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January 25, 2023

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 127105-3265

RE: Gladys Nnadozie v. Philadelphia Gas Works; Docket No. C-2022-3035981

Dear Secretary Chiavetta:

On December 21, 2022, the parties in the above captioned matter convened for an evidentiary hearing before Special Agent Michael Mroczka. At the conclusion of the hearing, the Complainant, Ms. Gladys Nnadozie, asked leave to submit late filed exhibits. Special Agent Mroczka granted Ms. Nnadozie's request. On January 4, 2023, Special Agent Mroczka served PGW with a late filed exhibit from Ms. Nnadozie via email; the proposed exhibit attached to that email is a document entitled First Judicial District of Pennsylvania Docket Report ("Docket Report"), which indicates that Ms. Nnadozie had a Protection from Abuse Order ("PFA") against Nnaemeka Nnadozie that expired on March 21, 2019. On January 6, 2023, Special Agent Mroczka served PGW with another late filed exhibit from Ms. Nnadozie via email; the proposed exhibit attached to that email is a letter from Temple Physicians, Inc. dated December 28, 2022 ("Letter"), which gives a list of Ms. Nnadozie's health conditions with the date of their diagnosis.¹ In his January 6, 2023 email, Special Agent Mroczka asked PGW to submit any objections. Please accept this letter as PGW's objection to the Docket Report on the grounds stated below.

PGW objects to the Docket Report on the grounds of relevance. The Docket Report is not relevant as Ms. Nnadozie's balance accrued in her name and there is no probative value in the information that Ms. Nnadozie had a PFA that expired almost three years ago.

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esq.

cc: Cert. of Service
Special Agent Michael Mroczka [micmroczka@pa.gov]

¹ While PGW does not object to the Letter, PGW notes that the Letter indicates that Ms. Nnadozie's most recent diagnosis in the list of "Active Ambulatory Problems" is from August 20, 2021 and, as such, predates Ms. Nnadozie's most recent Commission-issued payment agreement, which was issued on December 15, 2021 at BCS Docket 3814095. A copy of BCS 3814095 has been admitted to the record as PGW Exhibit 6.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Objection to Late Filed 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
Gladys Nnadozie
glnnadozie@gmail.com

Date: January 25, 2023

/s/ Graciela Christlieb
Graciela Christlieb, Esquire