



Philadelphia Gas Works

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November 24, 2010

Administrative Law Judge Angela T. Jones
Pennsylvania Public Utility Commission
801 Market Street
Suite 4063
Philadelphia, PA 19107

Re: Karleen Starkes v. PGW, Docket No. C – 2010 – 2156178

Dear Judge Jones:

Pursuant to 52 Pa. Code §§1.15(b), the Philadelphia Gas Works ("PGW") hereby requests a continuance of the hearing in this matter scheduled for Monday, November 29, 2010.

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,

Danielle Ross
Danielle Ross

Enclosure

cc: Rosemary Chiavetta Secretary (Regular Mail)
Ms. Karleen Starkes (Regular Mail)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Karleen Starkes,	:	
	:	
v.	:	Docket No. C – 2010 – 2156178
	:	
	:	
PHILADELPHIA GAS WORKS,	:	
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 Monday, November 29, 2010. In support of its motion, PGW states as follows:

1. On or about January 28, 2010, the Complainant filed a Formal Complaint against PGW disputing the filing of a municipal lien that was the subject of a municipal claim for unpaid debt for gas service consumed at 5422 W. Berks Street, 2nd Floor, Philadelphia, Pennsylvania by the Complainant’s tenant.
2. On February 24, 2010, PGW timely filed an Answer to the Complaint.
3. By notice dated September 9, 2010, the Commission scheduled an In Person hearing in the above captioned matter for Monday, November 29, 2010 at 10:00 a.m., before Administrative Law Judge Angela T. Jones in the Pennsylvania State Office Building, 801 Market Street, Philadelphia, Pennsylvania.
4. Counsel for both parties in this matter have engaged in settlement discussions and have eliminated the issue of the unpaid debt, (which is subject of municipal liens) for several of the Complainant’s tenants at 5422 W. Berks Street, Philadelphia, Pennsylvania. It is likely that the unpaid debt issues for the remaining tenants will be resolved with a further brief discussion between the parties.
5. PGW requests a continuance of the hearing scheduled for November 24, 2010 in this matter in order to complete settlement discussions.

6. Complainant's counsel, Tsiwen M. Law, Esq. had indicated that the Complainant does not object to this request for a continuance.

7. No previous continuances have been requested or granted in this matter.

WHEREFORE, PGW respectfully requests that this Commission grant a continuance of the hearing scheduled for November 29, 2010 in this matter.

Respectfully submitted,

November 24, 2010



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.

November 24, 2010



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).

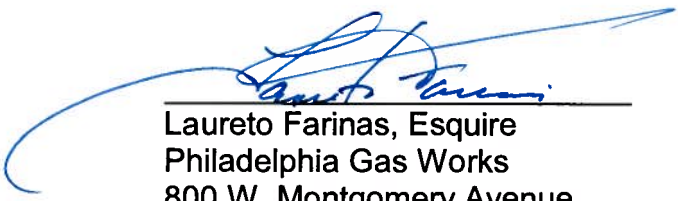
Service List:

For Complainant:

Ms Karleen Starkes
2432 N. 56th Street
Philadelphia, PA 19131

Tsiwen M. Law, Esq.
Law & Associates, L.L.C.
One Penn Center at Suburban Station
1617 John F. Kennedy Blvd., Suite 650
Philadelphia, PA 19103

November 24, 2010



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