



PHILADELPHIA GAS WORKS

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February 10, 2020

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

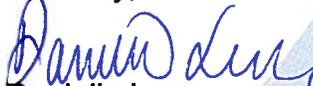
Re: Stayce Norton v. PGW, Docket No. F-2018-3005030

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.535, the Philadelphia Gas Works ("PGW") hereby files its Exceptions to the February 25, 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,


Danielle Leva

Enclosure

cc: Stayce Norton (Regular Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Stayce Norton	:	
Complainant	:	
v.	:	Docket No. F-2018-3005030
	:	
Philadelphia Gas Works	:	
Respondent	:	

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

Pursuant to 52 Pa. Code §5.535, and the Secretarial Letter dated January 29, 2020, the Philadelphia Gas Works, (“PGW”) hereby files its reply to the Complainant’s exceptions to the Initial Decision issued on February 25, 2019.

I. INTRODUCTION

On September 25, 2018, the Complainant, Stayce Norton (“Ms. Norton” or “Complainant”), filed a Complaint with the Pennsylvania Public Utility Commission (“Commission” or “PUC”) against PGW wherein she alleged that PGW was threatening to terminate her service because it refused to accept a payment of \$1,000. As relief, Complainant sought a payment arrangement.

On October 22, 2018, PGW filed an Answer to the Complaint wherein it denied the material allegations of the Complaint, stated that the \$1,000 check Complainant submitted to PGW was returned by the bank for insufficient funds, and asked that the Complaint be dismissed.

The initial telephonic hearing in this matter was convened, as scheduled, on December 11, 2018 before Special Agent Gail M. Chiodo. Complainant appeared *pro se*, and did not offer any exhibits into the record. PGW presented one witness and sponsored three exhibits that were admitted into the record.

On February 25, 2019, Special Agent Chiodo issued her Initial Decision in the above captioned matter wherein she found that Complainant had failed to carry her burden of proving that she was entitled to a second Commission-issued payment arrangement or an extension of her prior one.

The Complainant filed exceptions on March 15, 2019, but failed to serve PGW. On January 29, 2020, the Commission served PGW with the Complainant's exceptions. PGW's reply follows.

I. EXCEPTIONS AND PGW'S REPLY

Exceptions

Complainant appears to object to the burden of proof as articulated in Conclusion of Law #3, states "Household size has increased," and has included page 2 of 6 of a transaction history for Wells Fargo account number 5442343363.

PGW's Reply Exceptions

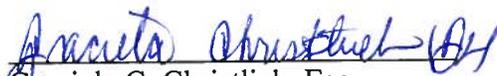
The exceptions fail to address any error in fact or law contained in the Initial Decision refuting the conclusions that the Complainant failed to sustain her burden of proving that she was entitled to a second Commission-issued payment arrangement or an extension of her prior one. The Exceptions also fail to demonstrate that the Initial Decision is unsupported by substantial evidence. The Complainant also fails to articulate how her exceptions relate to the conclusion that she failed to meet her burden in this case. Further, the Complainant appears to be attempting to use her exceptions to introduce an exhibit, which was not sponsored at the hearing, which PGW objects to.

II. CONCLUSION

For the reasons stated above, the PGW requests that the Commission deny Complainant's Exceptions and adopt the Initial Decision issued on February 25, 2019 as written.

Respectfully submitted,

February 7, 2020


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

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. Stayce Norton
830 Disston Street
Philadelphia, PA 19111

February 7, 2020


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