

October 26th, 2024

VIA (ELECTRONIC FILING)

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

Re: Emmett Patterson v. Philadelphia Gas Works; Docket No. F-2024-3051418

Dear Secretary Chiavetta:

Enclosed for filing please find Complainant's Answer to Respondent's Preliminary Objections in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in blue ink, appearing to be 'E. Patterson', with a long horizontal flourish extending to the right.

/s/ Emmett Patterson

Enclosure
cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October, 2024, I served a true copy of Complainant's Answer to Respondent's Preliminary Objections 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

Graciela Christlieb, Esq.
Counsel for Philadelphia Gas Works
graciela.christlieb@pgworks.com

Date: October 26th, 2024

A handwritten signature in blue ink, appearing to be 'E. Patterson', with a long horizontal line extending to the right.

/s/ Emmett Patterson

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Emmett Patterson,)	
Complainant,)	
v.)	
)	Docket No. F-2024-3051418
Philadelphia Gas Works,)	
Respondent.)	

**COMPLAINANT’S RESPONSE TO
RESPONDENT’S PRELIMINARY OBJECTIONS TO FORMAL COMPLAINT**

Pursuant to 52 Pa. Code §5.61 and 52 Pa. Code §5.101(f), Emmett Patterson (“Complainant”) hereby submits this Response to Philadelphia Gas Works’ (“Respondent”) Answer with New Matter to the Formal Complaint (“Complaint”) of Complainant that was served by the Secretary of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) on September 27, 2024. In support of this Response, Complainant states the following:

1. This paragraph consists of legal conclusions to which no response is required.
2. This paragraph consists of legal conclusions to which no response is required.
3. This paragraph consists of legal conclusions to which no response is required.
4. This paragraph consists of legal conclusions to which no response is required.
5. This paragraph consists of legal conclusions to which no response is required.
6. Admitted.
7. This paragraph consists of legal conclusions to which no response is required.
8. This paragraph consists of legal conclusions to which no response is required.
9. This paragraph consists of legal conclusions to which no response is required.
10. This paragraph consists of legal conclusions to which no response is required.

11. Admitted in part. Denied in part. Complainant now understands PUC's jurisdiction and that award money damages are impertinent matter. Complainant will amend the Complaint.

12. This paragraph consists of legal conclusions to which no response is required.

13. Admitted.

14. Admitted.

WHEREFORE, Complainant respectfully requests that the Commission grants the opportunity to amend the Complaint, Strike the request award money damages as impertinent matter, Proceed with the Formal Complaint process, and any other relief in favor of Complainant the Commission deems just and proper.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'E. Patterson', with a long horizontal line extending to the right.

/s/ Emmett Patterson

Date: October 26th, 2024

VERIFICATION

I, Emmett Patterson, appearing *Pro Se*, hereby state that the facts set forth in the foregoing Response to Respondent's Answer with New Matter are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).



/s/ Emmett Patterson

345 East Upsal Street

Philadelphia, PA 19119

Telephone: (412) 296-2587

emmettpatterson@gmail.com

PGW Customer

Date: October 26th, 2024