



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Leva, Paralegal
Legal Department
Direct Dial: 215-684-6862
FAX: 215-684-6798
E-mail: Danielle.leva@pgworks.com

April 24, 2013

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

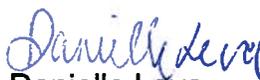
Re: Alexander Smith v. PGW, Docket No. F – 2012 – 2315538

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 Friday, April 26, 2013.

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

Sincerely,


Danielle Leva

Enclosure

cc: Rosemary Chiavetta, Secretary
Alexander Smith (Regular Mail)
Josie B.H. Pickens, Esq. (Regular Mail)
Anne Marie Cromley (PGW Mail)
Linda Pereira (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Alexander Smith,	:	
Complainant	:	
v.	:	Docket No. F – 2012 – 2315538
	:	
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 Friday, April 26, 2013. In support of its motion, PGW states as follows:

1. On July 25, 2012, the Commission served the Respondent with the Complaint filed in the above captioned matter, which is a billing dispute concern.
2. On August 14, 2012, PGW filed an Answer to the Complaint in the above captioned matter.
3. By Notice dated October 15, 2012, the Commission scheduled an In Person Hearing in this matter for December 7, 2012 at 10:00 a.m., before Administrative Law Judge Angela T. Jones, in the Commission's Philadelphia office.
4. By letter dated November 30, 2012, the Complainant's counsel requested a continuance of the December 7, 2012 hearing as the Complainant's counsel and Philadelphia Gas Works were having settlement discussions.
5. By notice dated December 6, 2012, the Commission scheduled an In Person Hearing in this matter for January 30, 2013 at 10:00 a.m., before Administrative Law Judge Angela T. Jones, in the Commission's Philadelphia office
6. By letter dated January 25, 2013, the Complainant's counsel requested a continuance of the January 30, 2013 hearing as the Complainant's was admitted for medical treatment and would not be released until February 5, 2013.
7. By notice dated February 1, 2013, the Commission scheduled an In Person Hearing in this matter for April 26, 2013 at 10:00 a.m., before Administrative Law Judge Angela T. Jones, in the Commission's Philadelphia office

8. In the process of review and consideration of settlement positions, PGW wants to visit the Service Address to ascertain further, the use of appliances as it relates to the calculation of the amount billed for unauthorized usage.

9. The parties believe that there is a possibility that the parties may resolve the instant matter as the parties have agreed to discuss the issues after further review of any changes that may be made in the calculation of the bill for unauthorized usage.

10. The Complainant has provided PGW with several dates during this week and next week to visit the Service Address in the presence of the Complainant's counsel, Josie Pickens, Esq. of Community Legal Services.

11. The Complainant's counsel has indicated that she does not object to PGW's request for a continuance of the hearing in this matter.

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

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

WHEREFORE, PGW respectfully requests that the hearing scheduled for Friday, April 26, 2013, in the above captioned matter be continued and rescheduled.

Respectfully submitted,

April 24, 2013



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.

April 24, 2013



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. Alexander Smith
3348 E. Street
Philadelphia, PA 19134

Josie B. H. Pickens, Esq.
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19107

April 24, 2013



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