

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ka'Deitra Buffaloe :

Complainant :

v. : Docket No. C-2025-3059206

Philadelphia Gas Works :

Respondent :

REPLY TO AMENDED NEW MATTER OF RESPONDENT PHILADELPHIA GAS WORKS

Complainant, Ka'Deitra Buffaloe, replies to the Amended New Matter as follows:

GENERAL RESPONSE

All allegations not expressly admitted are denied.

SPECIFIC RESPONSE

PGW does not deny that: (1) tenant payments were refused; (2) Complainant objected to payment at closing; (3) funds were applied to tenant accounts; (4) no lien was recorded; and (5) PGW's certification influenced the settlement process. These omissions are material and undermine PGW's jurisdictional arguments.

Complainant seeks regulatory review of PGW's practices, not adjudication of liens or damages.

Respectfully submitted,



Ka'Deitra Buffaloe

4830 Misty Ct

Wilmington, DE 19808

January 27, 2026

Date

VERIFICATION

I, Ka'Deitra Buffaloe, verify that the statements made in the foregoing Reply are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904.

With:


Ka'Deitra Buffaloe

January 27, 2026

CERTIFICATE OF SERVICE

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

Tracy Tripp, Esquire

Tracy.Tripp@pgworks.com

A handwritten signature in black ink that reads "Ka'Deindra Buffaloe". The signature is written in a cursive, flowing style.

Ka'Deindra Buffaloe

Date: January 27, 2026