



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney
Legal Department
Direct Dial: 215-684-6164
FAX: 215-684-6798
graciela.christlieb@pgworks.com

August 28, 2014

RECEIVED

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

AUG 28 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Sheryl Brown v. PGW, Docket No. C – 2014 – 2429270

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §1.15(b), the Philadelphia Gas Works ("PGW") hereby files a Motion for Continuance of Hearing in the above captioned matter.

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

Sincerely,


Graciela Christlieb, Esq.

Enclosure

cc: Sheryl Brown (FedEx)
Administrative Law Judge Katrina L. Dunderdale (FedEx)
Wendy Vacca (PGW Mail)

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

AUG 28 2014

Sheryl Brown

Complainant

v.

Philadelphia Gas Works,

Respondent

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket No. C-2014-2429270

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 Thursday, September 4, 2014. In support of its motion, PGW states as follows:

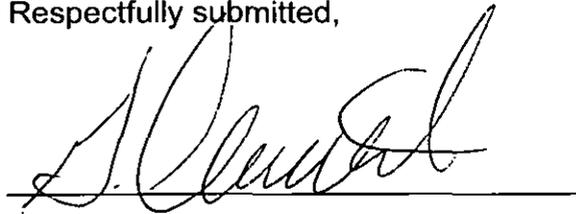
1. In 2013, the Complainant filed a Formal Complaint under Docket No. F-2013-2374970, involving the same factual circumstances and requesting the same relief as her Complaint in the instant matter.
2. On September 4, 2013, the Complainant and PGW settled the Formal Complaint under Docket No. F-2013-2374970; PGW filed a Certificate of Satisfaction that same day. The Settlement Letter sent to the Complainant, attached hereto as Exhibit A, shows that as part of the settlement Complainant agreed to pay her current bill plus \$15.00 a month towards her arrears for 40 months and, in exchange, PGW agreed to waive Late Payment Charges in the amount of \$55.35 as well as issue a Revenue Credit Adjustment in the amount of \$73.32.
3. The Complainant did not file an objection to the Certificate of Satisfaction.
4. The Complainant failed to comply with the settlement agreement.
5. On June 23, 2014 the Complainant filed the Complaint against PGW in the instant matter under Docket No. C-2014-2429270.
6. The Complaint under Docket No. C-2014-2429270 references the same arrearage and again requests a payment arrangement.

7. PGW intends to file a Motion for Summary Judgment in this matter, which would require that the Complainant have 20 days to reply.

WHEREFORE, Complainant requests that the hearing scheduled for Thursday, September 4, 2014, via telephone in the above captioned matter be continued and rescheduled.

Respectfully submitted,

August 28, 2014

A handwritten signature in black ink, appearing to read 'G. Christlieb', written over a horizontal line.

Graciela C. Christlieb, Esquire

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VERIFICATION

I, Graciela Christlieb, 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.

August 28, 2014



Graciela Christlieb, Esquire

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Exhibit A

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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

September 4, 2013

Ms. Sheryl Brown
7526 Maryland Street
Philadelphia, PA 19138

RE: Sheryl Brown v. Philadelphia Gas Works, Docket No. F – 2013 – 2374970

Dear Ms. Brown:

Pursuant to our settlement conference on September 3, 2013, this letter confirms the terms of the settlement of the above captioned matter.

In complete settlement of all issues in this matter, we have discussed your concerns with your account with PGW. The parties acknowledge and agree to the following:

1. This matter involves disputed balance of your account for gas service to 7526 Maryland Street Philadelphia, Pennsylvania (PGW Acct. No. 04-7006-8406).
2. As of August 23, 2013, your account balance is \$734.38. PGW has agreed to waive late payment charges in the amount of \$55.35 and issue a revenue credit adjustment of \$73.32 reducing your account balance to \$605.71.
3. You have agreed to a monthly payment agreement of your current bill plus \$15 towards arrears for 40 months. The first payment will be due with the October due date of your next bill.
4. You have indicated that you are satisfied with the treatment of your account for gas service, and you no longer wish to pursue the above captioned matter.

If you need any additional information, please contact me at my direct-dial number above. Thank you.

Sincerely,

Danielle Leva

cc: Anne Marie Cromley (PGW Mail)
Linda Pereira

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:

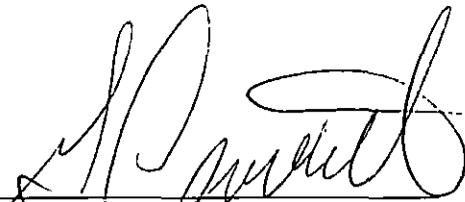
Ms. Sheryl Brown
7526 Mayland Road
Philadelphia, PA 19138

August 28, 2014

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



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

FedEx *NEW Package*
Express **US Airbill**

FedEx
Tracking
Number

8989 2249 0640

Form
ID No.

0215

Recipient's Copy

1 From: This portion can be removed for Recipient's records: -

Date 8/28/14 FedEx Tracking Number 898922490640

Sender's Name Graciela Christ. Eb Phone 215 684-6664

Company PHILADELPHIA GAS WORKS

Address 800 W MONTGOMERY AVE

City PHILADELPHIA State PA ZIP 19122-2878

RECEIVED
Dept./Floor/Suite/Room

2 Your Internal Billing Reference

AUG 28 2014

3 To

Recipient's Name PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU Phone PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Company PA Public Utility Commission

Address P.O. Box 3265
We cannot deliver to PO boxes or PO ZIP codes Dept./Floor/Suite/Room

Address _____
Use this line for the HOLD location address or for continuation of your shipping address

City Harrisburg State PA ZIP 17105-3265

0446046923



8989 2249 0640

4 Express Package Service * To most locations.
NOTE: Service order has changed. Please select carefully.

Packages up to 150 lbs.
For packages over 150 lbs., use the new
FedEx Express Freight US Airbill.

Next Business Day

2 or 3 Business Days

FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

NEW FedEx 2Day A.M.
Second business morning * Saturday Delivery NOT available

FedEx Priority Overnight
Next business morning * Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx 2Day
Second business afternoon * Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

FedEx Standard Overnight
Next business afternoon * Saturday Delivery NOT available

FedEx Express Saver
Third business day * Saturday Delivery NOT available

5 Packaging * Declared value limit \$500

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options

SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

No Signature Required
Package may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery. Fee applies.

Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only. Fee applies.

Does this shipment contain dangerous goods?

One box must be checked
 No Yes As per attached Shipper's Declaration. Yes Shipper's Declaration not required. Dry Ice Dry Ice, 3, UN 1845 _____ kg Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Sender Acct. No. in Section 1 will be billed Recipient Third Party Credit Card Cash/Check

Total Packages _____ Total Weight _____ Credit Card Auth. _____

Your liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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