



PHILADELPHIA GAS WORKS

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December 8, 2021

VIA ELECTRONIC FILING

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

Re: Latia Walker v. Philadelphia Gas Works; Docket No. F-2021-3028044

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' Motion to Admit Exhibit with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

Enclosure

cc: Hon. Darlene Heep, w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Motion to Admit Exhibit upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

Via Email Only

Latia Walker
1433 Higbee Street
Philadelphia, PA 19149
latiawalker1433@comcast.net

Date: December 8, 2021

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Latia Walker,	:	
Complainant,	:	
v.	:	Docket No. F-2021-3028044
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

PHILADELPHIA GAS WORKS’ MOTION TO ADMIT EXHIBIT

Pursuant to 52 Pa. Code §5.103, Philadelphia Gas Works (“PGW,” “Company,” or “Respondent”) hereby files this Motion to Admit Exhibit In support of this Motion, PGW states as follows:

1. PGW was served with the above-captioned Formal Complaint (“Complaint”) on August 20, 2021.
2. By Initial Call-In Telephonic Hearing Notice issued on September 28, 2021, an initial hearing was set for this matter was set on November 10, 2021.
3. On November 10, 2021, the parties convened as scheduled and the hearing was conducted.
4. On November 10, 2021, at 12:08 p.m., the hearing was adjourned with neither party admitting exhibits into evidence.
5. On November 10, 2021, at 12:54 p.m., the hearing was reconvened to permit both parties to admit their exhibits into evidence.
6. At that time, the Complainant sought to enter a document as an exhibit, which counsel for PGW pointed out was part of the Complaint.
7. The document was marked as Complainant Exhibit 2.
8. Believing that Complainant Exhibit 2 referred to the Complaint, counsel for PGW offered no objection and Complainant Exhibit 2 was admitted into the record.
9. On November 10, 2021, at 12:58 p.m., the hearing was adjourned.
10. Upon receipt of the exhibits as collected by the court reporting agency,¹ PGW determined that only the one page of the Complaint that the Complainant was referring to was marked as Complainant Exhibit 2, not the entire Complaint.

¹ Strehlow & Associates

11. The record in this matter is not yet closed.
12. Where a party introduces a portion of a writing or recorded statement, the rules of evidence permit the adverse party to introduce the remainder so that the fact finder can consider the evidence in context.²

WHEREFORE, PGW respectfully requests that the Commission grant this Motion to Admit Exhibit.

Respectfully submitted,

/s/ Graciela Christlieb

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Date: December 8, 2021

Counsel for PGW

² Pa.R.E., Rule 106. *See Commonwealth v. Bond*, 190 A.3d 664, 673-674 (Pa. Super. 2018) “Thus, where a party introduces a portion of a writing or recorded statement, Rule 106 permits the adverse party to introduce the remainder so that the fact finder can consider the evidence in context. *Commonwealth v. Bryant*, 57 A.3d 191, 195 (Pa. Super. 2012); *Commonwealth v. Passmore*, 857 A.2d 697, 712 (Pa. Super. 2004), *appeal denied*, 582 Pa. 673, 868 A.2d 1199 (2005).”