



PHILADELPHIA GAS WORKS

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August 25, 2014

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

Re: Jeanettie Hill v. PGW, Docket No. C – 2014 – 2434952
Jeanettie Hill v. PGW, Docket No. C – 2014 – 2435734

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.

Pursuant to 52 Pa. Code §5.102, you are hereby notified to file a written response to the enclosed Motion to Consolidate, within twenty (20) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted and a judgment may be entered against you

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: Jeanettie Hill (Regular Mail)
Linda Pereira (PGW Mail)
Wendy Vacca (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jeanettie Hill :
 :
 v. : **Docket No. C – 2014 – 2434952**
 :
Philadelphia Gas Works :

And

Jeanettie Hill :
 :
 v. : **Docket No. C – 2014 – 2435734**
 :
Philadelphia Gas Works :

**Philadelphia Gas Works’
Motion to Consolidate Formal Complaints**

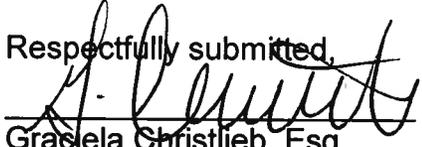
Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works (“PGW”) hereby files this Motion to Consolidate the above captioned matters. In support of its motion, PGW avers the following:

1. On August 1, 2014, the Complainant filed a formal complaint with the Commission under Jeanettie Hill v. PGW, Docket No. C – 2014 – 2434952. That matter concerned the request for a reasonable payment agreement for the service at 3141 N. 23rd Street, Philadelphia, Pennsylvania (Service Address). The Commission served PGW with that Complaint on October August 1, 2014.
2. PGW filed an Answer to that Complaint on August 21, 2014 indicating that the Complainant is to be set up on a payment agreement of \$480 monthly beginning with the August 2014 due date.
3. On July 29, 2014, the Complainant also filed a formal complaint with the Commission under Jeanettie Hill v. PGW, Docket No. C – 2014 – 2435743. That matter concerned a request a payment agreement for usage at the Service Address. The Commission served PGW with that Complaint on August 5, 2014.
4. PGW has filed an Answer to that Complaint on August 25, 2014.

5. Both matters, Jeanettie Hill v. PGW, Docket No. C – 2014 – 2434952 Jeanettie Hill v. PGW, Docket No. C – 2014 – 2434952, involve the same parties and revolve around the same factual events concerning the billing for gas service to the Service Address.
6. The witnesses for both parties would be the same in both matters.
7. The principle of judicial economy would be served best if the hearing for both matters was 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 matters Jeanettie Hill v. PGW, Docket No. C – 2014 – 2434952 and Jeanettie Hill v. PGW, Docket No. C – 2014 – 2434952 and have the hearing for both matters on the same date.

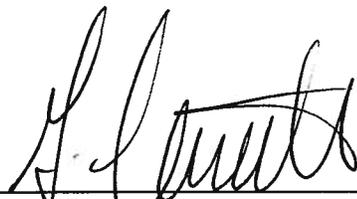
August 25, 2014

Respectfully submitted,

Graciela Christlieb, Esq.
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
215-684-6164

VERIFICATION

I, Graciela Christlieb, 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.

August 25, 2014



Graciela Christlieb, Esq.

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:

Ms. Jeanettie Hill
3141 N. 23rd Street
Philadelphia, PA 19132

August 25, 2014



Graciela Christlieb, Esquire
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