



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney
Legal Department
Direct Dial: 215-684-6164
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March 28, 2018

RECEIVED

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

MAR 29 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

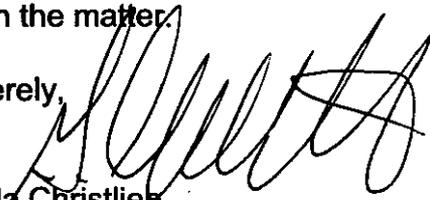
Re: Debbie Hughey v. Philadelphia Gas Works, Docket No. C-2016- 2567445

Dear Secretary Chiavetta:

The Philadelphia Gas Works hereby files the original Petition for Leave to Withdraw its Motion to Dismiss Any Further Exceptions as Untimely, 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,


Graciela Christlieb

cc: Debbie Hughey
Tyra Jackson

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MAR 29 2018

Debbie Hughey

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

v.

Docket No. C – 2016 – 2567445

Philadelphia Gas Works

**PETITION FOR LEAVE TO WITHDRAW PHILADELPHIA
GAS WORKS' MOTION TO DISMISS ANY FUTHER
EXCEPTIONS AS UNTIMELY**

Pursuant to 52 Pa. Code §5.94, the Philadelphia Gas Works (PGW) hereby files its Petition for Leave to Withdraw its Motion to Dismiss Any Further Exceptions as Untimely.

I. History of the proceedings relevant to the Petition

By Secretarial Letter dated March 12, 2018, the Commission granted the Complainant's request for extended time to file exceptions. Exceptions were due within ten days of that letter (*i.e.*, March 22, 2018). Reply Exceptions are due within ten days after the date that Exceptions were due (*i.e.*, April 2, 2018).

On March 23, 2018, PGW filed a Motion to Dismiss any Further Exceptions as Untimely.

Since the filing of the above referenced motion, it has come to PGW's attention that the Complainant did file further exceptions and that the Commission has marked those exceptions as having been received on March 22, 2018.

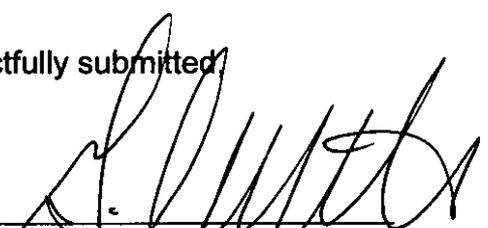
II. Petition to Withdraw Motion

As PGW is now aware that the grounds for its Motion no longer exist, PGW is seeking leave to withdraw the Motion.

Wherefore, PGW respectfully requests that this Commission grant the Petition and give PGW leave to withdraw the motion.

Respectfully submitted,

March 28, 2018

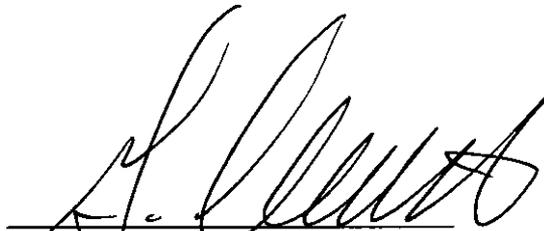


Graciela C. Christlieb, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

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 Petition 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.

March 28, 2018



Graciela Christlieb, Esquire

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MAR 29 2018

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

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).

Service List:

For Complainant:

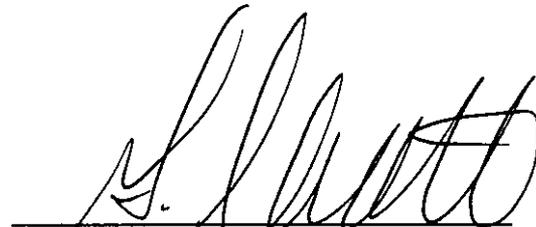
Ms. Debbie Hughey
P.O. Box 41842
Philadelphia, PA 19101

March 28, 2018

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MAR 29 2018

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**



Graciela C. Christlieb, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

FedEx Package
Express US Airbill

FedEx Tracking Number **8119 2771 4256**

Form ID No. **0215**

Residential

1 From

Date 5/29/18

Sender's Name Philadelphia Gas Works Phone 215 654-6104

Company PHILADELPHIA GAS WORKS

Address 800 W MONTGOMERY AVE
Dept./Floor/Suite/Room

City PHILADELPHIA State PA ZIP 19122-2898

2 Your Internal Billing Reference

3 To

Recipient's Name Parsons + Brinckerhoff Phone 717 732-7777

Company PBC

Address 4100 North Street
We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room

Address _____
Use this line for the MDLO location address or for continuation of your shipping address.

City Harrisburg State PA ZIP 17120

0127717438



8119 2771 4256

4 Express Package Service * To most locations. **Packages up to 70 lbs.**
For packages over 500 lbs., FedEx Express Freight (23 A)

Next Business Day	2 or 3 Business Days
<input type="checkbox"/> FedEx First Overnight <small>Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.</small>	<input type="checkbox"/> FedEx 2Day A.M. <small>Second business morning.* Saturday Delivery NOT available.</small>
<input type="checkbox"/> FedEx Priority Overnight <small>Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.</small>	<input type="checkbox"/> FedEx 2Day <small>Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.</small>
<input checked="" type="checkbox"/> FedEx Standard Overnight <small>Next business afternoon.* Saturday Delivery NOT available.</small>	<input type="checkbox"/> FedEx Express Saver <small>Third business day.* Saturday Delivery NOT available.</small>

5 Packaging * Declared value limit \$500.

FedEx Envelope* **FedEx Pak*** **FedEx Box** **FedEx Tube** **Other**

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

No Signature Required
Package may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery.

Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

No **Yes** (As per attached Shipper's Declaration) **Yes** (Shipper's Declaration NOT required)

One box must be checked.

Dry Ice (Dry Ice 9, UN 1845) _____ x _____ kg

Restrictions apply for dangerous goods -- see the current FedEx Service Guide. **Cargo Aircraft Only**

7 Payment Bill to: Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Sender's Acct. No. (in Section 1 will be billed) **Recipient** **Third Party** **Credit Card** **Cash/Check**

Total Packages _____ Total Weight _____ Credit Card Auth. _____

Your liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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