

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Andrew Perrong	:	
	:	
v.	:	Docket # C-2021-3024359
	:	
Alpha Gas & Electric LLC	:	

EMERGENCY REQUEST FOR CONTINUANCE

Pursuant to the prehearing order issued in this case, Docket C-2021-3024359, Complainant Andrew Perrong respectfully requests a continuance of the hearing in this matter, currently scheduled for Thursday, June 24, 2021 at 10:00 AM. Specifically, at 1:01 PM on June 17, 2021, Complainant received from counsel for Respondent an audio recording which was purportedly a copy of the recording shown as open on a computer in a screenshot produced in discovery. The filename of the document produced was “20210215-1204310971-all.mp3” (the “Altered File”).

A preliminary analysis of the Altered File provided to Complainant indicates not only that the file is NOT the file which was open on the computer in the screenshot, which was named under a completely different filename, 20210215-120431_..., but has also been edited by an audio editing program. The filename on the computer is only partially visible, but whomever renamed and altered the Altered File neglected the minor detail of an underscore (“_”) in the original file as opposed to the use of a dash (“-”) in the altered file.

It is alleged that the proper filename is “20210215-120431_[uniqueid]” and is a recording created by the ViciDial Automatic Telephone Dialing System. Moreover, the filename is consistent as being a recording of the illegal call that Complainant recorded, since this reflects the time the ViciDial system transferred the call to a representative after the initial prerecorded message played.

As such, the Complainant respectfully requests a continuance of the hearing scheduled for June 24, 2021, to uncover the circumstances surrounding the creation of the Altered File and

potentially seek other relief, including sanctions, for this conduct. Complainant attempted to meet and confer with counsel for Respondent prior to filing, but has not of yet received a response.

Dated: **June 17, 2021**

_____/s/_____
Andrew Perrong
Complainant Pro-Se
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andyperrong@gmail.com

CERTIFICATE OF SERVICE

Pursuant to 52 Pa. Code § 1.54, I hereby certify that I served a copy of the foregoing
Emergency Request for Continuance to Alpha Gas & Electric LLC via E-Mail only to:

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com

I also certify that I e-filed this certificate of service Commission via their web portal, with
an email to:

Hon. Charece Z. Collins
Administrative Law Judge
Office of the Administrative Law Judge
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17120
Charcollin@pa.gov

Dated: **June 17, 2021**

_____/s/_____
Andrew Perrong
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