

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Debbie Hughey, Complainant

v.

Docket No. C - 2016 - 2567445

Philadelphia Gas Works, Respondent

COMPLAINANT'S RESPONSE TO THE PHILADELPHIA GAS WORKS
MOTION TO DISMISS ANY FURTHER EXCEPTIONS AS UNTIMELY

I. Pertaining to the Respondent's History of the proceedings relevant to the Motion

The Secretarial Certified Letter of December 20, 2017 regarding the Initial Decision of the alleged Judge Pell's Illegal Decision stated that Exceptions were due on January 09, 2018, and the Reply Exceptions were due on January 19, 2018, but it was not received by the Complainant in a timely fashion as well as the Complainant had medical and other issues that had precluded her from FULLY filing her Exceptions as to why she was only able to file Partial Exceptions. Review the Commission's Copy of the USPS's Green Return Card that was signed for by the Complainant, showing the date that the Complainant received the letter.

The Complainant's First Request for Additional Time to File Exceptions was filed to the Commission on January 08, 2018, and was attached to the record on January 09, 2018. The Respondent are incorrect; whereas, the Complainant did not file an Amended Complaint, along with her Partial Exceptions. Over five requests later as well as 60 days later, the Commission refused to address the Complainant's several requests for Additional Time to File FULL Exceptions.

Finally on March 12, 2018, the Secretary issued a ten day extension for the Complainant to file FULL Exceptions; in which, Exceptions were due March 22, 2018, and reply Exceptions are due by April 02, 2018 (giving the Respondents 11 days in which to respond). On March 22, 2018, the Complainant filed timely FULL Exceptions along with Exhibits Attachments via Certified Mail # 7018 0040 0000 4339 2472; in which, it is presently listed on the record as being timely as of March 22, 2018 ! Please review the "Public Document" Portion of the Summary Case, and you will see that it is listed correctly for March 22, 2018.

II. Complainant's Response to the Respondent's Motion to Dismiss Any Further Exceptions as Untimely

Ms. Christlieb is again incorrect, The Complainant **did file timely** Full Exceptions on March 22, 2018; the date that they were due. The Complainant was not shown any fairness; when, her continual requests for additional time were ignore. Complainant was shown some fairness, when Ms. Chiavetta granted a ten day extension, as she is allowed to due, since she is the Secretary of the Commission. Also, by Ms. Chiavetta granting the extension, it prevented a repeat of the previous tactics of when the Complainant

needed additional time to file her objections to PGW's Preliminary Objections due to Critical Care Admission and Issues, and no one ever addressed the Complainant's Request, and then Judge Salapa just ruled in favor of the Respondent's Preliminary Objections and New Matter, without even giving the Complainant a fair chance.

Pertaining to Ms. Christlieb's Exhibits 10 and 11, both Judge Pell and Ms. Christlieb knew that they were not late, if they were received on June 29, 2017, but was not allegedly received by the Commission until June 30, 2017; even though, it was dated on June 29, 2017.

Both the alleged Judge Pell and Ms. Christlieb, the Attorney for PGW, the Respondent, continues to play their CHARADES in this case. They continued their Ex parate Communication. Prior to the denying of the Respondents Exhibits, Ms. Christlieb sent a copy of additional Exhibits that she send to Judge Pell that was added to the case; without, even giving the Complainant time to respond. Where is the fairness in that. In fact, the Complainant was not even given ample to response to Judge Pell's Second (but late), Interim Order (that is not listed on the Commission's Record as to when it was submitted/filed to the record) on the Complainant's Amended Complaint and Motion to Reopen the Case, that were filed several months ago. Judge Pell had a certain time by law; in which, to give a written response/order, but he has violated that. Thus, where is the fairness in that when he as well as Judge Salapa continues to abuse their Power as well as abuse their Discretion, and etc...; in favor, of Ms. Christlieb !

As a Judge of the Commission, Judge Pell knew as well as Ms. Christlieb being a lawyer working with the PA's PUC for her client, PGW, knows or should have known that according to the PUC's Rules, as long as the document for the Commission is postmarked on the day that is it due or if it is hand delivered to the PUC in Harrisburg before 12 noon the following day, the document will be accepted as timely. Therefore, the Complainant did not "failed to" meet the granted ten extension deadline on March 22, 2018 as Ms. Christlieb so falsified.

WHEREFORE, the Complainant request that the Respondents' Motion to Dismiss any Further Exception as Untimely, be dismissed with prejudice as well as the Complainant is requesting sanction again against the Respondent, and their Attorney, Ms. Graciela C. Christlieb, for their continual manipulation, lies, and duress in filing this false Motion.

NEW MATTER

The Complainant would like to know how Ms. Christlieb was able to file this Motion on the Commission's Website; without, the Complainant being E-Served. The Complainant recently signed up for E-Service since Ms. Christlieb falsely claimed that she served the Complainant something that the Complainant never received. Thus, since accepting to be E-Served, the Complainant has received notices of the document filed, except for this Motion; even though, the Complainant was served with a copy via Expressed Mail. How was the Respondent able to divert the Commission E-Service System ?

/s/ debbie hughey electronically filed on March 30, 2018

VERIFICATION

I, Debbie Hughey, the Complainant verify that the facts set forth in the foregoing statements 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.

/s/ debbie hughey electronically filed on March 30, 2018

CERTIFICATE OF SERVICE

I, certify this day that I served a true copy of the foregoing document regarding the Complainant's Response to the Philadelphia Gas Works Motion to Dismiss any Further Exceptions as Untimely, upon Ms. Graciela Christlieb (PGW - Respondent's Attorney), 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.

/s/ debbie hughey electronically filed on March 30, 2018