

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

Case No. C-2016-2567445

v.

Philadelphia Gas Works, Respondent

COMPLAINANT'S RESPONSE TO JUDGE PELL'S INTERIM ORDER
OF CLOSING THE HEARING, AND NEW MATTER - MOTION FOR
THE RE-OPENING OF THE EVIDENTIARY RECORD

Judge Pell's and Judge Salapa's Histories on this case continued to be **incorrect, misleading, and manipulative**. Prior to September 19, 2016, the Complainant, Debbie Hughey, filed an **Informal** Complaint (via Certified Mail # 7015 0640 0007 5103 1448) with the Pennsylvania Public Utility Commission (PUC) against PGW - Philadelphia Gas Works (Respondent); in which, her Informal Complaint was ignored, and no investigation, and etc... were ever done, and the PUC's Staff kept misleading the Complainant, by stating that it takes several months before she would hear anything about her Informal Complaint; in which, the Complainant continued to never hear nor received anything from the PUC. Therefore, in September, 2016, the Complainant filed a **Formal** Complaint, dated September 19, 2016. Wherefore, PGW illegally turned off Gas Service to Complainant's Property as a results of the Complaints that the Complainant has filed.

The Complainant filed her complaints against PGW based of the following:

1. Threatening to shut off our Gas Service or has already shut off Gas Service. Gas Service was terminated on April 27, 2016, and they refused to allow Complainant to submit another Medical Necessity Form.
2. Inflated and Illegal Gas Charges, Bad Faith, Fraud, and Fraudulent Business Practices, Incorrect Billing Charges, Intentional Torts,, and etc...
3. Reliability, Safety, and Quality Problems with PGW's Gas Services. PGW tampered with our gas line; in the dark time (after 6 pm), after Gas Services were already turned off on April 27, 2016. PGW claimed that they were back out to our house to turn the Gas OFF AGAIN because the Gas

Meter was registering usage. Also, PGW gave us the impressions/feelings that they were trying to blow up us and our property by sneaking on the property that late at night; without, even informing us of what they were doing in front of our property.

4. Attempted Theft of Property - The City of Philadelphia as owners of PGW and the Philadelphia Water Department are trying to steal our property by placing False Liens on our property. In 2016, the City of Philadelphia Water Department disclosed to us that in 2004 that they placed a Lien (for an Illegal Water Bill that we did not owe) against our property located at 1629 Newport Place in Philadelphia, PA 19122. Thus, as documented, PGW has a very pervasive illegal and fraudulent business practices of trying to steal our property, and the Complainant referenced the Certified Letter #7014 2120 0000 4339 4202 that was submitted with the Formal Complaint.

5. Retaliation - The City of Philadelphia Water Department had enlighten us in 2016 about the City of Philadelphia's attempted theft of our property via Water Department's Lien of 2004. PGW and the City of Philadelphia retaliated against Complainant and her family based upon the Complainant's Complaints to the PUC; whereas, in 2016, they added an alleged Water Lien Charge of \$40.00 of an alleged Lien of over 11 years ago that they never told us about. They chose at that time to inform us of what they have done to our house in 2004 (since we filed complaints with the PUC) as well as they stole money from the payments that we were making on the present Water Bills to apply to this alleged Lien Amount, and still REFUSED TO REMOVE THE LIEN. In fact, they took more than \$40.00, and never repaid it back. AS, I SAID, WE DID NOT AND NOT OWE THE CITY OF PHILADELPHIA WATER DEPARTMENT THAT FORTY THAT THEY TOOK FROM US !

6. A Bogus, Tampered, and Fraudulent Digital Gas Meter was placed in our house AGAIN, and the incidents of how it was maliciously done has been documented regarding the two (black and white) PGW's Workers who were outside (white) of our house, waiting for the other (black) PGW's Worker that was inside of our house, on the day that the new Gas Meter was being placed in Complainant's House. Also, we have pictures of the PGW's Supervisor who was called to remove the Black Colored PGW's Worker from our property; even though, PGW still denied this as well as the proof that two different PGW's Workers came out to service the Complainant's house on the same day is within the PGW's own Records that they have already submitted; proving that PGW (Philadelphia Gas Works) and their

alleged Attorney, Ms. Graciela Christlieb, to be **LYING AGAIN AND AGAIN !**

7. The meter installed in the Complainant's Residence is not providing accurate Gas Usage Readings. **The Fraudulent Gas Meter as evidenced in the documented pictures of July 02, 2017, showed that the Gas Meter Reading was stopped at 1670 ccf, but PGW's records stated that we used 2695 ccf as of April 27, 2016.** Thus, fraudulently inflated Gas Meter Readings. How is it that PGW's Automatic Gas Meter Records stated that **over an extra 1000 ccfs** were used as compared to the amount of ccfs that are still listed on the Gas Meter almost a year later ?

8. PGW falsely and fraudulently obtained funds from the Complainant by falsely claiming that an agreement was made for services; fraudulently obtaining additional funds under false pretends on claiming that an agreement was made; and PGW never gave Complainant a copy of the alleged agreement, denying the Complainant of her Due Process Rights.

9. PGW and the City of Philadelphia falsely and fraudulently placed Liens on our property, and in 2006, the Complainant was never informed that a Lien was placed on her property. In addition, PGW falsely and fraudulently placed additional charges to our previous Gas Bills in 2006; whereas, we were no longer using their Gas Services due to their illegal termination.

10. PGW and the City of Philadelphia also planned and plotted to steal Complainant's Property by their demanding a copy of the Complainant's DEED to the property before even turning Gas Services on in November, 2014. Thus, continual **deceptive pervasive practices.**

11. Judge Pell, you, refused to mention about the several Sanctions Requests/Motions that the Complainant has filed against PGW and their alleged Attorney's regarding their continual lies, maliciousness, fraud, harassments, and etc... In this case history, Judge Pell, you, did not mention about the Amended Complaint, Updated Preliminary Objections Responses, and Late Exceptions that were filed by the Complainant nor do you mention about the Complainant's Recusal Request/Motion of Judge Salapa, and as a matter of fact, you should have recused yourself from this case because you were the Judge that resided over my Municipal Court Case against Pulmonary Pacific Oxygen Company; whereas, the Oxygen Company in my opinion tried to commit attempted murder against my father's life on more than one occasion, threaten the Complainant, pushed the door opened,

trying to get into the Complainant's House, and maliciously crashed the window of the Complainant's House; while, the Municipal Court's Personnel fixed the documents that were already submitted to court; so that, they were intentionally not viewable by the Judge (you) as well as, you, as the Judge and other court personnel refused to submit the Complainant's additional documents/evidence into the record during that Court Hearing. Then what ensued next was that the Municipal Court Personnel removed the Complainant's already submitted documents off the record, and then re-entered them with a different date, to make it look like it was submitted after the court hearing; while still, refusing to accept the rest of the Complainant's Documents. The Municipal Court's Supervisor and the Court's Administrators were already aware of what was done in that Complainant's Case before they even talked to her (Thus, someone else informed them before I even had a chance to say anything), but still nothing was done to rectify those injustices, violations, and etc... However, you, Judge Pell, ruled against Complainant in that case, and you should not have resided over this case with the Pennsylvania Public Utility Commission. There needs to be an investigation against you and Ms. Christieb because the lady who identify herself over the phone as being the alleged Attorney for PGW was not the lady who was present in court on June 15, 2017 as to why she probably kept fighting against the Complainant's Live Hearing Requests.

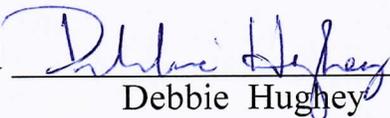
Both you, Judge Pell, and Judge Salapa have shown and continues to show their biases against the Complainant and prejudiced this case by slandering her name that she was delaying in paying PGW for Bogus Fraudulent Gas Services; while, the two of you still performing unfairness, illegally tactics, violations of the laws, Abuse of Power, Abuse of Discretion, and etc... The Complainant even documented how one Complainant had complained of ineffective Gas Meter Readings, but now the Complainant have researched that there are several Complainants that have complained about false Gas Meter Readings. Thus, as Claimant have said and complained that this is one of the ways that the City of Philadelphia and PGW have planed to steal our property via fraudulent Liens, pervasive fraudulent billing practices, fraud, and etc...

Judge Pell, since you falsely claimed that Judge Salapa and yourself claimed that the Complainant did not serve the two of you with documents/evidence that were submitted to the PUC, the Complainant demands a signed Affidavit attesting to that, and when it is investigated the Complainant would not only being seeking sanctions, but impeachment !

Judge Salapa did not issue instructions on subpoena procedures as well as you, Judge Pell, denied the Complainant Subpoenas Request to obtain additional evidence.

NEW MATTER - MOTION FOR THE REOPENING OF THE EVIDENTIARY RECORD

THEREFORE, the Complainant is still requesting, and still needing to obtain further evidence as well as witnesses, and the Complainant is requesting a Motion to re-open the record to obtain further evidence.

Signed  Date Oct 27, 2017
Debbie Hughey

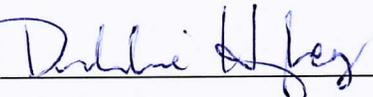
VERIFICATION STATEMENT

I, Debbie Hughey, the Complainant verify that the facts set forth in the foregoing statements/documents of the "Complainant's Response to Judge Pell's Interim Order for Closing the Hearing, and New Matter - Motion for the Re-opening of the Evidentiary Record" are true and correct to the best of my information, knowledge, and belief. I also understand that the statements contained herein are subject to the Penalties of 18 Pa.C.S.A., Section 4904 relating to unsown falsification to authorities.

Signed  Date Oct 27, 2017

PROOF OF SERVICE

I, certify that on October 27, 2017, the Complainant served a true copy of the Complainant's Response to Judge Pell's Interim Order of Closing the Hearing, and New Matter - Motion for the Re-Opening of the Evidentiary Record, PGW's via their alleged Attorney, Graciela Christlieb, in accordance with the requirements of 52 Pa Code § 1.54 (Relating to service by a Party) via the PUC's Electronic Filing System, since Ms. Graciela Christlieb accepts E-Service as well as sent a copy to Judge Pell via Regular Mail.

Signed  Date Oct 27, 2017

Service List:

Administrative Law Judge Christopher P. Pell
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

Graciela Christlieb, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
via E-Service