



**PHILADELPHIA GAS WORKS**

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November 25, 2025

**VIA ELECTRONIC FILING**

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Steve Frempong v. Philadelphia Gas Works; Docket No. C-2025-3052754

Dear Secretary Homsher:

PGW writes to request a continuance to submit its Replies to Complainant's Exceptions in the above-captioned matter, if the Commission allows his untimely filing. PGW would request 21 days from the date of this letter, to account for the upcoming holidays. PGW believes this request is appropriate given the procedural posture of this matter and some irregularities around Complainant's Exceptions and their filing.

Undersigned counsel has been counsel of record for PGW on this matter since May 20, 2025. I was the attorney who represented PGW at Mr. Frempong's hearing, and have an established email correspondence with him regarding matters in this complaint. In the case of these Exceptions, while he indicates he served Anita Murray, another lawyer at PGW, via first class mail, she received no such correspondence. I also have received no correspondence in any form, either through email, e-service, or first-class mail. Given I am the attorney of record, and Mr. Frempong has documented access to my contact information, I do not believe his "service" on Ms. Murray comports with 52 Pa. Code §1.55. PGW discovered the filing, after checking the docket repeatedly (including the day after Exceptions were due) from a courtesy call from the Secretary's Bureau after it became evident that PGW had not filed any Replies.

Additionally, Mr. Frempong's Exceptions were not timely filed. Originally, Mr. Frempong's Exceptions were due October 9, 2025, and he was granted an extension of time to file them until October 19, 2025.<sup>1</sup> On October 2, 2025, Mr. Frempong left a message for Ms. Murray at PGW, asking if she objected to his request for an extension of time to file Exceptions. Ms. Murray forwarded that voicemail to me, and I then returned Mr. Frempong's call at the number he provided. I recall not being able to leave a voicemail. I then, still on October 2, 2025, followed up with an email to Mr. Frempong voicing our objection to his extension request; he did not reply.<sup>2</sup> Subsequently, he filed a motion for an Extension of Time to File with the commission which stated that he had heard nothing from *Ms. Murray* regarding PGW's position on his request.<sup>3</sup>

While this representation was, at best, disingenuous wordsmithing, PGW saw no reason to address it after the fact, and was prepared to address any Exceptions filed on the merits. However, even with an ill-gotten delay of process, Mr. Frempong did not file his Exceptions until four days after his extended deadline, with no notice or explanation provided for his tardiness. Given his history of less-than-good-faith filings before the Commission,<sup>4</sup> I believe his lack of service here was intentional, and respectfully request an equivalent length of time to digest the lengthy hearing transcript – which PGW received yesterday afternoon – and respond fully both to his Exceptions and abuse of process.

Sincerely,

*/s/ Tracy Tripp*

Tracy Tripp, Esquire

Enclosure

cc: Cert. of Satisfaction [w/enc.]

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<sup>1</sup> See *Secretarial Letter October 9, 2025*, docketed October 9, 2025.

<sup>2</sup> That email is attached to this letter as Appendix A.

<sup>3</sup> See *Motion for Ten Days Extension of Time to File Exceptions* ¶ 3, docketed October 8, 2025.

<sup>4</sup> See e.g., *Steve Atuahene and Agnes Atuahene v. PGW* Docket No. F-2018-3004665 and *Steve Atuahene v. PGW* No. F-2013-2389261 (J. Pell's Initial Decision outlining Complainant's decades-long history of abuse of process before the Commission, across utilities).

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Certificate of Satisfaction 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 FIRST-CLASS AND ELECTRONIC MAIL**

Steve Frempong  
920 E. Price Street  
Philadelphia, PA 19138  
fas098@yahoo.com

*/s/ Tracy Tripp*

Tracy Tripp, Esquire

Date: November 25, 2025

A

**From:** [Tripp, Tracy](#)  
**To:** [fas098@yahoo.com](mailto:fas098@yahoo.com)  
**Subject:** PUC complaint  
**Date:** Thursday, October 2, 2025 3:42:00 PM  
**Attachments:** [image001.png](#)

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Good afternoon, Mr. Frempong –

It seems you called my colleague Ms. Murray to see if PGW would object to you requesting an extension of time to file exceptions to the judge’s initial decision in your complaint. PGW would object to this request; there is adequate time for you to file any exceptions you may have.

Respectfully,

Tracy Tripp



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