



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

June 19, 2012

Administrative Law Judge Joel H. Cheskis
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105

Re: William McKeown v. PGW, Docket No. C – 2012 – 2298188

Dear Judge Cheskis:

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 Thursday, June 21, 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
William McKeown
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

William McKeown,	:	
Complainant	:	
v.	:	Docket No. C – 2012 – 2298188
	:	
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 telephonic hearing in this matter scheduled for Thursday, June 21, 2012, as the PGW witness is unavailable due to a death in the family and the his own medical issues. In support of its motion, PGW states as follows:

1. On April 12, 2012, the Commission served the Respondent, PGW with the Complaint filed in the above captioned matter, which is a dispute of a bill for previous unbilled usage 2212 S. 3rd Street, Philadelphia, PA, to which PGW filed an Answer to the Complaint in the above captioned on May 2, 2012.
2. By Notice dated May 11, 2012, the Commission scheduled an Initial Telephonic Hearing on June 21, 2012 at 2:00 p.m., before Administrative Law Judge (ALJ) Joel H. Cheskis in the Commission's Harrisburg Office.
3. The PGW witness assigned to this matter, Jack Irizarry, is unavailable due to the death of his mother earlier this week and his requiring emergency surgery the result of a chronic medical condition.
4. As the PGW Customer Review Unit is currently understaffed, PGW is unable to provide a replacement witness that can familiarize herself/himself with the PGW investigation of this matter.
5. PGW has contacted the Complainant's wife in this regard who had indicated that she did not object to the continuance of the telephonic hearing to another date.
6. Counsel for PGW alerted ALJ Cheskis of the forthcoming request for a continuance, stating that the Complainant's wife indicated that she did not object.
7. Several minutes following the conversation between counsel for PGW and ALJ

Cheskis, the Complainant's wife contacted PGW and stated that she felt that the decision regarding the continuance was not her's to make. PGW attempted to contact the Complainant at his work telephone number but was only able to leave a message for him about the request for a continuance.

8. PGW has not previously requested a continuance in this matter.

9. Pursuant to 52 Pa. Code § 1.15(b), PGW has shown good cause for the grant of a continuance in this matter.

WHEREFORE, Complainant requests that the telephonic hearing scheduled for June 21, 2012, in the above captioned matter be continued and rescheduled.

Respectfully submitted,

June 19, 2012



Laureto Farinas

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: June 19, 2012



Laureto Farinas, Esquire

CERTIFICATE OF SERVICE

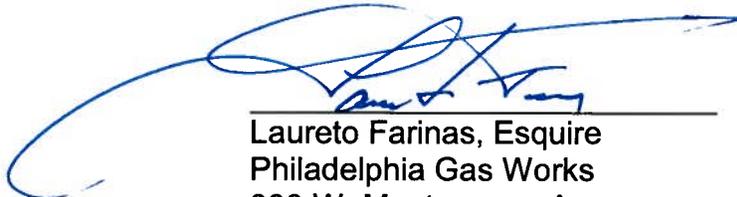
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Mr. William McKeown
2212 S. 3rd Street
Philadelphia, PA 19148

June 19, 2012



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