



PHILADELPHIA GAS WORKS

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March 22, 2022

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

Re: Regina Guyton v. PGW, Docket No. F – 2022– 3030775

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas works (“PGW”) hereby responds to the Complainant’s objections to PGW’s counsel.

Thank you for your assistance in the matter.

Sincerely,

Danielle Leva

Enclosure

cc: Regina Guyton (moderngent1515@yahoo.com)
Pamela McNeal (pmcneal@pa.gov)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Regina Guyton,
Complainant

v.

Philadelphia Gas Works,
Respondent

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Docket No. F- 2022 – 3030775

**Philadelphia Gas Works' ("PGW") Response
To Complainant's Objection to PGW's Counsel**

Pursuant to 52 Pa. Code §5.61, PGW hereby responds to the Complainant's objection to PGW's counsel. PGW requests that the Commission overrule the Complainant's objection to PGW's Counsel for the reasons contained herein. In support of its response PGW states the following:

1. On or about January 19, 2022, Regina M. Guyton ("Complainant") filed a formal complaint in the above captioned matter.
2. The explanation in Paragraph 4 of the complaint states that, "payments were sent over by mail and email."
3. Also in Paragraph 4 of the complaint the Complainant has stamped the following inverted words with no further explanation of their meaning or significance:

Accepted For Value
Per HJR 192 of 1939
Exempt From Levy
Deposit to US Treasury
Charge To TYRONE JAMEIR FLEMMINGS
SSN 181-78-3004
By (*Initials*) Heir
Exemption 181783004

Accepted For Value
Per HJR 192 of 1939
Exempt From Levy
Deposit to US Treasury
Charge To REGINA MERCEDES GUYTON
SSN 162-62-6792
By (*Initials*) Heir
Exemption 162626792

4. The stamped words in Paragraph 3 above seem to be the operative language from which the Complainant attributes the source of value and authority for the alleged payments made to PGW by "mail and email."

5. In her objection to my representation of PGW in this case the Complainant states that,

Mr. Laureto has had prior knowledge and information and we have shared emails. My family was placed in circumstances that should have been averted, instead it is my belief he used his influence to inflict further harm. So for me his entry is an attempt to drag those whom may have Shield his Tyranny!

6. PGW's telephone and email exchange with the Complainant through me, as counsel to PGW, was about understanding the nature and legal support for her position. Upon my request she provided information which she contents provides legal support for her belief that her submissions to PGW were valid payments of her PGW bill.

7. PGW's conclusion concerning her purported "payments" was that these were unacceptable as payments for gas service rendered. Her submissions could not be exchanged for anything of value at any bank or government office. Consequently, her account was subject to collection activity as well as termination for nonpayment in accordance with the PGW Tariff.

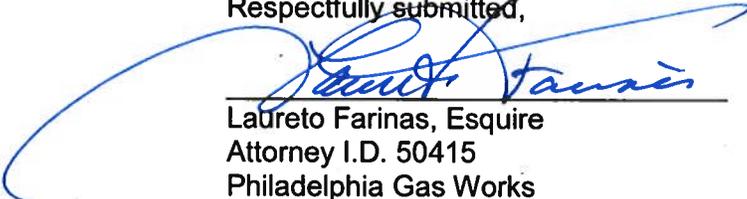
8. The "prior knowledge" to which the Complainant refers in Paragraph 5 above does not prejudice the Complainant's ability to prosecute the complaint in the instant matter.

9. PGW denies that there was any "tyranny" in the rejection of her submissions as payment of her entire outstanding account balance.

Therefore, for all the reasons stated above, the Complainant's objection to counsel should be denied.

March 22, 2022

Respectfully submitted,



Laureto Farinas, Esquire
Attorney I.D. 50415
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982

EXHIBIT A

Farinas, Laureto A

From: regina guyton <moderngent1515@yahoo.com>
Sent: Monday, March 14, 2022 12:12 PM
To: Leva, Danielle; Christlieb, Graciela C; Pamela McNeal; jameirsavage23@gmail.com;
Farinas, Laureto A
Subject: Re: Regina Guyton v. PGW, Docket No. F – 2022 – 3030775

External Email Notice. This Email originates from outside of PGW.

Do not click on links or open attachments unless you recognize the sender.

Good morning

Thank you for the notice please be advised that I am in objection of the entry of appearance ; of Mr. Laureto , Specifically of the posturing of this matter. Mr. Laureto has had prior knowledge and information and we shared emails. My family was placed in circumstances that should have been adverted, instead it is my belief he used his influence to inflict further harm. So for me his entry is an attempt to drag those whom may have Shield his Tyranny!

Respectfully

Regina Mercedes Guyton

Sent from Yahoo Mail for iPhone

On Monday, March 14, 2022, 10:19 AM, Leva, Danielle <Danielle.Leva@pgworks.com> wrote:

Ms. Guyton,

Please find attached a Notice of Appearance for the above captioned matter for the above captioned matter.

Thank you.



VERIFICATION

I, Laureto Farinas, hereby declare that I am counsel for the Philadelphia Gas Works. I am authorized to make this verification on its behalf. The facts set forth in the foregoing Answer are true and correct to the best of my knowledge, information and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities

March 22, 2022



Laureto Farinas, Esquire

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).

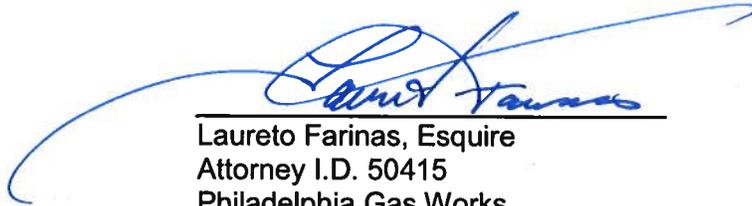
Service List

For Complainant:

Regina M. Guyton
3880 Glendale Street
Philadelphia, PA 19124

moderngent1515@yahoo.com

March 22, 2022



Laureto Farinas, Esquire
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