



**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](mailto:kristine.trock@pgworks.com)

October 20, 2009

Administrative Law Judge Ky Van Nguyen  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

**Re: Ellena Irby v. PGW, Docket No. C – 2009 – 2117933**

Dear Administrative Law Judge Nguyen:

Enclosed please find the Reply of Philadelphia Gas Works ("PGW") to Complainant's 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 (via Electronic Filing)  
Thu B. Tran, Esquire (via E-Mail and Regular Mail)  
Ms. Ellena Irby (Regular Mail)  
Anne Marie Cromley (PGW Mail)  
Linda Pereira (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Ellena Irby**

v.

**Philadelphia Gas Works**

:  
:  
:  
:  
:

**Docket No. C – 2009-2117933**

**Reply of Philadelphia Gas Works to  
Complainant's Motion for Continuance of Hearing**

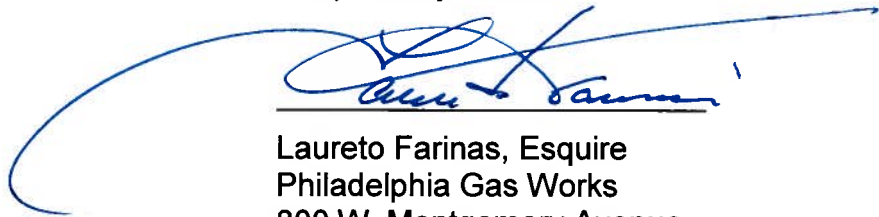
Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby replies to the Complainant's motion for a continuance in the above captioned matter. PGW hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. By way of further answer, PGW has agreed to the restoration of the Complainant's gas service for the payment of the current bill while this matter is pending.
5. Admitted. By way of further answer, PGW also anticipates that further informal discovery to discuss responses provided to formal discovery from both parties while considering the terms of a possible settlement of the matter.
6. Admitted.

**Wherefore**, PGW does not oppose the Complainant's request for a continuance of the hearing scheduled for October 23, 2009

Respectfully submitted,

October 20, 2009



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

**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.

October 20, 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:

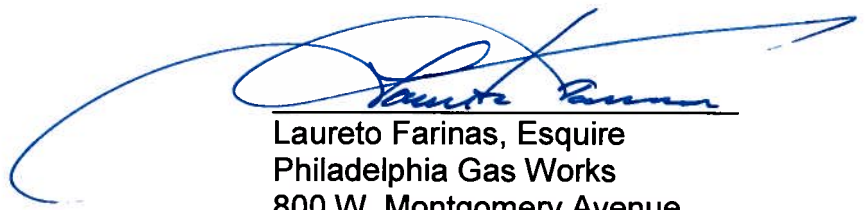
**For Complainant:**

Thu Tran, Esq.  
Community Legal Services, Energy Unit  
1424 Chestnut Street  
Philadelphia, PA 19102 – 2505

Ellena Irby  
955 N. 6<sup>th</sup> Street  
Philadelphia, PA 19123

Administrative Law Judge Ky Van Nguyen  
Pennsylvania Public Utility Commission  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107

October 20, 2009



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