



Philadelphia Gas Works

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June 10, 2009

James McNulty, Secretary
Pennsylvania Public Utility Commission
Room B-20, North Office Building
Harrisburg, PA 17105-3265


Re: Evelina Jacobs v. PGW, Docket No. C – 2008 – 2065458
Evelina Jacobs v. PGW, Docket No. F – 2009 – 2106000

Dear Secretary McNulty:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files the original copy of its Motion to Consolidate Formal Complaints in the above captioned matters.

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

Sincerely,


Kristine Trock

Enclosure

cc: Ms. Evelina Jacobs (Overnight Mail)
Administrative Law Judge Angela T. Jones (via E-mail)
Laureto Farinas, Esquire (PGW Mail)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Evelina Jacobs	:	
	:	
v.	:	Docket No. C – 2008 – 2065458
	:	
Philadelphia Gas Works	:	

And

Evelina Jacobs	:	
	:	
v.	:	Docket No. F – 2009 – 2106000
	:	
Philadelphia Gas Works	:	

**Philadelphia Gas Works’
Motion to Consolidate Formal Complaints**

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works (“PGW”) hereby files this Motion to Consolidate the above captioned matters. PGW hereby avers the following:

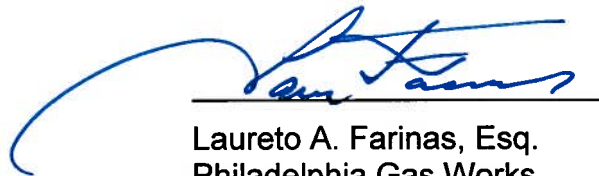
1. On June 23, 2006, the Bureau of Consumer Service (“BCS”) issued a decision under BCS Case No. 2126666, addressing Philadelphia Gas Works request for a determination of responsibility/liability for the payment for gas service to 1024 South Bouvier Street, Philadelphia, Pennsylvania 19145 (“Bouvier Service Address”), PGW Account Number 04-5960-9003. The BCS decision found that Evelina Jacobs was responsible for the final bill totaling \$244.33.
2. On or about September 25, 2008, Evelina Jacobs filed an appeal of the BCS decision under BCS Case No. 2126666 with the Commission to which PGW filed an answer on October 9, 2008. The matter was docketed at Docket No. C – 2008 – 2065458. This appeal restates the position that Evelina Jacobs should not be responsible for the final bill.
3. This matter was assigned to Administrative Law Judge Angela T. Jones and an Initial Hearing was scheduled for Tuesday, November 25, 2008 at 9:30 a.m. at the Philadelphia State Office Building.

4. At the Complainant's request, the Initial Hearing scheduled for November 25, 2008 was continued by Order of Administrative Law Judge Angela T. Jones dated November 20, 2008. No new hearing date has been scheduled.
5. On or about May 8, 2009, Evelina Jacobs filed a complaint with the Commission to which PGW filed an answer on May 28, 2009. The matter was docketed at Docket No. F – 2009 – 2106000. This appeal restates that Evelina Jacobs should not be responsible for the monthly gas bill at 1702 S. 23rd Street, Philadelphia, PA 19145 ("23rd Street Service Address") account number 71-1324-5955.
6. The Bouvier Service Address and the 23rd Street Service Address were listed under account number 71-1324-5955. On April 19, 2006, the Complainant requested separate accounts for the the Bouvier Service Address and the 23rd Street Service Address.
7. Both matters involve the same parties and revolve around the factual events concerning the payment for gas service at the service addresses.
8. The witnesses for both parties would be the same in both matters.
9. The principle of judicial economy would be served best if the hearing for both matter were conducted at one time as time and resources would be used efficiently in the disposition of these matters.

Wherefore, PGW respectfully requests that this Commission consolidate the matters, *Evelina Jacobs v. PGW*, Docket No. C – 2008 – 2065458 and *Evelina Jacobs v. PGW*, Docket No. F – 2009 – 2106000.

Respectfully submitted,

June 10, 2009



Laureto A. Farinas, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
215-684-6982

VERIFICATION

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

Date: June 10, 2009



Laureto Farinas

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 §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Mr. Evelina Jacobs
1702 S. 23rd Street
Philadelphia, PA 19145

June 10, 2009



Laureto A. Farinas, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122