



PHILADELPHIA GAS WORKS

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January 20, 2026

VIA ELECTRONIC FILING

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

Re: Consuelo Suarez v. Philadelphia Gas Works; Docket No. C-2025-3054512

Dear Secretary Homsher:

Enclosed for electronic filing please find Philadelphia Gas Works' Replies to Complainant's Exceptions to the Initial Decision issued 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' Replies to 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

Consuelo Suarez

218cherrera@gmail.com

Date: January 20, 2026

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Consuelo Suarez,	:	
Complainant,	:	
v.	:	Docket No. C-2025-3054512
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

**PHILADELPHIA GAS WORKS’
REPLY TO COMPLAINANT’S EXCEPTIONS**

Pursuant to 52 Pa. Code §5.535 and the Secretary’s Letter dated December 31, 2025, the Philadelphia Gas Works (PGW or Respondent) hereby submits the following Reply to the Exceptions filed by Consuelo Suarez (Complainant) to the Initial Decision in this matter issued on December 19, 2025 (Initial Decision).

I. INTRODUCTION

On April 10, 2025, the Commission served PGW with the instant Complaint wherein the Complainant alleges that there were incorrect charges on her bills due to theft of service. The Complainant denied that she committed theft.

On April 29, 2025,¹ the Respondent filed an Answer denying the material allegations of the Complaint.

On August 7, 2025, a Telephonic Hearing Notice was issued which scheduled the initial telephonic hearing for September 15, 2025, at 10:00 a.m. before Administrative Law Judge Marta Guhl.

On September 15, 2025, the hearing convened as scheduled. Both parties presented testimony and PGW offered nine exhibits, which were all entered into the record.

On December 19, 2025, Judge Guhl issued the Initial Decision wherein she denied the Complaint.

By Secretarial Letter dated December 31, 2025, the Commission served PGW with Exceptions to the Initial Decision filed by Complainant. PGW’s reply follows.

II. COMPLAINANT'S EXCEPTIONS AND PGW'S REPLY

Exceptions

Complainant's exceptions fail to identify any error in fact or law contained in the Initial Decision. Rather, Complainant's exceptions reiterate the claims in the Complaint and during the hearing.

Reply

Complainant's exceptions fail to demonstrate that the Initial Decision is unsupported by substantial evidence. Complainant fails to address any of the evidence presented by PGW or reference anything in the record that would challenge the finding that she failed to meet her burden of proof.

III. CONCLUSION

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

Respectfully submitted,

/s/ Graciela Christlieb

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Date: January 20, 2026

Counsel for PGW