

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Shasta Patrice Brown
Complainant

v.

Philadelphia Gas Works (PGW)
Respondent

Docket No. C-2024-3050761

SUPPLEMENTAL FILING IN SUPPORT OF MOTION FOR SUBPOENA OF RECORDS

This filing supplements the previously submitted Motion for Subpoena of Records. The attached materials are directed to Brett A. Zahorchak, Esquire, Vice President and Right to Know Officer at Philadelphia Gas Works (PGW), who serves as custodian of records and is responsible for compliance with legal and regulatory document requests.

SUBPOENA ADDENDUM DIRECTED TO:

Brett A. Zahorchak, Esquire
Vice President & Right to Know Officer
Philadelphia Gas Works (PGW)
brett.zahorchak@pgworks.com
215-684-6624

You are hereby required to produce the following documents and provide verification under oath:

1. Original application for natural gas service initiated under the name of Shasta Patrice Brown's daughter, including any credit authorization forms, communications, and consent documentation.
2. Records showing when Shasta Patrice Brown was added to the PGW account, including any amendments or updates to the account holder designation.
3. All internal records, memos, or correspondence regarding the decision to use the daughter's credit information in the original application.
4. Credit inquiries or soft/hard pulls initiated by PGW in relation to either Shasta Patrice Brown or her daughter, including which bureaus were contacted.
5. All records of communications between PGW and any credit reporting agencies concerning this account.

6. Documentation showing PGW's policy on adding a secondary party to an existing account and whether full disclosure or updated consent was obtained.
7. Any records showing ongoing credit damage, disputes, or complaints related to this account, particularly involving the daughter's credit file.
8. GAAP/FERC-compliant records showing how this account is classified internally and whether any securitization or reserve accounting is used.
9. All IRS-related filings or records associated with the Complainant or her daughter, including but not limited to:
 - Forms 1099-A, 1099-B, 1099-C, 1099-OID, 1096, and 1098,
 - Forms W-9, W-8BEN, or similar tax identification certifications,
 - Any filings evidencing the assignment, cancellation, acquisition, or discharge of debt obligations,
 - Any withholding records or tax classification forms used internally or shared with the IRS.
10. All communications between PGW legal counsel and your office related to this subpoena request.

All responsive documents must be certified as accurate and complete.

INTERROGATORIES AND REQUESTS FOR PRODUCTION

Directed to: PGW, Attn: Brett A. Zahorchak, Esq.

Interrogatories

1. State your full name, title, and responsibilities at PGW.
2. Explain your role in maintaining, certifying, or overseeing the records requested in this filing.
3. Identify the name and date on which the account in question was originally opened, and clarify who the designated account holder(s) were at each point.
4. Describe the process by which Shasta Patrice Brown was added to the account, and whether her daughter was notified or removed.
5. Identify any credit bureaus contacted regarding either party, the purpose of such inquiries, and the resulting impact.
6. Confirm under penalty of perjury whether PGW has maintained an accurate and lawful record of all credit activity related to this account.
7. Describe any IRS-related reporting responsibilities PGW recognizes in relation to customer accounts and whether any such reports have been filed related to the Complainant or her daughter.

Document Requests

- All items listed in the subpoena addendum above.
- Any complaints, disputes, or credit damage acknowledgments related to either party.
- Documentation of PGW's internal procedures for updating or correcting credit reporting

activity for accounts with multiple names.

- All IRS-related manuals, training, forms, instructions, or filings generated or received by PGW that reference the Complainant or her daughter directly or indirectly.

I, Shasta Patrice Brown, verify that the facts contained in this filing are true and correct to the best of my knowledge and belief. I understand that false statements herein are made subject to penalties under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Elected on: 15 October 2011

Signature: [Handwritten Signature]

Name: Shasta Patrice Brown

VERIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing

I, Shasta Patrice Brown, verify that the facts contained in this filing are true and correct to the best of my knowledge and belief. I understand that false statements herein are made subject to penalties under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Counsel for POW
graciela.christlieb@pgworks.com

Executed on: 15 May 25

Signature: *Shasta Patrice Brown*

Name: Shasta Patrice Brown

Executed on: _____

Signature: *Shasta Patrice Brown*

Name: Shasta Patrice Brown

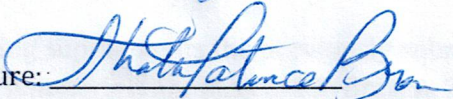
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Supplemental Filing upon the following person(s):

Graciela Christlieb
Counsel for PGW
graciela.christlieb@pgworks.com

Brett A. Zahorchak, Esq.
Vice President and Right to Know Officer
Philadelphia Gas Works
brett.zahorchak@pgworks.com

Executed on: 15 May 25

Signature: 
Name: Shasta Patrice Brown

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