

**Philadelphia Gas Works**



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(Via e-mail)

March 4, 2011

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

**RE: Inez M. Frisby v. Philadelphia Gas Works, Docket No. F – 2010 - 2198205**

Dear Judge Jones:

Please find attached PGW's Motion for a Continuance of the telephonic hearing scheduled for March 8, 2011, in the above referenced matter to which the Complainant does not object.

Pursuant to the Commission's policy promoting settlements, 52 Pa. Code §5.231(a), the parties have agreed to further settlement conferences over the next few weeks to resolve issues. I am confident that once the parties complete our discussions a settlement is likely to occur.

If you need additional information about this matter, please contact me at my direct-dial number above. Thank you.

Sincerely,



Laureto Fariñas, Esq.

cc: James McNulty, Secretary – Pa. Public Utility Commission  
Anne Marie Cromley

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Inez M. Frisby,	Complainant	:	
v.		:	Docket No. F– 2010 – 2198205
		:	
Philadelphia Gas Works,		:	
Respondent		:	

**MOTION FOR CONTINUANCE OF HEARING**

Pursuant to 52 Pa. Code § 1.15(b), Philadelphia Gas Works, the Respondent (PGW) hereby requests a continuance of the hearing in this matter scheduled for Tuesday, March 8, 2011. In support of its motion, PGW states as follows:

1. On September 10, 2010, the Commission served the Respondent (PGW) with the Complaint filed in the above captioned matter, which is a billing dispute concerning a weatherization program and request for consequential damages.

2. On September 28, 2010, PGW filed an Answer and Preliminary Objections to the Complaint in the above captioned matter to which the Complainant filed an answer to PGW's Preliminary Objections on October 15, 2010.

3. By order of January 5, 2011, Administrative Law Judge David A. Salapa sustained PGW's Preliminary Objections and struck the Complainant's request for relief in the form of monetary damages from the Complaint.

4. The Commission has scheduled a Telephonic Hearing in this matter for Tuesday, March 8, 2011 at 10:00 a.m., before Administrative Law Judge Angela T. Jones.

5. During the past week, the parties have engaged in settlement discussions concerning an agreement on the balance owed and a payment agreement on the Complainant's account. The Parties have not finalized a settlement.

6. The Complainant, Mrs. Frisby, has authorized her son, Rafiq Diya Al-Fareed, to complete settlement discussions with PGW due to her fragile health.

7. The Parties discussion has led them to believe that there is a possibility


that they may resolve this matter by amicable settlement, if provided additional time to consider options and to have further discussion.

8. In speaking with the Complainant's son, PGW states that the Complainant does not object to the continuance of the hearing of this matter and joins in the request.

**WHEREFORE**, Complainant requests that the hearing scheduled for Tuesday March 8, 2011, in the above captioned matter be continued and rescheduled.

Respectfully submitted,

March 4, 2011



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

## 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: March 4, 2011



Laureto Fariñas, 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).

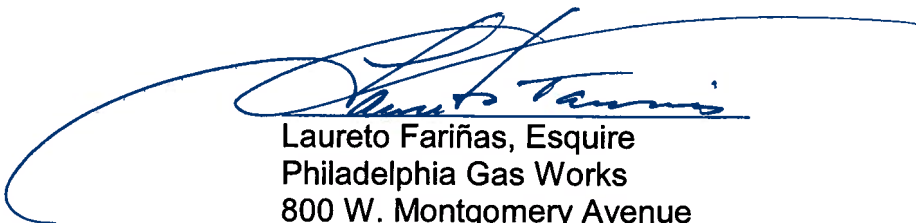
Service List:

For Complainant:

Mrs. Inez M. Frisby  
3721 N. 18<sup>th</sup> Street  
Philadelphia, PA 19140

Mr. Rafiq Diya Al-Fareed  
Via e-mail:  
Rafiq Diya Al-Fareed [RALFareed@aol.com]

March 4, 2011



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