

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Ka'Deitra Buffaloe :
Complainant, :
v. : Docket No. C-2025-3059206
:
Philadelphia Gas Works, :
Respondent. :

**REPLY TO NEW MATTER OF
RESPONDENT PHILADELPHIA GAS WORKS**

Complainant, Ka'Deitra Buffaloe, hereby submits the following Reply to the New Matter filed by Philadelphia Gas Works ("PGW"):

GENERAL RESPONSE

To the extent PGW's New Matter contains conclusions of law, arguments, or characterizations not expressly admitted herein, they are denied.

SPECIFIC REPLIES

Paragraph 8 — Denied.

Complainant denies that she seeks monetary damages. The Complaint requests investigation and correction of PGW's account-handling and payment-acceptance practices, including PGW's refusal to accept tenant payments and its issuance of payoff information contrary to Complainant's instructions. These matters fall within the Commission's regulatory jurisdiction.

Paragraph 9 — Denied as stated.

Complainant acknowledges that the Commission does not award tort damages. However, the relief requested is regulatory in nature, including findings, directives, and corrective measures permitted under 52 Pa. Code Chapter 56.

Paragraph 10 — Denied.

This matter does not concern a lien. No lien was ever filed or recorded against the property. Despite there being no lien, PGW issued payoff information and accepted payment after Complainant explicitly instructed that no tenant utility balances be paid at closing. Furthermore, the funds were not applied to any account belonging to Complainant, but instead were applied solely to tenant accounts. The Complaint concerns regulated customer-service and billing practices, not lien adjudication.

Paragraphs 11–12 — Denied. Standing Exists.

Complainant has standing because PGW's actions directly and foreseeably caused financial harm, including PGW's refusal to accept tenant payments, issuance of payoff information despite objection and no lien, and application of funds to tenant accounts rather than any account belonging to Complainant.

CLARIFICATION OF MISLEADING STATEMENT BY PGW

PGW states that Complainant "has never been the customer of record" at 1657 Margaret Street — 1F. That statement is incorrect. Complainant was the PGW account holder for the 1F unit from approximately 2009 through August 2017 while personally occupying that unit. PGW's contrary statement is factually inaccurate and misleading.

PRAYER FOR RELIEF

WHEREFORE, Complainant respectfully requests that the Commission deny PGW's New Matter, allow this Complaint to proceed on the merits, investigate PGW's payment-acceptance and billing practices, direct corrective action, and grant such other relief as is just and proper.

Respectfully submitted,

Ka'Deitra Buffaloe
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Wilmington, DE 19808
Email: Kadeidra262@gmail.com

Date: 1/13/2026


Ka'Deitra Buffaloe

VERIFICATION

I verify that the statements made in this Reply to New Matter are true and correct to the best of my knowledge, information, and belief. I understand that false statements are subject to the penalties of 18 Pa.C.S. §4904.

Date: 1/13/2026


Ka'Deitra Buffaloe

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Reply to New Matter upon counsel for Philadelphia Gas Works, Tracy Tripp, Esquire, via electronic mail at tracy.tripp@pgworks.com, in accordance with 52 Pa. Code §1.54.

Date: 1/13/2026


Ka'Deida Buffaloe