

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Patricia Sanford

v.

Philadelphia Gas Works

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C-2019-3009831

**EMERGENCY PETITION TO REOPEN THE EVIDENTIARY RECORD AND TO
REOPEN PROCEEDINGS TO PROVIDE ADDITIONAL EVIDENCE**

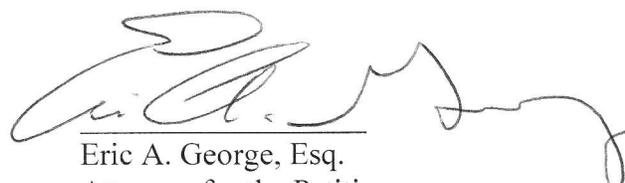
1. Petitioner is the owner of the property located at 6425 Drexel Road, Philadelphia, PA 19151.
2. The Petitioner is the contracting party with Philadelphia Gas Works (PGW) under account number 0073021413.
3. Petitioner has been in negotiations with PGW over an ongoing billing dispute and has filed a Complaint in order to resolve said dispute and to establish a resolution and settlement involving a payment plan where Petitioner maintains current payments with an additional amount added each month.
4. Petitioner's attorney, Eric A. George, Esq. has been in discussions with PGW's counsel, Graciela Christlieb, Esq. in order to establish a resolution and settlement of the billing dispute.
5. Despite communicating with PGW and its legal counsel for three (3) days where PGW was provided requested financials, proposals of payment (with PGW's attorney giving expectations of a written settlement agreement to be received for review on November 22, 2019), PGW's counsel on November 22, 2019 in the 11th hour of discussions wrote at 3:55 PM EST in an email: "I have spoken with my client and PGW is not agreeing to stay the termination for two weeks.". This two (2) week period was proposed to give time to come to a proper settlement based upon the financials Petitioner provided.

6. PGW through its legal counsel, Graciela Christlieb, Esq. had been notified and acknowledged that Petitioner's Complaint was still pending. 52 PA Code Section 5.571 prohibits a shutoff while a Complaint is pending as 52 Pa. Code Section 5.571 (a) states that "At any time after the record is closed but before a final decision is issued, a party may file a Petition to reopen the proceeding for the purpose of taking additional evidence." As there has not been a final Order from the Public Utility Commission, this Petition is timely even though filed in the 11th hour as per the circumstances as outlined in 5.
7. This Petition addresses 52 Pa. Code Section 5.571 (b) as it constitutes grounds for the reopening of the Evidentiary Record and proceedings as Petitioner was unaware of the rescheduled hearing date (as she did not receive notification) and as a result was not afforded the opportunity to present her case and voice her position and possible remedies such as a payment plan.
8. Petitioner requests a hearing in order to afford the opportunity she was denied to present her case.

Wherefore, Petitioner requests that the Commission stay the impending shut-off per the cited regulations and grant a hearing on the Complaint where the issues at hand may be properly heard and ruled upon. Petitioner further asks that the stay be until there is a final disposition of the Complaint allowing an opportunity to settle the issues at hand.

Respectfully submitted,

Date: November 23, 2019



Eric A. George, Esq.
Attorney for the Petitioner

Exhibit A

Eric George

From: Christlieb, Graciela C <Graciela.Christlieb@pgworks.com>
Sent: Friday, November 22, 2019 3:55 PM
To: Eric George
Subject: RE: Patricia Sanford C-2019-3009831 6425 Drexel Road, Philadelphia, PA 19151

I've spoken with my client and PGW is not agreeing to stay the termination for two weeks.

PGWP

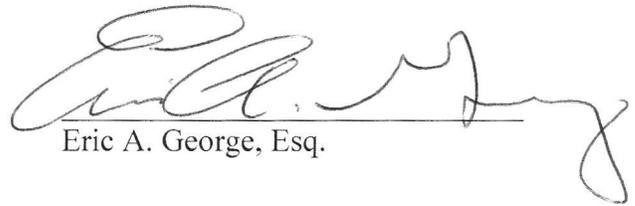
Graciela Christlieb | Senior Attorney | Legal Department
PGW Legal Services | 800 W. Montgomery Ave | Philadelphia, PA 19122
Tel: (215) 684-6798 | Fax: (215) 684-6798
graciela.christlieb@pgworks.com

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VERIFICATION

I, Eric A. George, hereby acknowledge that I verify that the facts stated therein are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are subject to the penalties of 18 Pa. C. S. 4904, relating to unsworn falsifications to authorities.

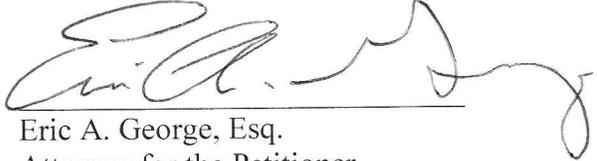
Date: 11-23-19


Eric A. George, Esq.

Certificate of Service

I true and correct copy of the forgoing Petition was serviced up Graciela Christlieb, Esquire, attorney for Philadelphia Gas Works on November 23, 2019 via email Graciela.Christlieb@pgworks.com.

Respectfully submitted,



Eric A. George, Esq.
Attorney for the Petitioner

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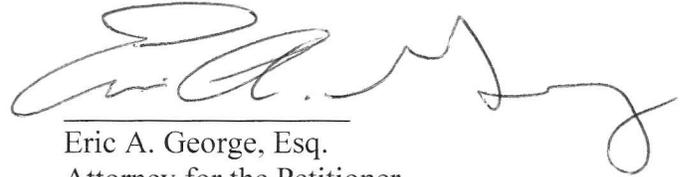
C-2019-3009831

ENTRY OF APPEARANCE

I hereby enter my appearance in the above captioned matter.

Respectfully submitted,

Date: November 23, 2019



Eric A. George, Esq.
Attorney for the Petitioner