

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROSEMARY CLAYTON	:	
Complainant	:	
v.	:	
	:	Docket No. Docket No. C-2009-2101042
PHILADELPHIA GAS WORKS	:	
Respondent	:	

**Motion for Continuance of Initial Hearing**

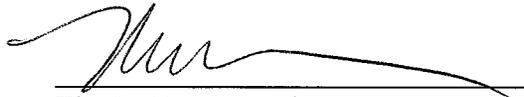
Pursuant to 52 Pa. Code § 1.15(b), Rosemary Clayton (hereinafter “Complainant”), through counsel Community Legal Services, Inc. (“CLS”), hereby moves for a continuance of the Initial Hearing in this matter scheduled for July 21, 2009, and in support states as follows:

1. On or about March 27, 2009, Complainant filed a Formal Complaint against Philadelphia Gas Works (hereinafter “Respondent”).
2. On April 15, 2009, Respondent was served with the Formal Complaint, and on May 4, 2009, filed its Answer.
3. On June 17, 2009, the Commission issued a Hearing Notice scheduling this matter for an Initial Hearing on Tuesday, July 21, 2009.
4. Since the time of the filing of the Formal Complaint, Respondent has suspended its late-payer deposit policy, which was a major issue of dispute in the Formal Complaint. In the attached letter dated May 11, 2009, Respondent informs Complainant that Respondent “will not require you to pay a deposit at this time.”
5. Concurrent with this Motion for Continuance of Initial Hearing, Complainant also files a Petition for Leave to Withdraw Formal Complaint Without Prejudice. If the Petition is granted then there would be no need for further hearing.

6. Counsel for Respondent has informed Counsel for Complainant that Respondent would agree to a withdrawal of the Formal Complaint without prejudice, and would agree to a continuance of the Initial Hearing scheduled for July 21, 2009.

WHEREFORE, Complainant moves that the July 21, 2009 Initial Hearing be continued.

Respectfully submitted,



---

Thu B. Tran, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
215-981-3777

Counsel for Complainant

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROSEMARY CLAYTON	:	
Complainant	:	
v.	:	
	:	Docket No. Docket No. C-2009-2101042
PHILADELPHIA GAS WORKS	:	
Respondent	:	

**ORDER GRANTING MOTION FOR CONTINUANCE**

Upon review of Complainant's Motion for Continuance of Initial Hearing, and upon good cause shown, the Initial Hearing scheduled in this matter for July 21, 2009 is hereby continued.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Administrative Law Judge  
Charles E. Rainey, Jr.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROSEMARY CLAYTON	:	
Complainant	:	
v.	:	
	:	Docket No. Docket No. C-2009-2101042
PHILADELPHIA GAS WORKS	:	
Respondent	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing Motion for Continuance of Initial Hearing upon the participants, listed below, in accordance with the requirements of 52 Pa.Code §1.54 (relating to service by a participant).

By First Class U.S. Mail, postage prepaid:

Administrative Law Judge Guy M. Koster  
1302 Philadelphia State Office Building  
1400 West Spring Garden Street  
Philadelphia, PA 19130  
Fax: 215-560-3133

Laureto A. Farinas, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
[Laureto.Farinas@pgworks.com](mailto:Laureto.Farinas@pgworks.com)

Dated this 13th day of July, 2009.



---

Thu B. Tran, Esquire  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102