

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Shasta-Patrice Brown

Docket No. C-2024-3050761

Complainant

v.

Philadelphia Gas Works

Respondent

REPLY EXCEPTION AND DEMAND FOR JUDGMENT BASED ON FRAUD, BAD FAITH, AND MATERIAL MISREPRESENTATION

Pursuant to 52 Pa. Code § 5.535, Complainant Shasta-Patrice Brown submits this Reply Exception to the April 3, 2025 filing by Philadelphia Gas Works (“Respondent” or “PGW”) in response to Complainant’s Exceptions to the Initial Decision issued on March 18, 2025.

I. INTRODUCTION

Respondent’s reply is materially defective and procedurally dishonest. PGW falsely asserts that the Complainant was not a customer, despite PGW billing the Complainant and her daughter at 3051 N. Stillman Street, Philadelphia, PA, and mailing multiple bills in their names. These documents remain in the Complainant’s possession and will be submitted as exhibits in support of this Reply Exception. PGW’s blanket denial of a known customer relationship constitutes fraud in factum, material misrepresentation, and bad faith in an administrative proceeding.

PGW’s response continues a pattern of obfuscation, refusing to acknowledge Complainant’s standing as an investor under SEC interpretations, denying access to the full accounting, and refusing to return interest, dividends, or closure documentation related to the mishandled account. Complainant also notes that the account was improperly reported on her daughter’s credit report, constituting further commercial injury and misrepresentation.

Further, PGW’s own audited financial statements and SEC-referenced documents acknowledge:

- * Revenues are derived from customer accounts
- * Customer deposits are held as liabilities and are to be refunded upon account closure

* PGW is subject to oversight by the Pennsylvania PUC, which governs billing and customer service

These facts directly contradict PGW's position in this matter.

II. POINT-BY-POINT REBUTTAL

Exception 1 – Mischaracterization of Claims as “Sovereign Citizen”

PGW's Reply mischaracterizes Complainant's claims as sovereign citizen arguments in an attempt to deflect from the actual legal and commercial foundation of the Complaint. Complainant has never invoked sovereign citizenship ideology. Rather, the Complaint clearly rests on:

- * Contract law
- * Equity and trust principles
- * SEC investor standing (based on PGW's own financial disclosures)
- * Commercial liability and billing fraud

Complainant operates in equity and asserts commercial standing. This is materially distinct from the false narrative PGW is attempting to construct.

Exception 2 – Fraudulent Denial of Customer Relationship

PGW's denial that Complainant was ever a customer is demonstrably false. Complainant is in possession of multiple unopened PGW bills addressed to both herself and her daughter at 3051 N. Stillman Street, Philadelphia, PA. These bills will be submitted as Exhibits.

Moreover, Complainant filed PUC Informal Complaint BCS Case #3912343 regarding the same account while it was still active. PGW has actual knowledge of this matter and is misrepresenting its own records to the Commission.

Additionally, PGW's 2024 and 2023 audited financial reports clearly indicate:

- * Customer accounts are a source of revenue
- * Customer deposits are listed as liabilities
- * PGW must return deposits upon account closure

The fact that PGW closed the account and failed to return interest, while allowing it to damage the credit of Complainant's daughter, amounts to willful and actionable commercial injury.

Exception 3 – Sufficiency of Pleading Commission for further review, sanctions, or civil

Contrary to PGW's assertions, the Amended Formal Complaint is sufficiently pled and states:

- * That the application was endorsed in blank under duress
- * That the note was securitized and should be liquidated with return of value
- * That billing errors occurred post-move, while the account was supposedly closed
- * That PGW failed to return the interest or dividends on account closure
- * That Complainant and her daughter were improperly listed as liable

Complainant also demanded:

- * Setoff and settlement
- * Return of all proceeds
- * General ledger access
- * Full reconciliation and credit correction

These are specific demands falling well within the jurisdiction of the PUC and supported by the utility's own financial disclosures and SEC reporting obligations.

III. DEMAND FOR RELIEF

Complainant respectfully requests the following:

1. That the Commission reject PGW's Reply as fraudulent and adopt this Reply Exception as truth on the record.
2. That the Commission grant judgment in favor of Complainant based on PGW's material misrepresentation and failure to respond in good faith.
3. That PGW be compelled to:
 - * Acknowledge the account and customer history
 - * Return all dividends and interest
 - * Submit the full accounting and general ledger
 - * Correct credit reporting violations

4. That this matter be referred to the full Commission for further review, sanctions, or civil referral.

I, Shasta Patrice Brown, submit this Reply Exception, verifying that the foregoing is true and correct to the best of my knowledge, information, and belief, and I am a party to the law.

Respectfully submitted,



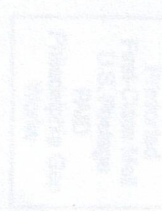
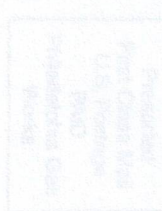
Shasta-Patrice Brown

5233 Heston Street

Philadelphia, PA 19131

VERIFICATION

I, Shasta Patrice Brown, submit this Reply Exception, verifying that the foregoing is true and accurate under penalty of perjury of the law.



Philadelphia Gas Works

P.O. Box 3500, Philadelphia, PA 19122-0500

ADDRESS SERVICE REQUESTED

037532 000006000
ARIANA MARTIN
SHASTA P BROWN
3051 N STILLMAN ST
PHILADELPHIA PA 19132-1306

23



Presorted
First-Class Mail
U.S. Postage
PAID
Philadelphia Gas
Works

Philadelphia Gas Works

P.O. Box 3500, Philadelphia, PA 19122-0500

ADDRESS SERVICE REQUESTED

014139 000013267
ARIANA MARTIN
SHASTA P BROWN
33 HESTON ST
PHILADELPHIA PA 19131-3615

24



Presorted
First-Class Mail
U.S. Postage
PAID
Philadelphia Gas
Works



PHILADELPHIA GAS WORKS
GAS LEAK EMERGENCIES: (215) 235-1212



Access Your Account Online www.pgworks.com



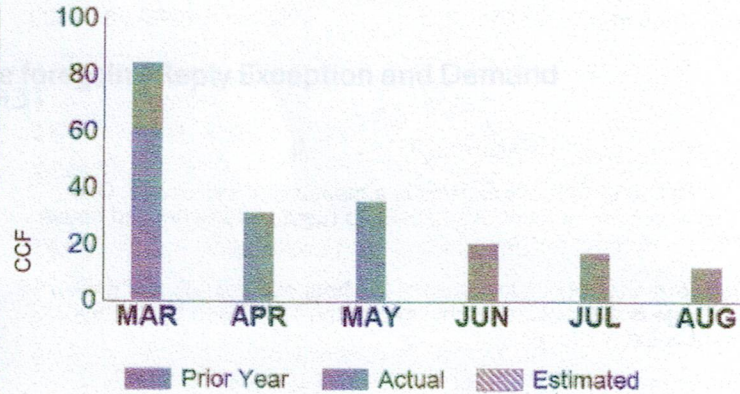
Billing & General Information (215) 235-1000 (English & Español)

CERTIFICATE OF SERVICE



Hello Ariana Martin,
SHASTA P BROWN, 3051 N STILLMAN ST
Account Number: 0915308687

ENERGY USAGE SNAPSHOT



Please Pay **\$1,233.81**
Due By **09/22/2023**

Billing Date **AUG 29, 2023**
Service From **07/27/2023 - 08/25/2023**
Past Due **\$1,201.51**
Current Charges **\$32.30**

Average Daily Cost
\$1.11
Current Month
Compared to \$0.00 prior year

Average Daily Temperature
77° Current Month | Compared to 81° prior year
Usage Over Last Year
49 Ccf* Monthly Average | 586 Ccf Total
1 CCF = approx. 1 hour of heat
*See terms on pg. 2

MESSAGE CENTER

Call 811 before you dig! It's for your safety, the safety of others, and to ensure underground utility lines are not damaged. Remember: It's the law.

Sign up for PGW My Account. Manage your account, make payments, get rebates and incentives, and more! Visit PGWorks.com/MyAccount

Need in-person assistance? Visit a Neighborhood Energy Center for help from a PGW-trained representative. Find your nearest center at PGWorks.com/NEC



Pay Online www.pgworks.com



Pay By Phone (215) 235-1000 (English & Español)

*a convenience fee of \$2.95 will be applied



Pay With Cash (See Back For Details)

Please return this portion with your payment.
Write your account number on your check or money order made payable to Philadelphia Gas Works.



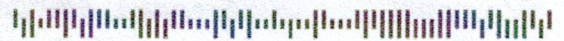
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Thank you!

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ARIANA MARTIN
SHASTA P BROWN
3051 N STILLMAN ST
PHILADELPHIA PA 19132-1306



Philadelphia Gas Works
P.O. Box 11700
Newark, NJ 07101-4700

0009153086878000000002233030

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Reply Exception and Demand for Judgment was served upon:

Graciela Christlieb, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
graciela.christlieb@pgworks.com

On this 13th day of May 2025, by electronic mail.

Shasta-Patrice Brown

