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MAR 31 2018

1 of 4 Certified Letter #7014 2120 0000 4339 3410

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSIONPA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Debbie Hughey, Complainant

v.

Docket No. C-2016 - 2567445

Philadelphia Gas Works, Respondent

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

The PUC's Website has prevented the Complainant from filing her "Complainant's Response to the Philadelphia Gas Works to Dismiss Any Further Exceptions As Untimely", since 3:30 pm on Friday, March 30, 2018 until 07:18 am about the morning of Saturday March, 31, 2018; in which, it was finally accepted, but still the Complainant received no E-Service Notification. Therefore the Complainant is also mailing her Original and her Supplement Documents regarding the Complainant's Additional Response to the PGW's Motion to Dismiss any further Exceptions as Untimely, via Regular Mail to the PUC and to PGW's Attorney.

**As the Complainant has confirmed that she did timely filed her Full Exceptions, according to 52 Pa. Code 1.56(a)(1), which stated that the date of service shall be when the document is deposited in the United States Mail, as proven in Exhibit A - Copy of Certified Receipt #7018 0040 0000 4339 2472, which clearly shows the date of postmark by the USPS, and two by the PPUC's Website that already listed that in deed, the Complainant's Full Exceptions were accepted as timely with the date of March 22, 2018 - Exhibit B.**

Ms. Graciela Christlieb continues to be so malicious in this case. She knows that her Motion was premature and unjust. She just does not want the Public, PPUC, and etc... to see how fraudulent her and her client (PGW) are. Even now, the Complainant has still showed them of how bogus their Gas Meter Readings were, and they still refused to admit defeat, and do the right things by removing ALL Liens, Balances, Fees, Changing of the Gas Meter without any additional fees as well as returning Gas Service to the Complainant's Property without any additional charges, and pay all of Complainant's Cost, Fees, Expenses, and etc... Also, the Complainant requests that the PPUC order the Respondent to Issue a Letter of Satisfaction in this matter to the Complainant, the Courts, the PPUC, and whoever else is appropriate.

Again, Ms. Christlieb is again incorrect, The Complainant **did file timely Full Exceptions on March 22, 2018; the date that they were due !**

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SECRETARY'S BUREAU

As stated, 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 parte Communication, tactics, and etc... 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, tactics, violation, and duress in filing this false Motion, and the way that they have been mishandling this case. The Complainant also request the above list items as well pertaining to Letter of Satisfaction, fees, cost, and etc..., and a signed letter of apology for the pain and suffering, the attempted theft of our property, leaving us without heat, and etc..., and several other acts of maliciousness, violations, fraud, and etc...

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 ? Even the mostly filed document of the Complainant was not accepted by the PPUC's Website, and when it was finally accepted, the Complainant received no E-Service Notification like she previously had.

Signed Debbie Hefey Date March 31, 2018

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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.

Signature Debbie Hughey Date 03/31/18

CERTIFICATE OF SERVICE

I, certify this day that I served a true copy of the foregoing document regarding the Complainant's Supplemental 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) to:

Service List:  
Ms. Graciela Christlieb  
800 West Montgomery Avenue  
Philadelphia, PA 19122

*via Cm # 7014 2120 0000  
4339 3410*

and

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

*via regular mail*

Signed Debbie Hughey Date March 31, 2018

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<u>Objection to Motion admit late file exhibits - PGW</u>	Answer to Motion	1650839	8/11/2017
<u>C-2016-2567445 Debbie Hughey v PGW Interim Order Closing Record Pell.docx</u>	Order	1650839	
<u>Motion for Additional Sanctions - D Hughey</u>	Motion	1650839	8/15/2017
<u>Responses to Objections-Debbie Hughey</u>	Case Related Document	1650839	8/28/2017
<u>Motion to Re-open Record - Hughey</u>	Motion	1650839	10/27/2017
<u>Reply to Petition to Reopen Record - PGW</u>	Answer to Petition	1650839	11/13/2017
<u>C-2016-2567445 Hughey v PGW - Interim Order on Amended Complaint and Motion to Reopen Record.docx</u>	Interim Order	1650839	
<u>C-2016-2567445 ID SEC LETTER.doc</u>	Secretarial Letter	1650839	12/20/2017
<u>C-2016-2567445 Debbie Hughey v Philadelphia Gas Works ID.pdf</u>	Initial Decision	1650839	12/20/2017
<u>Supporting Documentation-Motion.pdf</u>	Petition for Extension of Time	1650839	1/9/2018
<u>Exceptions (Partial) - Debbie Hughey</u>	Exceptions	1650839	1/9/2018
<u>Reply Exception - PGW</u>	Reply Exception	1650839	1/19/2018
<u>Answer to Petition-PGW</u>	Answer to Petition	1650839	1/19/2018
<u>Petition for Extension of Time to file Exceptions - Hughey</u>	Petition for Extension of Time	1650839	2/9/2018
<u>Other Filing-Petition for Extension of Time.pdf</u>	Petition for Extension of Time	1650839	2/22/2018
<u>Reply Exception - Debbie Hughey</u>	Reply Exception	1650839	2/20/2018
<u>Petition for Extension of Time Exceptions - Hughey</u>	Petition for Extension of Time	1650839	3/2/2018
<u>Secretarial Letter - C-2016-2567445 - March 2018 - Hughey v PGW - 2567445 - Granting Extension of Time to File Exceptions.docx</u>	Secretarial Letter	1650839	3/12/2018
<u>Motion - PGW</u>	Motion	1650839	3/23/2018
<u>Letter re updated cert of srvc - Hughey</u>	Letter	1650839	3/27/2018
<u>Exceptions - Debbie Hughey</u>	Exceptions	1650839	3/22/2018

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Exhibit B  
 (Included in Certified mail # 701421200000  
 43393410); RE: Docket NO. C-2016-2567445

4 of 4 (Document) Certified mail # 7014 2120 0000 4339  
(Included) 3410

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Docket No. C - 2016 - 2567445

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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 !

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

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

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P.O. Box 41842  
Phila. PA 19101



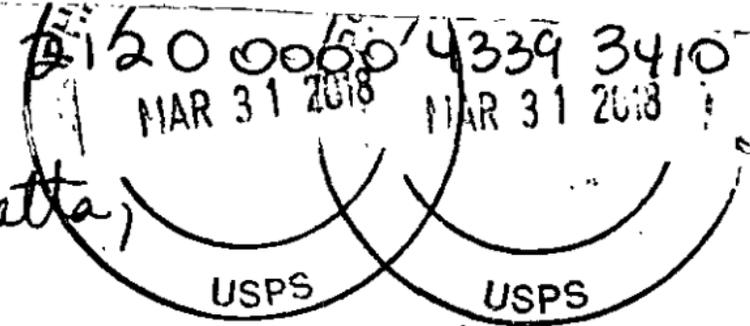
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CERTIFIED MAIL # 10



Ms. Rosemary Chiavetta,  
Secretary  
~~Philadelphia~~ Public Utility Commission  
P.O. Box 3265

Harrisburg, PA 17105-3265

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