



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Ross, Paralegal  
Legal Department  
Direct Dial: 215-684-6862  
FAX: 215-684-6798  
E-mail: [danielle.ross@pgworks.com](mailto:danielle.ross@pgworks.com)

August 22, 2011

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

Re: **Titus C. Wright v. PGW, Docket No. F – 2010 – 2192191**  
**Titus C. Wright v. PGW, Docket No. C – 2011 – 2225996**

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,

  
Danielle Ross

Enclosure

cc: Mr. Titus C. Wright  
Administrative Law Judge Angela T. Jones (e-mail)  
Anne Marie Cromley (PGW Mail)  
Linda Pereira (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Titus C. Wright**

**v.**

**Philadelphia Gas Works**

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**Docket No. F – 2010 – 2192191**

**And**

**Titus C. Wright**

**v.**

**Philadelphia Gas Works**

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**Docket No. C – 2011 – 225996**

**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. PGW hereby avers the following:

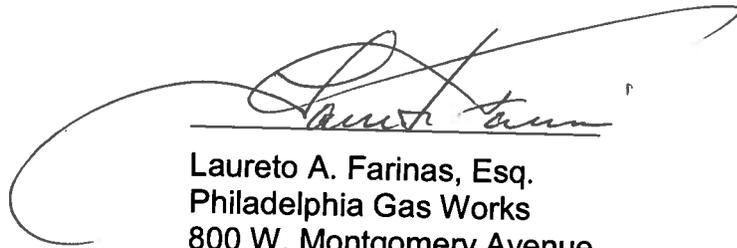
1. On August 4, 2010, the Complainant filed a formal complainant with the Commission at Docket No. C-2010-2192191. That complaint was served upon PGW on August 6, 2010 to which PGW filed an answer on August 26, 2010. The matter avers, *inter alia*, that the Complainant has received a termination notice, that the Complainant seeks a payment agreement, and that there are incorrect charges on the Complainant’s bill for gas service to 1137 Pratt Street, Philadelphia, Pennsylvania (Service Address).
2. On February 11, 2011, the Complainant filed a second formal complainant with the Commission at Docket No. C-2011-2225996. That complaint was served upon PGW on February 16, 2011 to which PGW filed an answer on March 7, 2011. The matter avers, *inter alia*, that there are incorrect charges on the Complainant’s bill for gas service to the Service Address for a three-month period (October, November and December).

3. By notice dated August 18, 2011, the Commission has scheduled an In Person Initial Hearing in the matter at Docket No. F-2011-2192191 for Friday, September 30, 2011 before Administrative Law Judge Angela T. Jones.
4. The Commission has yet to schedule a hearing in the matter at Docket No. Docket No. C-2011-2225996.
5. Both matters involve the same parties and revolve around the identical factual events concerning the billing for gas service at the Service Address.
6. The witnesses for both parties would be the same in both matters.
7. The principle of judicial economy would be best service if the hearings for both matters were 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 above captioned matters.

Respectfully submitted,

August 22, 2011

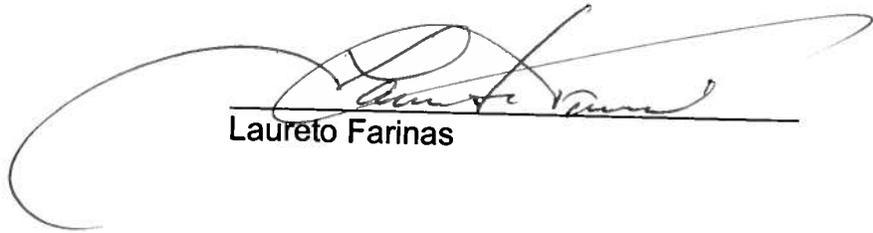
A handwritten signature in black ink, appearing to read "Laureto A. Farinas", is written over a horizontal line. The signature is stylized and cursive.

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: August 22, 2011



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).

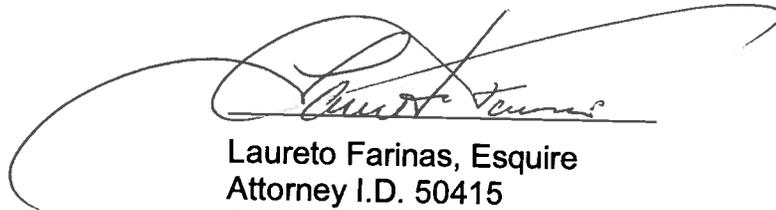
Service List:

For Complainant:

Mr. Titus C. Wright  
1137 Pratt Street  
Philadelphia, PA 19124

Mr. Titus C. Wright  
P.O. Box 23248  
Philadelphia, PA 19124

August 22, 2011

A handwritten signature in black ink, appearing to read "Laureto Farinas", is written over a horizontal line. The signature is stylized with a large, sweeping flourish that extends to the left and curves back under the line.

Laureto Farinas, Esquire  
Attorney I.D. 50415  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982