



**Philadelphia Gas Works**

800 West Montgomery Avenue, Philadelphia, PA 19122

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October 25, 2010

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

**Re: Janette Lee-Curry v. PGW, Docket No. C – 2010 – 2153042**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §§1.15(b), the Philadelphia Gas Works ("PGW") hereby amends its requests for a continuance of the hearing in this matter scheduled for Monday, January 3, 2011.

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 "Danielle Ross". The signature is written in a cursive, flowing style.

Danielle Ross

Enclosure

cc: Ms. Janette Lee-Curry  
Anne Marie Cromley (PGW Mail)  
Linda Pereira (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Janette Lee-Curry,	:	
Complainant	:	
v.	:	Docket No. C – 2010 – 2153042
	:	
Philadelphia Gas Works,	:	
Respondent	:	

**AMENDED MOTION FOR CONTINUANCE OF HEARING**

Pursuant to 52 Pa. Code § 1.15(b), Philadelphia Gas Works, the Respondent (PGW) hereby amends its motion, requesting a continuance of the hearing in this matter scheduled for Monday, January 3, 2011 as the Complainant has indicated that she does not object to PGW's request. In support of its amended motion, PGW states as follows:

1. On January 19, 2010, the Commission served the Respondent with the Complaint filed in the above captioned matter, which is a dispute concerning a payment agreement.
2. On February 8, 2010, PGW filed an Answer to the Complaint in the above captioned matter.
3. By Notice dated September 16, 2010, the Commission scheduled an In Person Hearing in this matter for October 20, 2010 at 10:00 a.m., before Administrative Law Judge Angela T. Jones, in the Commission's Philadelphia office.
4. By letter dated October 5, 2010, the Complainant requested a continuance of the October 20, 2010 hearing as that date conflicted with another court date involving the Complainant and the City of Philadelphia Water Department in municipal court in Philadelphia.
5. By notice dated October 12, 2010, the Commission scheduled an In Person Hearing in this matter for January 3, 2011 at 10:00 a.m., before Administrative Law Judge Angela T. Jones, in the Commission's Philadelphia office.
6. On January 3, 2011, counsel for PGW will be in route to Philadelphia returning from a planned vacation out of the country during the holiday season. Due to the heavy holiday traveling schedule, counsel for PGW could not obtain a return

flight to Philadelphia on Saturday, January 1 or Sunday, January 2, 2011.

7. At this time, PGW believes that there is a possibility that the parties will resolve the instant matter by settlement as the parties will have additional time to discuss settlement and a payment agreement.
8. PGW has contacted Ms. Lee-Curry, the Complainant by telephone. On October 22, 2010, she indicated that she does not object to PGW's request for a continuance of the hearing in this matter.

**WHEREFORE**, Complainant requests that the hearing scheduled for Monday, January 3, 2011, in the above captioned matter be continued and rescheduled.

Respectfully submitted,

October 25, 2010



Laureto Farinas

**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.

Dated: October 25, 2010



Laureto Farinas, Esquire

**CERTIFICATE OF SERVICE**

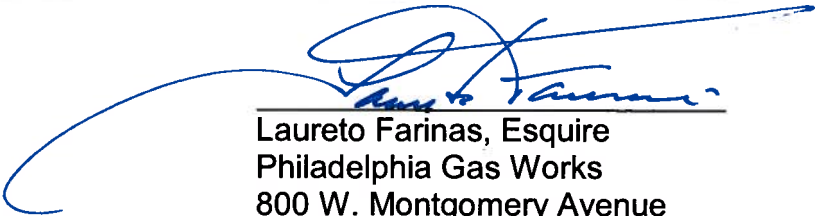
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Ms. Janette Lee - Curry  
305-A East Walnut Lane  
Philadelphia, PA 19144

October 25, 2010



Laureto Farinas, Esquire  
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