



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Tracy Tripp, Senior Attorney
Legal Department
Direct Dial: 215-684-6249
FAX: 215-684-6798
E-mail:tracy.tripp@pgworks.com

August 28, 2025

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: **Sonya Blackwood v. Philadelphia Gas Works, Docket No. C-2025-3055586**

Dear Secretary Homsher:

Enclosed for filing is Philadelphia Gas Works' Application for Subpoenas Ad Testificandum and Duces Tecum for Danella and its employees in the above-captioned matter.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,

/s/ Tracy Tripp

Tracy Tripp, Esquire

cc: Administrative Law Judge Christopher P. Pell
Beth Morris, Sr. Claims Manager, Danella Companies, Inc.
Bill Sorenson, Superintendent, Danella Companies, Inc.
Jeton Zabiku, Foreperson, Danella Companies, Inc.
Antonio Rodrigues, Danella Companies, Inc.
[w/encl.]

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sonya Blackwood	:	
Complainant	:	
v.	:	Docket No. C-2025-3055586
	:	
Philadelphia Gas Works	:	
Respondent	:	

NOTICE

TO: Bill Sorenson, Superintendent
Jeton Zabiku, Foreperson
Antonio Rodrigues, Foreperson
Danella Companies, Inc.
2290 Butler Pike
Plymouth Meeting, PA 19462

You are hereby notified that you may file a written objection to the attached Application for Subpoena Ad Testificandum and Duces Tecum within ten (10) days from the date of service hereof pursuant to 52 Pa. Code §5.421(f).

A copy of the written objection should be sent to the undersigned and to:

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburgh, PA 17120

Administrative Law Judge Christopher P. Pell
Pennsylvania Public Utility Commission
801 Market Street
Suite 4063
Philadelphia, PA 19107

/s/ Tracy Tripp

Tracy Tripp, Esq.
Philadelphia Gas Works
800 W. Montgomery Ave.
Philadelphia, PA 19122

Dated: August 28, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sonya Blackwood	:	
Complainant	:	
v.	:	Docket No. C-2025-3055586
	:	
Philadelphia Gas Works	:	
Respondent	:	

**PHILADELPHIA GAS WORKS APPLICATION
FOR SUBPOENA AD TESTIFICANDUM AND
DUCES TECUM ADDRESSED TO PECO**

TO THE HONORABLE CHRISTOPHER P. PELL, ADMINISTRATIVE LAW JUDGE:

Pursuant to 52 Pa. Code §5.421, the Philadelphia Gas Works (“PGW”) hereby requests Administrative Law Judge Christopher P. Pell to issue the attached subpoenas upon the custodian of records of Danella Companies, Inc. In support of its application, PGW respectfully represents the following:

Materiality, Relevance, and Scope

1. On June 28, 2025, Sonya Blackwood filed a formal complaint with the Pennsylvania Public Utility Commission alleging that she received inadequate service regarding the construction work performed on and around her property at 6228 N. Front Street from March 2023 through October 2023.

2. Danella Companies, Inc. (“Danella”) performed the work in question on PGW’s behalf, including, specifically, the repaving of the sidewalk at issue.

3. PGW seeks witnesses from Danella to A) authenticate and contextualize, via testimony, contemporaneous photos of the job site and work by employees who were present when it was performed and B) provide any other documentary evidence relating to work on 6228 N. Front Street and the nearby properties that resides solely in Danella’s possession which may be relevant to Ms. Blackwood’s complaint and PGW’s defense, and C) testify as to Danella’s rationale for certain construction decisions.

5. The records sought are relevant and material as they contain information necessary to the for the factfinder to make the central determination of the case – i.e., the adequacy of the quality of service provided to Complainant.

Facts to be Proved

6. The existence and quality of work performed at the Complainant's property.

7. PGW believes that the requested records will show whether and what cause Danella had for construction decisions it made which may have caused water to pool at Complainant's property.

WHEREFORE, PGW respectfully requests Administrative Law Judge Christopher P. Pell to:

1. Issue the attached subpoenas ad testificandum and duces tecum directing Danella Companies employees to appear at the scheduled Hearing with responsive documents; and
2. Grant any additional relief which is just and appropriate under the circumstances.

/s/ Tracy Tripp

Tracy Tripp, Esq.
Philadelphia Gas Works
800 W. Montgomery Ave.
Philadelphia, PA 19122

Dated: August 28, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Application for Subpoena Ad Testificandum and Duces Tecum addressed to Danella Companies, Inc. upon the participants listed below, in accordance with the requirements of 52 Pa.Code §§ 1.55 and 5.421(b)(4):

By ELECTRONIC AND FIRST-CLASS MAIL:

Bill Sorenson
bsorenson@danella.com
2290 Butler Pike
Plymouth Meeting, PA 19462

Jeton Zabiku
jzabiku@danella.com
2290 Butler Pike
Plymouth Meeting, PA 19462

Antonio Rodrigues
arodrigues@danella.com
2290 Butler Pike
Plymouth Meeting, PA 19462

BY ELECTRONIC MAIL & E-SERVICE

Administrative Law Judge Christopher P. Pell
c/o Legal Asst. Eric Ball
erball@pa.gov

Sonya Blackwood
Sonyaclarke2001@yahoo.com

/s/ Tracy Tripp

Tracy Tripp, Esq.

Dated: August 28, 2025