



**PHILADELPHIA GAS WORKS**

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May 7, 2026

**VIA ELECTRONIC FILING**

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

Re: Helena Barnhill v. Philadelphia Gas Works; Docket No. C-2025-3056201

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

Helena Barnhill

[hbarnhill5@hotmail.com](mailto:hbarnhill5@hotmail.com)

Date: May 7, 2026

*/s/ Graciela Christlieb*

Graciela Christlieb, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Helena Barnhill,	:	
Complainant,	:	
v.	:	Docket No. C-2025-3056201
	:	
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 April 23, 2026, the Philadelphia Gas Works (PGW or Respondent) hereby submits the following Reply to the Exceptions filed by Helena Barnhill (Complainant) to the Initial Decision in this matter issued on April 6, 2026 (Initial Decision).

**I. INTRODUCTION**

On July 11, 2025, the Commission served PGW with the instant Complaint wherein the Complainant alleges that there is a reliability, safety or quality problem with her utility service. As relief, the Complainant requested that the gas line to her home be moved.

On July 29, 2025, PGW filed an Answer with New Matter (Answer) along with a Notice to Plead. In its Answer, PGW denied the material allegations of the Complaint. In its New Matter, PGW averred that it has not performed any work at the Service Address or Complainant’s service line since February of 2022, thus, the Commission lacks jurisdiction over this matter pursuant to the statute of limitations at 66 Pa.C.S. § 3314, which divests the Commission of jurisdiction over an action brought more than three years from the date the liability arose. PGW requested that the Complaint be dismissed. Complainant did not file an Answer to PGW’s New Matter.

Also on July 29, 2025, PGW filed a Preliminary Objection to the Complaint along with a Notice to Plead. In its Preliminary Objection, PGW reiterated its argument that the statute of limitations at 66 Pa.C.S. § 3314 divests the Commission of jurisdiction in this matter because the alleged liability occurred more than three years ago. Thus, PGW requested the case be dismissed. Complainant did not file an Answer to PGW’s Preliminary Objection.

By Motion Judge Assignment Notice dated September 8, 2025, the parties were informed that Administrative Law Judge F. Joseph Brady (Judge Brady) was assigned as the Presiding Officer in this matter.

On October 2, 2025, Judge Brady issued an Order denying PGW's Preliminary Objection.

By Hearing Notice dated October 6, 2025, an Initial Call-In Telephonic Hearing was scheduled for December 17, 2025.

On December 17, 2025, the hearing convened as scheduled. The Complainant testified on her own behalf and offered no exhibits for the record. PGW presented the testimony of Albert Teti, Superintendent of Revenue Protection and Field Operations at PGW, and offered six exhibits, which were entered into the record. The record closed on January 12, 2026, upon receipt of the transcript of the hearing.

On April 6, 2026, Judge Brady issued the Initial Decision in this matter wherein he dismissed the Complaint pursuant to the Statute of Limitations at 66 Pa.C.S. § 3314(a), found that the Complainant did not present any evidence regarding the safety of the curb valve placement other than her own personal concerns, and ruled that the issue regarding the meter exchange is moot as PGW is the owner of the meter and has the right to exchange it at any time.

By Secretarial Letter dated April 23, 2026, 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**

The Complainant's exceptions are in the form of a generalized disagreement with "all of the decisions" made in the case. The exceptions fail to identify any error in fact or law contained in the Initial Decision. Rather, Complainant's exceptions reiterate the same claims as those made in the Complaint as well as during the hearing.

### **Reply**

Complainant's exceptions fail to demonstrate that the Initial Decision is unsupported by substantial evidence. The exceptions do not in any way address the untimeliness of the Complaint and further fail to address any of the evidence presented by PGW or reference anything in the record that would indicate that there is a basis for the Complaint beyond unfounded personal

concerns. The exceptions simply make the same allegations and arguments the Complainant made during the evidentiary hearing in this matter.

### 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: May 7, 2026

Counsel for PGW