



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

August 12, 2015

Administrative Law Judge Ember S. Jandebaur
Room 317
Scranton State Office Building
100 Lackawanna Avenue
Scranton, PA 18503

Re: Sandra Custis v. PGW, Docket No. F – 2015 – 2485825

Dear Judge Jandebaur:

Pursuant to 52 Pa. Code §1.15(b), Philadelphia Gas Works, the Respondent (PGW) hereby requests a continuance of the hearing scheduled for Tuesday, August 18, 2015.

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
Sandra Custis (Fed Ex)
Wendy Vacca (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sandra Custis,	:	
	:	
Complainant	:	
v.	:	Docket No. F – 2015 – 2485825
	:	
Philadelphia Gas Works,	:	
	:	
Respondent	:	

MOTION FOR CONTINUANCE OF HEARING

Pursuant to 52 Pa. Code § 1.15(b), Philadelphia Gas Works, the Respondent (PGW or the “Company”) hereby requests a continuance of the hearing in this matter scheduled for 10:00 a.m., Tuesday, September 1, 2015, as there has been a change in counsel, who will be unavailable at the scheduled hearing time. In support of its motion, PGW states as follows:

1. On or about June 4, 2015, the Commission served the Respondent, PGW with the Complaint filed in the above captioned matter, to which Michael P. Decktor, Esq filed an Answer on June 24, 2015 representing PGW as counsel.
2. By Notice dated July 1, 2015, the Commission scheduled an Initial Telephonic Hearing in this matter for Tuesday, September 1, 2105 at 10:00 a.m., before Administrative Law Judge Ember S. Jandebaur, from the Commission’s Scranton office.
3. The undersigned Counsel for PGW has filed an Entry of Appearance and intends to represent PGW at the hearing of this matter as Mr. Decktor is no longer with the Company.
4. The undersigned will be unavailable on September 1, 2015 to represent PGW at the hearing, as he is already scheduled to appear before Administrative Law Judge Eranda Vero for a hearing in the Commission’s Philadelphia Office at the same time in *SBG Management Services, Inc., et al.*, Docket Nos. C-2015-2486677, C-2015-2486674, C-2015-2486664, C-2015-2486670, C-2015-2486642, C-2015-2486618, C-2015-2486655, C-2015-2486648.
5. On August 12, 2015, PGW contacted the Complainant, Ms. Custis concerning PGW’s request for a continuance. Ms. Custis has indicated that she does not object to PGW’s request for a continuance of the hearing of this matter and stated that the only

date for which the new telephonic hearing should not be rescheduled is September 16, 2015, as she would be unavailable on that day.

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

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

WHEREFORE, PGW requests that the Initial Hearing scheduled for September 1, 2015 at 10:00 a.m., in the above captioned matter be continued and rescheduled.

Respectfully submitted,

August 12, 2015



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.

Dated: August 12, 2015



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:

Sandra Custis
5231 Woodland Avenue
Philadelphia, PA 19143

August 12, 2015



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