



PHILADELPHIA GAS WORKS

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April 26, 2023

Via Electronic Mail

Marta Guhl, Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street
Philadelphia, PA 19107

RE: Dawn Graham v. Philadelphia Gas Works; Docket No. C-2022-3032494

Dear Judge Guhl:

On the morning of April 19, 2023, the parties in the above captioned matter convened for an evidentiary hearing before Your Honor. At the conclusion of the hearing, the Complainant, Ms. Dawn Graham, asked leave to submit late filed exhibits. The Court granted this request and asked PGW to submit any objections to the proposed late filed exhibits within seven (7) days. On the afternoon of April 19, 2023, Ms. Graham sent several emails with proposed late filed exhibits. PGW understands the proposed late filed exhibits to be as follows: a photograph of a one (1) page document purporting to be a Contract with R&R Family Contractors, a three (3) page document purporting to be an Answer in the Court of Common Pleas of Philadelphia County, Orphan's Court Division, a two (2) page document purporting to be a Certificate of Trust dated July 9, 2008, an eighteen (18) page document purporting to be a Revocable Living Trust Agreement dated July 9, 2008, and an email chain between dawn456@msn.com and newservice@pgworks.com containing emails dated between May 3, 2022 and May 9, 2022. Please accept this letter as PGW's objections to the proposed late filed exhibits on the grounds stated below.

PGW objects to the Contract, the Answer, the Certificate of Trust, and the Revocable Living Trust Agreement on the grounds of irrelevance. The Contract with R&R Family Contractors is irrelevant because the Commission does not have jurisdiction to award monetary damages. The

Answer, the Certificate of Trust, and the Revocable Living Trust Agreement are irrelevant because the Commission lacks the jurisdiction to make determinations regarding the legitimacy and enforceability of these documents. Moreover, evidence entered into the record in the form of documentation (*see* PGW's Exhibit 2, pp. 35-36) and testimony provided by David Rubin, Esq. establishes that a court with the appropriate jurisdiction has already made determinations regarding the Complainant's occupancy at 315 N. 54th Street, Philadelphia, PA.

PGW does not object to the admission of the email chain between dawn456@msn.com and newservice@pgworks.com containing emails dated between May 3, 2022 and May 9, 2022.

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esq.

cc: Cert. of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' foregoing Objection 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 Electronic Mail

Dawn Graham

dawn456@msn.com

Date: April 26, 2023

/s/ Graciela Christlieb

Graciela Christlieb, Esq.