



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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**Graciela Christlieb, Senior Attorney  
Legal Department**

Direct Dial: 215-684-6164

FAX: 215-684-6798

E-mail: [graciela.christlieb@pgworks.com](mailto:graciela.christlieb@pgworks.com)

October 28, 2024

**VIA ELECTRONIC FILING**

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

Re: Christopher Haymes v. Philadelphia Gas Works; Docket No. C-2024-3047840

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' Reply to Complainant's Exceptions to the Initial Decision issued in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*/s/ Graciela Christlieb*

Graciela Christlieb, Esquire

Enclosure

cc: Cert. of Service [w/enc.]

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Reply to Exceptions 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

Christopher Haymes  
[haymes719@gmail.com](mailto:haymes719@gmail.com)  
[addikennco@gmail.com](mailto:addikennco@gmail.com)

Date: October 28, 2024

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Christopher Haymes,	:	
Complainant,	:	
v.	:	Docket No. C-2024-3047840
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

**PHILADELPHIA GAS WORKS’  
REPLY TO COMPLAINANT’S EXCEPTIONS**

Pursuant to 52 Pa. Code §5.535 the Philadelphia Gas Works (“PGW” or “Respondent”) hereby submits the following Reply to the Exceptions filed by Christopher Haymes (“Complainant”) to the Initial Decision in this matter issued on September 18, 2024 (“Initial Decision”).

**I. INTRODUCTION**

On March 26, 2024, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) against PGW wherein he alleged that he was being billed incorrectly and, as relief, he requested a payment agreement (“Complaint”).

On April 15, 2024, PGW filed an Answer wherein it denied the material allegations in the Complaint.

On April 19, 2024, the PUC issue a Call-In Telephone Hearing Notice scheduling a call-in telephonic hearing on June 13, 2024, before Administrative Law Judge F. Joseph Brady (“Judge Brady”).

On April 19, 2024, the hearing convened as scheduled. At the outset of the hearing, the Complainant moved to withdraw his complaint. PGW had no objection.

On September 18, 2024, Judge Brady issued the Initial Decision wherein he granted the Complainant’s request to withdraw his Complaint, stating:

“On April 23, 2024, Administrative Law Judge Guhl issued an Initial Decision in the Complainants other matter he had pending at the time before the Commission at Docket No. F-2023-3042824. Judge Guhl granted PGW’s Motion to dismiss the complaint in that matter with prejudice due to Complaint’s failure to appear for the hearing to prosecute that complaint; Judge Guhl also granted PGW’s Motion to

preclude the Complainant from filing any further informal or formal complaints until his current outstanding balance is paid in full.

In this case, the Complainant filed the instant Complaint alleging that he was being billed incorrectly and requesting a payment agreement. However, prior to going on the record, the parties established that the Complainant already had a pending complaint before the Commission at Docket No. F-2023-3042824 regarding the same issues. The Complainant confirmed this was the case on the record and consequently requested to withdraw the instant Complaint. PGW does not object. Under these circumstances, granting the Complainant's request to withdraw the Complaint is in the public interest because doing so will eliminate the need for litigation and save the parties any additional costs in time and money they would otherwise incur litigating a case that is already pending before the Commission. Accordingly, the Complainant's Petition for Leave to Withdraw the Complaint shall be granted."

Initial Decision at page 4.

## **II. COMPLAINANT'S EXCEPTIONS AND PGW'S REPLY**

### **Exceptions**

Complainant's Exceptions fail to identify any error in fact or law contained in the Initial Decision. Rather, the Complainant uses his Exceptions to raise allegations he has made in various other complaints and claim that he is somehow being personally victimized by PGW.

### **Reply**

The Complainant's exceptions fail to demonstrate or even allege that the Initial Decision is unsupported by both the law and his own request. PGW submits that the Complainant's own behavior in this matter is merely another example of his playing fast and loose with the Commission's procedures in order to abuse the process provided to benefit himself. His complaint at Docket No. F-2023-3042824, which was pending before the Commission at the time of the evidentiary hearing in this case, was dismissed with prejudice due to Complainant's failure to appear for the hearing to prosecute that complaint; the Commission also granted PGW's Motion to preclude the Complainant from filing any further informal or formal complaints until his current outstanding balance is paid in full.

**III. CONCLUSION**

WHEREFORE, PGW respectfully requests that this Commission deny Complainant's exceptions and adopt the Initial Decision.

Respectfully submitted,

*/s/ Graciela Christlieb*

Graciela Christlieb, Esquire  
Attorney I.D. 200760  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
Telephone: (215) 684-6164  
[graciela.christlieb@pgworks.com](mailto:graciela.christlieb@pgworks.com)  
Counsel for PGW

Date: October 28, 2024