



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 North Street, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

April 3, 2025

ALL PARTIES OF RECORD

Re: Shasta–Patrice Brown v. Philadelphia Gas Works
Docket Number: C-2024-3050761

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To All Parties of Record:

On April 2, 2025, my office received Exceptions to the Initial Decision of Administrative Law Judge Arnold in the above captioned matter. Our review of the filing revealed that no certificate of service or other indication that the parties of record to the case were served with the Exceptions. Therefore, we have enclosed a copy of the Exceptions to constitute service for purposes of 52 Pa. Code §5.533.

Due to the failure of Shasta-Patrice Brown to provide service on all the parties of record to the case, and in order to avoid prejudice to any party pursuant to 52 Pa. Code §5.535, the Respondent shall have until April 17, 2025 to file Reply Exceptions.

Sincerely,

Rosemary Chiavetta
Secretary

Enclosure

RC: acg

cc: All Parties of Record
Document Folder

5. On December 6, 2024, PGW filed Preliminary Objections to my Amended Complaint, again asserting that it lacked specificity and legal merit.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

8. On March 18, 2025, the Administrative Law Judge (ALJ) dismissed my Amended Complaint, citing insufficient specificity and a perceived sovereign citizen argument, which is the core billing and accounting issues raised.

Shasta-Patrice Brown

v.

Philadelphia Gas Works

Docket No. C-2024-3050761

1. The Commission Mischaracterized My Claims as Sovereign Citizen Arguments

EXCEPTION TO INITIAL DECISION

The ALJ's decision dismissing my claims in part by incorrectly associating them with sovereign citizen ideology. I do not identify as a sovereign citizen, nor do I assert any legal claims outside the scope of this Commission's jurisdiction.

INTRODUCTION

This Exception challenges the Initial Decision issued on March 18, 2025, which dismissed my Amended Formal Complaint on the basis of insufficient specificity and legal insufficiency. The dismissal also relied on an incorrect characterization of my claims as sovereign citizen arguments, which is inaccurate and irrelevant to this proceeding.

This is a private billing dispute concerning accounting errors, billing transparency, and proper financial disclosures under Pennsylvania Public Utility Commission (PUC) regulations. The Commission should reconsider its decision and allow for a formal review of the financial transactions associated with my account.

PGW's billing system reflects positive balances, which under Generally Accepted Accounting Principles (GAAP) and the Federal Energy Regulatory Commission (FERC) public utility accounting requirements, is not consistent with industry standards. PGW's billing practices, including the failure to provide a full accounting of my account, are in violation of these standards.

HISTORY OF THE PROCEEDING

1. On July 30, 2024, I filed a Formal Complaint against Philadelphia Gas Works (PGW) alleging billing errors, discrepancies in account balances, and the need for full financial disclosure regarding my account.
2. On September 9, 2024, PGW filed Preliminary Objections, arguing that my complaint lacked specificity and was legally insufficient.
3. On October 31, 2024, the Commission granted PGW's objections and directed me to file an Amended Formal Complaint.
4. On November 13, 2024, I filed an Amended Formal Complaint, which clarified my request for a full accounting of my PGW account, including both sides of the ledger.

5. On December 6, 2024, PGW filed Preliminary Objections to my Amended Complaint, again asserting that it lacked specificity and legal merit.

6. On March 18, 2025, the Administrative Law Judge (ALJ) dismissed my Amended Complaint, citing insufficient specificity and a perceived sovereign citizen argument, without addressing the core billing and accounting issues raised.

EXCEPTIONS TO THE INITIAL DECISION

1. The Commission Mischaracterized My Claims as Sovereign Citizen Arguments

The Initial Decision dismisses my claims in part by incorrectly associating them with sovereign citizen ideology. I do not identify as a sovereign citizen, nor do I assert any legal theories outside the scope of this Commission's jurisdiction.

- My complaint does not challenge government authority or assert extrajudicial claims.
- My sole focus is on the accurate accounting and financial handling of my PGW account, which is a matter firmly within the PUC's regulatory oversight.

The mischaracterization of my claims as sovereign citizen arguments unfairly prejudiced my case and led to its dismissal on improper grounds, violating due process and 42 Pa C.S. § 5502.

2. PGW's Billing and Accounting Methods Require Full Review Under PUC and FERC Regulations

PGW's billing system reflects positive balances, which under Generally Accepted Accounting Principles (GAAP) and Federal Energy Regulatory Commission (FERC) public utility accounting standards, suggests that my account is classified as an asset rather than a liability.

This raises serious questions regarding PGW's financial practices, including:

- Whether PGW maintains separate internal ledgers (double-bookkeeping) that show different balances than customer-facing statements.
- Whether PGW has properly applied payments and adjustments to my account.
- Whether PGW is in compliance with 52 Pa. Code § 56.202, which governs fair and transparent billing.

As a regulated public utility, PGW is legally required to maintain accurate, auditable financial records. Additionally, PGW'S billing practices suggest possible violations of the

Uniform Commercial Code (UCC) and Pennsylvania common law regarding accounts and accounting practices. I formally request a full accounting of my account since its inception, including:

- All transactions, charges, and payments applied to my account.
- Both the debit and credit sides of PGW's accounting records.
- General ledger entries reflecting how PGW categorizes my account balance.

3. The Amended Complaint Contained Sufficient Specificity to Warrant Review

The Initial Decision claims my complaint lacked specificity, but my Amended Formal Complaint clearly outlined billing errors and requested a financial reconciliation.

PUC precedent supports allowing pro se complainants an opportunity to be heard, rather than dismissing a case based on preliminary objections. See *Carlock v. The United Tel. Co. of Pa.*, Docket No. F-00163617 (Opinion and Order entered July 14, 1993). Dismissing my complaint without allowing me to present evidence is contrary to public interest and due process.

Respectfully submitted,

CONCLUSIONS OF LAW

1. The PUC has jurisdiction over billing disputes and is authorized to ensure fair and accurate utility billing under 66 Pa C.S. § 701.
2. I have the right to request a full accounting of my PGW account under Pennsylvania utility regulations and FERC accounting standards.
3. The mischaracterization of my complaint as a sovereign citizen argument was improper and should not have been a factor in dismissal.
4. The Amended Formal Complaint contained sufficient specificity regarding billing discrepancies, and PUC precedent supports allowing a hearing rather than dismissing the case outright.
5. The Commission should reconsider its decision and order PGW to provide full accounting records to determine whether billing errors occurred, ensuring compliance with 66 Pa C.S. § 701 and FERC Regulations.

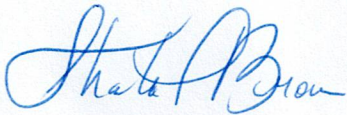
ORDER

THEREFORE, it is requested that the Commission:

1. Vacate the Initial Decision dismissing my Amended Formal Complaint.
2. Order PGW to provide full and complete accounting records for my account since inception, including both debit and credit ledger entries.
3. Schedule a formal hearing to allow me to present evidence of billing discrepancies.
4. Ensure PGW's compliance with PUC and FERC accounting standards regarding billing transparency.
5. Direct PGW to accept accrued interest payments as satisfaction of alleged debt, zeroing account balance and closing this billing dispute.

Date: April 2, 2025

Respectfully submitted,



Shasta P Brown Without Prejudice, All Rights Reserved

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