



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

April 5, 2012

Administrative Law Judge Ky Nguyen
Pennsylvania Public Utility Commission
801 Market Street
Suite 4063
Philadelphia, PA 19107

Re: Carlos Lage v. PGW, Docket No. C – 2011 – 2279459

Dear Judge Nguyen:

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 Friday, April 13, 2012.

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

Sincerely,

A handwritten signature in blue ink that reads "Danielle Ross".

Danielle Ross

Enclosure

cc: Rosemary Chiavetta, Secretary
Administrative Law Judge Marlane R. Chestnut
Carlos Lage
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Carlos Lage

v.

Philadelphia Gas Works

:
:
:
:
:
:

Docket No. C – 2011 – 2279459

JOINT 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 Friday, April 13, 2012. In support of its motion, PGW states as follows:

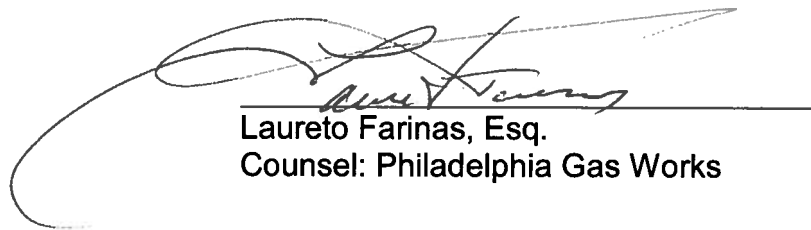
1. On or about December 8, 2011, Carlos Lage filed a Compliant at the above captioned docket with the Commission alleging that PGW had billed him incorrectly on his account for gas service to 903 E. Cayuga Street, Philadelphia, Pennsylvania (Service Address). The Complainant is represented by Bruce R. Kay, Esq.
2. On January 13, 2012, PGW timely filed an Answer to the Complaint.
3. By notice dated February 3, 2012, the Commission scheduled a hearing in the above captioned matter for Friday, April 13, 2011, before Administrative Law Judge Ky Van Nguyen.
4. The parties have had several discussions of settlement and have exchanged views and potential evidentiary exhibits in this matter.
5. The Complainant's counsel will be out of town during the week prior to the hearing scheduled for April 13, 2012, preventing the parties to complete settlement negotiations.
6. Pursuant to the Commission's policy promoting settlements, 52 Pa. Code §5.231(a), the Complainant and PGW have agreed to schedule a settlement conference when he returns in the near future in order to attempt the resolution of this matter by amicable settlement.
7. By letter dated April 2, 2012, Complainant's counsel has authorized PGW to file this joint request for a continuance.

8. The parties to this matter therefore request a continuance of the hearing scheduled for April 13, 2011 to permit parties to complete settlement negotiations.

WHEREFORE, The parties respectfully requests that this Commission issue an order granting a continuance of the hearing scheduled for April 13, 2012 in this matter.

Respectfully submitted,

April 5, 2012



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.

April 5, 2012



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).

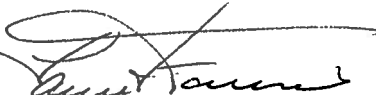
Service List:

For Complainant:

Mr. Carlos Lage
903 E. Cayuga Street
Philadelphia, PA 19124

Bruce Robert Kay, Esq.
Bruce Kay and Associates
1726 Welsh Road, 1st Floor
Philadelphia, PA 19115

April 5, 2012



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