

Debbie Hughey v. Philadelphia Gas Works
Docket No. C-2016-2567445

Debbie Hughey's Request for Information and Documents
From Philadelphia Gas Works
Submitted April 19, 2017

17. Need a copy of the Gas Meter Reading when the gas was shut-off in April, 2016.

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".

Exhibit
C-6

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28. 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).

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.

This information was prepared by Graciela Christlieb, Esq. – PGW

Exhibit C-7

Debbie Hughey v. Philadelphia Gas Works
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From Philadelphia Gas Works
Submitted April 19, 2017

29. 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.

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 PGW employees brought meters to the property that day. The serial number and model number for meter No. 2161639 are 14Y925643 and L250, respectively. A copy of the Meter Maintenance information, including the serial and model numbers is attached hereto as appendix "F".

This information was prepared by Graciela Christlieb, Esq. – PGW

Exhibit C8

Exhib. 4 C-9 (3 pages)

THE PENNSYLVANIA'S PUBLIC UTILITY COMMISSION

RESUBMISSIONS AND ADDITIONS

Debbie Hughey, Complainant

vs.

Docket No. C - 2016-2567445

PGW - Philadelphia Gas Works, Public Utility

**MOTION TO COMPEL DOCUMENTS, RECORDS, AND QUESTIONS
ANSWERED BY PGW**

The Complainant is requesting the following from PGW:

1. 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.
2. 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 ?
3. 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 ?
4. What were the determining factors and requests as to why the Gas Service was turned on by PGW in November, 2014 ?
5. What were the amounts of the Deposits/Down Payments that the Complainant was required to pay, and why ?
6. Was any Deposits or Down Payments ever returned to the Complainant, and if so, when, and if not, why not ?
7. Was any Deposits or Down Payments applied to any Gas Bills, and if so, when and why ?
8. Need an itemization of what happened to the Deposits/Down Payments that the Complainant paid ?
9. Why were Deposits/Down Payments required to start new Gas Service under the Complainant's Name ?
10. Why are there higher charges for Gas Services during the Spring and Summer Months; whereas, less Gas was used during those times ?
11. Need copies of All Gas Bills from 2014 to present.
12. Why is it that page numbered two is missing from ALL PGW's Gas Bill ?

13. Why is it that we never received a Lien Notice for the year of 2006 ?
14. Verify and supply copies of all Liens that have been placed on said Property by the City of Philadelphia and or by PGW.
15. Why are we being denied the ability to submit a Defendant's Affidavit on the Court's (Common Pleas) Records ?
16. 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 ?
17. Need a copy of the Gas Meter Reading when the gas was shut-off in April, 2016 ?
18. 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 ?
19. 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?
20. 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.
21. 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.
22. Need copies of the PGW's Worker who was assigned to place the new Digital Gas Meter.
23. 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...
24. 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.
25. Copies of ALL Emergency Calls and Reports made for Gas Leaks/Gas Smells at said property.
26. Copies of the Medical necessary Certificates that were obtained for James Hughey's physician; in order, to keep the Gas Service on.
27. Copies of ALL PGW's Bills from 2014 to present.
28. 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).

- 29. 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.
- 30. 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 ?
- 31. How many complaints to have there been about PGW's Digital Gas Meters, and exactly what are the complaints ?
- 32. 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 ?
- 33. 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.
- 34. How many NEW Digital Gas Reading Meters do PGW obtain each year ?
- 35. Who manufactured the Digital Gas Meters that PGW uses ?
- 36. What type and how often do PGW do quality control checks on their Digital Gas Meters ?
- 37. What type of indications are displayed when the Digital Gas Meters are not working effectively ?

Sign _____ Date _____
 Debbie Hughey, Pro se

PROOF OF SERVICE

I, Debbie Hughey, stated that I electronically serve a copy of this filing to PGW's Attorney on April 19, 2017.

Sign _____ Date _____

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

Handwritten: Brown of Hanif

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 **\$256.00**
- 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.

Handwritten: E. J. Herbst C-10