

May 14, 2025

To: Graciela Christlieb, Counsel for PGW
800 W Montgomery Avenue
Philadelphia, PA 19122
Email: Graciela.Christlieb@pgworks.com

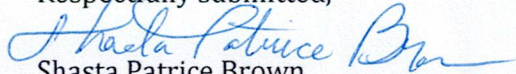
**Re: C-2024-3050761 – Supplement to Motion to Issue Subpoena Duces
Tecum**

I write to supplement my previously filed motion for a subpoena directed to Philadelphia Gas Works (PGW). The records requested are material and necessary to demonstrate that:

1. The company engaged in unjust enrichment by billing without proper disclosures of the investor-customer relationship;
2. The accounting records, applications, and hard files will show evidence of securitization, double-entry accounting, and the omission of required fiduciary acknowledgments;
3. The documents are vital to proving that my account was handled in a manner inconsistent with Generally Accepted Accounting Principles (GAAP) and Pennsylvania Public Utility Commission regulations.

This information is critical to resolve billing errors and determine whether I have been unlawfully deprived of my financial interest and status as a utility investor.

Respectfully submitted,



Shasta Patrice Brown
5233 Heston Street
Philadelphia, PA 19131

VERIFICATION OF SERVICE

I, Shasta P. Brown, hereby certify that I have this day served a true copy of the foregoing

I, Shasta Patrice Brown, hereby state that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Shasta P. Brown
shasta@pcra.pa.gov

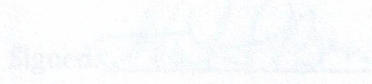
Respectfully submitted,



Shasta Patrice Brown

Administrative Law Judge
Criminal Unit
RA-PCRA-PC-CALL@pa.gov

Dated: May 14, 2025

Signed: 

CERTIFICATE OF SERVICE

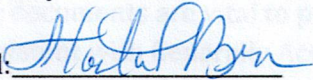
I, Shasta P Brown, hereby certify that I have this day served a true copy of the foregoing Supplement to Motion to Issue Subpoena Duces Tecum upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54, via electronic mail and eFiling:

Graciela Christlieb, Counsel for PGW
Graciela.Christlieb@pgworks.com


Secretary Rosemary Chiavetta
secretary@puc.pa.gov

Administrative Law Judge
Eranda Vero
RA-PCRA-PC-OALJ@pa.gov

Dated: May 14, 2025

Signed: 

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Respectfully submitted,

Shasta Patrice Brown
5233 Hegun Street
Philadelphia, PA 19131