



**Philadelphia Gas Works**

800 West Montgomery Avenue, Philadelphia, PA 19122

Danielle Ross, Paralegal

**Legal Department**

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November 15, 2010

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Myra Page v. PGW, Docket No. C – 2010 – 2205750**

**Myra Page v. PGW, Docket No. C – 2010 – 2206474**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files the original Motion to Consolidate 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 "Danielle Ross". The signature is written in a cursive, flowing style.

Danielle Ross

Enclosure

cc: Ms. Myra Page  
Anne Marie Cromley (PGW Mail)  
Linda Pereira (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Myra Page** :  
 :  
 **v.** : **Docket No. C – 2010 – 2205750**  
 :  
**Philadelphia Gas Works** :

**And**

**Myra Page** :  
 :  
 **v.** : **Docket No. C – 2010 – 2206474**  
 :  
**Philadelphia Gas Works** :

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

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works (“PGW”) hereby files this Motion to Consolidate the above captioned matters. In support of its motion, PGW avers the following:

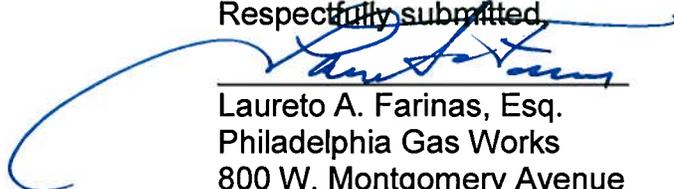
1. On October 18, 2010, the Complainant filed a formal complaint with the Commission under Myra Page v. PGW, Docket No. C – 2010 – 2205750. That matter concerned the allegations that there were incorrect charges on the Complainant’s bill for 1344 N. Taney Street, Philadelphia, Pennsylvania (Service Address). The Commission served PGW with that Complaint on October 22, 2010.
2. PGW filed an Answer to that Complaint on November 9, 2010 indicating that PGW had charged the Complainant correctly.
3. On October 18, 2010, the Complainant also filed a formal complaint with the Commission under Myra Page v. PGW, Docket No. C – 2010 – 2206474 concerning incorrect charges on the Complainant’s bill. The Complainant states that PGW has billed her for her entire blocks usage. The Commission served PGW with that Complaint on October 26, 2010.
4. PGW has filed an Answer to that Complaint on November 15, 2010.

5. Both matters, Myra Page v. PGW, Docket No. C – 2010 – 2205750 and Myra Page v. PGW, Docket No. C – 2010 – 2206474, involve the same parties and revolve around the factual events concerning the billing for gas service to the Service Address.
6. The witnesses for both parties would be the same in both matters.
7. The principle of judicial economy would be served best if the hearing for both matters was 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 Myra Page v. PGW, Docket No. C – 2010 – 2205750 and Myra Page v. PGW, Docket No. C – 2010 – 2206474 and have the hearing for both matters on the same date.

November 15, 2010

Respectfully submitted,



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: November 15, 2010

  
\_\_\_\_\_  
Laureto Farinas

**CERTIFICATE OF SERVICE**

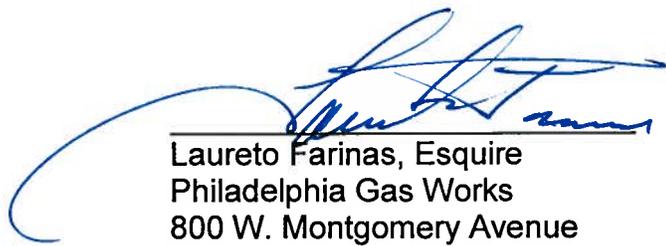
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Ms. Myra Page  
1344 N. Taney Street  
Philadelphia, PA 19121

November 15, 2010



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