



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

June 17, 2009

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

Re: Valerie and Robert S. Shields, Jr. v. PGW, Docket No. C – 2009 – 2109889
Valerie and Robert S. Shields, Jr. v. PGW, Docket No. C – 2009 – 2106416

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,

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

Kristine Trock

Enclosure

cc: Mr. Robert S. Shields, Jr. (Overnight Mail)
Ms. Valerie Shields (Overnight Mail)
Administrative Law Judge Cynthia Fordham (Overnight Mail)
Laureto Farinas, Esquire (PGW Mail)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)



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

June 17, 2009

Mr. Robert S. Shields, Jr.
Ms. Valerie Shields
6923 Lindbergh Blvd.
Philadelphia, PA 19142

VIA OVERNIGHT MAIL

Re: Valerie and Robert S. Shields, Jr. v. PGW, Docket No. C – 2009 – 2109889
Valerie and Robert S. Shields, Jr. v. PGW, Docket No. C – 2009 – 2106416

Dear Mr. and Ms. Shields:

Enclosed please find a copy of PGW's Motion to Consolidate the above referenced matters. Pursuant to 52 Pa. Code §5.61, you have twenty (20) days from the date of service to file a response to the enclosed pleading.

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: Administrative Law Judge Cynthia Fordham (Overnight Mail)
Laureto Farinas, Esquire (PGW Mail)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Valerie & Robert S. Shields, Jr.	:	
	:	
v.	:	Docket No. C – 2009 – 2106416
	:	
Philadelphia Gas Works	:	

And

Valerie & Robert S. Shields, Jr.	:	
	:	
v.	:	Docket No. C – 2009 – 2109889
	:	
Philadelphia Gas Works	:	

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

Pursuant to 52 Pa. Code §5.81, the Philadelphia Gas Works (“PGW”) hereby files this Motion to Consolidate the above captioned matters. PGW hereby avers the following:

1. On April 20, 2009, the Bureau of Consumer Service (“BCS”) issued a decision under BCS Case No. 2508938, addressing Philadelphia Gas Works request for a determination of responsibility/liability for the payment for gas service to 3128 Euclid Ave, Philadelphia, Pennsylvania 19121 (“Service Address”). The BCS decision found that the bill in question is from over four (4) years ago.
2. On or about April 20, 2009, Valerie and Robert Shields, Jr. filed an appeal of the BCS decision under BCS Case No. 2508938 with the Commission to which PGW filed an answer on May 29, 2009. The matter was docketed at Docket No. C – 2009 – 2106416. That appeal states the Shields’s position that Valerie and Robert S. Shields, Jr. should not be responsible for the outstanding balance on the gas account at the Service Address.
3. On or about May 19, 2009, Valerie and Robert S. Shields, Jr. filed a second appeal of the BCS decision under BCS Case No. 2508938 with the Commission to which PGW filed an Answer with New Matter on June 17, 2009. The matter

was docketed at Docket No. C – 2009 – 2109889. That appeal restates the Shields' position that they are not responsible for the outstanding balance on the gas account at the Service Address.

4. Both matters involve the same parties and revolve around the factual events concerning the lack of payment for gas service at the Service Address.
5. The witnesses for both parties would be the same in both matters.
6. By Motion dated June 15, 2009, the Commission has scheduled an Initial Hearing in Docket C – 2009 – 2106416 for August 18, 2009 at 10:00 a.m. before Administrative Law Judge Cynthia Williams Fordham.
7. The principle of judicial economy would be served best if the hearings for both matters 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, Valerie and Robert S. Shields, Jr. v. PGW, Docket No. C – 2009 – 2106416 and Valerie and Robert S. Shields, Jr. v. PGW, Docket No. C – 2009 – 2109889.

Respectfully submitted,

June 17, 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 17, 2009



Laureto Farinas

CERTIFICATE OF SERVICE

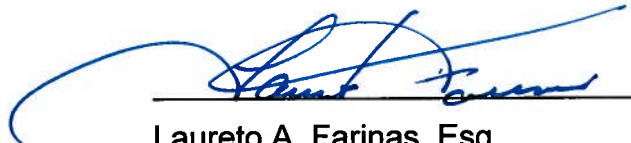
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Ms. Valerie Shields
Mr. Robert S. Shields, Jr.
6923 Lindbergh Blvd.
Philadelphia, PA 19142

June 17, 2009



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