

COMMONWEALTH OF PENNSYLVANIA
(Public Utility Commission)

-----*
ERIN BRENNER, :
Complainant, : Docket No.:
vs. : C-2025-3054534
PHILADELPHIA GAS WORKS, :
Respondent. :
-----*

Pages 1 through 83

TELEPHONIC HEARING
Judge's Chambers
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Wednesday, October 22, 2025
Met, pursuant to notice, at 10:00 a.m.

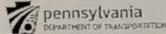
BEFORE: THE HONORABLE EMILY A. FARREN
Administrative Law Judge

INDEX TO EXHIBITS
Docket No.: C-2025-3054534
Hearing Date: October 22, 2025

EXHIBITS INDEX

NUMBER		MARKED	IN EVIDENCE
COMPLAINANT:			
1	(Form with DMV address change)	39	39
PHILADELPHIA GAS WORKS:			
1	(Letter from PGW to customer for dispute 4/14/2020 for Arthur Street)		72
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(Page 1 of 2) (5/17-18)



NON-COMMERCIAL DRIVER'S LICENSE / IDENTIFICATION CARD / LEARNER'S PERMIT APPLICATION TO RENEW / REPLACE / CHANGE / CORRECT

APPLICANT MUST APPEAR IN PERSON

MUST CHECK ONE: DRIVER'S LICENSE LEARNER'S PERMIT IDENTIFICATION CARD

A YOU MUST COMPLETE ALL PARTS OF SECTION A

ISSUE PERIOD (SEE REVERSE)	LAST NAME	MR, MRS
7/1/2025	Brenner	
FIRST NAME	MIDDLE NAME	
Ann	N	
DATE OF BIRTH	TELEPHONE NUMBER (AREA NO. & NUMBER)	E-MAIL ADDRESS (IF APPLICABLE)
07/02/1990	267-423-0857	WIL0620097@gmail.com

B REASON (* must be notarized)

ADDED/END RENEW STOLEN MUTILATED
 ADULT CHANGE/CORRECT NEVER RECEIVED
 OTHER

PRODUCT NEEDED

CAMERA CARD (See reverse for notarization)
 LICENSE/ID CARD LEARNER'S PERMIT UPDATE CARD
 MOTORCYCLE (license only renewal) NOTE: Class M information see reverse

Pennsylvania strongly supports organ and tissue donation because of its life-saving and life-enhancing opportunities.

ORGAN DONOR DESIGNATION ADD (Parental consent in Section D required if under 18) DO NOT ADD REMOVE

C CHANGE OR CORRECTION ONLY (Important information on reverse side)

ADDRESS CHANGE - A Post Office Box number may be used in addition to the actual residence address, but cannot be used as the only address. See reverse if using an out-of-state address.

STREET ADDRESS: 777 Rozel Avenue

CITY: Southampton STATE: PA ZIP CODE: 18966

YES NO
 If you are a registered voter in PA, would you like us to notify your county voter registration office of this change?
 If you are not a registered voter, you may contact your county voter registration office.

NAME CHANGE (Please note all name changes must be done to person with original documents) REASON: MARRIAGE DIVORCE OTHER (see reverse side)

LAST NAME: JR, ETC. FIRST NAME: MIDDLE NAME:

OTHER CHANGES

EYE COLOR (Please check one): BLUE BROWN GREEN HAZEL PINK BLACK GRAY DICHROMATIC OTHER

CONNECTION OF DATE OF BIRTH: MONTH, DAY, YEAR HEIGHT: FEET, INCHES SOCIAL SECURITY NUMBER: DROP PRIVILEGE: DROP CLASS M

D MUST BE COMPLETED IF APPLICANT IS UNDER THE AGE OF 18 APPLYING FOR A LEARNER'S PERMIT OR ORGAN DONOR DESIGNATION

I hereby certify that I am a Parent, Guardian, Person in Loco Parentis, or Spouse at least 18 years of age, of the applicant named herein, that the statements made hereon are true and correct to the best of my knowledge and that this application is made with my full consent.

E FOR DRIVER'S LICENSE AND LEARNER'S PERMIT

No person may hold more than one valid license at any time. If you have a license from another state, do not use this form. YOU MUST go to a Driver License Examination Center to surrender your out-of-state license and make application for a replacement PA license.

1. YES NO - Do you hold a valid driver's license issued by any other state?
 2. YES NO - Is your driver's license or driving privilege suspended or revoked in this state or any other state?
 3. YES NO - Do you have any pending criminal charges or driving violations in this state or any other state which may carry a possible penalty of suspension or revocation of your driver's license or driving privilege?
 If yes to any question, give state, date and reason.

F AUTHORIZATION AND CERTIFICATION

For Veterans wishing to add the Veterans Designation to their Driver's License or ID Card. I certify under penalty of law that I am a qualified applicant and hereby request it be added to my product. I understand that misrepresentation will result in the cancellation of my driver's license and/or identification card.

I acknowledge that receiving a Pennsylvania Permit, License or ID card will cancel or invalidate any Permit, License or ID card from another state. I certify under penalty of law that all information given on this application is true and correct. I hereby authorize the Social Security Administration to release to the Department of Transportation information concerning my Social Security Identifier Number for the purpose of identification. If using a Messenger Service, I hereby authorize the Department to furnish this with my driving record for the purpose of processing this form. I hereby acknowledge this day that I have received notice of the provisions of Section 3701 of the Vehicle Code (See request for privacy).

I wish to contribute \$1 to the Driver's Education Fund (See reverse)

I wish to contribute \$3 to the Motorist's Trust Fund (See reverse)

APPLICANT'S SIGNATURE (Date)

Ann Brenner (Date)

G NOTARY PUBLIC (See instructions on back)

SUBSCRIBED AND SWORN TO before me on this _____ day of _____, 2018

MY COM. NO. _____ EXPIRES _____

SIGNATURE OF NOTARY PUBLIC

STATE OF PENNSYLVANIA

NOTARY PUBLIC

PAID BY: Check Money Order Payable to PennDOT (PennDOT does not accept cash, credit or debit cards) TOTAL \$ 29.50

Nov 6 2018 Date I Changed Address



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

**Graciela Christlieb, Senior Attorney
Legal Department**

Direct Dial: 215-684-6164

FAX: 215-684-6798

E-mail: graciela.christlieb@pgworks.com

April 30, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Erin Brenner v. Philadelphia Gas Works; Docket No. C-2025-3054534

Dear Secretary Chiavetta:

Enclosed for filing please find Philadelphia Gas Works' Answer with New Matter to Formal Complaint in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

Enclosure

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Answer with New Matter upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Erin Brenner
6335 Carnation Street, B
Philadelphia, PA 19144
erinb901@yahoo.com

Date: April 30, 2025

/s/ Graciela Christlieb
Graciela Christlieb, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Erin Brenner,	:	
	:	
Complainant,	:	
v.	:	Docket No. C-2025-3054534
	:	
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

NOTICE TO PLEAD

To: Erin Brenner

Pursuant to Pa. Code § 5.63, you are hereby notified that any reply to the new matter in the enclosed Answer with New Matter of Philadelphia Gas Works must be filed within twenty (20) days of the date of service of the Answer with New Matter.

All pleadings, such as a Reply to New Matter, must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for PGW and, when applicable, the Administrative Law Judge presiding over the proceeding. Failure to file a timely reply to new matter may result in relevant facts stated in the new matter being deemed admitted.

/s/ Graciela Christlieb
 Graciela Christlieb, Esquire
 Philadelphia Gas Works
 800 W. Montgomery Avenue
 Philadelphia, PA 19122
graciela.christlieb@pgworks.com

Date: April 30, 2025

Counsel for PGW

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Erin Brenner,	:	
Complainant,	:	
v.	:	Docket No. C-2025-3054534
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

**PHILADELPHIA GAS WORKS’
ANSWER TO FORMAL COMPLAINT WITH NEW MATTER**

Pursuant to 52 Pa. Code §5.61 & §5.62, Philadelphia Gas Works (“PGW” or “Respondent”) hereby submits this Answer to the Formal Complaint with New Matter (“Complaint”) of Erin Brenner (“Complainant”) that was served by the Secretary of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) on April 10, 2025. In support of this Answer, PGW avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. PGW admits that on April 3, 2025, it issued a shut-off notice for the gas service at 6335 Carnation Street, B, Philadelphia, PA (“Service Address”).

PGW denies there are incorrect charges on the bills for the gas service at the Service Address.

PGW denies that there is a reliability, safety, or quality problem with the gas service at the Service Address.

By way of further answer, the Complainant established gas service at the Service Address as of April 17, 2024.

5. Denied. The averments contained in this paragraph are a prayer for relief to which no response is required.
6. Admitted.
7. Admitted.

NEW MATTER

8. The Complainant previously had gas service at 3408 Arthur Street, Philadelphia, PA from March 6, 2016, through March 27, 2020.

9. On March 27, 2020, the Complainant contacted PGW to establish gas service at 5359 Eadom Street. During the call, the Complainant indicated that she moved out of Arthur Street two years prior. PGW advised that the company has no record of her contacting the company to discontinue service at Arthur Street.

10. PGW took the gas service at Arthur Street out of the Complainant's name as of March 27, 2020, and began gas service for her at Eadom Street as of the same date.

11. The Complainant requested entered a billing dispute for the balance from Arthur Street.

12. On April 14, 2020, PGW mailed the Complainant a utility report regarding her dispute, attached hereto as attachment "A," wherein PGW advised that an investigation of the dispute had been completed, and it was determined that she is responsible for the balance in question as there is no record of the Complainant contacting PGW requesting to discontinue service at 3408 Arthur Street prior to March 27, 2020.

13. The statute of limitations at 66 Pa.C.S. § 3314 provides that no action for recovery of penalties or forfeitures, or any prosecution, may be maintained unless brought within three years from the date the liability arose.

14. The statute of limitations at 66 Pa.C.S. § 3314 divests the Commission of jurisdiction to hear an action brought more than three years from the date the liability arose.

15. The Complainant filed the Complaint on April 10, 2025.

16. To the extent that the Complaint raises issues pertaining to charges and/or bills issued to the Complainant prior to April 10, 2022, those issues are barred by the statute of limitations.

WHEREFORE, PGW respectfully requests that the Commission deny all relief requested in the Complaint, dismiss the Complaint, and grant any other relief in favor of PGW as deemed appropriate.

Respectfully submitted,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire
Attorney I.D. 200760
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
Telephone: (215) 684-6164
graciela.christlieb@pgworks.com

Date: April 30, 2025

Counsel for PGW

A

Philadelphia Gas Works



800 W. Montgomery Ave., Philadelphia, PA 19122
Telephone: 215-787-1288

Telephone 215-787-1288
Fax 215-684-6996

April 14, 2020

Erin Brenner
5359 Eadom Street
Philadelphia, PA 19137

Account Number: [REDACTED]
3408 Arthur Street

Dear Erin Brenner,

On March 27, 2020, a dispute was filed with the Philadelphia Gas Works (PGW) about the the bills for 3408 Arthur Street.. In your dispute, you stated that you moved out of the property two years ago, and would like the bills canceled from October of 2018 to present.

A review of our records indicates the following:

On March 7, 2016, you called in to have the service at 3408 Arthur Street placed into your name. Our records do not indicate that you contacted PGW to request that the gas service be turned off in your name at that location. On August 1, 2018, a PGW technician attempted to shut the gas off due to non-payment and was refused access, noting that a pit bull was also at that location.

PGW's Tariff and PUC regulations require that a customer must provide at least seven (7) days' notice prior to the date the service is to be cancelled. In the absence of notice, the customer is responsible for the service as billed. PGW's position is that you are responsible for the service, as billed, due to lack of prior notice until March 6, 2016.

To assist you in your review of our findings, we are including the following documents:

1. A statement of account
2. Sections of PGW Tariff or PUC regulations

PGW Tariff 5.5.A Notice of discontinuance. Except where the provisions of Discontinuance of Service to Leased Premises, 66. Pa.C.S.& 1521 et seq. apply, the Customer is required to give the Company at least seven days notice to discontinue the supply of Gas specifying the date on which it is desired that service be discontinued. In absence of notice, the Customer shall be responsible for services rendered.

PUC Chapter 56 56.16. Transfer of accounts.(a) A ratepayer who is about to vacate premises supplied with utility service or who wishes to have service discontinued shall give at least 7 days notice to the utility and a non-ratepayer occupant, specifying the date on which it is desired that service be discontinued. In the absence of a notice, the ratepayer shall be responsible for services rendered.

Please be advised that as of April 29, 2020, your account will become delinquent and subject to collection action. If you have any further questions please call 215-787-1288.

Philadelphia Gas Works



800 W. Montgomery Ave., Philadelphia, PA 19122
Telephone: 215-787-1288

Sincerely,

Mrs. Shirley Morrison.
Dispute Resolution Unit

Additional information regarding the content in this letter can be obtained by calling or writing us at:

P.O. Box 3500, Philadelphia, PA 19122, Telephone #: 215-787-1288

Payments can be made by phone at 215-235-1000, online at www.pgworks.com, by mail to P.O. Box 11700, Newark, NJ 07101 or at any of our (6) convenient Customer Service Centers or any authorized payment center. Information regarding our Customer Service Centers and authorized payment centers is available upon request.

If you do not agree with this report, you may file an informal complaint with the Pennsylvania **Public Utility Commission** to ensure preservation of your rights.

You can file an informal complaint at the following:

Telephone #: 1-800-692-7380

or

P.O. Box 3265, Harrisburg, Pa 17105-3265

or

<http://www.puc.state.pa.us>

When you file an informal complaint, the Public Utility Commission will need to know the following:

1. The name of the ratepayer (your name).
2. Your mailing address and, if different, the address at which service is provided.
3. Your account number.
4. The name of the utility with which you have the dispute.
5. A brief statement of the dispute.
6. Whether the utility has investigated and reported to you on the matter being disputed.
7. Whether the dispute has been subject of the previous complaint filed with the Commission.
8. The date, if any, of proposed termination.
9. What you would like the Commission to do.

VERIFICATION

I, Graciela Christlieb, hereby state that I am counsel for the Philadelphia Gas Works, that the facts set forth in the foregoing Answer with New Matter are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: April 30, 2025

/s/ Graciela Christlieb
Graciela Christlieb, Esquire



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

**Graciela Christlieb, Senior Attorney
Legal Department**

Direct Dial: 215-684-6164

FAX: 215-684-6798

E-mail: graciela.christlieb@pgworks.com

April 30, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Erin Brenner v. Philadelphia Gas Works; Docket No. C-2025-3054534

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' Preliminary Objection to the Formal Complaint in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Preliminary Objection upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Erin Brenner
6335 Carnation Street, B
Philadelphia, PA 19144
erinb901@yahoo.com

Date: April 30, 2025

/s/ Graciela Christlieb
Graciela Christlieb, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Erin Brenner,	:	
	:	
Complainant,	:	
v.	:	Docket No. C-2025-3054534
	:	
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

NOTICE TO PLEAD

To: Erin Brenner

Pursuant to Pa. Code § 5.101, you are hereby notified that any answer to the enclosed Preliminary Objections of Philadelphia Gas Works must be filed within ten (10) days of the date of service of the Preliminary Objection.

All pleadings, such as an Answer to Preliminary Objections, must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for PGW and, when applicable, the Administrative Law Judge or Special Agent presiding over the proceeding.

/s/ Graciela Christlieb
 Graciela Christlieb, Esquire
 Philadelphia Gas Works
 800 W. Montgomery Avenue
 Philadelphia, PA 19122
graciela.christlieb@pgworks.com

Date: April 30, 2025

Counsel for PGW

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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v.	:	Docket No. C-2025-3054534
	:	
	:	
Philadelphia Gas Works,	:	
	:	
Respondent.	:	

**PHILADELPHIA GAS WORKS’
PRELIMINARY OBJECTION TO FORMAL COMPLAINT**

Philadelphia Gas Works (“PGW” or “Respondent”) submits the following Preliminary Objection to the Formal Complaint of Erin Brenner (“Complainant”) served by the Secretary of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) on April 10, 2025 (“Complaint”). Pursuant to 52 Pa. Code §§ 5.61, 5.62 & 5.101(d) of the Commission’s regulations, PGW filed an Answer with New Matter to the Complaint on this same date. In support of this Preliminary Objection, PGW states as follows:

I. INTRODUCTION

Complainant is challenging a balance that accrued at her previous address, 3408 Arthur Street, Philadelphia, PA between 2018 and 2020. The Complainant was aware of this balance and disputed it with PGW in March of 2020.

II. LEGAL STANDARDS FOR PRELIMINARY OBJECTIONS

1. The Commission’s Rules of Administrative Practice and Procedure permit the filing of preliminary objections.¹ The Commission’s procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil practice.²

2. Under Section 5.101(a) of the Commission’s regulations, preliminary objections must specifically state the legal and factual grounds relied upon and be limited to the following:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding;
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter;
- (3) Insufficient specificity of a pleading;

¹ 52 Pa. Code § 5.101(a)(1)-(7). *Equitable Small Transportation Interveners v. Equitable Gas Company*, 1994 Pa. P.U.C. LEXIS 69, Docket No. C-00935435 (July 18, 1994).

² *Id.*

- (4) Legal insufficiency of a pleading;
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action;
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution; and
- (7) Standing of a party to participate in the proceeding.

3. The moving party may not rely on its own factual assertions but must accept for the purposes of disposition of the preliminary objection all well-pleaded, material facts of the other party, as well as every inference fairly deducible from those facts.³ However, the Commission need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations or expressions of opinion.⁴

4. In deciding the preliminary objections, the Commission must determine whether, based on the well-pleaded factual averments of the party, recovery or relief is possible.⁵

III. PRELIMINARY OBJECTIONS BY PGW

5. PGW's responses to Paragraphs 1 to 7 of the Complaint are incorporated herein by reference. In addition, PGW's New Matter to the Complaint is also incorporated herein by reference as well as any exhibits attached thereto.

A. Dismissal Based on Lack of Commission Jurisdiction

6. Section 5.101(a)(1) of the Commission's regulations permits a party to file a preliminary objection based on the lack of Commission jurisdiction. To act on the Complaint, the Commission must have jurisdiction. The Commission, as a creation of the General Assembly, has only the powers and authority granted to it by the General Assembly contained in the Public Utility Code. The Commission must act within, and cannot exceed, its jurisdiction. Jurisdiction may not be conferred by the parties where none exists. Subject matter jurisdiction is a prerequisite to the exercise of power to decide a controversy.

7. The statute of limitations at 66 Pa.C.S. § 3314 is a jurisdictional issue. It requires that any complaint seeking relief under the Public Utility Code be brought within three years from the date at which the liability therefor arose. As a jurisdictional issue, the statute of limitations and

³ County of Allegheny v. Cmwth. of Pa., 490 A.2d 402 (Pa. 1985).

⁴ Stanton-Negley Drug Co. v. Dep't of Pub. Welfare, 927 A.2d 671, 673 (Pa. Cmwth. 2007).

⁵ Department of Auditor General, et al. v. SERS, et al., 836 A.2d 1053, 1064 (Pa. Cmwth. 2003); P.J.S. v. Pa. State Ethics Commission, 669 A.2d 1105 (Pa. Cmwth. 1996).

the Commission's lack of jurisdiction may be raised at any time. *See, e.g., Application of Laurel Pipe Line Company*, Docket No. A-2016-2575829 (Order entered July 12, 2018) and *Hasty v. Philadelphia Gas Works*, Docket No. C-2014-2419203 (Final Order entered January 27, 2015).

8. The Complainant filed the instant Complaint on April 10, 2025.

9. Causes of action regarding the bills for gas service issued to the Complainant at her previous address issued between 2018 and 2020 fall outside the applicable statutory period of limitation and are barred under 66 Pa.C.S. § 3314.

IV. CONCLUSION

WHEREFORE, PGW respectfully requests that this Commission grant PGW's Preliminary Objection, dismiss issues raised in the Complaint regarding bills that were issued at 3408 Arthur Street, Philadelphia, PA as beyond the statute of limitations, and grant any other relief to PGW that is deemed to be reasonable and appropriate.

Respectfully submitted,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
graciela.christlieb@pgworks.com

Date: April 30, 2025

Counsel for PGW

Specific Service Agreement Statement of Account SA- 2138045812

Customer Name	From Date	To Date		
ERIN BRENNER	10/14/2023	10/14/2025		
Service Address	Account Number	S A Number	Meter	Rate/Class
6335 CARNATION ST Apt B PHIL, PA 191441616		2138045812	2275082	GS

STATEMENT

Transaction Date	Transaction Type	Reading	Read Code	# of Days	CCF Usage	Average CCF/Day	Heating DDDs	Payment Type	Due Date	Transaction Amount	Current Balance	Actual Balance
5/22/2024	BILL	1044	R	33	28	0.85	189		6/17/2024	\$57.46	\$57.46	\$57.46
6/21/2024	LPC									\$0.86	\$58.32	\$58.32
6/21/2024	BILL	1052	R	30	8	0.27	0		7/17/2024	\$28.63	\$86.95	\$86.95
7/23/2024	LPC									\$1.29	\$88.24	\$88.24
7/23/2024	BILL	1058	R	30	6	0.2	0		8/15/2024	\$25.73	\$113.97	\$113.97
8/21/2024	LPC									\$1.67	\$115.64	\$115.64
8/21/2024	BILL	1065	R	31	7	0.23	0		9/16/2024	\$27.09	\$142.73	\$142.73
9/21/2024	LPC									\$2.08	\$144.81	\$144.81
9/21/2024	BILL	1074	R	31	9	0.29	1		10/15/2024	\$29.83	\$174.64	\$174.64
10/22/2024	LPC									\$2.53	\$177.17	\$177.17
10/22/2024	BILL	1084	R	29	10	0.34	71		11/15/2024	\$31.42	\$208.59	\$208.59
11/22/2024	LPC									\$3.00	\$211.59	\$211.59
11/22/2024	BILL	1100	R	33	16	0.48	262		12/18/2024	\$43.81	\$255.40	\$255.40
12/21/2024	BILL	1114	R	29	14	0.48	683		1/17/2025	\$37.23	\$292.63	\$292.63
1/25/2025	BILL	1151	R	35	37	1.06	1156		2/19/2025	\$67.67	\$360.30	\$360.30
2/22/2025	LPC									\$5.23	\$365.53	\$365.53
2/22/2025	BILL	1186	R	28	35	1.25	859		3/18/2025	\$67.57	\$433.10	\$433.10
3/25/2025	LPC									\$6.24	\$439.34	\$439.34
3/25/2025	BILL	1215	R	29	29	1	538		4/17/2025	\$67.01	\$506.35	\$506.35
4/24/2025	BILL	1246	R	32	31	0.97	379		5/19/2025	\$69.89	\$576.24	\$576.24
5/23/2025	BILL	1260	R	29	14	0.48	37		6/18/2025	\$45.01	\$621.25	\$621.25
6/24/2025	BILL	1276	R	30	16	0.53	44		7/18/2025	\$43.95	\$665.20	\$665.20
7/24/2025	BILL	1282	R	32	6	0.19	0		8/18/2025	\$27.48	\$692.68	\$692.68
8/14/2025	BILL	1285	R	21	3	0.14	0		9/9/2025	\$22.49	\$715.17	\$715.17

Specific Service Agreement Statement of Account SA- 6036530260

Customer Name	From Date	To Date			
ERIN BRENNER	4/17/2024	7/2/2025			
Service Address	Account Number	S A Number	Meter	Rate/Class	
6335 CARNATION ST Apt B PHIL, PA 191441616	[REDACTED]	6036530260	2275082	GS	

STATEMENT

Transaction Date	Transaction Type	Read Reading	# of Days	CCF Usage	Average CCF/Day	Heating DDDs	Payment Type	Due Date	Transaction Amount	Current Balance	Actual Balance
5/8/2024	REXFER								\$3,109.48	\$3,109.48	\$3,109.48

Customer Contact: Billing [X]

Date: 01/25/2023 Time: 9:35:00 AM Source: JetSearch Related Tran: Account Maintenance
CC Type: BILL - Billing [v] Created: 01/25/2023 at: 9:35:48 AM by: RDUTTON
Area: 800 - Residential General Service [v] Changed: at: by:
 Surveyable Auto Delete Date: 01/25/2027 Class: Inquiry

Comments: cor erin brenner called in said need bill sent to 246 w upsal apt e204 gave collection agency number asked if satisfied didn't respond

Letter

Status: Print Date: Run Number: Reprint: [v]
Template:

Review List Tickler

Follow Up: [] to Review Group to User
Priority: [] Review Group... []

Account: [REDACTED] Brenner, Erin [v]
Premise: 5359 Eadom St/Phila,Pa [v]
Person: Brenner, Erin [v]

[Change] [Cancel]

Customer Contact: Billing [X]

Date: 05/06/2024 Time: 12:20:00 PM Source: JetSearch Related Tran: Account Maintenance
CC Type: BILL - Billing [v] Created: 05/06/2024 at: 12:20:26 PM by: LLOPEZ
Area: 800 - Residential General Service [v] Changed: at: by:
 Surveyable Auto Delete Date: 05/06/2028 Class: Inquiry

Comments: Applicant called in to start service at 6335 Carnation St B as of today. Backdate usage to Lease date 04/17/2024, advised applicant of w/o we had to reactivate to start service, she agreed, in the amount of 3,109.48. passed experian with Cno deposit required.

Letter
Status: Print Date: Run Number: Reprint: [v]
Template:

Review List Tickler
Follow Up: [] to Review Group to User
Priority: [] Review Group... []

Account: [REDACTED] Brenner, Erin [v]
Premise: 5359 Eadom St/Phila,Pa [v]
Person: Brenner, Erin [v]

[Change] [Cancel]

Customer Contact: Collection [X]

Date: 11/13/2024 Time: 8:02:00 AM Source: JetSearch Related Tran: Account Maintenance
CC Type: COLL - Collection Created: 11/13/2024 at: 8:02:48 AM by: DDOVE
Area: 800 - Residential General Service Changed: at: by:
 Surveyable Auto Delete Date: 11/13/2028 Class: Inquiry

Comments: cc advised old balance is from 2021 and had to be reactivated gmi \$2000 2hh eligible for crp, sent app placed 15 day hold and updated mailing address. also provided acct# so she can register online if she wants to apply for crp

Letter
Status: Print Date: Run Number: Reprint: [v]
Template:

Review List Tickler
Follow Up: [] to Review Group to User
Priority: [] Review Group... []

Account: [REDACTED] Brenner, Erin [v]
Premise: 6335 Carnation St,B/Phila,Pa [v]
Person: Brenner, Erin [v]

[Change] [Cancel]

Philadelphia Gas Works



800 W. Montgomery Ave., Philadelphia, PA 19122
Telephone: 215-787-1288

Telephone 215-787-1288
Fax 215-684-6996

November 29, 2024

Erin Brenner
6335 Carnation Street, B
Philadelphia, PA 19144-1616

Account Number: [REDACTED]
Service Address: 5359 Eadom Street

Dear Erin Brenner,

On November 22, 2024, a dispute was filed with the Philadelphia Gas Works (PGW). In your dispute, you stated that the balance from 5359 Eadom Street that was transferred to your new address, was for a bill that did not belong to you. You indicated that you moved and the person living there never called to place the service in their name.

A review of our records indicates you established service at 5359 Eadom Street on March 27, 2020. However, there are no records of you requesting to discontinue service. The gas service was finalized in your name as of April 9, 2021, which is the date the new tenant contacted our company and requested to have the service placed in their name.

PGW's Tariff and PUC regulations require that a customer must provide at least seven (7) days notice prior to the date the service is to be cancelled. In the absence of notice, the customer is responsible for the service as billed. PGW's position is that you are responsible for the service, as billed, due to lack of prior notice.

PGW Tariff (5.5.A) Notice of discontinuance: Except where the provisions of the Utility Service Tenants Rights Act apply, the Customer is required to give the Company at least seven days notice to discontinue the supply of Gas specifying the date on which it is desired that service be discontinued. In absence of notice, the Customer shall be responsible for services rendered.

PUC Chapter 56 (56.16) Transfer of accounts: (a) A ratepayer who is about to vacate premises supplied with utility service or who wishes to have service discontinued shall give at least 7 days notice to the utility and a non-ratepayer occupant, specifying the date on which it is desired that service be discontinued. In the absence of a notice, the ratepayer shall be responsible for services rendered.

To assist you in your review of our findings, we are including the following documents:

1. A statement of account
2. Sections of PGW Tariff and PUC regulations

Philadelphia Gas Works



800 W. Montgomery Ave., Philadelphia, PA 19122
Telephone: 215-787-1288

3. Utility report

Please be advised that as of December 19, 2024, your account will become delinquent and subject to collection action. To avoid collection activity, you can pay the bill in full or contact us at 215-235-1000 to determine if you are eligible for a payment agreement.

Sincerely,

S. Morrison
Dispute Resolution Unit

Additional information regarding the content in this letter can be obtained by calling or writing us at:

P.O. Box 3500, Philadelphia, PA 19122, Telephone #: 215-787-1288

Payments can be made by phone at 215-235-1000, online at www.pgworks.com, by mail to P.O. Box 11700, Newark, NJ 07101 or any authorized payment center. Information regarding our authorized payment centers is available upon request.

If you do not agree with this report, you may file an informal complaint with the Pennsylvania **Public Utility Commission** to ensure preservation of your rights.

You can file an informal complaint at the following:

Telephone #: 1-800-692-7380

or

P.O. Box 3265, Harrisburg, Pa 17105-3265

or

<http://www.puc.state.pa.us>

When you file an informal complaint, the Public Utility Commission will need to know the following:

1. The name of the ratepayer (your name).
2. Your mailing address and, if different, the address at which service is provided.
3. Your account number.
4. The name of the utility with which you have the dispute.
5. A brief statement of the dispute.
6. Whether the utility has investigated and reported to you on the matter being disputed.
7. Whether the dispute has been subject of the previous complaint filed with the Commission.
8. The date, if any, of proposed termination.
9. What you would like the Commission to do.

PHILADELPHIA GAS WORKS

PUC

Opening XML

Case Number: 4035422
Company Name: PGW (PHILA. GAS WORKS (NGDC))
Company Code: 0766
Company Type: GAS TRANSPORTER
Customer First Name: ERIN
Customer Middle Initial: N
Customer Last Name: BRENNER
Customer Account Number: [REDACTED]
Customer Home Phone w/ Area Code:
Customer Work Phone w/ Area Code:
Customer Service Class: RESIDENTIAL
Customer Mail Address 1:
Customer Mail Address 2:
Customer Mail Address City:
Customer Mail Address State:
Customer Mail Address Zip:
Customer Mail Address 4-Zip:
Customer Service Address 1: 6335 CARNATION ST
Customer Service Address 2:
Customer Service Address City: PHILADELPHIA
Customer Service Address State: PA
Customer Service Address Zip: 19144
Customer Service Address 4-Zip:
Customer Family Adults: 0
Customer Family Children: 0
Customer Family Age:
Gross Income
Source **Income Amount**
Date Open: 2024-12-11
Reason For Contact: BILLING DISPUTES (# 18)
Term Date: 2024-12-18
Business Name:
Case Problem: 18 – HIGH BILL DISPUTE. THE CUSTOMER IS DISPUTING THE BILL(S) FROM THE MONTH(S) OF AUGUST 2018. I HAVE PROOF FROM DMV THAT I WAS NOT LIVING AT 3408 ARTHUR ST 19136 PAST JULY OF 2018. EVEN THOUGH I CALLED AND CANCELLED SERVICE BACK IN 2018, THE SERVICE CONTINUED IN MY NAME AND HAS FOLLOWED ME. I KNOW ALL PHONE CALLS ARE RECORDED I ASKED THEM TO GO BACK TO PHONE CONVERSATIONS THAT I CALLED AND CANCELLED SERVICE. PGW SAID THAT WAS IMPOSSIBLE TO GO BACK THAT FAR. I HAVE PROOF FROM THE LANDLORD THAT I HAD 30 DAYS TO LEAVE. I THEN MOVED IN WITH MY MOTHER IN 2018. I HAVE A

CURRENT BILL AT 6335 CARNATION ST THAT PGW SENDING MY BILL THE ENTIRE TIME I LIVED HERE TO AN UNKNOWN ADDRESS. - RELIEF SOUGHT - I AM WILLING TO DEFINITELY PAY WHAT I OWE PGW FOR 6335 CARNATION ST BUT I HAVE A BALANCE FROM 2018 AND IT IS ALL FROM 3408 ARTHUR ST WHERE I MOVED OUT. THE CELL PHONE NUMBER [REDACTED] HAS BEEN ALLOWED TO BE SHARED. THE EMAIL ADDRESS ERINB901@YAHOO.COM HAS BEEN ALLOWED TO BE SHARED.

Company Position:

12/10/2024 THEY TOLD ME TO DISPUTE IT AND THAT MY SERVICE IS SET TO BE SHUT OFF ON DECEMBER 18, 2024.

Related Information:

Case Misc Info:

Hot Issue:

Case Origin:

PUC WEBSITE

Prior Case Number:

Universal Service:

M

Arrearage:

0

BCS Investigator First Name:

BCS

BCS Investigator Last Name:

CASE POOL

BCS Investigator Phone w/ Area Code:

[REDACTED]

BCSIntaker First Name:

MARIE

BCSIntaker Last Name:

KENNEDY

Number Of Time Send:

1

Number Of Time Faxed:

0

Number Of Time Faxed:

7172658273

PHILADELPHIA GAS WORKS

PUC

Closing XML

Case Number: 4035422
Company Name: PGW (PHILA. GAS WORKS (NGDC))
Company Code: 0766
Company Type: GAS TRANSPORTER
Customer First Name: ERIN
Customer Middle Initial: N
Customer Last Name: BRENNER
Account Number: XXXXXXXXXX
Service Address 1: 6335 CARNATION ST
Service Address 2:
Service City: PHILADELPHIA
Service State: PA
Service Zip 5: 19144
Service Zip 4:
Decision Issue: Y
Oral Written: W
Violation: NO
Chapter:
Section Rule:
Total Balance: 3469.78
Date Closed: 2025-02-13
Resolution: DECISION ISSUED - THE CUSTOMER FAILED TO REQUEST DISCONTINUATION OF SERVICE FOR HER PRIOR ACCOUNT AT 3408 ARTHUR STREET, PHILADELPHIA, PA. THE COMPANY TRANSFERRED THE OUTSTANDING BALANCE TO THE CUSTOMER'S ACTIVE ACCOUNT IN ACCORDANCE WITH PA REGULATIONS. THE CUSTOMER IS RESPONSIBLE FOR THE PAYMENT OF THE TOTAL ACCOUNT BALANCE OF \$3,469.78. CASE DISMISSED.
Balance Date: 2025-01-09
Service Restored Pay: 0.00
Service Continue Amount: 0.00
Service Continue Date:
Terms:
Special Budget Amount: 0.00
Regular Budget Amount: 0.00
Arrears Payment Plus: 0.00
FinalMonthlyPayment: 0.00
CurrentMonthlyPayment: 0.00
EndMonthlyPayment: 0.00
LetterDescription:
HeadDate: 2025-02-14
Paragraph:

Bill Date:
Reconnect Amount: 0
Pay Amount: 0.00
BCS Investigator First Name: MARIA
BCS Investigator Last Name: VELEZ
Number Of Time Send: 1
Number Of Time Faxed: 0
PUC Fax: 7172658273