

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey

v.

Docket No. C-2016-2567445

Philadelphia Gas Works

COMPLAINANT'S RESPONSES TO THE RESPONDENT'S (PGW), AND IT'S  
ATTORNEY (GRACIELA CHRISTLIEB) OBJECTIONS TO COMPLAINANT'S  
PETITION TO HER LATE FILED EXHIBITS

The Complainant received the Philadelphia Gas Work's Objections (dated August 10, 2017) to the Complainant's Petition to her Late Filed Exhibits on August 22, 2017, and the Complainant's Responses are as follows:

**I. FALSE HISTORY:**

First of all, The Complainant DID NOT FILED A MOTION, BUT A PETITION. The Respondent's History of Proceedings Relevant to Objections are not correct. The Complainant's Rights were violated again by both Ms. Christlieb's and Judge Pell's refusal to allow the Complainant's Witness to be present throughout the entire Commission (PUC) Hearing of June 15, 2017; in which the hearing is supposed to be **opened to the public !**

Secondly, the Complainant was not informed to file any objections to the PGW's proposed late filed exhibits by July 13, 2017. The Complainant was informed by Judge Pell that she had 15 days after she receives PGW's Late Exhibits; in which, to file her Objections to the Respondent's Late Exhibits. The Complainant received PGW's Late Filed Exhibits on July 06, 2017 via personally delivered by PGW's Security Guard (NOT TO COMPLAINANT'S POST OFFICE BOX AS MS. CHRISTLIEB'S SOWRN TO), and the Complainant submitted her Objections on the the PUC's Website on July 14, 2017, and copy was submitted to Judge Pell via Regular Mail and to Ms. Christlieb via the PUC's E-Service that she accepts.

Thirdly, Ms. Christlieb (PGW's Attorney) **intentionally lied again**, the Complainant **did file her timely Objections to PGW's Late Filed Exhibits along with her demands for Sanctions again**, against the Respondent and their Attorney due to PGW's Continual violations of the laws, Continual violations of the Complainant's Rights, violations of the Complainant's Privacy, Continual Violations on the Complainant's Due Process Rights, and etc... Being an Attorney, Ms. Christlieb knows better than to violate 204 Pa Code, by disclosing the Complainant's Date of Birth, Age, Social Security Number, Driver's License's Number, Third Party's Telephone Number, and etc..., but that is exactly what she has done, and it was done with such maliciousness and forethought, and the Complainant is still demanding that something is done about it. **THE COMPLAINANT IS STILL SEEKING SANCTIONS FOR THESE DEVIOUS ACTIONS AS WELL AS THE PREVIOUS ACTIONS, AND THE MORE RECENT MS. CHRISTLIEB'S/PGW'S ACTIONS, CONTINUAL PROOF OF FRAUD, AND ETC...**

Fourthly, Ms. Christlieb **lied again**, when she claimed, "to date, the Complainant has not filed any objection to PGW's proposed late file exhibits." According to the Pennsylvania Public Utility Commission's Website (that has been changed), the Complainant's Objections and Sanctions were electronically filed on 07/14/17 via PPUC's Website; in which, Ms. Christlieb accepts E-Service. Also, a copy was sent to Judge Pell via Regular mail. The PUC listed it under correspondence, and you know that this was done intentionally because there is not a correspondence tab to select, and the Complainant would not select the tab that has been selected, but nevertheless, whatever has been submitted to the PUC, Ms. Christlieb receives E-service pertaining to it. Thus, she already received a copy of the Complainant's Objections to PGW's Late Filed Exhibits.

## II. FALSE and BOGUS OBJECTIONS:

1. The Evidentiary Record was not closed as Ms. Christlieb claimed. Judge Pell did not send the Complainant anything in writing nor inform her verbally that the Evidentiary Record was closed, until she recently received on August 22, 2017, a Prehearing Order dated August 10, 2017, violating the Complainant's Rights to respond to PGW's Objections; which, is another violation of the law ! Judge Pell has closed the Evidentiary Record after the Respondent has filed Preliminary Objection. Thus, continue to show his bias, abuse of power, abuse of discretions, violations of the laws, and etc...

The Complainant again, objects to the Respondent's Attorney's Objections. Complainant's Late Exhibits were timely as well as they proved the continual fraud by PGW - Philadelphia Gas Works and the City of Philadelphia to try to continue to steal our property by malicious, fraudulent, outrageously inflated Gas Bills and Liens, illegal tactics, and etc... Complainant's Exhibits C-1 proved that the amount of gas that PGW alleged was used as of June, 2016 was 2695 ccf; however, the gas usage on the Gas Meter that is presently at the property at 1629 Newport Place in Philadelphia, PA 19122, listed that only 1760 ccf has been used, since July 02, 2017. Thus, PGW and their Attorney, Ms. Graceila Christlieb have lied, and not only is the Complainant demanding Sanctions, the Complainant is demanding ALL MONIES PAID TO BE RETURN ALONG WITH INTEREST, PENALTIES, DELAYING DAMAGES, PAIN AND SUFFERING, AND THE REMOVAL OF ALL LIENS OFF OF THE SAID PROPERTY AS BEING FULLY SATISFIED IN THE COMMON PLEASE COURT AS WELL AS ANY OTHER COURT THAT THE LIENS HAVE BEEN LISTED, DOCKETED, FILED, AND ETC... requested as already stated in other documents.

Judge Pell did not make it clear that he was ""not going to be considering additional filings after this"", as proven, in his previously submitted PreHearing Order that he has written after the Hearing was already conducted and dated August 11, 2017. The Complainant's Late Filed Exhibits are not a "collection of unauthenticated documents and uncorroborated hearsay", that PUC's Secretary needs to review for herself. There is an affidavit in there with a Verification Statement, attesting to the true statements of how PGW's Representatives have conducted themselves in and around our house at 1629 Newport Place, Philadelphia, PA 19122. There is a statement by Complainant (which is not hearsay) that she took a picture of the Gas Meter in her house at 1629 Newport Place that PROVED the continual FRAUD of the City of Philadelphia, PGW, and etc... as well as proved how they planned and plotted to steal our property - Theft of Property, Fraud, and etc... are criminal charges.

Of course, the Complainant's timely submission of her Late Filed Exhibits would not be an objection to the Respondent's Late Filed Exhibits because the Complainant's Objections to the Respondent's Late Filed Exhibits were already submitted on the record as well as to the the Respondent and to Judge Pell, and they are listed on the PUC's Website.

2. FALSE and INTENTIONALLY LIED - **Complainant's Exhibits 1-3** - these Exhibits were not submitted during the hearing of June 15, 2017.

3. FALSE and INTENTIONALLY LIED - **Complainant's Exhibit 4** - Complainant objects to Ms. Christlieb's and PGW's Objections. The photo has been authenticated by the Complainant as well as by the Daily News Paper of July 02, 2017, and it is definitely relevant to the Complainant's Complaint because the Complainant continues to state the fraud of the Respondents, and etc., and the picture proved it, and they know it ! The GAS METERED PICTURE PROVED THE INFLATED OUTRAGEOUS AND BOGUS BILLING SINCE PRIOR TO 2004, TO PRESENT.

4. FALSE - **Complainant's Exhibit 5** - Complainant objects to Ms. Christlieb's and PGW's Objections. This Exhibit is not cumulative. The Respondent and Ms. Christlieb continues to refused to submit ALL documents, records, forms, and etc... on the PUC's Record/Case No. C-2016-2567445. Several of their submissions were not and still are not listed on the Record, and the PUC, Judge Pell, and Judge Salapas continued to allow, such violations ! Also, the Complainant needed to clearly identify the Exhibits that she was talking about, since they still were not entered into the viewable PUC's Record.

5. **Complainant's Exhibits 6-8** - Complainant objects to Ms. Christlieb's and PGW's Objections. these Exhibits are not cumulative. The Respondent and Ms. Christlieb continues to refused to submit ALL documents, records, forms, and etc... on the PUC's Record/Case No. C-2016-2567445. Several of their submission was not and still are not listed on the Record, and the PUC, Judge Pell, and Judge Salapas continued to allow, such violations ! Also, the Complainant needed to clearly identify the Exhibits that she was talking about, since they still were not entered into the viewable PUC's Record.

6. FALSE and NONSENSE - **Complainant's Exhibit 9** - Complainant objects to Ms. Christlieb's and PGW's Objections. This Exhibit is definitely relevant. This is a copy of the Complainant's Motion to Compel that the Respondent and their Attorney, Ms. Christlieb still refused to submit their answer to the PUC's - Pennsylvania Public Utility Commission's Records. Complainant also proved at the hearing the Ms. Christlieb lied again regarding her response to question numbered 16, and Judge Pell did nothing about it !

7. FALSE - **Complainant's Exhibits 10** - Complainant objects to Ms. Christlieb's and PGW's Objections. This Exhibit is not cumulative. The Respondent and Ms. Christlieb continues to refused to submit ALL documents, records, forms, and etc... on the PUC's Record/Case No. definitely. Several of their submission was not and still are not listed on the Record, and the PUC, Judge Pell, and Judge Salapas continued to allow, such violations ! Also, the Complainant needed to clearly identify the Exhibits that she was talking about. When the Complainant checked the PUC's Website, Exhibit 8 was not listed on the viewable PUC's Record. Judge Salapas had already told both, Complainant and Ms. Christlieb, THAT "EVERYTHING MUST BE SUBMITTED TO PUC'S

WEBSITE"; in addition, to whatever is submitted to the judge, but this direction as NOT been maintained by the Respondent and it's Attorney, Ms. Christlieb. Recently, the PUC has juggle the previous organized listing of the PUC's Records; in which, it appeared that some documents have been submitted that were not there previously.

8. **FALSE - Complainant's Exhibits 11** - Complainant objects to Ms. Christlieb's and PGW's Objections. This Exhibit is not cumulative. The Respondent and Ms. Christlieb continues to refused to submit ALL documents, records, forms, and etc... on the PUC's Record/Case No. appeared. Several of their submission was not and still are not listed on the Record, and the PUC, Judge Pell, and Judge Salapas continued to allow, such violations ! Also, the Complainant needed to clearly identify the Exhibits that she was talking about, since they still were not entered into the viewable PUC's Record.

9. **Complainant's Exhibit 12** - Complainant objects to Ms. Christlieb's and PGW's Objections. This Exhibit is not cumulative. The Respondent and Ms. Christlieb continues to refused to submit ALL documents, records, forms, and etc... on the PUC's Record/Case No. appeared. Several of their submission was not and still are not listed on the Record, and the PUC, Judge Pell, and Judge Salapas continued to allow, such violations ! Also, the Complainant needed to clearly identify the Exhibits that she was talking about, since they still were not entered into the record. Also, this is not hearsay as well as it was submitted with the Complainant's Complaint (Certified Mail # 7014 2120 0000 4339 4202.

10. **Complainant's Exhibit 13** - Complainant objects to Ms. Christlieb's and PGW's Objections. This Exhibit is not cumulative. The Respondent and Ms. Christlieb continues to refused to submit ALL documents, records, forms, and etc... on the PUC's Record/Case No. appeared. Several of their submission was not and still are not listed on the Record, and the PUC, Judge Pell, and Judge Salapas continued to allow, such violations ! Also, the Complainant needed to clearly identify the Exhibits that she was talking about, since they still were not entered into the viewable PUC's Record.

11. **FALSE - Complainant's Exhibit 14** - Complainant objects to Ms. Christlieb's and PGW's Objections. Both Judge Pell and Ms. Christlieb continued to violate Complainant's Rights by telling her she can not submit her own statements for the records, and the Complainant continues to inform them that she wanted her staements, documents, and etc... submit on the records !

12. **Complainant's Exhibits 15 & 16** - Complainant objects to Ms. Christlieb's and PGW's Objections. Both Judge Pell and Ms. Christlieb continued to violate Complainant's Rights by telling her she can not submit her own statements for the records, and the Complainant continues to inform them that she wanted her staements, documents, and etc... submit on the records !

13. **Complainant's Exhibit 17** - Complainant objects to Ms. Christlieb's and PGW's Objections. This Exhibit is not cumulative. The Respondent and Ms. Christlieb continues to refused to submit ALL documents, records, forms, and etc... on the PUC's Record/Case No. C-2016-2567445. Several of their submission was not and still are not listed on the Record, and the PUC, Judge Pell, and Judge Salapas continued to allow, such violations ! Also, the Complainant needed to clearly identify the Exhibits that she was talking about, since they still were not entered into the viewable PUC's Record.

**Wherefore**, the Complainant requests that the Pennsylvania Public Utility Commission continues to accept the Complainant's Late Filed Exhibits, and deny the Respondent's/PGW's and Ms. Christlieb's Objections, and rule in favor of the Complainant, since she has PROVEN her case; PROVEN the Fraud and attempted theft of the Complainant's Property at 1629 Newport Place in Philadelphia, PA 19122 as well as the Complainant wants the PUC to honor the rest of the Complainant's previously documented and submitted requests against PGW and Ms. Christlieb, especially pertaining to sanctions, and etc...

Sincerely,

/s/ electronically signed by Debbie Hughey on August 25, 2017

#### VERIFICATION

The, Complainant, Debbie Hughey, hereby declare that the fact set forth in the foregoing document regarding the Complainant's Responses to the Respondent's (PGW), and it's Attorney's (Graciela Christlieb) Objections to the Complainant's alleged "MOTION" to admit Late Filed Exhibits, are true and correct to the best of my knowledge, information, and belief. I have already proved the fraud, the attempted theft of property, and etc... of PGW and the City of Philadelphia. This verification is made subject to the penalties of 18 Pa. C.S. 4904, concerning false statements to authorities.

/s/ electronically signed by Debbie Hughey on August 25, 2017

#### CERTIFICATE OF SERVICE

I, certify that a true copy of the Complainant's Responses to the Respondent's (PGW), and it's Attorney (Graciela Christlieb) Objections to the Complainant's Petition to her Late Filed Exhibits via PUC's Website, since she still accepts E-Service. Therefore, the Respondent has been served, according to 52 Pa. Code 1.54.

/s/ electronically signed by Debbie Hughey on August 25, 2017.