



PHILADELPHIA GAS WORKS

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December 1, 2025

VIA ELECTRONIC FILING

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

Re: Bhavesh Patel v. Philadelphia Gas Works; Docket No. C-2025-3055064

Dear Secretary Homsher:

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

Sincerely,

/s/ Tracy Tripp

Tracy Tripp, Esquire

Enclosure

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



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Reply Exceptions 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

Bhavesh Patel c/o
Edwin L. Stock, Esq.
estock@estocklaw.com

Date: December 1, 2025

/s/ Tracy Tripp
Tracy Tripp, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Bhavesh Patel,	:	
Complainant,	:	
v.	:	Docket No. C-2025-3055064
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

REPLY EXCEPTIONS OF PHILADELPHIA GAS WORKS

Pursuant to 52 Pa. Code §5.535 of the regulations of the Pennsylvania Public Utility Commission (“Commission”), the Philadelphia Gas Works (“PGW” or “Respondent”) hereby submits the following Reply to the Exceptions filed by Bhavesh Patel (“Complainant”) to the Initial Decision of Deputy Chief Administrative Law Judge Christopher Pell (“Judge Pell”) in this matter (“Initial Decision”).

I. INTRODUCTION

On May 9, 2025, the Complainant filed a Formal Complaint (“Complaint”) with the Commission against PGW wherein he alleges *inter alia* that there are incorrect charges on his bill and that he should be refunded money he paid to have gas service restored at the Service Address under a new company (“Hari Shambu”) name.

On May 30, 2025, PGW filed its Answer wherein it denied the material allegations of facts and conclusions of law.

On June 3, 2025, the Commission served an initial telephonic hearing notice setting a formal call-in hearing for this matter for August 5, 2025, at 10:00 a.m. and assigning Judge Pell as the presiding officer. The hearing convened as scheduled. The Complainant appeared, represented by counsel, and was the sole witness presented. PGW appeared represented by counsel, also with one witness.

Judge Pell issued the Initial Decision on October 31, 2025.

On November 20, 2025, the Complainant filed Exceptions to the Initial Decision and served PGW with Complainant’s Exceptions to the Initial Decision. PGW’s Reply to Complainant’s Exceptions follows.

II. COMPLAINANT’S EXCEPTIONS AND PGW’S REPLY

Exception

In his first Exception, Complainant addresses Finding of Fact No. 8., i.e, that Aaron Anderson and Complainant are business partners. Complainant argues that franchisor/franchisee is a different relationship than a partnership.

Reply

The Complainant has failed to identify any error in law or fact that would support reversal of Judge Pell’s finding regarding Mr. Anderson’s and Patel’s business relationship. Judge Pell explicitly recognized in Finding of Fact No. 8 that Anderson and Patel have franchisor/franchisee relationship: “Aaron Anderson is the Complainant’s partner in the franchising of Sunrise Social as the Complainant has a franchise agreement with Mr. Anderson.” ID at p.12.

Exception

In his second Exception, Complainant addresses the finding that Mr. Anderson and Complainant are, “in business together.”

Reply

The Complainant has failed to identify any error in law or fact that would support reversal of Judge Pell’s finding that Complaint and Aaron Anderson were “in business together.” Complainant acknowledges that he and Anderson have a “franchisee/franchisor” relationship, which, on its face, means they conduct business between themselves, or, in other words, “together.”

Exception

In his third Exception, Complainant addresses the Judge’s holding that Mr. Patel is not entitled to a refund of monies paid to restore gas service at the Service Address.

Reply

The Complainant has failed to identify any error in law or fact that would support reversal of Judge Pell’s finding that Complaint is not entitled to a refund. Complainant cites to no legal authority in any of his exceptions. Complainant repeatedly states that Complainant and Mr. Anderson are in a franchisee/franchisor relationship – aka a form of business relationship with mutual benefit – which supports Judge Pell’s findings.

III. CONCLUSION

WHEREFORE, PGW respectfully requests that this Commission deny Complainant's exceptions and adopt the Initial Decision.

Respectfully submitted,

/s/ Tracy Tripp

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Date: December 1, 2025

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