

**Philadelphia Gas Works**



800 West Montgomery Avenue, Philadelphia, PA 19122  
Laureto A. Farinas, Senior Attorney  
Legal Department  
Direct Dial: 215-684-6982  
FAX: 215-684-6798  
E-mail: laureto.farinas@pgworks.com

(Via e-mail and regular mail)

November 27, 2012

Administrative Law Judge Darlene D. Heep  
Pennsylvania Public Utility Commission  
801 Market Street, 4<sup>th</sup> Floor  
Philadelphia, PA 19130

RE: Johnny King v. PGW, Docket No. C – 2012 – 2304507

Dear Judge Heep:

PGW has been served by regular mail dated November 25, 2012, (post marked November 25 or 26, 2012) with a request for another continuance of the hearing in the above captioned matter. The latest hearing date is scheduled for Wednesday, November 28, 2012. PGW opposes the Complainant's latest request for a continuance for the following reasons:

First, the Commission has provided two previous continuances in this matter by the Complainant's request dated October 3, 2012, for the hearing scheduled to occur on October 12, 2012 and for the Initial Hearing scheduled for August 27, 2012, the result of the Complainant/Customer of Record not being present. The Complainant's sister-in-law/resident of the Service Address, 167 E. Herman Street, did not provide documentation that she has power of attorney of the Complainant's affairs.

Second, the most recent request for a continuance has been filed less than 5 days prior to the hearing as is required under the Commission's procedural rules at 52 Pa. Code §1.15(b). The instant request was written on November 25, 2012, only three days before the hearing. Further, the Ms. Thompson states that she is more seriously injured than she thought when requesting the continuance dated October 3, 2012. She states that she has several appointments for ex-rays this week and is using crutches. As Ms. Thompson appears to have been aware of her ex-ray appointments prior to this week, it does not appear that her appointments are an emergency procedure. While the November 28, 2012 hearing date has been scheduled since October 11, 2012 (date of hearing notice), Ms. Thompson would have known of the potential consequences of scheduling the taking of ex-rays so close to tomorrow's hearing. Ms. Thompson should have had the foresight to schedule the ex-rays on another day or to alert the Commission soon after receiving the hearing notice dated October 11, 2012. The request fails to present good for the grant of the third continuance.

RECEIVED  
2013 AUG 28 AM 8:25  
PA PUBLIC UTILITIES  
SECRETARY'S OFFICE

PGW Exhibit A

Finally, with Ms. Thompson's latest request, she encloses a letter dated November 10, 2010 to an Ohio base mortgage/finance company. This letter purports to be the document granting power of attorney to Ms. Thompson. Also included is a copy of the Complainant's Pennsylvania Identification Card. Both of these documents have been redacted to conceal the Complainant's date of birth, Social Security Number, the address of the mortgage/finance company. As such, these appear suspect that they may not be documents intended to give Ms. Thompson authority litigate this matter with PGW on the Complainant's behalf since (even if power of attorney is granted) it is granted only for "the duration of the loan on said property." The letter is not a document granting power durable power of attorney to Ms. Thompson, it is a letter (written in 2010) that merely references the grant of authority during the period of a loan repayment with the mortgage/finance company. The scope of whatever authority is granted by this letter is ambiguous.

From my brief, previous conversation with Ms. Thompson, I understand that the Complainant, Mr. King is not incapacitated. When I asked to speak with him, Ms. Thompson stated that he was at work. Therefore, there should be nothing to prevent the Complainant from representing himself in the prosecution of this matter or in the least, to have made it known to the Commission that he has granted to Ms. Thompson power of attorney over this matter.

Although PGW has received payments on the account, Ms. Thompson requests a further reduction in the balance by credit of PGW and has rejected PGW's offer of settlement. PGW concludes that the request for a continuance is dilatory. The Complainant and/or Ms. Thompson attempt to delay the final disposition of this matter in order to avoid payment of the entire account balance. Therefore, the Commission should deny the Complainant's request for a third continuance of the hearing for failure to show good cause.

Sincerely,



Laureto Farinas

cc: Service List  
Anne Marie Cromley

RECEIVED  
2013 AUG 28 AM 8:25  
FA 1150  
SECRETARY'S BUREAU

*From the Desk of  
Harriet Sewell Thompson, Paralegal  
167 E. Herman Street  
Philadelphia, PA 19144  
215-843-6466*

November 25, 2012

**Via Fax and US Mail**  
**215-560-3133**

The Honorable Judge Darlene Heep  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107

**RE: Johnny King v. Philadelphia Gas Works  
Case No.: 2012-2304597**

Dear Judge Heep:

I am writing again to ask for a continuance in the above referenced matter. When I wrote you the letter dated October 3, 2012, I did not know the severity or the extent of my injury. I have been in a cast for the past two months and at present I am still in said cast. I cannot walk on my foot and I am on crutches. It is a non weight bearing cast.

I also have several appointments with various doctors this week to see what is going to be done with my foot. I have to go for further ex-rays as well as see three (3) doctors this week. Dr. Jerry Murphy, Dr. Robert E. Liebenberg and Dr. Norman B. Stempler.

I also called and spoke with Ms. Anne Cromley on Friday, November 23, 2012. Returning a phone called which she had placed to me. When I spoke with Ms. Cromley, I told her about my present situation and to see if we could come to an understanding with regards to the past due amount. Unfortunately we were not able to agree on a settlement. I asked Ms. Cromley if anything could be taken off of the past due balance which is at present \$766.40; her response to me was that they did not see anything wrong with the billing.

We would in some way like to settle this matter if PGW's would at least take off the \$283.00 which they added back to our September billing, which would bring the past amount down to \$483.40 and we would be willing to pay off the balance of that amount in a six (6) month agreement, along with the current billing during those months.

Also enclosed I have provided for your convenience a copy of the Letter of Authorization from Mr. King with regards to the residence, as well as a copy of Mr. King's State ID.

RECEIVED  
2013 AUG 28 AM 8:25  
PA. PUC  
SECRETARY'S OFFICE

Page 2  
Judge Heep  
November 25, 2012

Should you have any questions, please feel free to contact me

Very truly yours,



Harriet Sewell Thompson

HST  
Enclosures

Cc: Laureto A. Farinas, Esq., w/encls.

RECEIVED  
2013 AUG 28 AM 8:25  
IN PLEASANT BUREAU  
SECRETARY'S BUREAU



Johnny King  
1167 E. Harman Street  
Philadelphia, PA 19144-2050

November 10, 2010

Chase Home Finance  
[REDACTED]  
[REDACTED]  
[REDACTED]

Columbus, OH 43224-0696

RE: **Letter of Authorization**  
**Johnny King**  
[REDACTED]  
SS#: [REDACTED]  
Address: **167 E. Herman Street**  
**Philadelphia, PA 19144-2050**

Dear Sir/Madam:

This letter is to verify that I Johnny King of the above mention information gives authorization to my sister-in-law, Harriet Sewell Thompson to conduct any/all business related to or associated with the residence of 167 E. Herman Street, Philadelphia, PA 19144-2050; from present date until the duration of the loan on said property.

Should you have any questions, please feel free to contact me.

Very truly yours,

*Johnny King*

Johnny King

JK

73-643-0400



# The Office of Property Assessment

Property Location	
Address:	167 HERMAN ST
Unit Number:	
Zip Code:	191440000
Zoning:	R5
Zoning Description:	Single Family Row and Twin

Owner Information	
Owner(s):	KING JOHNNY
Account Number:	
Mailing Address:	KING JOHNNY , 167 HERMAN ST Philadelphia PA, 191440000

Property Characteristics	
Land Area:	4200 SqFt
Improvement Description:	DET W/DET GAR 3 STY MASON
Improvement Area:	1665 SqFt
Beginning Point:	203'6" E OSCEOLA
Exterior Condition:	Average

Certified Values for 2012	
Market Value:	\$31,400
Assessed Land (Taxable):	\$2,191
Assessed Improvement (Taxable):	\$7,857
Assessed Land (Exempt):	\$0
Assessed Improvement (Exempt):	\$0
Total Assessment:	\$10,048

Sale Information	
Sale Date:	1/28/2000
Sale Price:	\$3
Tax Information	
Real Estate Tax:	\$947.73

Proposed Values							
Year	Market Value	Assessed Land (Taxable)	Assessed Land (Exempt)	Assessed Improvement (Taxable)	Assessed Improvement (Exempt)	Total Assessment	Gross Tax
2013	\$31,400	\$2,191	\$0	\$7,857	\$0	\$10,048	\$981.79

Certified Values							
Year	Market Value	Assessed Land (Taxable)	Assessed Land (Exempt)	Assessed Improvement (Taxable)	Assessed Improvement (Exempt)	Total Assessment	Gross Tax
2012	\$31,400	\$2,191	\$0	\$7,857	\$0	\$10,048	\$947.73
2011	\$31,400	\$2,191	\$0	\$7,857	\$0	\$10,048	\$912.56
2010	\$31,400	\$2,191	\$0	\$7,857	\$0	\$10,048	\$830.37
2009	\$31,400	\$2,191	\$0	\$7,857	\$0	\$10,048	\$830.37
2008	\$31,400	\$2,191	\$0	\$7,857	\$0	\$10,048	\$830.37
2007	\$31,400	\$2,191	\$0	\$7,857	\$0	\$10,048	\$830.37
2006	\$31,400	\$2,191	\$0	\$7,857	\$0	\$10,048	\$830.37

© 2006 Office of Property Assessment. All Rights Reserved.

Don't  
visitPA.com

IDENTIFICATION CARD

655



No. 25 325 475 Dups: 00

DOB: [REDACTED]

Sex: M

Eyes: BRO

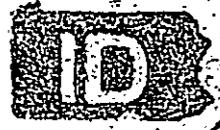
Height: 5'07"

Issued: 11/28/2009

Expires: 11/30/2013

*Johnny King*

JOHNNY KING  
167 E HERMAN ST  
PHILADELPHIA PA 19144

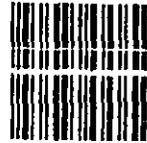




Ms. Harriet S. Thompson  
167 E. Herman St.  
Philadelphia, PA 19144



1000



19122

U.S. POSTAGE  
PAID  
PHILADELPHIA, PA  
19119  
AMOUNT

\$0.20

00026789-08



Laureto A. Farinas, Esquire  
Legal Department  
Philadelphia Gas Works  
800 W. Montgomery Ave.  
Philadelphia, PA 19122

1912232998 0012



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:**

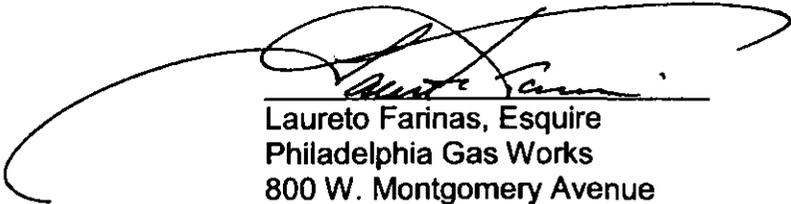
**For Complainant:**

**Mr. Johnny King  
167 E. Herman Street  
Philadelphia, PA 19144**

**Harriet Sewell Thompson, Paralegal  
167 E. Herman Street  
Philadelphia, PA 1944**

**By FedEx**

November 27, 2012



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