



**PHILADELPHIA GAS WORKS**

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October 25, 2024

**VIA ELECTRONIC FILING**

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

**VIA ELECTRONIC MAIL ONLY**

Administrative Law Judge Eranda Vero  
Office of Administrative Law Judge  
400 North Street  
Harrisburg, PA 17120

**Re: Nina Reese v. Philadelphia Gas Works, Docket No. F-2024-3049697**

Dear Secretary Chiavetta and Judge Vero:

Enclosed for electronic filing please find Philadelphia Gas Works' Objections to Complainant's Late-Filed Exhibits in the above referenced matter. Copies will be served in accordance with the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

/s/ **Anita J. Murray**  
Anita J. Murray

/awm  
encl.

cc (w/encl.): Nina Reese via Email: [carikiareese@gmail.com](mailto:carikiareese@gmail.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served a true and correct copy of Philadelphia Gas Works' Objections to Complainant's Late-Filed Exhibits upon the person(s) listed below in the manner indicated below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA EMAIL ONLY**

Nina Reese  
carikiareese@gmail.com

**/s/ Anita J. Murray**  
Anita J. Murray, Esquire

Date: Oct. 25, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nina Reese,	:	
	:	
Complainant,	:	
v.	:	Docket No. F-2024-3049697
	:	
	:	
Philadelphia Gas Works,	:	
	:	
Respondent.	:	

**OBJECTIONS BY THE PHILADELPHIA GAS WORKS  
TO COMPLAINANT’S LATE-FILED EXHIBITS**

Philadelphia Gas Works (“PGW” or “Respondent”), by and through its undersigned attorney, and pursuant to 52 Pa. Code § 5.401, hereby objects to the Late-Filed Exhibits of Complainant, Nina Reese (“Complainant”). PGW objects as follows:

1. Complainant filed a Formal Complaint dated May 28, 2024, with the Pennsylvania Public Utility Commission, and alleged that gas service was placed in her name even though she never lived at 12728 Verda Drive, Philadelphia, PA (“Service Address”). It is Complainant’s position that she is not responsible for those unpaid gas charges.

2. PGW filed an Answer on June 15, 2024, and denied her allegations.

3. The issue in this case is whether Complainant lived and used gas at the Service Address from September 10, 2021, to August 16, 2023 (“Time Period”).

4. On October 8, 2024, a hearing was held before ALJ Eranda Vero, with Complainant, Complainant’s witness, a PGW Customer Review Officer, and undersigned counsel in attendance.

5. At the hearing, both parties presented testimony and PGW Exhibits 1-10 were admitted into evidence.

6. At the hearing, ALJ Vero also permitted Complainant to provide additional documentary evidence supporting her position as late-filed exhibits.

7. On October 15 and 16, 2024 over email changes with ALJ Vero and PGW’s counsel, Complainant offered several additional documents as her late-filed exhibits. Complainant’s late-filed exhibits consist of:

- a. A Proof of Receipt of Program Benefits from the State of Illinois Department

of Human Services dated October 9, 2024, regarding her receipt of Supplemental Nutrition Assistance Program (“SNAP”) benefits from February 1, 2021 to February 2, 2025 (“Benefits Letter”);

- b. A letter from Dr. Kimberly Kimbrough, Principal of Rickover Junior High School, dated October 10, 2024, regarding a child’s attendance at said junior high school from August 2020 to May 2023 (“Junior High School Letter”); and
- c. An Official Transcript from Bloom Trail High School dated October 9, 2024, for the same child for the 2023-2024 school year (“Transcript”) (collectively, “Complainant’s Late-Filed Exhibits”).

8. In the October 15-16, 2024 emails from Complainant, she indicated that she would be offering an employment verification letter from her employer for relevant Time Period. As of the date of these Objections, Complainant has not provided to counsel or offered up such a record in this matter.

9. PGW now files Objections to Complainant’s Late-Filed Exhibits as follows:

10. Regarding the Benefits Letter, PGW acknowledges that the awarded benefits appear to encompass the entire Time Period at issue. However, the Benefits Letter contains an address for Complainant – 101 Carriage Lane - which differs from the address she purportedly lives at – 83 Candlelight Drive. Additionally, there is nothing in this correspondence which demonstrates or establishes that Complainant constantly lived in Illinois, at either address, during the Time Period – it only shows that she received SNAP benefits from the State of Illinois. It is possible for Complainant to have moved to Pennsylvania during the Time Period, without informing the Department of Human Services and without transferring her benefits to Pennsylvania. Therefore, PGW objects to the relevancy of the Benefits Letter and its probative value is outweighed by unfair prejudice and confusion of the issues.

11. Regarding both the Junior High School Letter and Transcript, PGW objects to their relevancy and their probative value is outweighed by unfair prejudice and confusion of the issues. Both documents pertain directly to a child, not the Complainant, and they only establish that the child attended school in Illinois from 2020-2024. Only the Transcript lists an address for the child. Interestingly, the Benefits Letter only lists Complainant as the individual receiving benefits; there’s no mention of the child receiving the same benefits. There lacks any evidence of a causal connection between the child, the Complainant, and living in Illinois. These documents do not

establish that Complainant lived in Illinois during the Time Period, or that Complainant lived with the child in Illinois during the Time Period.

12. For these reasons, PGW objects to the admission of Complainant's Late-Filed Exhibits into evidence.

13. WHEREFORE, PGW respectfully requests that Complainant's Late-Filed Exhibits not be admitted into the record.

Respectfully submitted,

*/s/ Anita J. Murray*

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Date: Oct. 25, 2024

*Counsel for PGW*