



PHILADELPHIA GAS WORKS

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October 20, 2014

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

Re: Hassan S. Hashi v. PGW, Docket No. C – 2014 – 2438411
Hassan S. Hashi v. PGW, Docket No. C – 2014 – 2445068

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 Leva

Enclosure

cc: Hassan S. Hashi (Regular Mail)
Administrative Law Judge Darlene D. Heep (Email)
Linda Pereira (PGW Mail)
Wendy Vacca (PGW Mail)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Hassan S. Hashi

v.

Philadelphia Gas Works

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Docket No. C – 2014 – 2445068

**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 matter with a pending matter listed for a hearing. PGW hereby avers the following:

1. On September 24, 2014, the Complainant filed a formal complainant with the Commission at the docket number in the above captioned matter. That complaint was served upon PGW on October 1, 2014, to which PGW filed an answer on October 20, 2014. That matter avers, *inter alia*, that the Complainant is low income and seeks a payment agreement.
2. The Complainant had previously filed a formal complainant with the Commission at Docket No. C-2014-2438411. The matter avers, *inter alia*, that the Complainant is low income and seeks a payment agreement. That complaint was served upon PGW on August 20, 2014, to which PGW filed an answer on September 9, 2014.
3. Both matters involve the same parties and revolve around identical factual events concerning the billing and payment for gas service at the Service Address.
4. By notice dated September 25, 2014, the Commission scheduled the hearing of the matter in Docket No. C-2012-2438411 for Monday, November 3, 2014 at 10:00 a.m., before Administrative Law Judge Darlene D. Heep at the Commission’s Philadelphia Office.
5. The witnesses for both parties would be the same in both matters.

6. The principle of judicial economy would be best served if the hearings for both matters were conducted at one time, as time and resources would be used efficiently in the disposition of these matters if consolidated.

Wherefore, PGW respectfully requests that this Commission consolidate the matters at Docket Nos. C-2012-244568 and C-2012-2438411 and hear both on November 3, 2014.

Respectfully submitted,

October 20, 2014

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

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.

Date: October 20, 2014



Graciela Christlieb, Esq.

CERTIFICATE OF SERVICE

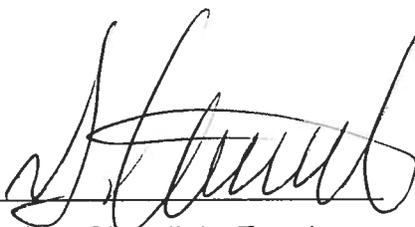
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Hassan S. Hashi
6579 Winsor Street
Philadelphia, PA 19142

October 20, 2014



Graciela Christlieb, Esquire
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