



PHILADELPHIA GAS WORKS

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July 1, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Rashida Pickett v. PGW, Docket No. C - 2014 - 2444967

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.535, the Philadelphia Gas Works ("PGW") hereby files its reply to the Complainant's exceptions to the June 2, 2015, Initial Decision in the above captioned matter.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,


Danielle Leva

Enclosure

cc: Rashida Pickett (Regular Mail)
Linda Pereira (PGW Mail)
Wendy Vacca (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rashida Pickett

v.

Philadelphia Gas Works

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:
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Docket No. C – 2014 – 2444967

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

Pursuant to 52 Pa. Code §5.535, the Secretary's letters dated June 16 & 17, 2015 and the Initial Decision in the above captioned matter, the Philadelphia Gas Works ("PGW") hereby files its reply to the Complainant's exceptions to the Initial Decision issued June 2, 2015, in the above captioned matter.

I. INTRODUCTION

On September 17, 2014, the Complainant filed a complaint with the Commission against PGW seeking a payment arrangement for gas service at 1236 Atwood Road, Philadelphia, PA (Service Address).

On October 20, 2014, PGW filed an answer, asserting that the Complainant has defaulted on three (3) PGW payment agreements and has had three (3) instances of suspension from the Customer Responsibility Program ("CRP").

The hearing in this matter was held on January 22, 2015 in the Philadelphia Regional Office at 801 Market Street before Administrative Law Judge Darlene Heep.

The Complainant, Rashida Pickett, was present and represented herself. Ms. Pickett testified in support of the Complaint. PGW was represented by counsel and presented one witness, Joyshalyn Moore, a Customer Review Unit Officer.

The Initial Decision was issued on June 2, 2015. In the Initial Decision, Judge Heep found that the Complainant had broken three payment arrangements with PGW, had only made six payments in the last 12 months, and had a balance comprised of missed payments, late charges, and a CRP balance of almost \$3,000.00. For those reasons, it was determined that awarding the Complainant a payment arrangement was not in her best interest.

The Complainant filed exceptions to the Initial Decision on or about June 5, 2015. Pursuant to 52 Pa. Code §5.535, and the Secretary's letters dated June 16 & 17, 2015 in this matter, this timely reply follows.

II. PGW'S REPLY TO EXCEPTIONS

The Complainant's Exceptions fail to address any error in fact or law contained in the Initial Decision refuting the conclusion that it is not in the Complainant's best interest to issue a payment arrangement.

Exceptions

1. Defaulting on the 3 previous payment arrangements was not intentional.
2. The Complainant can make payments on a payment arrangement as evidenced by her not being behind and having a positive payment history with PGW.

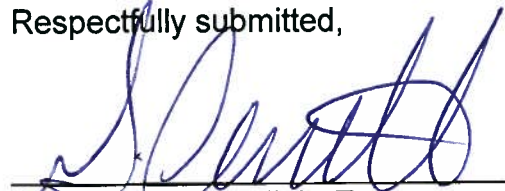
PGW's Reply

1. The Complainant's Exceptions fail to demonstrate that the Initial Decision is unsupported by substantial evidence; they merely reiterate the testimony presented during the hearing in this matter. The Complainant states that it was not her intention to break her payment arrangements, but that he had financial difficulties as a result of health issues.
2. The record of this matter shows that the Complainant is "behind" in that she has a substantial balance, which is the result of missed payments and late payment charges. The record also shows that the Complainant has a poor payment history with PGW in that, as of the time of the hearing, she had only made 6 payments in the last 12 months.

III. CONCLUSION

For the reasons stated above, the PGW requests that the Commission deny the Complainant's Exceptions to the Initial Decision and adopt the Initial Decision issued June 2, 2015 in this matter as written dismissing the Complaint.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Graciela C. Christlieb', written over a horizontal line.

July 1, 2015

Graciela C. Christlieb, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122

CERTIFICATE OF SERVICE

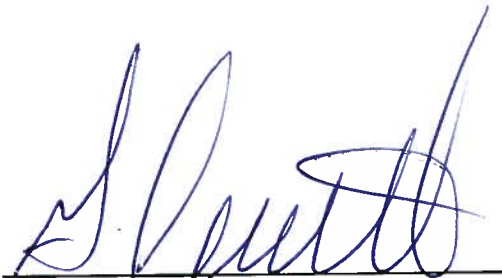
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Ms. Rashida Pickett
1236 Atwood Road
Philadelphia, PA 19151

July 1, 2015

A handwritten signature in blue ink, appearing to read 'Graciela C. Christlieb', written over a horizontal line.

Graciela C. Christlieb, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122