



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Leva, Paralegal
Legal Department
Direct Dial: 215-684-6862
FAX: 215-684-6798
E-mail: danielle.leva@pgworks.com

March 15, 2019

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

Re: Tenika Gray v. PGW, Docket No. C-2018-3005910

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.535, the Philadelphia Gas Works ("PGW") hereby files its Reply to the Complainants' Exceptions to the February 21, 2019 Initial Decision 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,

A handwritten signature in blue ink, appearing to read "Danielle Leva", is written over a large, faint, light blue graphic of a flame or leaf shape that occupies the right side of the page.

Danielle Leva

Enclosure

cc: Tenika Gray (Regular Mail)
Wendy Vacca (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tenika Gray	:	
	:	
v.	:	Docket No. C-2018-3005910
	:	
Philadelphia Gas Works	:	

**PHILADELPHIA GAS WORKS’
REPLY TO COMPLAINANT’S EXCEPTIONS**

Pursuant to 52 Pa. Code §5.535, and the Secretary’s letter dated March 6, 2019, the Philadelphia Gas Works, (“PGW”) hereby files its Reply to the Complainant’s Exceptions to the Initial Decision issued February 21, 2019, in the above captioned matter (“Initial Decision”).

I. INTRODUCTION

On November 7, 2018, the Complainant, Tenika Gray, filed a Complaint with the Pennsylvania Public Utility Commission (“Commission” or “PUC”) against PGW wherein the Complainant indicated that she wanted a payment agreement.

On November 29, 2018, PGW filed its Answer to the Complaint wherein it denied the material allegations and stated that the Complainant had failed to satisfy a previous Commission-issued payment arrangement.

A Hearing Notice dated December 21, 2018, notified the parties that an initial telephonic hearing was scheduled on February 4, 2019. This Notice indicated that the case was assigned to Special Agent Gail Chiodo (“Agent Chiodo”) as the presiding officer.

On February 4, 2019, the hearing was convened as scheduled and the parties presented evidence.

On February 21, 2019, Agent Chiodo issued her Initial Decision in the above captioned matter wherein she denied the Complainant’s request for another Commission-issued payment arrangement.

The Complainant filed Exceptions on March 4, 2019, which were served on PGW by the Secretary’s Bureau on March 6, 2019. PGW’s timely Reply follows.

II. PGW'S REPLY

The Complainant's exceptions fail to address any error in fact or law contained in the Initial Decision refuting the conclusions that the Complainant failed to sustain her burden of proving that she was entitled to another payment arrangement from the Commission.

Exceptions

The Complainant's Exceptions are a reiteration of her Formal Complaint, which was a request for a payment arrangement.

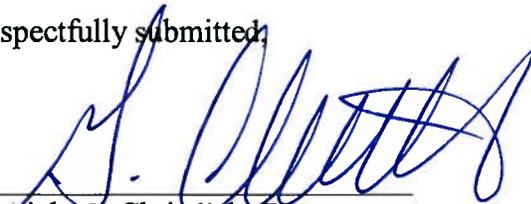
PGW's Reply Exceptions

The Exceptions fail to demonstrate that the Initial Decision is unsupported by substantial evidence. The record of this matter clearly indicates that the Complainant has not suffered a change in income or a significant change in circumstances.

III. CONCLUSION

For the reasons stated above, the PGW requests that the Commission deny the Complainant's Exceptions to the Initial Decision and adopt the Initial Decision issued February 21, 2019 in this matter, as written.

Respectfully submitted,



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

March 15, 2019

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. Tenika Gray
534 S. 52nd St.
Philadelphia, PA 19143

March 15, 2019



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