

**COVER LETTER**

Date: 22 August, 2025

Via Certified Mail  
Secretary's Bureau  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**Re: Motion to Compel Arbitration Under Common Law – Shasta Patrice Brown v. Philadelphia Gas Works, Docket No. C-2024-3050761**

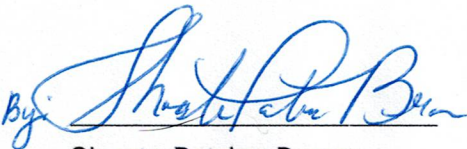
Dear Secretary:

Enclosed for filing in the above-captioned matter please find the following documents:

1. Motion to Compel Arbitration Under Common Law (AAA Forum)
2. Proposed Order
3. Certificate of Service

I respectfully request that these documents be filed of record. Please return a time-stamped copy to me in the enclosed self-addressed stamped envelope.

Respectfully submitted,

By: 

Shasta Patrice Brown  
Executor, Ren-Ira Michal Zuri-El Private Estate

Enclosures: as stated

CC: Philadelphia Gas Works (via E Mail)

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Shasta Patrice Brown, Executor of the Ren-Ira Michal Zuri-El Private Estate**

**Complainant**

**v.**

**Philadelphia Gas Works (PGW)**

**Respondent**

**Docket No.: C-2024-3050761**

**MOTION TO COMPEL ARBITRATION UNDER COMMON LAW (AAA FORUM)**

Complainant, a living woman acting as Executor of the Ren-Ira Michal Zuri-El Private Estate, respectfully moves the Commission to (1) take notice of Complainant's election of common-law arbitration; (2) compel Respondent Philadelphia Gas Works ("PGW") to participate in arbitration administered by the American Arbitration Association (AAA), but governed by common-law principles as recognized in Pennsylvania law; and (3) maintain this docket open for oversight (no dismissal).

**I. INTRODUCTION AND RELIEF REQUESTED**

Complainant has exhausted administrative remedies and elects arbitration under common law. Complainant seeks an order compelling PGW to arbitrate within AAA but expressly under common-law principles pursuant to 42 Pa. C.S. §§ 7341-7342.

**II. PROCEDURAL BACKGROUND**

1. Complaint filed and perfected.
2. Multiple filings submitted including Form 56 (Appointment of Fiduciary), affidavits, and notices.

3. Certified Mail motion previously sent demanding disclosure of the financial value of this docketed claim and related instruments; no response provided.
4. PGW denied or obscured Complainant's account and continued reporting adverse credit information while refusing remedy.
5. Administrative remedy has been exhausted without performance.

### **III. LEGAL STANDARD**

Arbitration is strongly favored. See 9 U.S.C. §§ 2–4; *Moses H. Cone Mem'l Hosp. v. Mercury Constr. Corp.*, 460 U.S. 1 (1983); *Dean Witter Reynolds Inc. v. Byrd*, 470 U.S. 213 (1985).

Pennsylvania recognizes common-law arbitration independent of the statutory scheme. See 42 Pa. C.S. §§ 7341–7342; *Runewicz v. Keystone Ins. Co.*, 383 A.2d 189 (Pa. 1978); *Allstate Ins. Co. v. Fioravanti*, 299 A.2d 585 (Pa. 1973).

### **IV. ARGUMENT**

- AAA is the administrative forum frequently invoked by Respondent. Complainant does not object to AAA as administrator.
- However, Complainant requires that AAA proceedings be conducted strictly under common-law arbitration principles as recognized in Pennsylvania, not under statutory or AAA's corporate commercial rules.
- Under 42 Pa. C.S. § 7341, awards of common-law arbitration are final and binding except for limited challenges such as fraud, misconduct, or denial of a hearing. This ensures remedy and prevents dismissal.

### **V. NOTICE OF ELECTION**

Complainant hereby elects arbitration under common law, administered by AAA, on the following terms:

- Governing Law: Pennsylvania common law under 42 Pa. C.S. §§ 7341–7342.
- Arbitrators: one neutral unless the parties select three.
- Venue: Philadelphia County, Pennsylvania, or another agreed location.

- Notice: service by Certified Mail or better.
- Default: if Respondent refuses to participate, arbitration shall proceed in default.

## VI. REQUESTED RELIEF

Complainant respectfully requests the Commission:

1. Acknowledge election of arbitration under common law.
2. Compel PGW to participate in arbitration administered by AAA but conducted under common-law principles.
3. Maintain this docket open for oversight (no dismissal).
4. Treat refusal or silence by PGW as acquiescence permitting default arbitration.

Date: 22 August, 2025

Respectfully submitted,

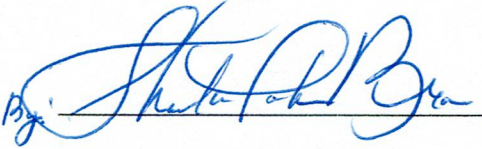
By:   
Shasta Patrice Brown

Executor, Ren-Ira Michal Zuri-El Private Estate

**VERIFICATION**

I, Shasta Patrice Brown, hereby state that the facts set forth in the foregoing Motion to Compel Arbitration Under Common Law 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.

Date: 22 August, 2025

By: 

Shasta Patrice Brown

Executor, Ren-Ira Michal Zuri-El Private Estate

**PROPOSED ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2025, upon consideration of Complainant's Motion to Compel Arbitration Under Common Law, it is ORDERED:

1. Complainant's election of arbitration under common law is acknowledged.
2. PGW is compelled to participate in arbitration administered by AAA but conducted under Pennsylvania common-law principles (42 Pa. C.S. §§ 7341–7342).
3. This docket shall remain open for oversight and shall not be dismissed while arbitration is pending.
4. If PGW refuses or remains silent, arbitration may proceed in default and any award may be presented for enforcement in equity.

**BY THE COMMISSION:**

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Chairman  
Pennsylvania Public Utility Commission

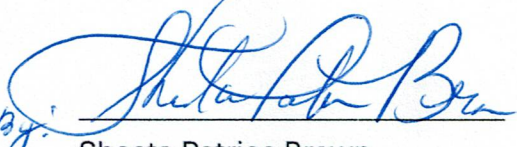
**CERTIFICATE OF SERVICE**

I certify that on 22 August, 2025, I served the foregoing Motion to Compel Arbitration Under Common Law and Proposed Order upon the following by Certified Mail:

Secretary's Bureau  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

Office of General Counsel  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
[Jamie.Panzer@pgworks.com](mailto:Jamie.Panzer@pgworks.com)  
[Graciela.christlieb@pgworks.com](mailto:Graciela.christlieb@pgworks.com)

Date: 22 August, 2025

By:   
Shasta Patrice Brown