for disputing any bills or liens, all over again. The Liens of 2006 were not disclosed to the Complainant, and the **Complainant was not aware of the Liens of 2006, until ten years later, in 2016**. The City of Philadelphia and PGW have both violated the Municipal Claims and Tax Liens Act (MCTL), by not informing the Complainant of the Liens placed on the property of 1629 Newport Place located in Philadelphia, PA 19122. In addition, they violated the MCTL again by refusing to allow the Complainant to file an Affidavit of Defense pertaining to these liens.

Thus, the **Statue of Limitation as it related to fighting these Liens, and the Gas Bills pertaining to it, do not begin to toll until 2016**. Therefore, the Complainant is still entitled to receive any monies, refunds, fees, new rulings, and etc... for any alleged billings and liens of 2006, due to Covert Tactics, Bad Faith, pervasive fraudulent practices, violations of the MCTL, violations of the laws, and etc... Furthermore, the Statute of Limitation does not apply to the Gas Bills and Liens of 2015 and 2016, as of yet, **but yet the Respondent tried to manipulatively group all claims of 2006, 2015, and 2016 together**, to state that ALL of the Claims and Liens are passed the Statute of Limitation.

Therefore, the PUC is not deprived of it's functioning duties pertaining to the Complainant's Formal and Informal Complaints. As stated before, the PUC - Public Utility Commission **does** have jurisdiction to not only hear, to investigate, to assign fines for violations, corrections of services and billing, and etc..., and to rule in the Complainant's Cases due to the several patterns of fraud, overcharging, inaccurate meter readings, covert tactics, and etc... that exists in this cases. **This is not the first time that the City of Philadelphia tried to steal our property**. In 2008, the Real Estate Tax Division claimed that we did not pay our Real Estate Taxes for 2006. They waited until after some of our documents and receipts were taken from our house to claim two years later that we never paid Real Estate Taxes for 2006. Therefore, **we were forced to pay those taxes again, due to fraud, Covert Tactics, theft of documents, and etc...**

A couple of months ago, we again received retaliation from the City of Philadelphia (**ANOTHER COVERT TACTIC**), but in the form of the City of Philadelphia Water Revenue, sending the Complainant an alleged Water Bill of over thirteen years old, claiming that a charge of \$40.00 was due, based on an alleged damaged Water Meter. This added charged of \$40.00 inflated the Complainant's Water Bills; so that, the amount that they were

asking, could not be paid; thereby, forcing the Complainant on an agreement; in order, to avoid Shut-off Services. However, the Philadelphia Water Department did not disclose the truth about the agreement nor did they inform us of our rights to obtain a Medical Note nor of our right to dispute the bill would be waived; whereas, it was because of the added charges of \$40.00; is what mainly sent the bill into a Shut-off Status.

**Something that was deviously planned.** Thus, the Water Bill was paid to void the illegal and bogus agreement. Covert Tactics like these continued to show the City's Deceptions, Bad Faith, Intentional Torts, Maliciousness, and etc...

Again, the City of Philadelphia and the Philadelphia Water Department have violated the MCTL again, by not informing the Complainant of this Water Lien in a timely fashion. The Water Lien was placed against said property in 2004, but we were not informed of this lien, until a couple of months ago via the monthly Water Bills. They have retaliated against the Complainant for filing a PUC's Formal Complaint against the PGW and the City of Philadelphia.

4. **Denied** - As stated, fraud voids any Statute of Limitation as it related to the Complainant receiving justice regarding the Bills and the Liens of 2006. The Philadelphia Gas Works and the City of Philadelphia never informed the Complainant about the Gas Lien of 2006; which is, a violation. The Complainant discovered this Lien, while she was reviewing other Court Records in 2016. Thus, the tolling of the Statue of Limitation does not start for the fighting of the 2006 PGW/City of Philadelphia's Liens and PGW's Billings, until 2016. Also, the City of Philadelphia has encumbered said property via fraud, forethought and malice, covert tactics, and etc..., and without affording the Complainant a meaningful opportunity to be heard as well as to submit documentation denying the City's and the PGW's Claims. The Common Pleas Court refused to allow the Complainant to file her rebuttals (Affidavit of Defense) against the City of Philadelphia and PGW's False, Fraudulent, and etc... Claims.

The City of Philadelphia and the Philadelphia Gas Works have also violated the Complainant's 14th Amendment Rights to due process regarding the bills and especially the Liens of 2006, 2015, and 2016. The City Hall Prothonotary's Office, the Judgment Division as well as the Prothonotary himself, all refused to allow the Complainant to file her counter statements (Affidavit of Defense) to said judgments, claims, and liens. Thus, they have ALL violated the law ! They even lied by telling the Complainant that there is nothing that she could file about the Judgement

Claims, and that they could not accept any filings from the Complainant. The City and PGW erred by violating the Municipal Claims Tax Liens Act 53 P.S. § 7271, 53 P.S. § 7432, and § 56.141(1)(2) of the public utility code, 66 Pa. C.S., by not providing notice as well as denied Complainant's Rights to fair hearings and rebuttals. **Even the U.S. Supreme Court held that a lien on real property constitutes a deprivation of property; which, is protected by Due Process Rights.**

Even in the United States v. James Daniel Good, stated that Due Process encompassing the rights to be given notice and the opportunity to be heard pertaining to the claims. The City of Philadelphia processing of Municipal Judgment Claims are **unfair, illegal, and one-sided in favor of the the City of Philadelphia, the Water Department, and PGW.** The City of Philadelphia and PGW continued to maintain a **MONOPOLY** over the Gas Services in the County of Philadelphia, and since the Public Utility Commission have responsibility as well as **jurisdiction** over Utility Companies, the Pennsylvania Public Utility Commission have the power and the authority to prevent the City of Philadelphia's and PGW's Abuses of Power, and prevent their further reign of **MONOPOLY**. As stated in her complaint, the Complainant only used Gas Services for the heating of the house during the Winter's Months and for the Gas Water Heater, but the Gas Bills went over a thousand (\$1,000.00) during the Summer and Spring, and we were just using Gas to heat the water.

5. **Denied and Updated** - The liens that are placed on the property located at 1629 Newport Place in Philadelphia, PA 19122 are fraudulent, led by Covert Tactics, Tampered Digital Gas Meter, and etc..., and the Complainant does not owe any amount to PGW or to the City of Philadelphia due to their defrauding actions, Bad Faith, Covert Tactics, and etc... The Respondents intentionally inflicted emotional distress and duress by their intentional negligence, fraud, pervasiveness, malicious planning and plotting to take said property and house, and etc....

6. **Admitted** - We are seeking the correction of all bills, liens, charges, fees, costs, collections, fines, interests, penalties, expenses, fees, costs, and etc... to reflect a zero balance being owed as well as the removal of **ALL** Liens on the property and house located at 1629 Newport Place in Philadelphia, PA 19122 as well as refunds, interest and penalties, security deposits, down payments, wavier of reconnection fees, wavier of any cost associated with the replacement of the present Digital Gas Meter that is presently placed in the house at 1629 Newport Place in Philadelphia, PA. In addition, the Complainant is seeking the PUC to apply fines and Penalties to the City of

Philadelphia and PGW for their violations of the PA Code, the laws, and etc...

7. **Disagreed and Updated** - Since fraud, Covert Tactics, and etc... exist, the City of Philadelphia and PGW are not entitle to anything. Pursuant to the Municipal Claim Tax Lien Law, Act 153 of 1923, p.l. 207 53 P.S. § 7101, et seq (Municipal Lien Act), the city as the owner of PGW has the right to collect on municipal claims, but this law does not address the areas of deceitfulness, fraud, covert tactics, and etc..., involved in this case, and on that note, the City of Philadelphia is NOT entitled to place a Lien on said property. They conducted their business in BAD FAITH, Intentional Torts, and Fraud, etc... Their process of placing the Liens violates the Complainant's 14th Amendment Rights to Due Process under the law. They denied the regress process and law of allowing the Complainant to place her disagreements on the records/Judgment Claims. As stated, even the Common Pleas Court continued to refused to allow the Complainant to place her counter statements of the record regarding the Judgement Claims. record information of worker who came to install meters color

They continued to act in Bad Faith. Even the mere fact that PGW's Workers came back to the said property after the Gas was turned off is proof that their Gas Meter was still not reading the correct Gas Usages as PGW has stated themselves as well as the way and the timing of when the PGW's Workers came by (which was at night and dark) sneaking around our property and without disclosing before hand what, and why they were back out on our property gave us the impression that they were **trying to blow us and our property up**. They did not expected us to have seen them tampering on our property after the gas was already cut off. When Complainant called PGW to find out why their workers were back out on our property, is when it was disclosed to Complainant that their **Digital Gas Meter was reading gas usage; even though, the gas was already turned off by them**.

In addition, for several years (over 30 years), we would have to periodically call PGW, just like we have done a couple of times in 2015 and 2016, for gas leakages, and each time they come out, they would claimed that their gas reading device did not detect any gas, but there was one time (years ago), my father was no longer accepting their false claims. My father told the PGW's Workers, if they do not fix the gas leak that he was calling the News Media because that just how strong the gas fumes were in a certain section of the house. It made you sick, and they kept claiming that there were no gas leaks. Then, one of the PGW's Worker stated, that he was

going to check the Gas leak (that was obviously very strong) with another device, and that device picked up the gas leak immediately, and then, they finally fixed it years ago, but again, we never received any credit for the gas leak that I'm, sure was registered as being used.

8. **Agreed in Part** - the Complainant want the entire bill/balance wipe away as being paid in full, and **All Liens** removed and listed as satisfied in the Common Pleas Court's Records due to PGW's Fraud, Covert Tactics, inflation Gas Bills, inaccurate gas meter readings, and etc... In addition, the Complainant is also requesting any and all fees, costs, expenses, legal fees and expenses, Attorney Fees, Costs, and Expenses, Liens Fees, Collection Fees, Interests, Fines, Penalties, and etc... be paid by the City of Philadelphia and PGW as well as correcting/reflecting a positive credit reporting on James R. Hughey's and Debbie Hughey's Credit Reports. In addition, the Complainant is seeking a refund of the monies (along with interests and penalties) that has already paid as well as any pain and suffering. Also, the Complainant is seeking a new free Digital Gas Meter Placement with reconnection fees free of charge and without any deposits or upfront fees.

9. **Updated Response** - Complainant has already objected the Respondents' Objections as well as clearly stated why on more than one occasion. Pursuant to the Pennsylvania Public Utility Code at 66 Pa. C.S. §101 et seq., the Pennsylvania Public Utility Commission (PUC) is statutorily mandated to supervise **all public utilities** (including electric, telephone, gas, water, railroads and motor carriers) **in the Commonwealth of Pennsylvania**. Thus, the **PUC has jurisdiction over this case #Docket No. C - 2016-2567445** as well as according to 52 Pa. Code §1.1 et seq., the PUC implemented and maintained various substantive and procedural regulations regarding the supervision of those utilities. **The Pennsylvania Public Utility Commission also has the power to not only to investigate, but to prosecute those who are and have violated the Public Utility Code and Commission Regulations.**

10. **Updated Response** - According to 66 Pa.C.S. Municipal Claim Tax Lien Law § 501, 1301, 1304, 1501, 1502, 1504, 1507, & 1508, the PUC can adjust the Utilities Bills for meter errors; however, since, the meter has not been tested under § 59.21, make it very difficult in deciding how much of a refund shall be given to the Complainant. Whereas, the Complainant is also seeking a refund of the entire Gas Bills of 2006, 2014, 2015, and 2016 as well as seeking judgments for the City of Philadelphia and PGW to be responsible for all fees, costs, expenses, Attorneys Fees, Costs, and

Expenses, Liens and Collections Fees, Reconnections Fees, Fines, Penalties, Interests, and etc...

11. **Updated Response** - These cases are also about the billings that led to the Liens; thus, by correcting the billings should correct the Liens. Just the mere fact that the bills have been inflated, Covert Tactics, inaccurate meter readings, and etc..., is enough to remove all billings and Liens. Thus, the Liens must automatically be removed as well.

12. **Disagreed** - The City of Philadelphia Common Pleas Court has even denied and violated the Complainant's Rights to even place rebuttals on the Philadelphia Courts Civil Dockets/Records: 060730129, 061030833, 150433708, 150630676, 151230285, and 160430199. The way this has been handled is like a **Dictatorship** of whatever the city and/or the PGW said is the only thing that mattered; therefore, showing a continual reflection of the City's and PGW's unfairness and unjust system. The PGW and the City of Philadelphia also violated the rules and the regulations by terminating Gas Services off, since an Informal and a Formal Complaints with the PUC were already filed. Also, the City of Philadelphia via PGW violated §56.231 regarding Interruption of Service because **according the regulations, Gas Services were not to be terminated while these Gas Bills were being disputed, but yet PGW turned the Complainant's Gas Service off, since her filing of a Formal as well as an Informal Complaints.** In addition, the City of Philadelphia and PGW violated § 56.141(1)(2) of the public utility code, 66 Pa. C.S. § § 331, 501, 504, 1301, 1305, chapter 14, 1501, & 1504 as it related to the Complainant's Disputes with the City and PGW.

13. **Disagreed** - The City of Philadelphia and the Philadelphia Gas Works are not entitled to a lien against said property, especially when fraud, Covert Tactics, Tampering with the Gas Meter to produce Fraudulent inflated Gas Bills, and etc... existed. There has been recent news reports of how the City of Philadelphia has tried to take other people property via these Liens Process. By PGW mandating a copy of the DEED on said property before the gas services could be turned on as well as claiming that an agreement that the Complainant knew nothing about were manipulative, illegal, fraudulent, deceitful, Covert Tactics, and etc...

14. **Disagreed** - The PUC definitely has jurisdiction over these subject matters, and the City of Philadelphia, PGW, and Ms. Ms. Graciela Christlieb are definitely aware of this !

**Complainant's Responses to PGW's Answer to Numbered Four:**

4. **Misleading** - The PGW issued about three 10-day Shut-Off Notice; in which, the Property Owner's Doctor signed and sent the PGW's Medical Necessity Forms to maintain heat in the house for said Owner, but PWG refused to supply said Owners with copies of those documentation. The PGW did continue Gas Services after the Medical Necessity Submissions; however, without any advanced notice, the PGW terminated Gas Service; while, denying Complainant the ability to obtain another Medical Necessity Form. Prior to and including now, the Complainant had continued to complained about the gas bills and Liens to the PUC as wells as the PGW. Also, as stated within this document, the PGW and the City violated the law by terminating Gas Service; while, it is under dispute !

#### **Complainant's Responses to Defendants' New Matter**

8. **Neither Denied nor Admitted** - Proof has not been submitted in reference to this.

9. **False** - the PGW's Gas Service was not under Complainant's Name from December 2007 through May, 2008. The Complainant has no knowledge of this. The Complainant requests that the PUC to compel PGW to produce proof - STRICK PROOF IS DEMANDED !

10. **Denied in part** - due to the PGW's Termination of Gas Service in 2006; which was due to fraudulent billing, Covert Tactics, and etc..., the PGW continued to deny Gas Services in other family members' names. The only way that the Complainant was able to obtain Gas Service in November, 2014 was that she was forced to give PGW a copy of the DEED of the Property of 1629 Newport Place in Philadelphia, PA, and were charged with some additional fees, and they alleged that an agreement was in place that the Complainant was not informed of nor had any knowledge of nor made any agreement.

11. **Denied** - Due to fraud, Covert Tactics, Violations of the Laws, and etc..., the 2006 Lien falls within the Statue of Limitation. Again, fraud, Covert Tactics, lack of timely notification, and etc... tolls the Statue of Limitation as it related to fighting the billing and lien of 2006. Therefore, 66 Pa. C.S. § 3314 does not apply to the billing and lien of 2006 as well as may not apply to the others years listed there as well because the Respondents keep listing 1964 (and etc...), like something happened then, that has not been disclosed to the Complainant.

**Wherefore**, the Complainant is requesting that the Pennsylvania Public Utility Commission does have jurisdiction over this case, and due to the City of Philadelphia's and Philadelphia Gas Works' continual fraud, inaccurate gas meter reading, inflated Gas Bills, Tampering with Gas Meter, Covert Tactics, retaliation, and etc..., the Complainant is seeking a ruling in her favor, bringing a zero balance on the Utility Bills and Liens of 2006, 2015, and 2016 on the property at 1629 Newport Place in Philadelphia, PA. The Complainant is also seeking that the PUC rules that PGW and the City of Philadelphia pay for all legal fees, costs, and expenses; Courts Costs; interests and penalties; Liens Fees; Collections Fees, Attorneys Fees, Cost, Reconnection Fees, and Expenses; and any other charges or fees. Lastly, the Complaint is requesting that if the PUC rules in the Complainant's favor; then, the Liens must automatically be removed/satisfied on the said property, and a reimbursement of all monies, fees, payments, and etc... that has been paid to the Philadelphia Gas Works.

Signed Debbie Hughey Date May 26, 2017  
Debbie Hughey, Pro se January, 2017 - May 26, 2017

#### CERTIFICATE OF SERVICE

I, certify that a true copy of the Complainant's Request for Reconsideration to the Respondent's Preliminary Objections and Motion to Strike, has been served to the Philadelphia Gas Works/City of Philadelphia to their counsel, Ms. Graciela Christlieb, via the Commission Website, since she accept E-Service.

Signed Debbie Hughey Date May 26, 2017  
Debbie Hughey, Pro se Complainant January, 2017 - May 26, 2017

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JUN - 8 2017

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Exhibit A

PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Leva, Paralegal  
Legal Department  
Direct Dial: 215-684-6862  
FAX: 215-684-6798  
E-mail: danielle.leva@pgworks.com

October 11, 2016

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

Re: Debbie Hughey v. PGW, Docket No. C – 2016 – 2567445

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.101, the Philadelphia Gas Works ("PGW") hereby files the original Preliminary Objections to the Complaint 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,

  
Danielle Leva

Enclosure

cc: Debbie Hughey (Regular Mail)  
Wendy Vacca (PGW Mail)

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JUN - 8 2017

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey

v.

Philadelphia Gas Works

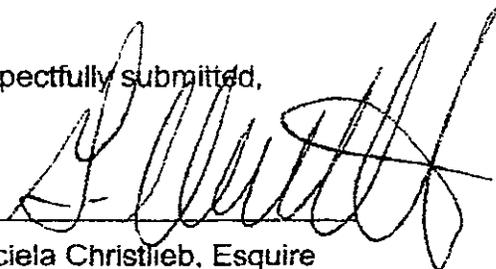
Docket No. C – 2016 – 2567445

NOTICE TO PLEAD

To: **Debbie Hughey, Complainant**

Pursuant to 52 Pa. Code §5.101, you are hereby notified to file a written response to the enclosed Preliminary Objection and Motion to Strike, within ten (10) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted and a judgment may be entered against you.

Respectfully submitted,



October 11, 2016

Graciela Christlieb, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6164

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Debbie Hughey</b>	:	
	:	
v.	:	<b>Docket No. C – 2016 – 2567445</b>
	:	
<b>Philadelphia Gas Works</b>	:	

**Philadelphia Gas Works  
Preliminary Objections and Motion to Strike**

Pursuant to 52 Pa. Code §5.101, the Philadelphia Gas Works (PGW) hereby files its Preliminary Objections to the Complaint filed in the above captioned matter on the grounds that the Commission lacks jurisdiction over the subject matter of the Complaint with regard to the issues raised in the complaint that are beyond the statute of limitations at 66 Pa.C.S. § 3314 and that the Complaint includes impertinent matter in its requested relief to remove (or forbear collection of) liens, and moves to strike the requested relief as "impertinent matter" pursuant to 52 Pa. Code §§5.101(a)(1) and (2).

In support of its preliminary objection and motion to strike, PGW hereby avers the following:

1. On or about September 19, 2016, the Complainant filed a formal complaint against PGW with the Commission under the above captioned Docket No., regarding an unpaid debt for gas service at 1629 Newport Place, Philadelphia, PA (Service Address).
2. In her Complaint, the Complainant refers to bills and liens from 2006.
3. The statute of limitations at 66 Pa.C.S. § 3314 provides that no action for recovery of penalties or forfeitures, or any prosecution, may be maintained unless brought within three years from the date the liability arose. The statute of limitations at 66 Pa.C.S. § 3314 divests the Commission of jurisdiction to hear an action brought more than three years from the date the liability arose.

4. The Complainant has lost her right to pursue litigation regarding her account for gas service prior to 2013, as any cause of action arising from that time period falls outside the statute of limitations.

5. There are outstanding liens on the Service Address that reflect the amount owed to PGW for usage at the Service Address.

6. In the Complaint, Complainant states that she "is seeking removal of all of the amounts that PGW claimed that we owed for gas services, liens, (from 2006 to present), collections, court fees, any additional fees, and etc..."

7. Pursuant to the Municipal Claim and Tax Lien Law, Act 153 of 1923, P.L. 207 53 P.S. §7101, et seq. (Municipal Lien Act), the City of Philadelphia as owner of PGW has the right to collect on municipal claims owed to PGW for gas service to a Service Address.

8. The Complainant requests relief in the form of a removal of the lien and balance.

9. Under the Commission's Rules of Administrative Practice and Procedure at 52 Pa. Code §5.101, the treatment of preliminary objections is comparable to that of Pennsylvania civil practice. (See: Order Sustaining Preliminary Objection in *Paul W. Fricker v. PECO Energy Company*, Docket No. C-2009-2094757 (May 21, 2009))

The Commission's regulations provide, in relevant part:

(a) *Grounds.* Preliminary objections are available to parties and may be filed in response to a pleading except motions and prior preliminary objections. Preliminary objections...must state specifically the legal and factual grounds relied upon and be limited to the following:

(1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.

(2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.

52 Pa. Code §5.101(a) (2)<sup>1</sup>

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<sup>1</sup> 52 Pa. Code §5.101(a) (2) emphasis added.

10. Pursuant to the Natural Gas Choice and Competition Act, 66 Pa. C.S.A Section 2201 et seq., section 2212(n), which specifically provides, "Nothing contained in this title shall abrogate the power of a city natural gas distribution operation to collect delinquent receivables through the imposition of liens pursuant to section 3 of the act of May 16, 1923 (P.L. 207, No. 153), referred to as the Municipal Claim and Tax Lien Law, or otherwise. Thus, under 66 Pa. C.S.A Section 2212(n), the Commission has no jurisdiction over the filing of such a lien.<sup>2</sup>

11. The Commission has repeatedly recognized its lack of subject matter jurisdiction in cases involving a dispute over a municipal lien placed upon a property. *Cornelia Strowder v. Philadelphia Gas Works*, 2002 WL 32069511 (2002), *Debra Williams Lawrence v. Philadelphia Gas Works*, Docket Number C-20066672 (Final Order entered January 22, 2007), *Tina L. Francis-Young v. Philadelphia Gas Works*, Docket Number C-2008-2029672, (Final Order entered February 23, 2009), *Dung Phat, LLC v. Philadelphia Gas Works*, Docket Number C-2009-2135667, (Final Order entered January 13, 2010), *Nathaniel Lewis Mooney v. PGW*, Docket No. C-2009-2134673, (Final Opinion and Order entered January 13, 2010), *David Golan v. Philadelphia Gas Works*, Docket Number C-2009-2138115, (Final Order entered February 4, 2010), *2020 West Passyunk Avenue Inc. v. Philadelphia Gas Works*, Docket Number C-2009-2138727, (Final Order entered February 4, 2010), *Jean Charles v. Philadelphia Gas Works*, Docket Number C-2009-2138638, (Final Order entered February 5, 2010), *Agron Vata v. Philadelphia Gas Works*, Docket No. C-2009-2149960 (Final Order entered August 24, 2010), *William Petravich v. Philadelphia Gas Works*, Docket No. C-2010-2188984, (Final Opinion and Order entered February 10, 2011), *Avner and Gail Yamin v. Philadelphia Gas Works*, Docket No. C-2011-2221883, (Final Order entered June 29, 2011), *Ardelle Jackson v. Philadelphia Gas Works*, Docket No. C-2009-2119940 (Final Opinion and Order entered July

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<sup>2</sup> 52 Pa. Code §5.101(a) (1)

1, 2011), Larry and Gail Newman v. Philadelphia Gas Works, C-2011-2273565 (Final Opinion and Order issued March 29, 2012)

12. Pursuant to the Responsible Utility Customer Protection Act at 66 Pa. Cons. Stat. § 1414, which states: "[a] city natural gas distribution operation furnishing gas service to a property is entitled to impose or assess a municipal claim against the property and file as liens of record claims for unpaid natural gas distribution service and other related costs, including natural gas supply ...." clarifies and confirms such rights to impose a lien.

13. The nature of a lien is such that it encumbers the real estate, regardless who caused the event, which results in the imposition of a municipal claim. PGW may collect as a municipal claim, unpaid debt for gas service rendered, even when the gas service was not rendered to the owner of the property. *Newberry Township v. Ray Stambaugh*, 848 A.2d 173; (Pa. Cmwlth. 2000)

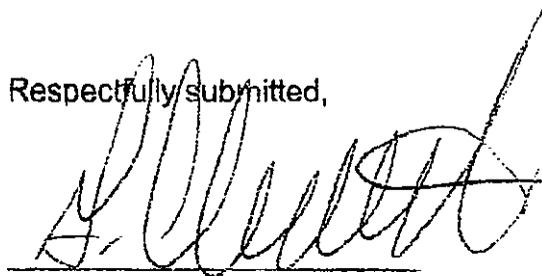
14. As the Commission is without jurisdiction to decide on matters falling outside of the statute of limitation and/or involving the imposition of a municipal lien, the Complainant's request for relief is "impertinent matter" within the use and meaning of 52 Pa. Code §5.101(a) (2) and, should be stricken from the Complaint.<sup>3</sup>

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<sup>3</sup> 52 Pa. Code §5.101(a) (2)

**Wherefore**, PGW respectfully requests that this Commission sustain PGW's preliminary objections to the Complaint and dismiss the Complaint for lack of jurisdiction and strike off the requested relief as impertinent matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. Christlieb', written over a horizontal line.

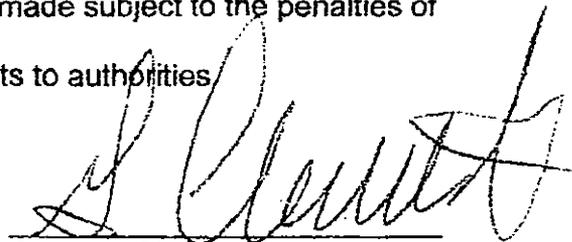
October 11, 2016

Graciela Christlieb, Esquire  
Philadelphia Gas Works  
300 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6164

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 Preliminary Objection 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.

October 11, 2016



Graciela Christlieb, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6164

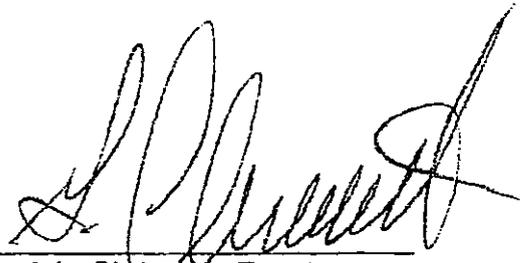
CERTIFICATE OF SERVICE

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).

For Complainant:

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

October 11, 2016



Graciela Christief, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6164

Exhibit B

RECEIVED

JUN - 8 2017

**CORRECTION**

THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Debbie Hughey

v.

Docket No. C - 2016-2567445

Philadelphia Gas Works

**COMPLAINANT'S RESPONSE TO THE PHILADELPHIA GAS WORKS'  
PRELIMINARY OBJECTIONS AND MOTION TO STRIKE**

1. **Admitted;** however, in addition to filing a Formal Complaint. The Complainant had also filed an Informal Complaint over a year ago, but nothing was done about it.
2. **Admitted in Part and Denied in Part.** Complainant referred to bills and liens of 2006, 2015, and 2016.
3. According to law, **fraud voids any Statute of Limitation.** Thus, the PUC - Public Utility Commission does have jurisdiction to not only hear, but to rule in this case due to the several patterns of fraud, overcharging, inaccurate meter readings, and etc... that exist in this case.
4. **Denied.** As stated, fraud voids any Statute of Limitation. Also, the Philadelphia Gas Work never informed the Complainant about the lien of 2006. The Complainant discovered it while she was reviewing other Court Records in 2016. Thus, the tolling of Statute of Limitation does not start for the 2006 Lien, until 2016.
5. **Denied.** The liens that are placed on the property located at 1629 Newport Place in Philadelphia, PA 19122 are fraudulent, and etc...
6. **Admitted.** We are seeking the correction of all bills, liens, and etc... to reflect a zero balance being owed as well as the removal of **ALL** liens on said property.
7. **Disagreed.** Since fraud, and etc... exist, the City of Philadelphia and PGW are not entitle to anything. They continued to act in bad faith. Even the mere fact that PGW's Workers came back after the Gas was turned off is proof that their Gas Meter was still not reading the correct Gas Usage as well as the way and the timing of when the PGW's Workers came by (which was at night and dark) sneaking around our property and without disclosing what and why they were back out on our property for; giving us the impression that they were trying to blow us and our property up. They did not expect us to have seen them tampering on our property after the gas was already cut off. When I called PGW to find out why their workers were back out on our property, is when it was disclosed to me that their Digital Gas Meter was reading gas usage; even though, the gas was already turned off. In addition, for several years (over 30 years), we would have to periodically call PGW, just like we have done a couple of times in 2015 and 2016, for gas leakage and each time they come out, they would claimed that their gas reading

device did not detect any gas, but their one time, my father was no longer accepting their false claim. My father told the PGW's Workers, if they do not fix the gas leak that he was calling the News Media because that just how strong the order was in the house. It made you sick, and they kept claiming that there was no gas leak. Then one of the worker stated let me check it with another device, and that device picked up the gas leak, and then they finally fixed it back then, but again, we never received any credit for the gas leak that I'm, sure was registered as being used.

8. **Agreed.** the Complaint want the entire bill/balance wipe away as being paid in full, and **All Liens** removed due to PGW's fraud, over inflating the bills. inaccurate gas meter, and etc...

9. **Delayed Response.** Need additional time to respond.

10. **Delayed.** Need additional time to respond.

11. **Delayed.** Need additional time to respond.

12. **Disagreed.** The City of Philadelphia has even denied and violated our rights to even place our rebuttals on the Philadelphia Courts Civil Dockets/Records. The way this has been handled is like a dictatorship of whatever the city and/or the PGW said is the only thing that matters.

13. **Disagreed.** The City of Philadelphia and the Philadelphia Gas Works are not entitled to a lien against said property, especially when fraud, and etc... existed. There has been recent news reports of how the City has tried to take other people property via these Liens Process. By PGW mandating a copy of the deed before the gas services could be turned on as well as claiming that an agreement that the Complainant knew nothing about, was manipulative, illegal, fraudulent, deceitful, and etc...

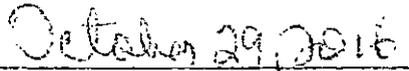
14. **Disagreed.** The PUC definitely has jurisdiction over these subject matters.

**Wherefore,** the Complaint is still seek a ruling in our favor for All Liens of 2006, 2015, and 2016, and any other liens that we may not have knowledge of and/or planned to add later, be removed, and to bring any other balances to zero balance of the Complainant, Owners, Occupants, and etc... owing the City of Philadelphia and PGW nothing due to their continual fraud, inaccurate gas meter, and etc... Also, Complainant needs additional time to fully respond to these objections, new matters, and etc... Complaint did not have a full ten days; in which, to respond, and definitely ten days would not even be enough time to respond anyway.

Signed

  
Debbie Hughey

Date



**CORRECTION**

THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey

v.

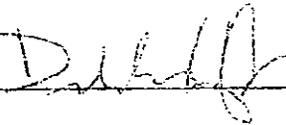
Docket No. C - 2016-2567445

Philadelphia Gas Works

**Request for additional time to respond to Preliminary Objections, Motions to Strike,  
New Matter, and etc...**

The Complaint is asking for an additional fifteen days in which to respond to  
PGW's Preliminary Objections, Motion to Strike, New Matter, and etc...

Signed



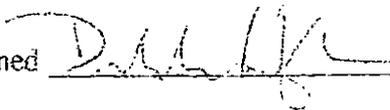
Date

October 29, 2016

**CORRECTION**

**CERTIFICATE OF SERVICE**

I, certify that I have served a true copy of the Complainant's Corrected Responses to the Philadelphia Gas Works Preliminary Objections and Motions to Strike as well as a true copy of the Complaint's Request for additional fifteen days in which to fully respond to their New Matter. Motion to Strike, Preliminary Objections, and etc..., sent to the Philadelphia Gas Works via their counsel Ms. Graciela Christlieb, at 800 W. Montgomery Avenue, Philadelphia, PA 19122 via Regular Mail on October 29, 2016.

Signed  Date 10-29-16

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, **Complainant**

v.

Docket No. C - 2016-2567445

Philadelphia Gas Works,  
**Respondents**

**COMPLAINANT'S AMENDED FORMAL COMPLAINT AND AMENDED  
RELIEF**

COMPLAINANT'S AMENDED FORMAL COMPLAINT

The Complainant is amending her Formal Complaint (Exhibit A {15 pages}) against the Philadelphia Gas Works (PGW) as follows:

1. PGW is threatening to shut off my service or has already shut off my service.
2. Incorrect charges are on my bill.
3. I am having a reliability, safety or quality problem with my utility service, the Philadelphia Gas Works.
4. PGW has pervasive illegal and fraudulent business practices of trying to **steal our property**. Also, **it was reported on the news of how PGW has tried to steal other people property** as well.
5. PGW falsely and fraudulently inflated the Gas Bills and placed Liens on our property; in order to, plot and planned, to **steal our property**.
6. PGW falsely and fraudulently placed additional charges to previous Gas Bills in 2006; whereas, Gas Services were already terminated. Thus, we kept being billed for increased Gas Services that we never received.
7. PGW informed us that the payments that we were forced to make; in order, to turn on the Gas Service were for previous bills as well as a down payment.
8. PGW demanded a copy of the DEED of said property before they would even start Gas Services.
9. PGW and the City of Philadelphia (the owners of PGW) violated the Municipal Claims and Tax Liens Act by not informing the Complainant that they placed a Lien against our property in 2006.
10. PGW falsely and fraudulently placed additional charges to our PGW's Gas Bills for Commodity Charges; whereas, Gas Services had ceased.

11. PGW tampered with the gas line after it was already turned off on April 27, 2016. claiming that they wanted to make sure that the gas was turned off, due to their Digital Gas Meter was registering gas usage as well as they gave us the impression that they wanted to blow up us and our property.
12. The returning of the PGW's Workers **proved that their Digital Gas Meter was falsely reading that gas was being used**; whereas, we only use gas for the heating our house during the Winter, and for heating the water; in which, both the hot water and the heater were already turned off, but yet they told us that the gas was on, and that the meter was reading gas usage.
13. Even further PGW's deceptive practices are by the City of Philadelphia and the Common Pleas Court of Philadelphia denying our rights to place our counter statement (Affidavit of Defense) to their fraudulent Gas Bills and Liens on the Court's Records.
14. A bogus, tampered, and/or fraudulent Digital Gas Meter was placed in our house again. The Incidents of Black vs. White Colored PGW's Workers both coming to our property to place the Digital Gas Meter at the same time are clearer now of the **continual Covert Tactics**.
15. PGW falsely and fraudulently claiming that an agreement was made for services; whereas, the Complainant never made any agreement.
16. PGW fraudulently obtaining additional funds under false pretends of claiming that an agreement was made, and etc...
17. PGW never gave Complainant a copy of the alleged agreement.
18. PGW violated our rights to be informed of the alleged agreement. Thus, continuing their deceptive pervasive practices.
19. Also, other issues and incidents as listed in the Certified Letter #7014 2120 0000 4339 4202; which is, included in Exhibit A.
20. PGW also violated our rights to Due Process.
21. PGW violated the law by retaliating against the owners of said property, for filing a Formal Complaint against them.
22. PGW never gave full disclosure nor obtained the Complainant's authorization to check Complainant's Credit Report regarding reconnection of Gas Service inquiry.

#### AMENDED RELIEF

According to the Complainant's Formal Complaint (see Exhibit A), she is seeking the following reliefs:

1. Due to outrageous, inflated, and fraudulent PGW's Gas Bills as well as Bad Faith. Intentional Torts; and pervasive, illegal, and fraudulent Business Practices, Complainant

is seeking the removal of ALL of the amounts of monies that PGW and/or the City of Philadelphia claimed that is owed for Gas Services, Liens (from 2006 to present), Collections Costs/Fees, Court Fees, Attorney Fees, and any additional fees, and etc...

2. Complainant is also requesting a restoration of our Credit Bureau Rating, and the removal of the amounts of these PGW's Gas Bill, Liens, Collections, negative reporting, and etc... removed off of our credit reports, since 2006 to present.
3. Ruling that the Complainant, the owners, and etc... do not owe PGW nor the City of Philadelphia for any Gas Bills; bringing the balance to zero, and satisfying the fraudulent liens that were illegally placed on the property at 1629 Newport Place in Philadelphia, PA 19122.
4. Rules that PGW and the City of Philadelphia pay for all legal fees, costs, and expenses; Court Costs; Attorney Fees, Cost, and Expenses, interests, penalties, Collections Fees, Reconnection Fees, and any other charges or fees.
5. Rules that the Liens be removed and satisfied on the said property.
6. Reimbursement of ALL monies paid to PGW in 2014 through 2016 along with interest and penalties.
7. Replacement of Digital Gas Meter free of charge to said owners.
8. PGW be fine, disciplined, and etc... for their illegal and fraudulent dealings in this case, and any other sanctions that the PUC feels are appropriate.
9. Anything else that the PUC knows that the Complainant is entitled to.

Signed Debbie Hughey  
Debbie Hughey, Pro se  
Complainant

Date May 26, 2017  
May 23 - 26, 2017

#### CERTIFICATE OF SERVICE

I, certify that a true copy of the Complainant's Amended Formal Complaint and Amended Relief, is being served as per 52 Pa. Code § 1.54(b)(3)(ii), to the Philadelphia Gas Works' Attorney, Ms. Graciela Christlieb, via the PUC's Website, since she accept E-Service.

Signed Debbie Hughey  
Debbie Hughey, Pro se  
Complainant

Date 05/26/2017  
May 23 - 26, 2017

# Exhibit A

## PENNSYLVANIA PUBLIC UTILITY COMMISSION

### Formal Complaint

Filing this form begins a legal proceeding and you will be a party to the case.  
If you do not wish to be a party to the case, consider filing an informal complaint.

To complete this form, please type or print legibly in ink.

#### 1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Debbie Hughey  
Street/P.O. Box P.O. Box 41842 Apt #                       
City Philadelphia State PA Zip 19101  
County Philadelphia

Telephone Number(s) Where We Can Contact You During the Day:

(215) 617-8047 (home)      (215) 617-8047 (mobile)

*\* Do not release my email for legal proceedings, etc. \**

E-mail Address (optional): debbie-hughey@yahoo.com

Utility Account Number (from your bill) 0915897210

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name Debbie Hughey and James Hughey  
Street/P.O. Box 1629 Newport Place  
City Philadelphia State PA Zip 19122

#### 2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

PGW-Philadelphia Gas Work

3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- |   |   |
|---|---|
| <input type="checkbox"/> ELECTRIC       | <input type="checkbox"/> WASTEWATER/SEWER                                     |
| <input checked="" type="checkbox"/> GAS | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance)  |
| <input type="checkbox"/> WATER          | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |
| <input type="checkbox"/> STEAM HEAT     |   |

4. Reason for Complaint

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. **Your complaint may be dismissed without a hearing if you do not provide specific information.**

- The utility is threatening to shut off my service or has already shut off my service.
- I would like a payment agreement.
- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.
- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.
- Other (explain). PG&W has Pervasive illegal and fraudulent business practices of trying to ~~steal~~ steal our property - see certified mail copy # 7014 2620 0000 4339 4202.

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to internet service.

## 5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

Due to outrageous, inflated, and fraudulent PG&E's Gas Bills as well as Bad Faith, Intentional TORTS, Pervasive, Illegal, and fraudulent Business Practices, we ARE SEEKING the removal of ALL of the amounts that PG&E claimed that we owed for Gas Services, Liens (from 2006 to present), Collections, Court Fees, any additional fees, and etc... from the City of Philadelphia, Philadelphia Gas Works, and etc... as well as requesting a Restoration of Credit Bureau Rating, and the removal of the amounts of these PG&E's Gas Bills, Liens, Collections, and etc... totally removed off of our credit reports since 2006.

In addition to the above, we aver the following:

1. A Bogus, Tampered, and/or Fraudulent Digital Gas Meter was placed in our house again. Incident of Black vs. white colored PG&E's workers apparently cleared now.
2. Falsely and fraudulently claiming that an agreement was made for services.
3. Fraudulently obtaining additional funds under false pretenses of claiming that an agreement was made.
4. NEVER gave us a copy of the alleged agreement.

\*SEE Attachment To the Relief Sought\*

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

6. **Protection From Abuse (PFA)**

**Has a court granted a "Protection From Abuse" order that is currently in effect for your personal safety or welfare?** The PUC needs this information to properly process your complaint so that your identity is not made public.

Note: You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection From Abuse" order for your personal safety or welfare?

YES

NO

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

7. **Prior Utility Contact**

a. **Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?**

YES

NO

Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. **If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?**

YES

NO

Note: You must contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.

c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why. N/A

CONTACTED COMPANY SEVERAL TIMES

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.

8. Legal Representation

If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, if known. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name \_\_\_\_\_  
Street/P.O. Box \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Area Code/Phone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

9. Verification and Signature

**You must sign your complaint.** Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. **If you do not sign the Formal Complaint, the PUC will not accept it.**

**Verification:**

I Debbie Hughey, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Debbie Hughey (Signature of Complainant)      Sept. 19, 2016 (Date)  
N/A      \*total of 15 pgs Submitted

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept** it.

10. Two Ways to File Your Formal Complaint

**Electronically.** You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

**Note:** If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

**Mail.** Mail the completed form with your original signature and any attachments, by certified mail, first class mail, or overnight delivery to this address:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

Note: Formal Complaints sent by fax or e-mail will **not** be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.

## ATTACHMENT OF RELIEF SOUGHT IN THE FORMAL COMPLAINT WITH THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Due to outrageous, inflated, and fraudulent PGW's Gas Bills as well as Bad Faith; Intentional Torts; Pervasive, Illegal, and Fraudulent Business Practices; we are seeking the removal of all of the amounts that PGW claimed that we owed for Gas Services, Liens (from 2006 to present), Collections, Court Fees, Legal Fees, any additional fees, and etc... from the City of Pennsylvania, Philadelphia Gas Works, and etc... as well as requesting a restoration of Credit Bureau Rating, and the removal of the amounts of these PGW's Gas Bills, Liens, Collections, and etc..., totally removed off of our Credit Reports since 2006.

In addition to the above, we aver the following:

1. A Bogus, Tampered, and/or Fraudulent Digital Gas Meter was placed in our house again. Incident of Black vs. White Colored PGW's Workers apparently clearer now; in order, for the Tampered/Fraudulent/Malfunctioned, and etc... Digital Gas Meter to get placed into our house. The Black Colored allegedly PGW's Worker got to our house before the White Colored PGW's Worker (who came about a week ago) that we were expecting to replace the meter, and the White Guy was surprised as well as we were surprised that a Black PGW's Worker came to put the Gas Meter in. We said that there are two PGW's Worker out there to replace the Digital Gas Meter. This sounded too much like the Cover Tactics that we as a family have been and continued to be subjected to. Why would the Philadelphia Gas Work send out two different workers for the same job ?
2. Falsely and fraudulently claiming that an agreement was made for services.
3. Fraudulently obtaining additional funds under false pretends of claiming that an agreement was made.
4. Never gave us a copy of the alleged agreement.
5. Also, violated our rights to be informed of the alleged agreement. Thus, continual deceptive pervasive practices.
6. Falsely and fraudulently placed Liens on our property to try to steal our property.
7. Falsely and fraudulently placed additional charges to our previous Gas Bills in 2006, especially when we were no longer using the gas services due to PGW's termination of gas services.
8. PGW never informed us that they placed a Lien against our property in 2006.
9. Falsely and fraudulently placed additional charges to our PGW's Gas Bills for Commodity Charges of not even using the gas services.
10. Tampered with the gas line after it was turned off on April 27, 2016, claiming that they wanted to make sure that the Gas was turned off as well as they gave us the impression that they wanted to blow us up as well as our property. The returning of the PGW's Workers to our house a couple of days after the gas was turned off, claiming that they were making sure that the gas was turned off, **proved** that their Digital Gas Meter was reading Gas usage; even though, it was already turned off. Therefore, a defective, malfunctioning, and/or tampered Digital Gas Meter also lead to the PGW's inflated Gas Bills.
11. The City of Philadelphia and the Common Pleas Court of Philadelphia have denied our rights to place our counter statements to their Fraudulent Gas Bills and Liens on the court records on June 22, 2016. *D.H.J. 09/19/16*

09/19/16 Copy submitted with PUC's formal complaint

*Handwritten signature/initials*

PHILADELPHIA GAS WORKS  
800 W. MONTGOMERY AVENUE  
PHILADELPHIA, PA 19122-0050

Date of Notice: 04/27/2016  
Account Number: 915897210  
Customer Name: HUGHEY, DEBBIE  
Premise Address: 1629 NEWPORT PL/PHILA,PA

19122-2713

## YOUR GAS HAS BEEN SHUT-OFF

### WE SHUT OFF YOUR GAS BECAUSE:

- You did not pay your past due bill.
- You did not pay your security deposit.
- You did not give us access to your meter.
- You did not meet the requirements and/or complete the application for service process.
- Theft of service or tampering with utility equipment.
- Rejected payment.
- Fraud/Material misrepresentation.

### TO HAVE YOUR SERVICE TURNED BACK ON YOU MUST DO ALL OF THE FOLLOWING:

- Arrange to pay your overdue bill of **\$2,885.24**
- Pay a Turn On Charge of \$123.23 (Plus \$372.00 if we dug up the street to shut off the gas).
- Pay a Deposit (if required) of **\$276.00**
- Other: \_\_\_\_\_

You must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premises. You may be required to pay more than the amount on this notice to have your service restored.

### MEDICAL EMERGENCY NOTICE

LET US KNOW IF SOMEONE LIVING IN YOUR HOME IS SERIOUSLY ILL OR HAS A MEDICAL CONDITION THAT WILL BE AGGRAVATED BY THE CESSATION OF SERVICE. WE WILL RESTORE YOUR GAS SERVICE WITHIN 24 HOURS during such illness provided you:

1. Have your LICENSED physician or nurse practitioner certify by phone or in writing that such illness exists and that it may be aggravated if your service is not restored; and
2. Call us at 215-235-1777 and make arrangements to pay your bills for service. You must provide us with household income and occupant information to determine any payment terms while protected under the medical certification.
3. HAVE YOUR LICENSED PHYSICIAN SEND A LETTER TO PGW WITHIN 7 DAYS OF VERIFYING THE MEDICAL CONDITION.

### IMPORTANT TO KNOW

If you have questions or need more information, please call us at 215-235-1777 or write us at P.O. Box 3500, Philadelphia, PA 19122. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC will attempt to help you with your problem. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.

### WINTER SHUT-OFF PROVISIONS (Dec. 1-Mar. 31)

- We will restore your service within 24 hours of your meeting all requirements to have service reconnected. Where street digging is required, it may take up to 7 days.
- If you are low-income, there are special rules about whether we may shut off your gas in the winter. Add together the monthly income for the household and look at the chart to determine your group.
- If your income is 150% of the federal poverty guidelines or below, we must first ask the PUC for permission to shut off your service. If you did not receive notification that we obtained permission from the PUC, call us immediately.
- If your income is above 150% but does not exceed 250% of the federal poverty guidelines, we will not shut off your service if:
  1. Someone in your household is 12 or younger or 65 or older; or
  2. You have paid at least one-half of your last two monthly gas bills; or
  3. If over the last two months you have paid at least 15% of your income toward the gas bills.

Federal Poverty Guidelines (FPG) 2016		
Household Size including Children	Your income is 150% of the FPG or below if it is:	Your income is between 151-250% of the FPG if it is:
1	\$1,485 or less	\$1,486-\$2,475
2	\$2,003 or less	\$2,004-\$3,338
3	\$2,520 or less	\$2,521-\$4,200
4	\$3,038 or less	\$3,039-\$5,063
Each additional person add	\$520	\$521 - \$867

- If you have a valid Protection From Abuse order from a court, there are some additional protections available to you. Call us immediately at 215-235-1777. (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. Call 215-235-1777 right away to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- If your landlord pays your utility bill you have other legal protections. Please call us at 215-235-1777.
- If you have trouble understanding or speaking English please call us at 215-235-1777 for free interpretation.
- All adult occupants of the premise, whose names are on the mortgage, deed, or lease are considered the customer and are responsible for payment to restore service.
- ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.

09/19/16 Copies submitted with PUC's formal complaint

**COLLECTION AGENCY REFERRAL NOTICE**

**PAYMENT DUE ON RECEIPT**

Since you have not paid your past due balance of \$3,631.45, action will be taken to refer your account to a collection agency unless you make full payment upon receipt of this notice.

A good credit rating is a valuable asset, and we are sure that you wish to protect your rating.

To avoid referral to a collection agency contact our Credit/Collection department immediately at 215-235-1777, Monday through Friday, between 8:00 a.m. and 4:30 p.m. to make a full payment. You can make payments over the telephone using your checking account or credit card.

You can make a payment at one of our Customer Service Centers between the hours of 9:00 A.M. and 5:00 P.M. at one of the following locations:

- Center City, 1137 Chestnut Street - Monday, Tuesday, Thursday and Friday.
- Frankford, 4410 Frankford Avenue - Tuesday, Thursday and Friday.
- Germantown, 210 W. Chelton Avenue - Tuesday, Wednesday and Friday.
- North Philadelphia, 1337 W. Erie Avenue - Monday, Wednesday and Thursday.
- South Philadelphia, 1601 S. Broad Street - Monday, Wednesday and Thursday.
- West Philadelphia, 5230 Chestnut Street - Monday, Tuesday, Wednesday and Friday.

Questions or complaints about your bill? Please call 215-235-1000, or write to: PGW P.O. Box 3500, Phila., PA 19122-0050

PG\_20160531180100.dat-485-00000725

Please return this portion with your payment.  
Write your account number on your check or money order made payable to Philadelphia Gas Works

Account Number: 0915897210  
Notice Date: May 31, 2016  
Please Pay: \$3,631.45

Place "X" in box for address corrections. Print corrections on reverse side.

Amount Enclosed:

000243 000000725  
DEBBIE HUGHEY  
PO BOX 41842  
PHILADELPHIA PA 19101-1842

Philadelphia Gas Works  
P.O. Box 11700  
Newark, NJ 07101-4700

0009158972108099000000363147

09/19/16 Copies submitted with PVC's formal complaint

1 of 2 pages Certified Mail #7014 2120 0000 4339 4202

Ms. Debbie Hughey  
1629 Newport Place  
Philadelphia, PA 19122  
June 11 - 17, 2016

PGW - Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
RE: Fraudulent and Inflated Gas Bills;  
Account # 0915897210

Dear Representatives:

Your company continued to send us outrageous, inflated, and fraudulent Gas Bill. We do not owe the amount that you claimed of \$3,631.45.

A couple of days after your company turned off the Gas Service to our house, two PGW's Men came to our house and tampered with our Gas Line, like giving us the impression that they were trying to blow our house up. We also feel that an intentionally high registering Gas Meter was placed in our house as to possibly being one reason why the Gas Meter Charges are so high. We know that another reason why our Gas Bill has been inflated is because of your company Commodity (additional fees for not when we do not need to use the) Charges as well as other false charges. The Commodity Charges are higher than the actual Gas Usage. Our Gas Bills went from about an alleged \$800.00 to over \$1,500.00 within six to seven months (non Winter Months); when, we were not even using the gas, except to heat the Gas Water Heater. We only used Gas for heating of the house during the Winter and for heating the water tank. Again, our Gas Bill should not have jumped from over \$500.00 in 2015 to over \$3,500.00 in 2016. About a week ago, there was a reported case on the news that verified the bad faith of PGW, scamming to take a customer property from them.

In addition, PGW has exhibited numerous acts of Bad Faith. At one point they, charged us a \$350.00 when they changed their accounting methods and charged an additional \$300.00 or more dollars to change the Gas Meter to a Digital Gas Meter a couple of years ago. Also, a couple of years ago, they charged us over \$1,000.00; whereas, we were not even using Gas at that time, and we do NOT owe for that as well. Shortly after that time is when we found out about PGW charging us a fees; even, if we do not use their Gas Service, i.e. during the Summer and Spring Months. Recently, it was disclosed to me that the previous \$1,000.00 charged that they illegally and fraudulently placed on our bill, that they placed a Lien on our house in 2006, for those false Gas Bill Charges, but never told us that they placed a Lien for any bills. We do NOT owe for those fraudulent Gas Bills of 2006 !

Since PGW cut our Gas Service off for the fraudulently high bill of \$1,000.00 (est. in 2006), they refused to allow my sister and my brother to obtain Gas Services in their name. Then, I was informed in November, 2014 that the only way that we could have Gas Services turned on, is that you must me the owner of the house, and you must bring

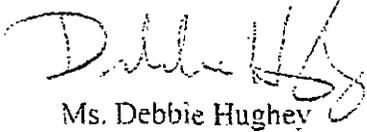
2 of 2 pages Certified Mail #7014 2120 0000 4339 4202

a copy of the deed. PGW is the only Utility Company that has requested a copy of the deed; in order, to receive services. We did not realized that by PGW asking for a copy of the deed was a way of them trying to eventually steal our property by their pervasive illegal and fraudulent business practices.

Also, what PGW did not disclosed to me was that the amount that they required that I pay; in order, to have the Gas turned on was for a payment agreement. I never made nor was asked to be placed on an agreement to pay for services that had not yet began at that time. Thus, this was an additional way to falsely charges you additional fees.

I want to know what will be done about reducing these bills and removing ALL of the Liens that you have falsely placed on our property. I look forward to your response. Please respond by June 30, 2016.

Sincerely,



Ms. Debbie Hughey

cc: files  
cc: News Media

09/19/16 Copies (1 of 4 pages of PGW's response) submitted with  
PVC formal complaint



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Telephone 215-787-1288

Fax 215-684-6996

July 14, 2016

Debbie Hughey  
P.O. Box 41842  
Philadelphia, Pa. 19101-1842

Re: Ac#915897210  
1629 Newport Pl.

Dear Ms. Hughey,

On June 21, 2016 a dispute was filed regarding the overall balance which represents service from November 10/2014 to April 27, 2016 in the amount of \$3,631.45.

An investigation of your dispute has been completed and it was determined that the bill in question is correct as rendered. These bill represents usage that recorded on your meter from a reading of 0000 (Mtr#2161639) to 2695 for a total of 2695 CCF. The meter at your property is equipped with an Automatic Meter Reading (AMR) device. This device allows PGW to obtain the actual usage recording at your meter without having to gain access into the property.

The bill that you are disputing reflects the actual usage recording on the meter. A gas usage analysis which analyzes your consumption and takes into consideration factors such as the weather conditions was also completed and indicated that there is a consistent pattern of usage at the property. Although there may have been no change in the thermostat settings in the residence, the weather can impact how often the heater operates in order for it to maintain the same internal temperature. To assist you in your review of our findings we are including the following documents:

1. A statement of account
2. A gas usage analysis
3. Utility Report

PGW does offer tips on how to conserve energy and possibly reduce future bills. To learn more, please visit our PGW Energy Sense website at [www.pgwenergysense.com](http://www.pgwenergysense.com) and click on energy sense for homeowners.

If you would like to test the accuracy of the meter, a Special Meter Test can be requested by submitting a request and payment in the amount of \$10.00 to:

PGW Special Meter Test  
P.O. Box 37019  
Philadelphia, PA 19122

Our records indicate that the service is no longer active at 1629 Newport Place. Please contact us at 215-235-1000 Monday thru Friday between 8AM and 6PM in order to inquire about terms and restoration options.

Sincerely,

Mr. Soto  
Dispute Resolution Unit

Additional information regarding the content in this letter can be obtained by calling or writing us at:

P.O. Box 3500 Philadelphia PA 19122 Telephone #: 215-787-1288

Payments can be made by phone at 215-235-1000, online at [www.pgworks.com](http://www.pgworks.com), by mail to P.O. Box 11700, Newark, NJ 07101 or at any of our (6) convenient Customer Service Centers or any authorized payment center. Information regarding our Customer Service Centers and authorized payment centers is available upon request.

***If you do not agree with this report, you may file an informal complaint with the Pennsylvania Public Utility Commission to ensure preservation of your rights.***

***You can file an informal complaint at the following:***

***Telephone #: 1-800-692-7380***

***or***

***P.O. Box 3265 Harrisburg Pa 17105-3265***

***or***

***<http://www.puc.state.pa.us>***

When you file an informal complaint, the Public Utility Commission will need to know the following:

1. The name of the ratepayer (your name).
2. Your mailing address and, if different, the address at which service is provided.
3. Your Account number.
4. The name of the utility with which you have the dispute.
5. A brief statement of the dispute.
6. Whether the utility has investigated and reported to you on the matter being disputed.
7. Whether the dispute has been subject of the previous complaint filed with the Commission.
8. The date, if any, of proposed termination.
9. What you would like the Commission to do.

Specific Service Agreement Statement of Account SA- 9924567348

<b>Customer Name</b>	<b>From Date</b>	<b>To Date</b>
DEBBIE HUGHEY	11/10/2014	5/6/2016

<b>Service address</b>	<b>Account Number</b>	<b>SA Number</b>	<b>Meter</b>	<b>Rate</b>
1629 NEWPORT PL PHIL, PA 19122-2713	915897210	9924567348	2161639	GS

STATEMENT

Transaction Date	Type	Reading	Reading Code	# of Days	CCF Usage	Average CCF/Days	Heating DDD's	Payment Type	Due Date	Transaction Amount	Current Balance	Actual Balance
11/13/2014	BPTOCG					0.00				\$123.23	\$0.00	\$0.00
12/04/2014	BILL	172	R	22	172	7.82	478		12/30/2014	\$248.64	\$248.64	\$248.64
12/30/2014	PAY					0.00		Check		(\$95.00)	\$153.64	\$153.64
01/05/2015	PAY					0.00		Cash		(\$162.50)	\$1.14	\$1.14
01/06/2015	LPC					0.00				\$0.01	\$1.15	\$1.15
01/06/2015	BILL	486	R	31	314	10.13	757		01/30/2015	\$476.06	\$477.21	\$477.21
01/29/2015	PAY					0.00		Check		(\$110.00)	\$367.21	\$367.21
02/04/2015	LPC					0.00				\$5.50	\$372.71	\$372.71
02/04/2015	BILL	866	R	31	380	12.26	1058		02/27/2015	\$527.89	\$900.40	\$900.40
03/04/2015	LPC					0.00				\$13.42	\$913.82	\$913.82
03/04/2015	BILL	1270	R	29	404	13.93	1128		03/27/2015	\$511.69	\$1,425.51	\$1,425.51
03/23/2015	PAY					0.00		Check		(\$110.00)	\$1,315.51	\$1,315.51
04/03/2015	LPC					0.00				\$19.73	\$1,335.24	\$1,335.24
04/03/2015	BILL	1521	R	29	251	8.66	710		04/28/2015	\$311.09	\$1,646.33	\$1,646.33
04/03/2015	INTAPL					0.00				(\$2.05)	\$1,644.28	\$1,644.28
04/03/2015	DEPAPL					0.00				(\$142.50)	\$1,501.78	\$1,501.78
05/05/2015	LPC					0.00				\$22.23	\$1,524.01	\$1,524.01
05/05/2015	BILL	1594	R	30	73	2.43	274		05/29/2015	\$111.55	\$1,635.56	\$1,635.56
06/03/2015	LPC					0.00				\$23.90	\$1,659.46	\$1,659.46
06/03/2015	BILL	1612	R	32	18	0.56	33		06/26/2015	\$37.34	\$1,696.80	\$1,696.80
07/02/2015	LPC					0.00				\$24.46	\$1,721.26	\$1,721.26
07/02/2015	BILL	1630	R	29	18	0.62	3		07/28/2015	\$34.51	\$1,755.77	\$1,755.77

Heat & Domestic

GAS USAGE  
ANALYSIS OF ACCOUNT

Hughey, Debbie  
1629 Newport Pl  
Philadelphia, PA. 19122-2713

NON-HEATING  
DAILY USAGE  
0.00 CCF PER DAY

ACCOUNT # 0009 1589 7210

DATES		METER READINGS		NUMBER OF	USAGE IN	DOMESTIC	HEAT	NUMBER	C.F.D.D.**
FROM	TO	FROM	TO	DAYS	CCF*	USAGE CCF *	USAGE	DEG.DAYS**	
11/10/2014	5/1/2015	0	1594	172	1594	0	1594	4405	36.2
5/1/2015	4/27/2016	1594	2695	362	1101	0	1101	3439	32.0
11/10/2014	4/27/2016	0	2695	534	2695	0	2695	7844	34.4

\* CCF = hundred Cubic feet

\*\* DEGREE DAYS AN INDEX OF ENERGY CONSUMPTION FOR HEATING

IT INDICATES THE NUMBER OF DEGREES THE AVERAGE TEMPERATURE DROPS BELOW 65° F.

\*\*\*CFDD EQUALS CUBIC FEET OF GAS USED PER DEGREE DAY

15

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

vs.

Docket No. C - 2016-2567445

Philadelphia Gas Works, Respondent

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

The Complainant had already filed another Motion for Sanction, labeled "Complainant's Continual Motion for Sanctions and Motion To Compel Respondent to Fully Answer the Complainant's Questions, Statements, Requests, and etc...", electronically on May 27, 2017 due to the blatant refusal to answer as well as supply Complainant with the necessary Documents, Requests, and etc...

**I. COMPLAINANT'S HISTORY OF PROCEEDINGS**

First of all, the History that the Respondent, PUC, and some of Judge Salapa's Documentation are not correct.

Secondly, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (PUC) against PGW, and filed an **Informal** Complaint a year prior to the Formal Complaint, but the PUC has done nothing about Complainant's Informal Complaint. The Complainant's Formal Complaints dated September 19, 2016 against PGW are about:

1. "PGW has pervasive illegal and fraudulent business practices of trying to **steal our property**".
2. PGW falsely and fraudulently claiming that an agreement was made for services
3. PGW fraudulently obtaining additional funds under false pretends, and etc... Please review the Complainant's Formal Complaint (**15 pages**) that has been deleted from the PUC's Online Records.
4. The Utility is threatening to shut of my service or has already shut of service.
5. In correct charges are on my bill.
6. I am having reliability, safety, or quality problems with my utility service.
7. PGW has pervasive illegal and fraudulent business practices of trying to steal our property - see Certified Letter #7014 2120 0000 4339 4202, and etc...

Complainant's Second Continuance was granted for about 45 days and not 60 days. Judge Salapa informed the Complainant that there will be no further delays, and Ms. Christieb threaten sanctions, if the June 15, 2017 Hearing is not conducted !

Thirdly, Complainant did not receive the Respondent documents on May 16, 2017.

**II. RESPONSE TO RESPONDENT'S REPLY FOR SANCTIONS**

After the Pre-Hearing, Judge Salapa informed the Complainant that the Respondent has 20 days; in which, to answer the Complainant, but they choose not to do it within 20 days as well as they are playing Delaying Tactics by the responses that they supply !

WHEREFORE, The Complainant stills seeking sanctions against PGW. Please review the Complainant's Response/Answer to to PGW's Reply to Complainant's Request for Sanctions, and please grant the Complainant's requests for Sanctions as well as the Motion to Compel. Thank you.

/s/ Debbie Hughey electronically served on May 28, 2017 at 11:45 pm

Sign \_\_\_\_\_ Date \_\_\_\_\_

#### CERTIFICATE OF SERVICE

I, certify this day that I served a true copy of the foregoing document, Complainant's Response/Answer to the Philadelphia Gas Works' Reply to Complainant's Request for Sanctions, upon the parties (Ms. Graciela Christlieb) listed below, in accordance with the requirements of 52 Pa Code § 1.54 (Relating to service by a Party) via the PUC Electronic Filing System, since Ms. Graciela Christlieb, the Respondent's Attorney, accepts E-Service.

/s/ Debbie Hughey electronically served on May 28, 2017 at 11:45 pm

Signed \_\_\_\_\_ Date \_\_\_\_\_

Debbie Hughey, Pro se  
Complainant

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

**Complainant's Objections** - Respondent and Ms. Christieb 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. Christieb'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. Christieb'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, attached 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 \_\_\_\_\_

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, **Complainant**

v.

Docket No. C - 2016-2567445

Philadelphia Gas Works,  
**Respondent**

COMPLAINANT'S RESPONSE TO JUDGE SALAPA'S ORDER  
DENYING EXCEPTIONS AND GRANTING REQUEST FOR IN-  
PERSON HEARING, AND NEW MATTER OF JUDGE SALAPA'S  
RECUSAL

The Complainant received Judge Salapa's Order of May 15, 2017 (Exhibit A) on May 23, 2017, as it pertained to her Filing of Exceptions (Exhibit C), and she is disappointed by his level of manipulation, bias, prejudice, libel, slander, and etc... that the Complainant is requesting an **immediate Recusal** of Judge Salapa.

Judge Salapa and the PUC - Public Utility Commission continued to leave out several points in the Complainant's Formal Complaints about PGW; like, "PGW has pervasive illegal and fraudulent business practices of trying to **steal our property**"; Falsely and fraudulently claiming that an agreement was made for services; Fraudulently obtaining additional funds under false pretends, and etc... See Exhibit B - a copy of the Complainant's Formal Complaint (**15 pages**) that has been deleted from the PUC's Online Records. Judge Salapa was informed of the Complainant's filing of her Exceptions during the Pre-Hearing as well as he had already acknowledged the Complainant's Motion to Compel PGW for Documents, Records, and etc... Prior to this Formal Complaint, the Complainant filed an Informal Complaint that was never addressed, never investigated never docketed, and etc...

Judge Salapa claimed that he was not properly served, but the Complainant has done as Judge Salapa had previously told her to do, and that was that everything must be filed to the PUC; thus, he should have been served via the PUC. Complainant kept wondering when Ms. Christlieb was going to file her objections via PUC that were already sent to Judge Salapa's Email; which, still has not been done; even though the Complainant had

already submitted her responses to Judge Salapa's Email as well as to the PUC.

Thus, according to 52 Pa. Code § 1.54, Judge Salapa was properly served. 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)(ii) Electronically

Thus, an electronic mail notice **constitutes service**.

Judge Salapa claimed that the Complainant was not allowed to file Exceptions, but he did not state the law/rule/code that stated that Exceptions could not be filed. According to the PUC's Website, a party is allowed to file Exceptions to a Judge's Order. The Complainant was not aware nor informed of her Rights to File an Exception nor was she informed nor aware of the effects of not filing Exceptions nor was she informed of the timeline for filing an Exception. The Complainant did not know anything about filing an Exception, and due to the situations, incidents, illnesses, injuries, continual covert tactics, cyber attacks, and etc..., Complainant was not able to file Exceptions within 15 days.

In addition, to Judge Salapa's statement about the In-Person Hearing. The Complainant should have been given a choice as to whether she wanted a Telephonic or In-Person Hearing, since both the Respondent and Complainant are in Philadelphia, PA. Neither Judge Salapa nor the PUC disclosed to the Complainant that the PUC also conducts hearings at their downtown office in Philadelphia, PA.

The Complainant objects to Judge Salapa's Statements that "the Complainant using the Commission's administrative processes to avoid paying for her utility service. Using the Commission's processes to avoid termination or avoid paying for utility service is an abuse of the Commission's administrative processes and will not be countenanced." **The Complainant will not allow her rights to file anything be violated by Judge Salapa's biases, Abuses of Power, Abuses of Discretions, and his hands of manipulation in this case.** The Complainant had already detected Judge Salapa's bias during the Pre-Hearing that he was already set to rule in favor of the Respondent - the Philadelphia Gas Works, and **Judge Salapa's manipulative, bias, slanderous, and libelous statements are unacceptable !** The Complainant requests the **immediate recusal of Judge Salapa** off of this case. He continued to ignore the fact of how PGW kept saying that the

Complainant made an agreement, but when asked to produce the agreement, they lied, and said that there was no agreement. Judge Salapa continued to ignore the fact that PGW demanded a copy of the DEED to said property before Gas Services would be turned on, but yet again, they lied. Judge Salapa ignored how the Complainant has stated that two Gas Workers came on the same day, at the same time, to said property to place the Digital Gas Meters, and etc..., but PGW has lied again via of their Attorney, Ms. Graciela Christlieb, and most importantly, Judge Salapa continued to ignore the covert tactics involved in this case as well as the fact that according to PGW, the Gas was **on**, reading usages, after it was already officially turned off; which, **proved the tampering of Gas Service/Gas Meter to make the gas bills high, producing inflated and outrageous Gas Bills !** Therefore, who has control of the PGW's Digital Gas Meter to make it register that Gas is being used; whereas, the Gas Service was off. Judge Salapa ignoring the fact that PGW violated the law by retaliating against the Complainant, and turned her Gas Service off, due to her filing of her Formal Complaint, and according to the law, PGW was not allowed to turn the Gas Service off, once a Complaint was filed with the PUC, but Judge Salapa said otherwise. Thus, violating the law. Therefore, Judge Salapa had already decided this case in favor of PGW, and then tries to manipulate and threaten the Complainant from her Due Process Filings.

**WHEREFORE**, the Complainant wants Judge Salapa recuse off of this case **IMMEDIATELY**, and request any further rulings to be done by the new Judge that will be conducting the Hearing on June 15, 2017. In addition, the Complainant is requesting that the PUC fully update ALL of the Complainant's Complaints on the record as listed in the Formal Complaint.

Signed Debbie Hughey Date May 25, 2017  
Debbie Hughey, Pro se

#### CERTIFICATE OF SERVICE

I, certify that a true copy of the Complainant's Response to Judge Salapa's Order denying Exceptions and Granting Request for In-Person Hearing, and New Matter of Judge Salapa's Recusal has been served to the Philadelphia Gas Works via their counsel Ms. Graciela Christlieb, via the PUC's Website, since she accept E-Service.

Signed Debbie Hughey Date 05/25/17  
Debbie Hughey, Pro se

Exhibit A

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Debbie Hughey

v.

Philadelphia Gas Works

:  
:  
:  
:  
:

C-2016-2567445

**ORDER DENYING EXCEPTIONS  
AND GRANTING REQUEST FOR IN-PERSON HEARING**

On September 21, 2016, Debbie Hughey (Complainant) filed a complaint with the Pennsylvania Public Utility Commission (Commission) against Philadelphia Gas Works (Respondent). The complaint generally alleges that the Respondent is threatening to shut off the Complainant's natural gas utility service, that there are incorrect charges on the Complainant's bills, that the Complainant has reliability, safety or quality problems with her utility service and that the Respondent engages in illegal and fraudulent business practices.

Specifically, the complaint asserts that the Respondent placed liens against the Complainant's property. According to the complaint, the amounts of the liens are the result of fraudulent, inflated bills and bad faith.

The complaint further explains that the meter installed in the Complainant's residence is not providing accurate readings of the Complainant's natural gas usage. The complaint further alleges that the Respondent fraudulently obtained funds from the Complainant. Attached to the complaint is a document with further allegations.

The document indicates that the Respondent installed a meter at the Complainant's residence that is "bogus". The document further alleges that the Respondent falsely claimed that an agreement was made for services, never gave the Complainant a copy of the alleged agreement and violated the Complainant's rights to be informed of the agreement.

The document also contends that the Respondent placed false and fraudulent liens on her property. The document contends that the Respondent never informed the Complainant that it placed a lien on her property in 2006.

According to the document, the Respondent placed false and fraudulent charges on her bills in 2006 when she was no longer receiving gas service due to service termination.

The document also alleges that the Respondent tampered with the gas line at her residence after the Respondent terminated service on April 27, 2016. The document requests that the Commission direct the Respondent to remove the liens placed on her property from 2006 forward, remove the amounts the Respondent claims she owes from her account from 2006 forward and restore her credit bureau rating.

The Respondent filed an answer with new matter as well as preliminary objections on October 11, 2016. The answer admits that the Respondent terminated service to the Complainant.

The answer denies that there are incorrect charges on the Complainant's account. The answer further denies that there are reliability, safety or quality problems with her natural gas utility service.

The answer asserts that the Complainant most recently established service at her residence on November 10, 2014. The account is listed as a residential heating account.

The Complainant's residence has an Automatic Meter Reading (AMR) device. According to the answer, the Respondent obtains actual meter readings every month.

The answer states that on March 24, 2016 the Respondent issued a ten day shut off notice to the Complainant and on April 27, 2016 terminated service to the Complainant.

The new matter asserts that from May 1964 through July 2006 service at the Complainant's residence was in the name of James Hughey. From December 2007 through May 2008 service was in the name of the Complainant. Between May 2008 and November 2014 neither the Complainant nor James Hughey were customers of the Respondent. The new matter argues that both the periods from 1964 through 2006 and from 2007 through 2008 are outside the statute of limitations.

The new matter states that there are outstanding liens on the Complainant's property reflecting amounts owed to the Respondent. The new matter contends that the Commission lacks jurisdiction over these liens. The answer with new matter requests that the Commission dismiss the Complainant's complaint.

The preliminary objections allege that the Commission lacks jurisdiction over the subject matter of the complaint and that the complaint includes impertinent matter in its request for relief. The preliminary objections allege that the Complainant's complaint raises claims barred by the statute of limitations. The preliminary objections point out that the Complainant's complaint refers to liens and bills from 2006. According to the preliminary objections, the statute of limitations divests the Commission jurisdiction to hear an action brought more than three years from the date the liability arose.

According to the preliminary objections, the Public Utility Code at 66 Pa.C.S. § 2212(n) states that nothing shall abrogate the power of the Respondent to collect delinquent accounts through the imposition of liens, pursuant to the Municipal Claim and Tax Lien Law. The preliminary objections assert that, under 66 Pa.C.S. § 2212(n), the Commission has no jurisdiction over the filing of such a lien. The preliminary objections point out that the Public Utility Code at 66 Pa.C.S. § 1414(a) authorizes the Respondent to file liens for unpaid natural gas service.

The preliminary objections also allege that the prayer for relief in the complaint is beyond the Commission's authority. The prayer for relief is irrelevant and therefore impertinent

matter that the Commission should strike. The preliminary objections request that the Commission dismiss the complaint and strike off the requested relief as impertinent matter.

On November 23, 2016, Complainant filed a request for additional time to fully respond to the Respondent's pleading. According to the request, the Complainant had been attending to a critically ill family member at the hospital. Apparently, the Commission did not act on the Complainant's request. As of the date of this order, the Complainant has not filed a response to the Respondent's pleadings.

By notice dated December 30, 2016, the Commission notified the parties that it had assigned the case to me as motion judge. By order dated January 13, 2017, I sustained the preliminary objections in part by dismissing the Complainant's claims that arose prior to September 21, 2013 and any claim concerning the liens placed on her property.

By hearing notice dated February 2, 2017, the Commission scheduled a telephonic hearing for this matter on March 22, 2017 at 10:00 a.m. and assigned the case to me. I issued a prehearing order dated February 3, 2017, addressing, inter alia, requests for continuance, subpoena procedures, attorney representation and the Commission's policy encouraging settlements.

On March 15, 2017, the Complainant filed a letter requesting that the March 22, 2017 hearing be rescheduled. The letter represented that the Respondent did not object to rescheduling the hearing. I granted the request and by hearing notice dated March 21, 2017, the Commission scheduled a telephonic hearing for this matter on April 25, 2017.

On April 19, 2017, the Complainant filed a letter requesting that the April 25, 2017 hearing be rescheduled. In support of the request the letter represented that the Complainant had spinal damage making it difficult for the Complainant to effectively litigate her case. Since the Respondent objected to the Complainant's request, I converted the telephonic hearing into a telephonic prehearing conference in order attempt to narrow the issues to be

litigated and determine when the Complainant's medical condition would allow her to participate in a hearing.

Also on April 19, 2017, the Complainant filed a document titled motion to compel which requested certain information from the Respondent. This appears to be discovery request from the Complainant to the Respondent. It will be treated as interrogatories and requests for production of documents. As of the date of this order, the Respondent has not filed a response to this document.

I conducted a telephonic prehearing conference on April 25, 2015. The Complainant appeared pro se. Graciela Christlieb, Esquire represented the Respondent. During the telephonic prehearing conference, the Complainant indicated that her medical condition was such that she needed a sixty day continuance. N.T. 10. The Respondent objected to a sixty day continuance. N.T. 10-11. After confirming that the Complainant had no conflicts, I agreed to reschedule the hearing for June 15, 2017.

By hearing notice dated April 25, 2017, the Commission scheduled a telephonic hearing for this matter on June 15, 2017.

On April 25, 2017, the Complainant filed a document excepting or objecting to my January 13, 2017 order on preliminary objections. While this document indicates that the Complainant served a copy of the document on the Respondent, the Complainant failed to serve a copy on me as required by 52 Pa.Code § 1.54. As of the date of this order, the Respondent has not filed a response to this document.

On May 12, 2017, the Complainant filed a request for an in-person hearing and a request for sanctions. While these documents indicate that the Complainant served copies of the documents on the Respondent, the Complainant failed to serve copies on me as required by 52 Pa.Code § 1.54. As of the date of this order, the Respondent has not filed a response to these documents.

I will first address the exceptions or objections to my January 13, 2017 order sustaining preliminary objections, in part. Quite simply, the Commission's Rules of Practice and Procedure do not permit the filing of exceptions or objections to an order sustaining preliminary objections in part.

Furthermore, the Commission's Rules of Practice and Procedure permit the filing of objections or exceptions to an initial, tentative or recommended decision within twenty days. 52 Pa.Code § 5.533. Under this rule, the Complainant's exceptions or objections are untimely. The Complainant's exceptions or objections to my January 13, 2017 order on preliminary objections are denied.

Turning to the Complainant's request for an in person hearing, I will first observe that the Complainant did not make this request at the April 25, 2017 telephonic prehearing conference. Had she done so, the request could have been addressed at that time and avoided wasting staff time scheduling a telephonic hearing.

In addition, given the Complainant's medical condition, her ability to attend an in-person hearing is questionable. However, the Commission has, as a matter of course, granted the request of a pro se complainant for an in-person hearing. I will grant the request consistent with past Commission practice.

Finally, at the April 25, 2017 telephonic prehearing conference, I cautioned the Complainant that there would be no further continuances. N.T. 17. Any further request for continuance or other delay could be viewed by the Commission as the Complainant using the Commission's administrative processes to avoid paying for her utility service. Using the Commission's processes to avoid termination or avoid paying for utility service is an abuse of the Commission's administrative processes and will not be countenanced. The Commission has previously barred consumer complainants from filing further complaints with the Commission in order to protect the interests of other ratepayers. Seidenstricker v. Metropolitan Edison Co., Docket No. F-2008-2019388 (Opinion and Order entered July 28, 2009), Thomas v The Peoples Natural Gas Co., Docket No. C-2009-2102194 (Opinion and Order entered June 17, 2010),

Mazza v. PECO Energy Co., Docket No. C-2012-2318472 (Opinion and Order entered April 23, 2014). The Complainant is warned to refrain from further delaying tactics or face the possibility of sanctions.

Concerning the Complainant's request for sanctions, this request should be treated as a motion to compel answers to the interrogatories and requests for production of documents filed on April 19, 2017. Since the time for the Respondent to answer the Complainant's motion to compel set forth at 52 Pa.Code § 5.342(g) has not run, I will not address the Complainant's request.

ORDER

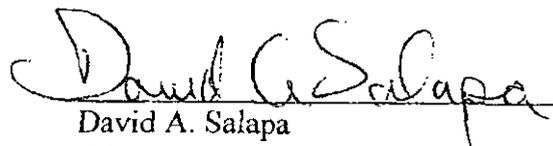
THEREFORE,

IT IS ORDERED:

1. That the exceptions or objections to the January 13, 2017 order sustaining preliminary objections, in part filed by Debbie Hughey at Docket No. C-2016-2567445 are denied.

2. That the request for an in person hearing filed by Debbie Hughey at Docket No. C-2016-2567445 is granted.

Dated: May 15, 2107

  
David A. Salapa  
Administrative Law Judge

C-2016-2567445 - DEBBIE HUGHEY v. PHILADELPHIA GAS WORKS

DEBBIE HUGHEY  
PO BOX 41842  
PHILADELPHIA PA 19101  
215.617.8047

GRACIELA CHRISTLIEB ESQUIRE  
PHILADELPHIA GAS WORKS  
800 WEST MONTGOMERY AVENUE  
PHILADELPHIA PA 19122  
215.684.6164

Accepts E-Service

# Exhibit B

## PENNSYLVANIA PUBLIC UTILITY COMMISSION

### Formal Complaint

Filing this form begins a legal proceeding and you will be a party to the case.  
If you do not wish to be a party to the case, consider filing an informal complaint.

**To complete this form, please type or print legibly in ink.**

#### 1. **Customer (Complainant) Information**

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Debbie Hughey  
Street/P.O. Box P.O. Box 41842 Apt #                       
City Philadelphia State PA Zip 19101  
County Philadelphia

Telephone Number(s) Where We Can Contact You During the Day:

(215) 617-8047 (home)      (215) 617-8047 (mobile)

\*Do not release my email for legal proceedings, etc.\*  
E-mail Address (optional): debbie.hughey@yahoo.com

Utility Account Number (from your bill) 0915897210

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name Debbie Hughey and James Hughey  
Street/P.O. Box 1629 Newport Place  
City Philadelphia State PA Zip 19122

#### 2. **Name of Utility or Company (Respondent)**

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

PG&W-Philadelphia Gas Work

3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- |   |   |
|---|---|
| <input type="checkbox"/> ELECTRIC       | <input type="checkbox"/> WASTEWATER/SEWER                                     |
| <input checked="" type="checkbox"/> GAS | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance)  |
| <input type="checkbox"/> WATER          | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |
| <input type="checkbox"/> STEAM HEAT     |   |

4. Reason for Complaint

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. Your complaint may be dismissed without a hearing if you do not provide specific information.

- The utility is threatening to shut off my service or has already shut off my service.
- I would like a payment agreement.
- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.
- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.
- Other (explain). PG&W has pervasive illegal and fraudulent business practices of trying to ~~steal~~ steal our property - see certified mail copy # 7014 2620 0000 4339 4202.

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

## 5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

Due to outrageous, inflated, and fraudulent PG&E's Gas Bills as well as Bad Faith, Intentional TORTS, Pervasive, Illegal, and fraudulent Business Practices, we ARE SEEKING the removal of ALL of the amounts that PG&E claimed that we owed for Gas Services, Liens (from 2006 to present), Collections, Court Fees, any additional fees, and etc... from the City of Philadelphia, Philadelphia Gas Works, and etc... as well as requesting a Restoration of Credit Bureau Rating, and the removal of the amounts of these PG&E's Gas Bills, Liens, Collections, and etc..., totally removed off of our Credit reports since 2006.

In addition to the above, we aver the following:

1. A Bogus, Tampered, and/or Fraudulent Digital Gas Meter was placed in our house again, Incident of Black vs. white colored PG&E's workers apparently cleared now.
2. Falsely and fraudulently claiming that an agreement was made for services.
3. Fraudulently obtaining additional funds under false pretenses of claiming that an agreement was made.
4. NEVER GAVE US a copy of the alleged agreement.

\*SEE Attachment TO THE RELIEF SOUGHT\*

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

6. **Protection From Abuse (PFA)**

Has a court granted a "Protection From Abuse" order that is currently in effect for your personal safety or welfare? The PUC needs this information to properly process your complaint so that your identity is not made public.

Note: You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection From Abuse" order for your personal safety or welfare?

YES

NO

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

7. **Prior Utility Contact**

a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?

YES

NO

Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?

YES

NO

Note: You must contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.

c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why. N/A

CONTACTED COMPANY SEVERAL TIMES

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.

8. Legal Representation

If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, if known. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name \_\_\_\_\_  
Street/P.O. Box \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Area Code/Phone Number \_\_\_\_\_  
E-mail Address (if known) \_\_\_\_\_

Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

9. Verification and Signature

You must sign your complaint. Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in ink. If you do not sign the Formal Complaint, the PUC will not accept it.

Verification:

I, Debbie Hughey, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Debbie Hughey Sept. 19, 2016  
(Signature of Complainant) (Date)  
N/A \*total of 15 pgs Submitted

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification must be signed by an authorized officer or authorized employee. If the Formal Complaint is not signed by one of these individuals, the PUC will not accept it.

10. Two Ways to File Your Formal Complaint

Electronically. You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

Note: If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

Mail. Mail the completed form with your original signature and any attachments, by certified mail, first class mail, or overnight delivery to this address:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

Note: Formal Complaints sent by fax or e-mail will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.

**ATTACHMENT OF RELIEF SOUGHT IN THE FORMAL COMPLAINT WITH THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Due to outrageous, inflated, and fraudulent PGW's Gas Bills as well as Bad Faith; Intentional Torts; Pervasive, Illegal, and Fraudulent Business Practices; we are seeking the removal of all of the amounts that PGW claimed that we owed for Gas Services, Liens (from 2006 to present), Collections, Court Fees, Legal Fees, any additional fees, and etc... from the City of Pennsylvania, Philadelphia Gas Works, and etc... as well as requesting a restoration of Credit Bureau Rating, and the removal of the amounts of these PGW's Gas Bills, Liens, Collections, and etc..., totally removed off of our Credit Reports since 2006.

In addition to the above, we aver the following:

1. A Bogus, Tampered, and/or Fraudulent Digital Gas Meter was placed in our house again. Incident of Black vs. White Colored PGW's Workers apparently clearer now; in order, for the Tampered/Fraudulent/Malfunctioned, and etc... Digital Gas Meter to get placed into our house. The Black Colored allegedly PGW's Worker got to our house before the White Colored PGW's Worker (who came about a week ago) that we were expecting to replace the meter, and the White Guy was surprised as well as we were surprised that a Black PGW's Worker came to put the Gas Meter in. We said that there are two PGW's Worker out there to replace the Digital Gas Meter. This sounded too much like the Cover Tactics that we as a family have been and continued to be subjected to. Why would the Philadelphia Gas Work send out two different workers for the same job ?
2. Falsely and fraudulently claiming that an agreement was made for services.
3. Fraudulently obtaining additional funds under false pretends of claiming that an agreement was made.
4. Never gave us a copy of the alleged agreement.
5. Also, violated our rights to be informed of the alleged agreement. Thus, continual deceptive pervasive practices.
6. Falsely and fraudulently placed Liens on our property to try to steal our property.
7. Falsely and fraudulently placed additional charges to our previous Gas Bills in 2006. especially when we were no longer using the gas services due to PGW's termination of gas services.
8. PGW never informed us that they placed a Lien against our property in 2006.
9. Falsely and fraudulently placed additional charges to our PGW's Gas Bills for Commodity Charges of not even using the gas services.
10. Tampered with the gas line after it was turned off on April 27, 2016, claiming that they wanted to make sure that the Gas was turned off as well as they gave us the impression that they wanted to blow us up as well as our property. The returning of the PGW's Workers to our house a couple of days after the gas was turned off, claiming that they were making sure that the gas was turned off, **proved** that their Digital Gas Meter was reading Gas usage; even though, it was already turned off. Therefore, a defective, malfunctioning, and/or tampered Digital Gas Meter also lead to the PGW's inflated Gas Bills.
11. The City of Philadelphia and the Common Pleas Court of Philadelphia have denied our rights to place our counter statements to their Fraudulent Gas Bills and Liens on the court records on June 22, 2016. *D.H.J. 09/19/16*

09/19/16 Copy submitted with PUC's formal complaint

*Handwritten signature/initials*

PHILADELPHIA GAS WORKS  
800 W. MONTGOMERY AVENUE  
PHILADELPHIA, PA 19122-0050

Date of Notice: 04/27/2016  
Account Number: 915897210  
Customer Name: HUGHEY, DEBBIE  
Premise Address: 1629 NEWPORT PL/PHILA, PA

19122-2713

## YOUR GAS HAS BEEN SHUT-OFF

### WE SHUT OFF YOUR GAS BECAUSE:

- You did not pay your past due bill.
- You did not pay your security deposit.
- You did not give us access to your meter.
- You did not meet the requirements and/or complete the application for service process.
- Theft of service or tampering with utility equipment.
- Rejected payment.
- Fraud/Material misrepresentation.

### TO HAVE YOUR SERVICE TURNED BACK ON YOU MUST DO ALL OF THE FOLLOWING:

- Arrange to pay your overdue bill of **\$2,885.24**
- Pay a Turn On Charge of \$123.23 (Plus \$372.00 if we dug up the street to shut off the gas).
- Pay a Deposit (if required) of **\$266.00**
- Other: \_\_\_\_\_

You must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premises. You may be required to pay more than the amount on this notice to have your service restored.

### MEDICAL EMERGENCY NOTICE

LET US KNOW IF SOMEONE LIVING IN YOUR HOME IS SERIOUSLY ILL OR HAS A MEDICAL CONDITION THAT WILL BE AGGRAVATED BY THE CESSATION OF SERVICE. WE WILL RESTORE YOUR GAS SERVICE WITHIN 24 HOURS during such illness provided you:

1. Have your LICENSED physician or nurse practitioner certify by phone or in writing that such illness exists and that it may be aggravated if your service is not restored; and
2. Call us at 215-235-1777 and make arrangements to pay your bills for service. You must provide us with household income and occupant information to determine any payment terms while protected under the medical certification.
3. HAVE YOUR LICENSED PHYSICIAN SEND A LETTER TO PGW WITHIN 7 DAYS OF VERIFYING THE MEDICAL CONDITION.

### IMPORTANT TO KNOW

If you have questions or need more information, please call us at 215-235-1777 or write us at P.O. Box 3500, Philadelphia, PA 19122. After you talk with us, if you are not satisfied, you may file a complaint with the Public Utility Commission (PUC). The PUC will attempt to help you with your problem. To contact them call (800) 692-7380 or write to: Pennsylvania Public Utility Commission, Box 3265, Harrisburg, PA 17105-3265.

### WINTER SHUT-OFF PROVISIONS (Dec. 1-Mar. 31)

- We will restore your service within 24 hours of your meeting all requirements to have service reconnected. Where street digging is required, it may take up to 7 days.
- If you are low-income, there are special rules about whether we may shut off your gas in the winter. Add together the monthly income for the household and look at the chart to determine your group.
- If your income is 150% of the federal poverty guidelines or below, we must first ask the PUC for permission to shut off your service. If you did not receive notification that we obtained permission from the PUC, call us immediately.
- If your income is above 150% but does not exceed 250% of the federal poverty guidelines, we will not shut off your service if:
  1. Someone in your household is 12 or younger or 65 or older;
  2. You have paid at least one-half of your last two monthly gas bills; or
  3. If over the last two months you have paid at least 15% of your income toward the gas bills.

### Federal Poverty Guidelines (FPG) 2016

Household Size including Children	Your income is 150% of the FPG or below if it is:	Your income is between 151-250% of the FPG if it is:
1	\$1,485 or less	\$1,486-\$2,475
2	\$2,003 or less	\$2,004-\$3,338
3	\$2,520 or less	\$2,521-\$4,200
4	\$3,038 or less	\$3,039-\$5,063
Each additional person add	\$520	\$521 - \$867

- If you have a valid Protection From Abuse order from a court, there are some additional protections available to you. Call us immediately at 215-235-1777. (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. Call 215-235-1777 right away to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- If your landlord pays your utility bill you have other legal protections. Please call us at 215-235-1777.
- If you have trouble understanding or speaking English please call us at 215-235-1777 for free interpretation.
- All adult occupants of the premise, whose names are on the mortgage, deed, or lease are considered the customer and are responsible for payment to restore service.
- ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.

09/19/16 Copies Submitted with PUC's Formal Complaint

**COLLECTION AGENCY REFERRAL NOTICE**

**PAYMENT DUE ON RECEIPT**

Since you have not paid your past due balance of \$3,631.45, action will be taken to refer your account to a collection agency unless you make full payment upon receipt of this notice.

A good credit rating is a valuable asset, and we are sure that you wish to protect your rating.

To avoid referral to a collection agency contact our Credit/Collection department immediately at 215-235-1777, Monday through Friday, between 8:00 a.m. and 4:30 p.m. to make a full payment. You can make payments over the telephone using your checking account or credit card.

You can make a payment at one of our Customer Service Centers between the hours of 9:00 A.M. and 5:00 P.M. at one of the following locations:

- Center City, 1137 Chestnut Street - Monday, Tuesday, Thursday and Friday.
- Frankford, 4410 Frankford Avenue - Tuesday, Thursday and Friday.
- Germantown, 210 W. Chelton Avenue - Tuesday, Wednesday and Friday.
- North Philadelphia, 1337 W. Erie Avenue - Monday, Wednesday and Thursday.
- South Philadelphia, 1601 S. Broad Street - Monday, Wednesday and Thursday.
- West Philadelphia, 5230 Chestnut Street - Monday, Tuesday, Wednesday and Friday.

Questions or complaints about your bill? Please call 215-235-1000, or write to: PGW P.O. Box 3500, Phila., PA 19122-0050

PG\_20160531180100 dat-485-00000725

Please return this portion with your payment.  
Write your account number on your check or money order made payable to Philadelphia Gas Works

Account Number: 0915897210  
Notice Date: May 31, 2016  
Please Pay: \$3,631.45

Place "X" in box for address corrections. Print corrections on reverse side.

Amount Enclosed:

000243 000000725  
DEBBIE HUGHEY  
PO BOX 41842  
PHILADELPHIA PA 19101-1842

Philadelphia Gas Works  
P.O. Box 11700  
Newark, NJ 07101-4700

0009158972108099000000363147

09/19/16 Copies submitted with PVC's formal complaint

1 of 2 pages Certified Mail #7014 2120 0000 4339 4202

Ms. Debbie Hughey  
1629 Newport Place  
Philadelphia, PA 19122  
June 11 - 17, 2016

PGW - Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122  
RE: Fraudulent and Inflated Gas Bills:  
Account # 0915897210

Dear Representatives:

Your company continued to send us outrageous, inflated, and fraudulent Gas Bill. We do not owe the amount that you claimed of \$3,631.45.

A couple of days after your company turned off the Gas Service to our house, two PGW's Men came to our house and tampered with our Gas Line, like giving us the impression that they were trying to blow our house up. We also feel that an intentionally high registering Gas Meter was placed in our house as to possibly being one reason why the Gas Meter Charges are so high. We know that another reason why our Gas Bill has been inflated is because of your company Commodity (additional fees for not when we do not need to use the) Charges as well as other false charges. The Commodity Charges are higher than the actual Gas Usage. Our Gas Bills went from about an alleged \$800.00 to over \$1,500.00 within six to seven months (non Winter Months); when we were not even using the gas, except to heat the Gas Water Heater. We only used Gas for heating of the house during the Winter and for heating the water tank. Again, our Gas Bill should not have jumped from over \$500.00 in 2015 to over \$3,500.00 in 2016. About a week ago, there was a reported case on the news that verified the bad faith of PGW, scamming to take a customer property from them.

In addition, PGW has exhibited numerous acts of Bad Faith. At one point they charged us a \$350.00 when they changed their accounting methods and charged an additional \$300.00 or more dollars to change the Gas Meter to a Digital Gas Meter a couple of years ago. Also, a couple of years ago, they charged us over \$1,000.00; whereas, we were not even using Gas at that time, and we do NOT owe for that as well. Shortly after that time is when we found out about PGW charging us a fees; even, if we do not use their Gas Service, i.e. during the Summer and Spring Months. Recently, it was disclosed to me that the previous \$1,000.00 charged that they illegally and fraudulently placed on our bill, that they placed a Lien on our house in 2006, for those false Gas Bill Charges, but never told us that they placed a Lien for any bills. We do NOT owe for those fraudulent Gas Bills of 2006 !

Since PGW cut our Gas Service off for the fraudulently high bill of \$1,000.00 (est. in 2006), they refused to allow my sister and my brother to obtain Gas Services in their name. Then, I was informed in November, 2014 that the only way that we could have Gas Services turned on, is that you must be the owner of the house, and you must bring

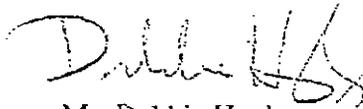
2 of 2 pages Certified Mail #7014 2120 0000 4339 4202

a copy of the deed. PGW is the only Utility Company that has requested a copy of the deed; in order, to receive services. We did not realized that by PGW asking for a copy of the deed was a way of them trying to eventually steal our property by their pervasive illegal and fraudulent business practices.

Also, what PGW did not disclosed to me was that the amount that they required that I pay; in order, to have the Gas turned on was for a payment agreement. I never made nor was asked to be placed on an agreement to pay for services that had not yet began at that time. Thus, this was an additional way to falsely charges you additional fees.

I want to know what will be done about reducing these bills and removing ALL of the Liens that you have falsely placed on our property. I look forward to your response. Please respond by June 30, 2016.

Sincerely,



Ms. Debbie Hughey

cc: files  
cc: News Media

09/19/16 Copies (1 of 4 pages of PGW's response) submitted with  
PUC formal complaint



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Telephone 215-787-1288

Fax 215-684-6996

July 14, 2016

Debbie Hughey  
P.O. Box 41842  
Philadelphia, Pa. 19101-1842

Re: Ac#915897210  
1629 Newport Pl.

Dear Ms. Hughey,

On June 21, 2016 a dispute was filed regarding the overall balance which represents service from November 10/2014 to April 27, 2016 in the amount of \$3,631.45.

An investigation of your dispute has been completed and it was determined that the bill in question is correct as rendered. These bill represents usage that recorded on your meter from a reading of 0000 (Mtr#2161639) to 2695 for a total of 2695 CCF. The meter at your property is equipped with an Automatic Meter Reading (AMR) device. This device allows PGW to obtain the actual usage recording at your meter without having to gain access into the property.

The bill that you are disputing reflects the actual usage recording on the meter. A gas usage analysis which analyzes your consumption and takes into consideration factors such as the weather conditions was also completed and indicated that there is a consistent pattern of usage at the property. Although there may have been no change in the thermostat settings in the residence, the weather can impact how often the heater operates in order for it to maintain the same internal temperature. To assist you in your review of our findings we are including the following documents:

1. A statement of account
2. A gas usage analysis
3. Utility Report

PGW does offer tips on how to conserve energy and possibly reduce future bills. To learn more, please visit our PGW Energy Sense website at [www.pgwenergysense.com](http://www.pgwenergysense.com) and click on energy sense for homeowners.

If you would like to test the accuracy of the meter, a Special Meter Test can be requested by submitting a request and payment in the amount of \$10.00 to:

PGW Special Meter Test  
P.O. Box 37019  
Philadelphia, PA 19122

Our records indicate that the service is no longer active a 1629 Newport Place. Please contact us at 215-235-1000 Monday thru Friday between 8AM and 6PM in order to inquire about terms and restoration options.

Sincerely,

Mr. Soto  
Dispute Resolution Unit

Additional information regarding the content in this letter can be obtained by calling or writing us at:

P.O Box 3500 Philadelphia PA 19122 Telephone #: 215-787-1288

Payments can be made by phone at 215-235-1000, online at [www.pgworks.com](http://www.pgworks.com), by mail to P.O. Box 11700, Newark, NJ 07101 or at any of our (6) convenient Customer Service Centers or any authorized payment center. Information regarding our Customer Service Centers and authorized payment centers is available upon request.

***If you do not agree with this report, you may file an informal complaint with the Pennsylvania Public Utility Commission to ensure preservation of your rights.***

***You can file an informal complaint at the following:***

***Telephone #: 1-800-692-7380***

***or***

***P.O. Box 3265 Harrisburg Pa 17105-3265***

***or***

***<http://www.puc.state.pa.us>***

When you file an informal complaint, the Public Utility Commission will need to know the following:

1. The name of the ratepayer (your name).
2. Your mailing address and, if different, the address at which service is provided.
3. Your Account number.
4. The name of the utility with which you have the dispute.
5. A brief statement of the dispute.
6. Whether the utility has investigated and reported to you on the matter being disputed.
7. Whether the dispute has been subject of the previous complaint filed with the Commission.
8. The date, if any, of proposed termination.
9. What you would like the Commission to do.

Specific Service Agreement Statement of Account SA- 9924567348

<b>Customer Name</b> DE BBIE HUGHEY	<b>From Date</b> 11/10/2014	<b>To Date</b> 5/6/2016
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<b>Service address</b> 1629 NEWPORT PL PHIL, PA 19122-2713	<b>Account Number</b> 915897210	<b>SA Number</b> 9924567348	<b>Meter</b> 2161639	<b>Rate</b> GS
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STATEMENT

Transaction Date	Type	Reading	Reading Code	# of Days	CCF Usage	Average CCF/Days	Heating DDD's	Payment Type	Due Date	Transaction Amount	Current Balance	Actual Balance
11/13/2014	BPTOCG					0.00				\$123.23	\$0.00	\$0.00
12/04/2014	BILL	172	R	22	172	7.82	478		12/30/2014	\$248.64	\$248.64	\$248.64
12/30/2014	PAY					0.00		Check		(\$95.00)	\$153.64	\$153.64
01/05/2015	PAY					0.00		Cash		(\$152.50)	\$1.14	\$1.14
01/06/2015	LPC					0.00				\$0.01	\$1.15	\$1.15
01/06/2015	BILL	486	R	31	314	10.13	757		01/30/2015	\$476.06	\$477.21	\$477.21
01/29/2015	PAY					0.00		Check		(\$110.00)	\$367.21	\$367.21
02/04/2015	LPC					0.00				\$5.50	\$372.71	\$372.71
02/04/2015	BILL	866	R	31	380	12.26	1058		02/27/2015	\$527.69	\$900.40	\$900.40
03/04/2015	LPC					0.00				\$13.42	\$913.82	\$913.82
03/04/2015	BILL	1270	R	29	404	13.93	1128		03/27/2015	\$511.69	\$1,425.51	\$1,425.51
03/23/2015	PAY					0.00		Check		(\$110.00)	\$1,315.51	\$1,315.51
04/03/2015	LPC					0.00				\$19.73	\$1,335.24	\$1,335.24
04/03/2015	BILL	1521	R	29	251	8.66	710		04/28/2015	\$311.09	\$1,646.33	\$1,646.33
04/03/2015	INTAPL					0.00				(\$2.05)	\$1,644.28	\$1,644.28
04/03/2015	DEPAPL					0.00				(\$142.50)	\$1,501.78	\$1,501.78
05/05/2015	LPC					0.00				\$22.23	\$1,524.01	\$1,524.01
05/05/2015	BILL	1594	R	30	73	2.43	274		05/29/2015	\$111.55	\$1,635.56	\$1,635.56
06/03/2015	LPC					0.00				\$23.90	\$1,659.46	\$1,659.46
06/03/2015	BILL	1612	R	32	18	0.56	33		06/26/2015	\$37.34	\$1,696.80	\$1,696.80
07/02/2015	LPC					0.00				\$24.46	\$1,721.26	\$1,721.26
07/02/2015	BILL	1630	R	29	18	0.82	3		07/28/2015	\$34.51	\$1,755.77	\$1,755.77

Heat & Domestic

Hughey, Debbie  
 1629 Newport Pi  
 Philadelphia, PA. 19122-2713

GAS USAGE  
 ANALYSIS OF ACCOUNT

NON-HEATING  
 DAILY USAGE  
 0.00 CCF PER DAY

ACCOUNT # 0009 1589 7210

DATES		METER READINGS		NUMBER OF DAYS	USAGE IN CCF*	DOMESTIC USAGE CCF *	HEAT USAGE	NUMBER DEG DAYS**	C.F.D.D.***
FROM	TO	FROM	TO						
11/10/2014	5/1/2015	0	1594	172	1594	0	1594	4405	36.2
5/1/2015	4/27/2016	1594	2695	362	1101	0	1101	3439	32.0
11/10/2014	4/27/2016	0	2695	534	2695	0	2695	7844	34.4

\* CCF = hundred Cubic feet

\*\* DEGREE DAYS AN INDEX OF ENERGY CONSUMPTION FOR HEATING

IT INDICATES THE NUMBER OF DEGREES THE AVERAGE TEMPERATURE DROPS BELOW 65° F.

\*\*\*CFDD EQUALS CUBIC FEET OF GAS USED PER DEGREE DAY

# Exhibit C

BEFORE  
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

vs.

Docket No. C-2016-2567445

Philadelphia Gas Works, Respondent

**FILING OF EXCEPTIONS OF JUDGE SALAPAS' ORDER  
SUSTAINING PRELIMINARY OBJECTIONS IN PART**

Due to Previous and Present Injuries, Sickness, Covert Tactics, Lack of Funding Issues, Cyber Attacks, Transportation, Other Legal Cases, and etc..., the Complainant has not been able to submit her Exceptions regarding the Order of Judge David A. Salapas. I write the above and the below statements to displayed what the Complainant has been and continues to be subjected to that necessitate the need for a continuance as well as the ability to finally respond to the Judge's Orders as well as to amend the Complainant's Responses to PGW's Objections.

Since December 05, 2011 to present, the Complainant has been fighting her Employer over her PA's Workers' Compensation (WC) Case; in which, she had a total of four different Attorneys, who have ALL shown their solidarity to the Defendants and the Judges that has forced the Complainant to continue to fight for her rights, benefits, health, her life, and etc... as a Pro se Litigant. On January 28, 2015, while still being represented by Legal Counsels in her WC Case, the Complainant's Bi-weekly Loss Wages were illegally stopped by the Employer, Defendants, Defendant's Attorney, the Judge, and it was done with the Duplicity of the Complainant's own Attorneys because according to the WC Laws and the Rules and Regulations of the WC Act, a Complainant's Loss Wages can not be terminated unless there was new Medical Evidence to prove that the Claimant (Complainant) had fully recovered from her injuries or that the Claimant had returned to work; in which, neither was, the situation with the Complainant. The Complainant stills remains totally and permanently disabled. The judges also allowed the Complainant's own Attorney, Employer, Defendants, Defendants' Attorney, and etc... to violate it's own Rule 314 Judge Order of providing Medical Care, Medical Treatments, and etc... to the Complainant for her Work Related Injuries and Worsening Conditions.

Since November, 2015, the Complainant has been complaining of her Traceha moving in one direction; while, her Cervical Spine going in the opposite direction. The Complainant's Attorneys, Employer, Defendants, Defendant's Attorney, and the Judge refused to make the Defendants pay for further studies, care, treatments, and etc...; while, the WC Case was still under litigation. No Judge's Decisions have been made at that time. Thus, they refused to pay for the Complainant's MRI Studies of her Cervical and Lumbar Spines, and boldly violated the law, the WC Act, and etc... as well as jeopardized the Complainant's health and her life. The MRI Studies were finally done almost a year later via Medicaid due to the Complainant's continual complaints, injuries and worsening conditions, and etc... Also, in May, 2016, Complainant's Spine had shifted for the fifth time, and still nothing was done about it. Finally, in September,

2016. a MRI of the Cervical and Lumbar Spines were done based on abnormalities that were revealed via CT Scan of the Spine. These MRI Studies proved the continual Spinal Damages, continual Herniations, new Herniations. and etc...

Based on the WC's Judge's Abuses of Power, Abuses of Discretions, Biases, Violations, Prejudices, and etc..., the Complainant has been fighting for the Judge's Recusal to the WCAB - Workers' Compensation Appeal Board to the Commonwealth Court of Pennsylvania (CCP) to the Supreme Court of Pennsylvania (SCP), and due to Covert Tactics, Cyber Attacks to Complainant's Computer and Printer, and etc..., they have prevented the Complainant from effectively filing her Writ of Certiorari to the United States Supreme Court in Washington, DC. The Complainant has proven each courts' (WCAB, CCP, and SCP) level of fraud, deceit, violations, and etc...; thus, still proving the Collusion in these cases: instead, of each court performing their own appellate prerogative corrections on the lower courts. While still fighting these cases, the Complainant was fighting another round of Appeals, and etc... as well as presently fighting Appeals again, now to the Commonwealth Court of Pennsylvania.

Then, as of January 17, 2017, a Court of Common Pleas Judge illegally allowed the Complainant's Lawyer in her cases against SEPTA to withdraw his representation of the Complainant based of false, slanderous, and libel statements, and etc..., and verbally ordered the Complainant to take her case on as a Pro se Litigant because she had already denied the Complainant time to obtain another Attorney to further litigate these SEPTA's Cases. The Complainant is not a lawyer. Thus, she is forced to handle all of these cases on her own. As stated previously, a family member (said home owner) became critically ill, and was placed in the Critical Care Unit; in which, we spent the entire days and nights in the hospital. Then, his acute illness continued for a couple of weeks to months. In addition, the Complainant continued to try to deal with these issues and more; while, trying to litigate the Philadelphia Gas Works' Case via PUC. Then, the Complainant's WC Injuries and Worsening Conditions, and etc... started taking additional and continual tolls on the Complainant that it affected the Complainant's ability to effectively handle this PUC Complaint against PGW as to why the Complainant still need more time to fully litigate this case. Please see Exhibit A - Copy of the Letter written to you via email on April 20, 2017.

The Complainant was finally able to file a Formal Complaint Form (form dated September 19, 2016) with the PUC - Public Utility Commission via online services on or about September 19-20, 2016, regarding the violations, bad faith, plans of theft of property, pervasive illegal and fraudulent billing and business practices, inaccurate and fraudulent gas meter readings, and etc... of PGW and the City of Philadelphia. However, a year prior to filing her **Formal** Complaint, the Complainant filed an **Informal** Complaint with the PUC pursuant to the PUC's Regulation 52 Pa. Code 56.162, and nothing was ever done by the PUC - no investigation, and etc...

The Complainant takes exceptions/objects to the following:

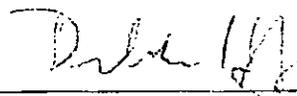
1. Gas Services were not in the name of the Complainant from December, 2007 through May, 2008. Poof is demanded.
2. The Complainant is entitled to know the name that Gas Services were in from May, 2008 and November, 2014.

3. Even though the PUC stated that they do not have control over the Liens placed on said property, but the PUC has control over the alleged amount/bills that the Respondents claimed that are owed that led to the Liens being placed on the property at 1629 Newport Place in Philadelphia, PA 19122.
4. Objects to the inaccurate calculations and the violations of denial of the tolling of the Statute of Limitation that is preventing the Complainant from litigating the Liens and Bills that lead up to the Lien for the year of 2006.
5. Take exception as to why the Respondent are allowed to violate the Municipal Claim Tax Lien Law. Even in *Lea Augustin, et. al v. City of Philadelphia - 2016 U.S. Dist. LEXIS 35142 (E.D. Pa. 2016)* the U.S. District Court held that the City of Philadelphia/Philadelphia Gas Works procedure for imposing Liens violates Plaintiffs' due process rights under the Constitution.
6. Disagreed with the alleged amounts that the Respondent claimed that is owed that led to the alleged "outstanding liens".
7. Objects to the Respondent trying to have the Complainant's Complaint dismissed.
8. Disagreed, the PUC does not lack jurisdiction over the subject matter in the complaint, especially pertaining to the Gas Bills as well as the Complaint does involve pertinent matter in it request for relief. The Complainant has listed her requested relief for the fraudulent Gas Bills. fees, fines, and etc...
9. According to the law, Partial Relief is not beyond the commission authority.
10. Also, please see the Complainant's Amended Responses to the Respondent's Preliminary Objections.

Sign  Date April 25, 2017

CERTIFICATE OF SERVICE

I. certify that I serve a true copy of the Complainant's FILING OF EXCEPTIONS OF JUDGE SALAPAS' ORDER SUSTAINING PRELIMINARY OBJECTIONS IN PART to the Respondent via their Attorney a [graciela.christieb@pgws.com](mailto:graciela.christieb@pgws.com) today.

Signed  Date April 25, 2017  
Debbie Hughey; Pro se

# Exhibit A

Emailed to: ~~XXXXXXXXXX~~  
From: Debbie Hughey  
To: Judge Salapa of PA Public Utility Commission  
RE: Graciela C. Christieb - Attorney for PGW  
Docket No. C - 2016-2567445  
April 20, 2017

Dear Judge Salapa:

First of all, I am writing you in reference to what Ms. Christieb have written, and emailed to you yesterday. The first time that I had contacted Ms. Christieb about the first hearing postponement, I had to keep calling, and emailing, with no returns. Eventually, I was able to finally get in contact with her. This time, I did not have a chance to contact her before submitting my requests because I was already rushing to attend my doctor's appointment. My Internet Service was even giving me so much delay that I had to try to submit my Motions, while trying to submit a copy to her; however, I was able to finally succeed in my submissions to both the PUC as well as to Ms. Christieb, and I objects to her objects, the truth must come out, and justice needs more time to prevail.

Secondly, I had already faxed you a copy (yesterday) of the motion that I had already emailed her regarding my request for more time. Also, I had already served her with a copy of my Motion to Compel as well as my Re-Submitted and Additions Motion to Compel. Please see attachment.

Thirdly, I did not fully wanted to list most of the things that I had as well as still are being subjected to that still necessities my needs for additional time; especially, additional time to obtain witnesses, documents, answers from PGW, affidavits, evidence, and etc..., but I will list some of them within this letter.

Fourthly, as of December 05, 2011, I remained out of work due to injuries on the job. Some of my injuries were and still are: Bilateral Sacroiliitis; whereas, I can not sit for long or short periods of time; sometimes, without being numbered in the sacral, vaginal, rectal, hips, thighs, legs, feet, ankles, and etc... areas; Myofasciitis, Cervical and Lumbar Herniations; which, affect my ability to urinate and defecate. I am a woman of over 50 years old of age that has been forced to wear diapers due to being incontinnce of bowel and bladder based on my Spinal Damages, Neurology Problems, and etc... Also, due to the herniations. I can barely walk sometimes. I walk with a cane or a roillator. I also have Bilateral Shoulder Tears, and etc... My Left Shoulder Tendons are hanging out of it's sock, and surgery still has not been done; Heart and Lungs Issues; Muscle Damages, Muscle Weakness, Muscle Electrocution, Mytosis, Myglia, and etc... Further proof of worsening Spinal Damages and additional Herniations were finally proven by MRIs of September, 2016. Due to Attorneys' and Judges' Violations, Abuses of Power, and etc..., I was **forced** to handle my WC (Workers' Compensation) Cases Pro se. Also, I have been **forced** to handle my WCAB (Workers' Compensation Appeal Board Bureau) Cases Pro se; likewise, handling my cases to the Commonwealth Court of Pa. Supreme Court of PA as Pro se. I am not a lawyer, and I have to learn as I go. Presently, I am **FORCED** to handle the following cases as Pro se as well: Court of Common Pleas, Commonwealth Court of PA, Superior Court, Supreme Court, Writ of Certiorari to the Untied States of America Supreme Court, back to Workers'

Compensation again, and the PUC Case. Even though my IFP - In Forma Pauperis has been approved in the courts' system, I still do not have enough money to continue to fight all of these entities. living off of \$148.59 per month, but about \$102.00 has already claimed for repayment of loan. Thus, I have been during this all as a Pro se Litigant with less than \$150.00 month and \$194.00 in food stamps. Thus, money needed for copies, mailing, faxing, and etc... I must borrow. Then as of January 17, 2017, the Judge in my SEPTA Cases forced me to functioned as a Pro se Litigant, based on her efforts of duplicity of trying to allow SEPTA to win over the Plaintiff, and as of last week, I had to prepare documents for the Superior Court Battle. Please keep in mind that I had already borrow over \$125.00 at the beginning of the month, just to handle what I had already handled.

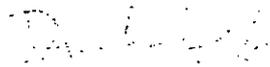
Fifthly, if you may recall, we had to handle a family member illness, Mr. James Hughey (owner of said property); whereas, we stayed a couple of days and nights at the hospital; while, he was in the Intensive Care as well as when he was moved to a heart monitoring floor. Then he had to go back and forth for doctors appointments. Then, my injuries continued to take a toll on my body, and started to be even more worst. I had heart issues that needed to be addressed, and yesterday, I obtained the results of my 2D Echo: even though, my follow-up with the Cardiologist would have to be when I obtain additional money for transportation, and the earliest appointment that I could obtain was for May, 2017. Also, additional Heart Study (Stress Test) is pending. Every since November, 2015, I have been complaining about how my Trachea had shifted to one side: while my Cervical Spine has shifted in the opposite direction. My employer as well as the WC's Judge continued to allow my employer to violate the laws by refusing to provide me with Medical Care and Treatments for my Work Related Injuries and Worsening Conditions. Also, my employer as well as the WC Judge continued to violate the laws by illegally terminating my WC Indemnity Checks, since January 19, 2015; whereas, my injuries did not and have not improved, and my doctor kept me out of work due to being totally and permanently disabled. Due to the Herniations in my Cervical and Lumbar Spines, I am not able to do a lot of work on my computer. It takes me a while to produce the necessary documents. My hands, fingers, arms, wrists, and etc... still becomes numbed, fatigued, swollen, and etc... that it takes me a long time; in order, to submit a document or two. I have been juggling all of this, and that is why, I never had the opportunity to effectively response to the judge or PGW's previous objectives; even though, I obtained a great deal of research that proved PGW's illegal moves of violating the laws, but due to my **FORCED** Pro se Status, my injuries as well as other issues, I continue to do my best, and hold my head above water. I feel as though with my other medical and legal scheduling, I will be able to litigate this PUC, if the hearing of April 25, 2017 is post pone, just one last time, by rescheduling the hearing for 60 days from now. pending PGW's willingness to honor discovery, and provide the requested documents, questions, and etc..., and as stated, please see attachment of Motion to Compel that was recently filed.

Recently, within the last two weeks, I started having more problems; whereas, I started feeling pressure and pain anteriorly and posteriorly on my Aorta, Neck, Throat, and thyroid, but it took over a week and a half before evening receiving a denial of medical treatment/studies from my Medicaid Insurance. However, because I kept pressuring the issues with problems swallowing, talking, and food keeps coming back up my throat, another doctor finally called the insurance company, and did a peer review; in which, the two studies were finally ordered, and one is pending, and one confirmed what

is pressing on my throat, and I have a follow-up with the medical doctors next week, pending funds for transportation. I barely had enough money to fax a copy of my Motion for additional time, yesterday.

Lastly, I hope that you would please give me enough time of more than 30 days, preferably 60 days or more to continue to effectively litigate our case with the PUC against PGW. In addition to our lives being at stake, our home and property are at stake as well. I look forward to your respond. Thank you.

Respectfully your,



Ms. Debbie Hughey

cc: files

cc: Ms. Christieb

P. S. Please inform me of how to obtain a Subpoena for this case; when, I called the PUC, no one knows how.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

vs.

Docket No. C - 2016-2567445

Philadelphia Gas Works, Respondent

**COMPLAINANT'S RESPONSE/ANSWER TO THE PHILADELPHIA GAS WORKS'  
REPLY TO COMPLAINANT'S MOTION FOR IN-PERSON HEARING**

The Respondent and Ms. Christieb's Reply to the Complainant's Request for a In-Person Hearing are invalid on two levels.

The First Level is that Judge Salapa had already made his ruling to approve the Complainant's Request for the In-Person Hearing on May 15, 2017, and Ms. Christieb's Reply is dated (May 16, 2017) after the Judge's Decision.

The Second Level, Ms. Christieb's Reply is also INVALID because she is **falsely** trying to claim that the she was not timely served.

The Complainant's Request for an In-Person - a "Live Hearing" was submitted to both the PUC and Ms. Christieb. Thus, Ms. Christieb was timely served via the PUC Online Service, since she accept E-Service, and according to 52 Pa. Code § 1.54, the Respondent via their Attorney, Ms. Graciela Christieb, Esquire was properly served. 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)(ii) Electronic. The PUC further 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.**" Therefore, AGAIN, the Respondent was served via their Attorney, Ms. Christieb. Section 1.54(b)(3)(ii)(B), even 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.

I. COMPLAINANT'S HISTORY OF PROCEEDINGS

First of all, the History that the Respondent, PUC, and some of Judge Salapa's Documentation are not correct.

Secondly, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (PUC) against PGW, and filed an **Informal** Complaint a year prior to the Formal Complaint, but the PUC has done nothing about Complainant's Informal Complaint. The Complainant's Formal Complaints dated September 19, 2016 against PGW are about:

1. "PGW has pervasive illegal and fraudulent business practices of trying to **steal our property**".
2. PGW falsely and fraudulently claiming that an agreement was made for services
3. PGW fraudulently obtaining additional funds under false pretends, and etc... Please review the Complainant's Formal Complaint (**15 pages**) that has been deleted from the PUC's Online Records.
4. The Utility is threatening to shut of my service or has already shut of service.
5. In correct charges are on my bill.
6. I am having reliability, safety, or quality problems with my utility service.
7. PGW has pervasive illegal and fraudulent business practices of trying to steal our property - see Certified Letter #7014 2120 0000 4339 4202, and etc...

Complainant's Second Continuance was granted for about 45 days and not 60 days. Judge Salapa informed the Complainant that there will be no further delays, and Ms. Christieb threaten sanctions, if the June 15, 2017 Hearing is not conducted !

## II. RESPONSE TO MOTION TO REQUEST A LIVE HEARING

PGW's Objections were already stated to the Complainant via Telephone (days before filing her In-Person/Live Hearing) as well as via email, but the Complainant still asserted her rights to have an In-Person Hearing. The Complainant did not have "ample time and opportunity" to address the form of Hearing because the Complainant was not given a choice of a Telephonic Hearing vs. an In-Person Hearing. The Complainant was not aware that the PUC even had Live Hearings/In-Person Hearings. The Complainant was not even aware that the Pennsylvania Public Utility Commission houses a location in Center City Area nor was the Complainant informed that the PUC holds Hearing at this location. The Complainant did not discover these issues until recently. The Complainant does not see why PGW is so opposed to the location change; whereas, their location is in the County of Philadelphia, just like the Complainant's location is in the County of Philadelphia, and as a matter of fact, PGW is just a couple of blocks from said property.

In addition to the above, the Complainant did not like how the Telephonic Pre-Hearing was conducted, and even now, she is seeking the removal of Judge Salapa off of the case based on his prejudicing this case; based on his biases; based on his Abuses of Power; Abuses of Discretions, Slander, Libel, Manipulations; His planned violations of the Law, and etc... Given the Complainant's Injuries, Illnesses, and Disabilities, the Complainant is not participating in a "Dilatory (lazy) Tactic" as Ms. Christieb has alleged. Furthermore, the Complainant objects to the Ms. Christieb's name calling, assassination of the Complainant's Character, Libelous and Defamatory Statements, and etc... The Complainant sited more than just health issues; like, lack of funds (having less than \$25.00 to try to conduct this case as well as other cases), and etc... **Judge Salapa as well as the Respondent and Ms. Christieb do not have the right to decide what is best for the Complainant.** Thus, The Complainant would still need to sit for a Telephonic

Ms. Debbie Hughey  
P. O. Box 41842  
Philadelphia, PA 19101  
June 08, 2017

Ms. Graciela Christieb, Attorney for PGW  
Legal Department  
Philadelphia Gas Works  
800 West Montgomery Avenue  
Philadelphia, PA 19122

RE: Copies of Additional Filings

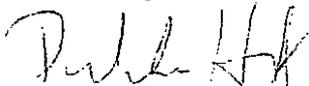
Dear Ms. Christieb:

Enclosed are your copies of the additional filing to the PUC as well as a copy of the letters that I sent to Judge Pell and Secretary Chiavetta:

1. Complainant's Request For Reconsideration to the Respondent's - Philadelphia Gas Works - Preliminary Objections and Motion to Strike along with Exhibits A & B.
2. Complainant's Amended Formal Complaint and Amended Relief along with Exhibit A.
3. Complainant's Response to Judge Salapa's Order Denying Exceptions and Granting Request For In-Person Hearing, and New Matter of Judge Salapa's Recusal along with Exhibits A, B, & C.

Also, my sister, Dianne Hughey, will be testifying at the Hearing of June 15, 2017.

Sincerely,



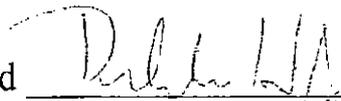
Ms. Debbie Hughey

cc: files  
cc: Judge Pell  
cc: Secretary Chiavetta

Updated Certificate of Service

I certify that on this 8<sup>th</sup> day of June, 2017, I served a true copy via Regular Mail of the: Complainant's Request For Reconsideration to the Respondent's - Philadelphia Gas Works - Preliminary Objections and Motion to Strike along with Exhibits A & B; Complainant's Amended Formal Complaint and Amended Relief along with Exhibit A; and Complainant's Response to Judge Salapa's Order Denying Exceptions and Granting Request For In-Person Hearing, and New Matter of Judge Salapa's Recusal along with Exhibits A, B, & C; A Copy of Letter (dated June 06, 2017) sent to the Secretary Chiavetta; and A Copy of the Letter/Statement to Judge Pell (RE: Regarding Documents filed), to Ms. Graciela Christieb, Attorney for PGW, Legal Department, Philadelphia Gas Works, 800 West Montgomery Avenue, Philadelphia, PA 19122; in accordance, with the requirements of 52 Pa. Code § 1.54 (relating to service by a party). Previous and recent documents were already served to the Respondent and Ms. Christieb via her acceptance of E-Service with the PUC.

Signed



Debbie Hughey, Complainant

June 08, 2017

Ms. Debbie Hughey  
P. O. Box 41842  
Philadelphia, PA 19101  
June 08, 2017

Administrative Law Judge Christopher P. Pell  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
RE: Copies of My Recent Filings with the PPUC

Dear Judge Pell:

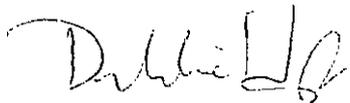
I am submitting the following copies of the documents that I have filed, since you are now the new Judge on this case:

1. Complainant's Request For Reconsideration to the Respondent's - Philadelphia Gas Works - Preliminary Objections and Motion to Strike along with Exhibits A & B.
2. Complainant's Amended Formal Complaint and Amended Relief along with Exhibit A.
3. Complainant's Response/Answer to the PGW's Reply to Complainant's Request for Sanctions.
4. Complainant's Continual Motion for Sanctions and Motion to Compel Respondent to fully Answer the Complainant's Questions, Statements, Requests, and Etc...
5. Complainant's Response to Judge Salapa's Order Denying Exceptions and Granting Request For In-Person Hearing, and New Matter of Judge Salapa's Recusal along with Exhibits A, B, & C.
6. Complainant's Second Reply to the Philadelphia Gas Works' Reply to Complainant's Response to the PGW's Reply to the Complainant's Motion For In-Person Hearing.
7. Complainant's Response/Answer to the Philadelphia Gas Works' Reply to Complainant's Motion for In-Person Hearing.

8. A copy of the letter to Ms. Christieb and the Updated Certificate of Service to PGW for Documents that were too big (greater than 10 MB) to be uploaded in the Pennsylvania Public Utility Commission's Online Server.

Also, my sister, Ms. Dianne Hughey, will be testifying at the Hearing of June 15, 2017.

Respectfully,

A handwritten signature in cursive script, appearing to read "Debbie Hughey".

Ms. Debbie Hughey

cc: files

cc: Ms. Christieb

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**FROM:**

Debbie Hughey  
P.O. Box 41842  
Phila, PA 19101

**TO:**

Ms. Rosemary Chiavetta, Sec  
Secretary Bureau  
Pennsylvania Public Utility  
Commission  
400 North Street  
Keystone Building  
Harrisburg, PA 17120

DATE OF DELIVERY SPECIFIED\*

SPS TRACKING™ INCLUDED\*

INSURANCE INCLUDED\*

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CUSTOMS DECLARATION  
MAY BE REQUIRED.

Expected Delivery Day: 06/10/2017

**USPS TRACKING NUMBER**



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Label 228, March 2016

FOR DOMESTIC AND INTERNATIONAL USE