



Philadelphia Gas Works

800 West Montgomery Avenue, Philadelphia, PA 19122

Kristine Trock, Paralegal

Legal Department

Direct Dial: (215) 684-6862

Fax: (215) 684-6798

E-mail: kristine.trock@pgworks.com

May 5, 2009

Administrative Law Judge Guy M. Koster
1302 Philadelphia State Office Building
1400 West Spring Garden Street
Philadelphia, PA 19130

Re: Beulah McCarthy v. PGW, Docket No. C – 2009 – 2084025

Dear Administrative Law Judge Koster:

Enclosed please find the Philadelphia Gas Works ("PGW") Motion for Continuance of Hearing 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,

A handwritten signature in blue ink that reads "Kristine Trock". The signature is written in a cursive, flowing style.

Kristine Trock

Enclosure

cc: James McNulty, Secretary (FedEx)
Ms. Beulah McCartney (Regular Mail)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Beulah McCarthy,	:	
Complainant	:	
v.	:	Docket No. C – 2009 – 2084025
	:	
	:	
PHILADELPHIA GAS WORKS,	:	
Respondent	:	

MOTION FOR CONTINUANCE OF HEARING

Pursuant to 52 Pa. Code § 1.15(b), Respondent, Philadelphia Gas Works (hereinafter “PGW”) hereby requests a continuance of the hearing in this matter scheduled for Wednesday, May 20, 2009. In support of its motion, PGW states as follows:

1. On January 8, 2009, the Complainant, Beulah McCarthy, filed a Formal Complaint disputing the gas bills for gas service rendered at 6810 Torresdale Avenue, Philadelphia, Pennsylvania (Service Address) against PGW in the above captioned matter, which the Commission served upon PGW on January 13, 2009.
2. On January 30, 2009, PGW timely filed an Answer to the Complaint.
3. By notice dated March 5, 2009, the Commission scheduled an In Person hearing in the above captioned matter for Wednesday, May 20, 2009 at 10:00 a.m., before Administrative Law Judge Guy M. Koster in the Pennsylvania State Office Building, Broad and Spring Garden Streets, Philadelphia, Pennsylvania.
4. Counsel for PGW is a member of the Board of Directors of a Pennsylvania nonprofit organization. The hearing date for this matter, May 20, 2009, conflicts with a daylong Continuing Legal Education seminar given by the Pennsylvania Bar Institute (PBI), to which counsel for PGW is scheduled to attend. PBI offers this seminar only once a year.
5. PGW requests a continuance of the hearings scheduled for May 20, 2009 in this matter in order to attend the seminar.

6. As is it practice, PGW has attempted to contact the Complainant to engage in settlement discussions. The telephone number listed to contact the Complainant is disconnected and gas service has been terminated. PGW has learned that, according to the new occupants of the Service Address, the Complainant is no longer at the Service Address and has moved to another state, possibly Florida. PGW has no further information concerning communication with the Complainant.

7. Due to the Complainant's unavailability, PGW is unable to obtain the Complainant's consent to its request for a continuance of the hearing scheduled for May 20, 2009.

8. No previous continuances have been requested or granted in this matter.

WHEREFORE, PGW respectfully requests that this Commission grant a continuance of the hearing scheduled for May 20, 2009 in this matter.

Respectfully submitted,

May 5, 2009



Laureto Farinas, Esq.
Counsel: Philadelphia Gas Works

VERIFICATION

I, Laureto Farinas, hereby declare that I am counsel for the Philadelphia Gas Works. I am authorized to make this verification on its behalf. The facts set forth in the foregoing Answer are true and correct to the best of my knowledge, information, and belief. I expect to be able to prove these facts at a hearing held in this matter. This verification is made subject to the penalties of 18 Pa. C.S. §4904, concerning false statements to authorities.

May 5, 2009



Laureto Farinas
Laureto Farinas, Esquire

CERTIFICATE OF SERVICE

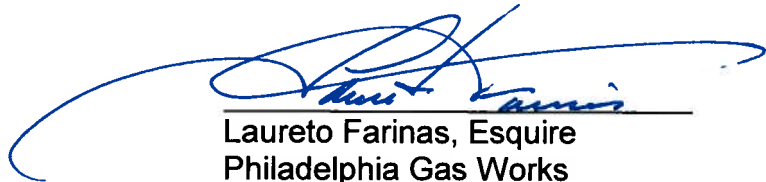
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Ms Beulah McCarthy
6647 Kindred Street
Philadelphia, PA 19149

May 5, 2009



Laureto Farinas, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982