



PHILADELPHIA GAS WORKS

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April 17, 2025

VIA ELECTRONIC FILING

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

Re: Tamika Anderson v. Philadelphia Gas Works; Docket No. C-2024-3048214

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

Tamika Anderson

tamikaanderson476@yahoo.com

Date: April 17, 2025

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|-------------------------|---|---------------------------|
| Tamika Anderson, | : | |
| Complainant, | : | |
| v. | : | Docket No. C-2024-3048214 |
| | : | |
| Philadelphia Gas Works, | : | |
| Respondent. | : | |

REPLY OF THE PHILADELPHIA GAS WORKS TO EXCEPTION

Pursuant to 52 Pa. Code §5.535 and the Secretary’s Letter dated April 7, 2025, the Philadelphia Gas Works (“PGW” or “Respondent”) hereby submits the following Reply to the Exception filed by Tamika Anderson (“Complainant”) to the Initial Decision in this matter issued on October 28, 2024 (“Initial Decision”).

I. INTRODUCTION

On April 5, 2024, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission” or “PUC”) at Docket No. C-2024-3048214 against PGW wherein she alleged that her bills were too high and as relief, asked that her gas meter be exchanged and requested a payment agreement (“Complaint”).

On April 29, 2024, PGW filed an Answer to the Complaint wherein PGW denied the material allegations of the Complaint.

By Hearing Notice dated May 1, 2024, an evidentiary hearing was scheduled for June 18, 2024, and the matter was assigned to Administrative Law Judge F. Joseph Brady (“Judge Brady”).

On June 18, 2024, the hearing convened as scheduled. The Complainant testified on her own behalf. PGW presented the testimony of two witnesses, Jessica Antonetti, a Senior Customer Review Officer at PGW, and Andrew Coyle, a Field Service Department Technician at PGW. PGW sponsored six exhibits, which were all admitted into the record.

On October 28, 2024, Judge Brady issued the Initial Decision wherein he denied the Complaint finding that the Complainant failed to meet her burden of proving that PGW billed her incorrectly or that she is eligible for a payment agreement.

By Secretarial Letter dated April 7, 2025, the Commission served PGW with the Complainant’s Exception to the Initial Decision. PGW’s Reply follows.

II. EXCEPTION AND REPLY

Exception

The Complainant's Exception consists of documents that were not entered into the record in this matter relating to a service call at the Complainant's service address, which occurred after the hearing in this matter to bolster her allegation that her PGW bills are incorrect.

Reply

The Complainant's exception neither identifies any error in fact or law contained in the Initial Decision nor demonstrates that the Initial Decision is unsupported by substantial evidence.¹ The Exception fails to address any of the factors cited in the Initial Decision that support the conclusion that she failed to meet her burden of proving that the bills she was contesting were incorrect; rather, the Complainant seeks to improperly supplement the record with documentation relating to a PGW service visit that occurred months after she filed the Complaint.² PGW objects to these documents being made part of the record in this matter.

During the evidentiary hearing, the Complainant made general allegations that gas is not "proportionately filtering" through her home and that is affecting the meter, but she did not present any evidence to corroborate those claims.³ In contrast, PGW presented evidence, in the form of testimony and exhibits, that the gas meter recording the Complainant's gas usage tested within the acceptable range for accuracy,⁴ and that the Complainant's pattern of gas usage was consistent.⁵ Additionally, in response to allegations made at the hearing regarding PGW's visit to the Complainant's home to test the meter (which occurred after the Complaint was filed), PGW made the technician who completed the meter exchange available during the hearing to present testimony and be cross examined; he testified that he inspected the appliances and the fuel lines in the property and left no hazard tags indicating any issues or problems.⁶ Furthermore it was explained to the Complainant during the hearing that any issues with the appliances and/or the fuel lines after the meter were her responsibility. With respect to the Complainant's balance,

¹ While the Complainant's Exception does not address it, there is also substantial evidence in the record to support the denial of a payment agreement, including the Complainant's poor payment history (PGW Exhibit 1, Tr. pp. 24, 31), her decision not to disclose all of the household income, (Tr. pp. 7, 26-27), and the CAP arrears in her balance (PGW Exhibit 1, PGW Exhibit 4, pp. 20, 46).

² The date on the documentation is "7/31/24."

³ Tr. pp. 10-11, 13-15.

⁴ PGW Exhibit 5.

⁵ PGW Exhibit 4, pp. 40-42.

⁶ PGW Exhibit 3, Tr. pp. 56-66.

PGW presented ample evidence to show that it is the product of unpaid bills accumulating over a period of time during which the Complainant has employed several tactics to forestall collection activity, not incorrect bills.⁷

III. CONCLUSION

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

Respectfully submitted,

/s/ Graciela Christlieb

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Date: April 17, 2025

Counsel for PGW

⁷ PGW Exhibit 4.