



1410 West Erie Avenue Philadelphia, PA 19140
Phone: 215.227.2400
Web Address: www.clsphila.org

March 14, 2019

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

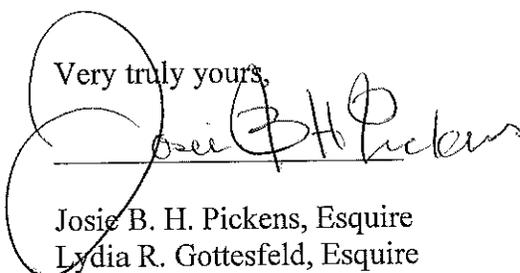
**Re: Petition for Interim Emergency Order, Tomisha Palmer v. Philadelphia
Gas Works, Docket No. F-2018-3006197**

Dear Secretary Chiavetta:

Enclosed for filing is the Petition for Interim Emergency Order, on behalf of Tomisha Palmer, with Verified Statement of Facts and Certificate of Service.

Pursuant to 52 Pa. Code § 3.6(a), copies of these documents have been served on the Chief Administrative Law Judge and the parties.

Very truly yours,



Josie B. H. Pickens, Esquire
Lydia R. Gottesfeld, Esquire

Attorneys for Tomisha Palmer

Community Legal Services
1410 West Erie Avenue
Philadelphia, PA 19140
(215) 227-4378 (p)
jpickens@clsphila.org

Enclosures
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TOMISHA PALMER	:	
Complainant	:	
	:	
	:	F-2018-3006197
	:	
	:	
PHILADELPHIA GAS WORKS	:	
Respondent	:	

PETITION FOR INTERIM EMERGENCY ORDER

Pursuant to 52 Pa. Code § 3.6, Petitioner, Tomisha Palmer, through Counsel Community Legal Services, Inc., hereby petitions the Commission for Interim Emergency Order to establish gas service at 1763 N. Croskey Street, and in support states as follows:

1. Complainant Tomisha Palmer (Petitioner) lives at 1763 N. Croskey Street in Philadelphia, PA.
2. On August 1, 2018, Petitioner went to a Philadelphia Gas Works (PGW) office to apply for gas service at 1763 N. Croskey Street. PGW informed Petitioner that she could not establish service at 1763 N. Croskey Street because PGW was holding Petitioner responsible for billing charges associated with an alleged meter bypass and/or tampering at 4244 N. Hicks Street in Philadelphia.
3. The sole basis for PGW's denial of service to Petitioner at 1763 N. Croskey Street is PGW's claim that Petitioner is responsible for charges associated with an alleged meter bypass and/or tampering at 4244 N. Hicks Street. Petitioner satisfies all other applicable requirements to establish service at 1763 N. Croskey Street.

4. Petitioner resided at 4244 N. Hicks Street in Philadelphia for some periods of time prior to June 27, 2017.
5. Petitioner does not own the property at 4244 N. Hicks Street in Philadelphia.
According to public records 4244 N. Hicks Street is owned by Iota Trust, the owner since 2000. See attached record from City of Philadelphia Office of Property Assessment, Appendix A.
6. During the periods when she resided at 4244 N. Hicks Street, Petitioner did not have exclusive possession or control of the property. Other parties had access to 4244 N. Hicks Street, which included access to PGW's meter.
7. PGW alleges that there was a meter bypass and/or tampering at 4244 N. Hicks Street that was discovered on June 27, 2017.
8. Petitioner had a PGW account for service at 4244 N. Hicks Street from 2012-2013.
9. Petitioner was not PGW's most recent customer of record at 4244 N. Hicks Street at the time PGW allegedly discovered a meter bypass and/or tampering at that address.
10. Oliver Jackson, Petitioner's deceased common law husband, was PGW's last and most recent known customer of record prior to PGW's alleged discovery of a meter bypass and/or tampering at 4244 N. Hicks Street.
11. Petitioner was not aware of the alleged existence of a meter bypass and/or tampering at 4244 N. Hicks Street until June 27, 2017, when PGW removed its gas meter from the property.
12. Petitioner did not cause or permit any meter bypass and/or tampering to exist or occur at 4244 N. Hicks Street and denies PGW's allegation that she is responsible for any

charges associated with alleged meter bypass and/or tampering at 4244 N. Hicks Street.

13. Petitioner is not requesting restoration of service at 4244 N. Hicks Street where PGW alleges there to have been a meter bypass and/or meter tampering.
14. Petitioner is requesting new service at 1763 N. Croskey Street where PGW has made no allegation of meter bypass and/or meter tampering.
15. Petitioner has been living at 1763 N. Croskey Street since August 2018 without any natural gas service. Petitioner has not had gas service for heat, hot water, or cooking since that time. Petitioner has not had access to heat during the cold winter months. Petitioner has had to rely on electric space heaters for heating.
16. Petitioner is the mother of five school aged children ages 12 through 17. Petitioner's children are currently in temporary foster placement due to the intervention of Philadelphia's Department of Human Services.
17. Petitioner desperately wants to reunify with her children at 1763 N. Croskey Street but DHS will not return the children to the home until Petitioner has established PGW service at the address. The inability to reunify with her children has caused Petitioner severe stress and emotional anguish. Petitioner's children have also suffered stress and trauma.
18. Establishment of gas service is the only barrier to Petitioner reunifying with her children at 1763 N. Croskey Street. See attached Family Court of Philadelphia County, Permanency Review Orders, Appendix B.

19. PGW has demanded that Petitioner pay \$5314.23 in charges associated with allegations of a meter bypass and/or meter tampering at 4244 N. Hicks Street as a precondition to establishing service at 1763 N. Croskey Street.
20. Petitioner is a low wage worker and cannot afford to pay \$5314.23 to establish service at 1763 N. Croskey Street.
21. Petitioner is eligible for grant assistance from the Low Income Home Energy Assistance Program (LIHEAP).
22. Petitioner is financially eligible to enroll in PGW's low income customer assistance program, the Customer Responsibility Program (CRP).
23. Despite her denial of responsibility for charges associated with alleged meter bypass and/or tampering at 4244 N. Hicks Street, Petitioner has requested a payment arrangement or other equitable arrangement to establish service and be reunified with her children, putting an end to the ongoing stress, emotional anguish and trauma she and her children are experiencing.
24. PGW has denied Petitioner's request for a payment arrangement or an equitable arrangement on the charges PGW claims to result from the alleged meter bypass and/or meter tampering charges at 4244 N. Hicks Street.
25. Petitioner's right to relief is clear because there are substantial questions of law raised by her formal complaint, including but not limited to:
 - a. Whether there was actually a meter bypass and/or meter tampering at 4244 N. Hicks Street while Petitioner resided there;

- b. Whether Petitioner is responsible for any meter bypass and/or meter tampering (and associated charges) that may have occurred at 4244 N. Hicks Street;
- c. Whether PGW may condition establishment of service at 1763 N. Croskey Street upon payment of charges associated with alleged meter bypass and/or meter tampering at 4244 N. Hicks Street;
- d. Whether PGW can require Petitioner to pay for charges associated with alleged meter bypass and/or meter tampering at a property that she does not own and where she is not the last customer of record;
- e. Whether PGW's process for associating Petitioner with a property where alleged meter bypass and/or meter tampering has occurred is reasonable and lawful; and,
- f. Whether the amount that PGW demands prior to establishment of service at 1763 N. Croskey Street is reasonable and lawful in accordance with the Public Utility Code, Commission regulations and PGW's Tariff.

26. Petitioner's need for relief is immediate because Petitioner has been prevented from establishing gas service in her home and has lived for months without natural gas for heat, cooking, and hot water.

27. Further, Petitioner's need for relief is immediate, and indeed profound, because Petitioner is unable to reunify with her children at 1763 N. Croskey Street and end the ongoing stress, emotional anguish, trauma and instability she and her children are experiencing until she is able to establish PGW service in her name. The Petitioner is

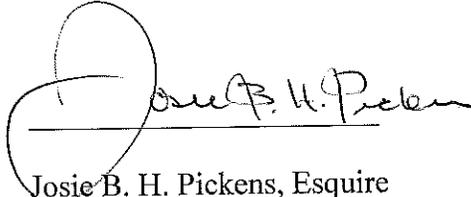
in immediate need of gas service to provide warmth and sanitary conditions in the home, pending the outcome of this case.

28. Petitioner's injury would be irreparable if relief is not granted because Petitioner's health and safety is at risk each day that she remains unable to establish gas service at 1763 N. Croskey Street. Further Petitioner and her children are suffering irreparable emotional injury as a result of being unable to reunify with her children at 1763 N. Croskey Street. Petitioner and her children are suffering irreparable injury because they are experiencing losses that they will not be able to recover later.
29. Petitioner's requested relief is not injurious to the public interest because on balance the harm to Petitioner and her family in remaining without access to natural gas service substantially outweighs any purported harm to PGW. PGW has not alleged the existence of any meter bypass, meter tampering or unauthorized use at 1763 N. Croskey Street, where Petitioner continues to reside without gas service. Further, PGW can protect itself from financial harm by taking efforts to secure its interest in any unpaid charges associated with gas service at 4244 N. Hicks Street pursuant to the provisions of 66 Pa. C.S. §1414 (permitting PGW to impose or assess a municipal claim against the property and file as liens of record claims for unpaid natural gas distribution service and other related costs). In addition, the Petitioner will be required to pay for all new gas service charges at 1763 N. Croskey and will be able to direct available grant assistance to PGW. Finally, the public interest is furthered by restoring service and permitting Petitioner and her children to reunify at 1763 N. Croskey Street instead of allowing the children to remain in foster placements paid for by the City of Philadelphia.

WHEREFORE, Petitioner being without other remedy, requests the Commission to:

1. Issue an Interim Emergency Order compelling PGW to establish gas service at 1763 N. Croskey Street in Philadelphia, PA, without requiring Petitioner to pay for meter bypass and/or meter tampering charges at 4244 N. Hicks Street as a precondition to the establishment of service.
2. Order such other relief that may be just and appropriate.

Respectfully submitted,



Josie B. H. Pickens, Esquire

Lydia R. Gottesfeld, Esquire

Attorneys for Tomisha Palmer

Community Legal Services
1410 West Erie Avenue
Philadelphia, PA 19140
(215) 227-4378 (p)
jpickens@clsphila.org

APPENDIX A

4244 N HICKS ST

Philadelphia, PA 19140-1916

OWNER

IOTA TRUST

MAILING ADDRESS

4715 N 5TH ST
PHILADELPHIA PA
19120-4107

VALUATION HISTORY

Year	Market Value	Taxable Land	Taxable Improvement	Exempt Land	Exempt Improvement
2019	\$39,900	\$5,985	\$33,915	\$0	\$0
2018	\$38,500	\$5,775	\$32,725	\$0	\$0
2017	\$38,500	\$5,775	\$32,725	\$0	\$0
2016	\$38,500	\$2,916	\$35,584	\$0	\$0
2015	\$38,500	\$2,916	\$35,584	\$0	\$0
2014	\$38,500	\$2,916	\$35,584	\$0	\$0
2013	\$16,500	\$658	\$4,622	\$0	\$0

Note: Taxable and exempt land values can represent:

1. The contributory value of land in relation to the total market value, or
2. Where no structure is present, the value of vacant land

Consistent with International Association of Assessing Officers (IAAO) standards, the value of an improved parcel is separated into the portion of value attributed to the improvement and the portion of value attributed to the land.

SALES DETAILS

SALES PRICE: **\$1**

SALES DATE: **12/31/1999**

PROPERTY DETAILS

OPA ACCOUNT: **132077500**
HOMESTEAD EXEMPTION: **No**
DESCRIPTION: **ROW 2 STY MASONRY**
CONDITION: **Average**
BEGINNING POINT: **289'5" N RUFFNER ST**
LAND AREA (SQFT): **678**
IMPROVEMENT AREA (SQFT): **1,012**
ZONING: **RSA-5**
Zoning data source: Planning and Development

CORRECTIONS OR QUESTIONS ABOUT THIS INFORMATION?:

APPENDIX B

Commonwealth of Pennsylvania

In the Interest Of:

Tyleem Palmer-Jackson, A Minor
Date of Birth: 03/26/2003

IN THE FAMILY COURT OF PHILADELPHIA COUNTY,
PENNSYLVANIA

JUVENILE DIVISION

DOCKET NO: CP-51-DP-0065977-2005
FID: 51-FN-384141-2009

PERMANENCY REVIEW ORDER

Attendance

<u>Attendee Name</u>	<u>Attendee Role</u>	<u>Attendance Type</u>
Saafir, Carlin Talib	Attorney - Palmer, Tamisha	In Person
Palmer-Jackson, Alicia	Sibling	Did Not Attend
Palmer-Jackson, Tyleem	Child	Did Not Attend
Silverstein, Melanie Katz	GAL for Child - Palmer-Jackson, Tyleem	In Person
Palmer, Tamisha	Mother	In Person

PERSONS APPEARING AT HEARING

The following persons appeared at this hearing: ACS C. McGinn, Court Rep M. Whitaker, CUA J. Mitchell (TP), Mother, Atty f/Mother C. Saafir -P, GAL M. Silverstein -P, DCR AML/RB

AND NOW, this 18th day of September, 2018, the court finds:

CONTINUING PLACEMENT - Necessity and Appropriateness

The placement of the child continues to be necessary and appropriate.

PERMANENCY PLAN - Compliance:

MOTHER - There has been substantial compliance with permanency plan.

PERMANENCY PLAN - Reasonable efforts to finalize

Reasonable efforts have been made by the Philadelphia Department of Human Services ('Agency') to finalize this child's permanency plan.

CURRENT PERMANENT PLACEMENT GOAL

The current placement goal for the child is return to parent or guardian.

CURRENT PLACEMENT - Child's Safety

The child is safe in the current placement setting. Safety as of 9/17/18.

ORDER OF COURT - On the basis of the above findings, IT IS HEREBY ORDERED THAT:

Legal Custody of the Child shall remain with the Philadelphia Department of Human Services.

Placement of the Child shall remain in a Group Home thru St Vincent. The Child's placement is the least restrictive placement that meets the needs of the child and there is no less restrictive alternative available. The additional condition(s) of visitation is set forth as: Mother visits are liberal unsupervised.

FINDINGS/ORDERS

THE COURT FURTHER FINDS: Child receives group therapy at St Vincent. Child is in 9th grade. Child has current IEP. Child has not missed any school. Child medical and dental are up to date. Last SCP meeting was on 8/25/18.

In The Interest Of: Christian Palmer-Jackson, A Minor

THE COURT FURTHER ORDERS: Remain as committed and placed. PGW is to remove the gas debt of Oliver Jackson from Tamisha Palmer. Tamisha Palmer is not responsible for Oliver Jackson PGW debt. Tamisha Palmer is allowed to open a PGW account under her own history. CUA to assist Tamisha Palmer to obtain from PECO good standing letter as to her credit to open a PGW account. Discharge planning meeting to take place. Stagnant reunification with Mother, once PGW account is obtained for Mother by agreement of all parties.

NEXT SCHEDULED COURT DATE(S)

Next Scheduled Court Date: - CUA Permanency Hearing - 12/10/2018 - 11:30AM - 1501 Arch Street - Courtroom 4A

Such disposition having been determined to be best suited to the protection and physical, mental and moral welfare of the child.

BY THE COURT:



Judge Joseph Fernandes

Copies To: ACS C. McGinn, Court Rep M. Whitaker, CUA J. Mitchell (TP), Mother, Atty f/Mother C. Saafir -P, GA M. Silverstein -P, DCR AML/RB

12
Commonwealth of Pennsylvania

In the Interest Of:

Christian Palmer-Jackson, A Minor
Date of Birth: 06/15/2004

IN THE FAMILY COURT OF PHILADELPHIA COUNTY,
PENNSYLVANIA

JUVENILE DIVISION

DOCKET NO: CP-51-DP-0065978-2005
FID: 51-FN-384141-2009

PERMANENCY REVIEW ORDER

Attendance

<u>Attendee Name</u>	<u>Attendee Role</u>	<u>Attendance Type</u>
Saafir, Carlin Talib	Attorney - Palmer, Tamisha	In Person
Palmer-Jackson, Alicia	Sibling	Did Not Attend
Palmer-Jackson, Christian	Child	Did Not Attend
Silverstein, Melanie Katz	GAL for Child - Palmer-Jackson, Christian	In Person
Palmer, Tamisha	Mother	In Person

PERSONS APPEARING AT HEARING

The following persons appeared at this hearing: ACS C. McGinn, Court Rep M. Whitaker, CUA J. Mitchell (TP), Mother, Atty f/Mother C. Saafir -P, GAL M. Silverstein -P, DCR AML/RB

AND NOW, this 18th day of September, 2018, the court finds:

CONTINUING PLACEMENT - Necessity and Appropriateness

The placement of the child continues to be necessary and appropriate.

PERMANENCY PLAN - Compliance

MOTHER - There has been substantial compliance with permanency plan.

PERMANENCY PLAN - Reasonable efforts to finalize

Reasonable efforts have been made by the Philadelphia Department of Human Services ('Agency') to finalize this child's permanency plan.

CURRENT PERMANENT PLACEMENT GOAL

The current placement goal for the child is return to parent or guardian.

CURRENT PLACEMENT - Child's Safety

The child is safe in the current placement setting. Safety as of 9/17/18.

ORDER OF COURT - On the basis of the above findings, IT IS HEREBY ORDERED THAT:

Legal Custody of the Child shall remain with the Philadelphia Department of Human Services.

Placement of the Child shall remain in a Group Home thru St Vincent. The Child's placement is the least restrictive placement that meets the needs of the child and there is no less restrictive alternative available.

The additional condition(s) of visitation is set forth as: Mother visits are liberal unsupervised.

FINDINGS/ORDERS

THE COURT FURTHER FINDS: Child receives group therapy at St Vincent. Child is in 9th grade. Child has current IEP. Child has not missed any school. Child medical and dental are up to date. Last SCP meeting was on 8/25/18.

In The Interest Of: Tyleem Palmer-Jackson, A Minor

THE COURT FURTHER ORDERS: Remain as committed and placed. PGW is to remove the gas debt of Oliver Jackson from Tamisha Palmer. Tamisha Palmer is not responsible for Oliver Jackson PGW debt. Tamisha Palmer is allowed to open a PGW account under her own history. CUA to assist Tamisha Palmer to obtain from PECO good standing letter as to her credit to open a PGW account. Discharge planning meeting to take place. Stagnant reunification with Mother, once PGW account is obtained for Mother by agreement of all parties.

NEXT SCHEDULED COURT DATE(S)

Next Scheduled Court Date: - CUA Permanency Hearing - 12/10/2018 - 11:30AM - 1501 Arch Street - Courtroom 4A

Such disposition having been determined to be best suited to the protection and physical, mental and moral welfare of the child.

BY THE COURT:



Judge Joseph Fernandes

Copies To: ACS C. McGinn, Court Rep M. Whitaker, CUA J. Mitchell (TP), Mother, Atty f/Mother C. Saafir -P, GA M. Silverstein -P, DCR AML/RB

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TOMISHA PALMER	:	
Complainant	:	
	:	
	:	F-2018-3006197
	:	
	:	
PHILADELPHIA GAS WORKS	:	
Respondent	:	

VERIFIED STATEMENT OF FACTS

1. My name is Tomisha Palmer. I reside at 1763 N. Croskey Street in Philadelphia, PA.
2. On August 1, 2018, I went to a PGW office to apply for gas service at 1763 N. Croskey Street. PGW informed me that I could not establish service at 1763 N. Croskey Street because PGW was holding me responsible for billing charges associated with an alleged meter bypass and/or meter tampering at 4244 N. Hicks Street in Philadelphia.
3. I resided at 4244 N. Hicks Street in Philadelphia for some periods of time prior to June 27, 2017.
4. I do not own the property at 4244 N. Hicks Street in Philadelphia.
5. During the periods when I resided at 4244 N. Hicks Street, I did not have exclusive possession or control of the property. Other parties had access to 4244 N. Hicks Street, which included access to PGW's meter.
6. PGW personnel have informed me that PGW claims to have found a meter bypass and/or meter tampering at 4244 N. Hicks Street on June 27, 2017.

7. I had PGW service in my name at 4244 N. Hicks Street from 2012-2013. After that time my deceased common law husband, Oliver Jackson, had service in his name at the property.
8. My common law husband, Oliver Jackson, died in February 2017 from an uncontrolled asthma attack. I was not aware of the alleged existence of a meter bypass and/or meter tampering at 4244 N. Hicks Street until June 27, 2017 when PGW removed its meter from the property.
9. I did not bypass or tamper with the gas meter at 4244 N. Hicks Street.
10. I did not authorize any other person to bypass or tamper with the gas meter at 4244 N. Hicks Street.
11. I am not requesting restoration of PGW gas service at 4244 N. Hicks Street.
12. I am requesting new PGW gas service at 1763 N. Croskey Street.
13. I have not bypassed or tampered with the gas meter at 1763 N. Croskey Street, where I currently live without any gas service.
14. I have been living at 1763 N. Croskey Street since August 2018. For eight months, I have not had gas service for heat, hot water, or cooking. I have not had access to heat during the cold winter months. I have had to rely on electric space heaters for heating.
15. I am the mother of five school aged children ages 12 through 17. My children are currently in temporary foster placement due to the intervention of Philadelphia's Department of Human Services (DHS). My children are separated from each other and scattered in placements in Philadelphia and Bensalem.

16. I want to reunite with my children at 1763 N. Croskey Street but DHS will not return the children to the property until I get PGW service in my name. The lack of gas service is the only reason that my children cannot be returned to me. The inability to reunite with my children has caused me severe stress and emotional anguish. I am concerned that my children have also suffered stress and trauma during the time that we have been separated.
17. PGW has demanded that I pay \$5314.23 in charges associated with the alleged meter bypass and/or meter tampering at 4244 N. Hicks Street before PGW will allow me to establish service at 1763 N. Croskey Street.
18. I am a low wage worker and I cannot afford to pay \$5314.23 to establish service at 1763 N. Croskey Street. My current wages total approximately \$830 per month.
19. I am income eligible for grant assistance from the Low Income Home Energy Assistance Program (LIHEAP). I would like to direct my LIHEAP grants to PGW if PGW will allow me to establish service at 1763 N. Croskey Street.
20. I am financially eligible to enroll in PGW's low income customer assistance program, the Customer Responsibility Program (CRP). I would like to enroll in CRP if PGW will allow me to establish service at 1763 N. Croskey Street.
21. Even though I do not believe I am responsible for charges associated with alleged meter bypass and/or meter tampering at 4244 N. Hicks Street, I have authorized my attorneys to request a payment agreement or some other form of agreement to establish service at 1763 N. Croskey Street if it will help me bring my children home.

22. PGW has denied my request for a payment arrangement or an equitable arrangement on the charges it claims I must pay due to an alleged meter bypass and/or meter tampering at my former address.

I, Tomisha Palmer, hereby state that the facts contained in the above Statement of Facts are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

3-14-19
DATE

Tomisha Palmer
Tomisha Palmer

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TOMISHA PALMER	:	
Complainant	:	
	:	
	:	F-2018-3006197
	:	
	:	
PHILADELPHIA GAS WORKS	:	
Respondent	:	

INTERIM EMERGENCY RELIEF ORDER

AND NOW, this _____ day of _____, 2019, upon consideration of the Petition for Interim Emergency Relief, the Verified Statement of Facts attached thereto, and the testimony of Tomisha Palmer (Complainant), it is hereby **ORDERED** and **DECREED** that:

1. Complainant's right to relief is clear.
2. Complainant's right to relief is immediate.
3. Complainant would suffer irreparable injury if gas service is not restored to her home.
4. Restoring gas service to Complainant's home will not be injurious to the public interest.
5. It is hereby ordered that Respondent Philadelphia Gas Works shall immediately establish gas service in Complainant's name at 1763 North Croskey Street in Philadelphia without requiring Complainant to pay for meter bypass and/or meter

tampering charges at 4244 N. Hicks Street as a precondition to the establishment of service.

Date

Administrative Law Judge

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TOMISHA PALMER	:	
Complainant	:	
	:	F-2018-3006197
PHILADELPHIA GAS WORKS	:	
Respondent	:	

CERTIFICATE OF SERVICE

Re: Tomisha Palmer v. Philadelphia Gas Works, Docket No. F-2018-3006197

I hereby certify that I have this day, served a copy of the foregoing Petition for Interim Emergency Order upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant) and 52 Pa. Code § 3.6(a)(relating to service of a petition for interim emergency order), in the manner and upon the persons listed below:

By First Class U.S. Mail, postage prepaid, and e-mail as indicated:

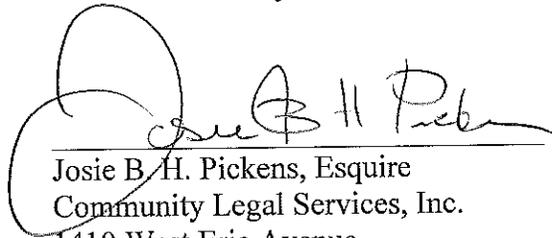
Chief Administrative Law Judge
Charles E. Rainey, Jr.
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, L-M West
Harrisburg, PA 17120

Administrative Law Judge Christopher Pell
Pennsylvania Public Utility Commission
801 Market Street
Suite 4063
Philadelphia, PA 19107
cpell@pa.gov

Graciela Christlieb, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
Graciela.christlieb@pgworks.com

Tomisha Palmer
1763 N. Croskey Street
Philadelphia, PA 19121

Dated this 14th day of March, 2019



Josie B. H. Pickens, Esquire
Community Legal Services, Inc.
1410 West Erie Avenue
Philadelphia, PA 19140