



**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)

January 20, 2010

Administrative Law Judge Charles E. Rainey, Jr.  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
801 Market Street  
Philadelphia PA 19107

**Re: Edward M. Lloyd v. PGW, Docket No. F – 2009 – 2128885**

Dear Administrative Law Judge Rainey:

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 style with a large, sweeping "K" and "T".

Kristine Trock

Enclosure

cc: James McNulty, Secretary (Electronic Filing)  
Mr. Edward M. Lloyd (Regular Mail)  
Anne Marie Cromley (PGW Mail)  
Linda Pereira (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Edward M. Lloyd,</b>	:	
Complainant	:	
v.	:	Docket No. F – 2009 – 2128885
	:	
<b>Philadelphia Gas Works,</b>	:	
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 Thursday, January 28, 2010. In support of its motion, PGW states as follows:

1. On August 26, 2009, the Complainant, Edward M. Lloyd, filed a Formal Complaint against PGW in the above captioned matter, disputing the accuracy of the billing and gas usage associated with the Complainant's residence located at 222 E. Mentor Street, Philadelphia, Pennsylvania (Service Address). The Complaint was served upon PGW on September 8, 2009.
2. On September 28, 2009, PGW timely filed an Answer to the Complaint.
3. By notice dated November 18, 2009, the Commission scheduled an In Person hearing in the above captioned matter for Thursday, January 28, 2010, 2009 at 10:00 a.m., before Administrative Law Judge Charles E. Rainey, Jr. in the Commission's Philadelphia Office at 801 Market Street, Suite 4063, Philadelphia, Pennsylvania.
4. Pursuant to the Commission's policy promoting settlements, 52 Pa. Code §5.231(a), the parties scheduled a settlement conference for January 20, 2010. At that conference, the parties discussed the presence of gas consuming appliances at the Service Address.
5. According to PGW records, a gas fired house heater heats the Service Address. According to the Complainant, the Service Address is heated by electricity but had been converted from gas to oil, then electricity some time ago.

6. PGW and the Complainant have agreed to an inspection of the Service Address and the exchange of the PGW meter at the Service Address for testing for accuracy. After the inspection and meter testing is completed, the Parties have agreed to discuss settlement again.

7. PGW is in the process of scheduling a date with the Complainant to inspect the Service Address and to exchange the meter for testing. PGW expects that the date for inspection and meter exchange will occur in the near future.

8. The instant request is outside of the 5-day period in which to request a continuance, and PGW is confident that once the Parties have the additional information resulting from the inspection and meter test, a settlement is more likely to occur.

9. The Complainant has informed PGW that he is not opposed to the request for a continuance.

10. PGW therefore requests a continuance of the hearing in the above captioned matter scheduled for January 28, 2010.

**WHEREFORE**, PGW respectfully requests that this Commission issue an order granting a continuance of the hearing scheduled for January 28, 2010 in this matter.

Respectfully submitted,

January 20, 2010

  
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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.

January 20, 2010



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:

(Via FedEx)

For Complainant:

Mr. Edward M. Lloyd  
222 E. Mentor Street  
Philadelphia, PA 19120

January 20, 2010



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