

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DaJuan Ruff-Kelly	:	
	:	
v.	:	F-2025-3055087
	:	
Philadelphia Gas Works	:	

**INTERIM ORDER #1**

This Order directs DaJuan Ruff-Kelly to have an attorney enter his or her appearance on behalf of Know Finish LLC **on or before July 8, 2025.**

*Procedural History*

On May 5, 2025, DaJuan Ruff-Kelly filed a Formal Complaint (“Complaint”) with the Pennsylvania Public Utility Commission (“Commission”) against Philadelphia Gas Works (“PGW”). On the Complaint form, Mr. Ruff-Kelly indicated that the Complaint concerns utility service provided to Know Finish LLC. Mr. Ruff-Kelly alleged that PGW was overcharging Know Finish LLC for utility service.

On June 3, 2025, PGW filed an Answer against the Complaint admitting or denying the allegations of the Complaint.

On June 4, 2025, a Hearing Notice was issued to the parties, scheduling this matter for an evidentiary hearing on July 18, 2025. Of relevance, the Hearing Notice states the following:

**REPRESENTATION.** If you are an individual, you may represent yourself or you may have an attorney represent you. All others, including a partnership, corporation, trust, association, or governmental agency or subdivision, must be represented by an attorney licensed to practice law in Pennsylvania, or admitted *pro hac vice*. Only an attorney may represent someone else.

June 4, 2025, Hearing Notice.

On June 6, 2025, a Prehearing Order was issued to the parties, providing the parties with the procedural rules that would govern the hearing. Of relevance, the Prehearing Order states the following:

7.       **REPRESENTATION.** If you are an individual, you may represent yourself or you may have an attorney represent you. All others, including a partnership, corporation, trust, association, or governmental agency or subdivision, must be represented by an attorney licensed to practice law in Pennsylvania, or admitted *pro hac vice*. And, unless you are an attorney, you may not represent someone else.

June 6, 2025, Prehearing Order.

*Attorney Representation*

The Complaint in this matter was filed by Mr. Ruff-Kelly on behalf of Know Finish LLC. Mr. Ruff-Kelly did not indicate that he was an attorney licensed to practice law in Pennsylvania, further, no attorney is listed on paragraph 10 of the Complaint titled “legal representation.” Once PGW filed an Answer to the Complaint, this proceeding became adversarial in nature. *See* 52 Pa. Code § 1.8. The Commission’s regulations require that persons in adversarial proceedings be represented by an attorney or legal intern. *See* 52 Pa. Code § 1.21(b). The Commission’s regulations define “persons” as including individuals, corporations, partnerships, associations, joint ventures, other business organizations, trusts, trustees, legal representatives, receivers, agencies, governmental entities, municipalities, municipal corporations or other political subdivisions. *See* 52 Pa. Code § 1.8.

It is well-settled in Commission practice that participation in a formal adversarial proceeding before the Commission constitutes the practice of law. *See, e.g.,* Lesley A. Scheaffer for Leslie W. Scheaffer v. Pa. Pub. Util. Comm’n, Docket No. F-2016-2577647 (Opinion and

Order entered Apr. 3, 2018). As such, that participation is limited to those who either file as individuals and represent themselves or to attorneys who are representing others. *Id.*

Accordingly, upon the filing of the Answer in this matter, Know Finish, a limited liability company, was required to be represented by an attorney. The absence of an attorney where one is required deprives the Commission of jurisdiction to adjudicate the matter. *Adventure Alley CLC, LLC v. PECO Energy Co. and Great Am. Power*, Docket No. C-2014-2430850 (Final Order entered Nov. 25, 2014) (citing *McCain v. Curione, Pa. Bd. of Prob. and Parole*, 527 A.2d 591 (Pa. Cmwlth. 1987)). An issue of subject matter jurisdiction may be raised at any stage of a proceeding by a party or *sua sponte* by the presiding officer or by the Commission. *Blackwell v. State Ethics Comm'n*, 567 A.2d 630 (Pa. 1989).

Accordingly, this Order directs Mr. Ruff-Kelly to have an attorney enter his or her appearance on behalf of Know Finish LLC **on or before July 8, 2025**. Non-compliance with this Order will result in cancellation of the hearing and dismissal of the Complaint. *See, e.g., New Fizon Catering, Inc. v. PECO Energy Co.*, Docket No. C-2008-2065498 (Opinion and Order entered June 24, 2009); *Snyderville Cmty. Dev. Corp. v. Phila. Gas Works*, Docket No. C-20055032 (Opinion and Order entered July 31, 2006) (citing *Treffinger v. PPL Elec. Util. Corp.*, Docket No. C-20027978 (Opinion and Order entered Mar. 3, 2003); *Franconia Mennonite Conf. v. Verizon Pa. Inc.*, Docket No. C-2010-2193709 (Order entered June 6, 2003).

THEREFORE,

IT IS ORDERED:

1. That DaJuan Ruff-Kelly shall have an attorney shall enter his or her appearance on behalf of Know Finish LLC in this proceeding on or before July 8, 2025.



**F-2025-3055087 - DAJUAN RUFF-KELLY v. PHILADELPHIA GAS WORKS**

DAJUAN RUFF-KELLY  
6011 WALTON AVENUE  
PHILADELPHIA PA 19143  
**267.391.2091**

[dajuanrk@gmail.com](mailto:dajuanrk@gmail.com)

Served via USPS First Class Mail

GRACIELA CHRISTLIEB ESQUIRE  
PHILADELPHIA GAS WORKS  
800 WEST MONTGOMERY AVE  
PHILADELPHIA PA 19122

**215.684.6164**

[graciela.christlieb@pgworks.com](mailto:graciela.christlieb@pgworks.com)

Served via eService

*(Counsel for Philadelphia Gas Works)*