

**COMMONWEALTH OF PENNSYLVANIA
BEFORE
THE PUBLIC UTILITY COMMISSION**

Rita Seben)	Complaint Docket
v.)	No. C-2022-3030734
Peoples Natural Gas Company)	

COMPLAINANT’S PETITION TO RE-OPEN RECORD

Complainant, Rita Seben (“Seben”), by and through her undersigned counsel, respectfully Petitions this Honorable Tribunal, pursuant to 52 Pa. Code §5.571, to reopen the record for this proceeding for the purpose of taking additional evidence, based upon the following:

1. Seben commenced this proceeding with the filing of a Formal Complaint against Peoples Natural Gas Company (“Peoples) regarding the reoccurring presence of natural gas odors at her residence at 133 Argonne Drive, New Kensington, PA 15068 (the “Property”).
2. The hearing in this matter was conducted on April 19, 2022, before the Honorable Katrina L. Dunderdale.
3. Administrative Law Judge Dunderdale issued an Interim Order Closing the Hearing Record, dated May 26, 2022.
4. An Initial Decision has yet to be issued as of the time of filing of the within Petition.
5. Since the time the Hearing was held, Seben has purchased a methane gas detector (the “Detector”) and received the same on July 7, 2022.
6. Seben has since used the Detector at the Property and taken several video recordings of such use on the Property.
7. Subpart (a) to 52 Pa. Code §5.571 provides as follows:


(a) At any time after the record is closed but before a final decision is issued, any party may file a petition to reopen the proceeding for the purpose of taking additional evidence.

(Id.)

8. Pursuant to this provision, Seben respectfully requests that the record for this proceeding be reopened to take additional evidence relating to the results of the use of the Detector on the Property.

Respectfully submitted,

GALANTER TOMOSOVICH, LLC



Jeffrey P. Brahan, Esquire

Counsel for Rita Seben

Certificate of Service

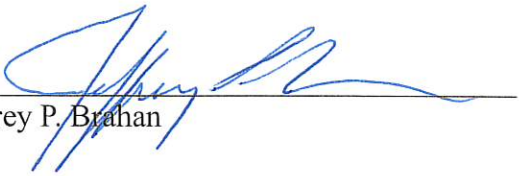
I hereby certify that I have this day served a true and correct copy of the foregoing Complainant's Petition to Reopen Record upon the parties listed below in the manner indicated below, and in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL

Jennifer L. Petrisek, Sr. Counsel
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Counsel for Peoples Natural Gas Company, LLC
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The Honorable Katrina Dunderdale
Pennsylvania Public Utility Commission
301 5th Avenue
Pittsburgh, PA 15222
(kdunderdal@pa.gov)

Done at Pittsburgh, Pennsylvania this 8th day of July, 2022.



Jeffrey P. Brahan
Counsel for Rita Seben