



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

March 10, 2016

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

Re: William Ford v. PGW, Docket No. F – 2015 – 2519079

Dear Secretary Chiavetta:

The Philadelphia Gas Works (PGW) 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 this matter.

Sincerely,


Danielle Leva

Enclosure

cc: William Ford (Fed Ex)
Administrative Law Judge Conrad A. Johnson (Email)
Wendy Vacca (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

William Ford,	:	
Complainant	:	
v.	:	Docket No. F – 2015 – 2519079
	:	
Philadelphia Gas Works,	:	
Respondent	:	

**Motion for Change from a Telephonic Hearing to an
In Person Hearing at the Commission’s Philadelphia Offices**

Pursuant to 52 Pa. Code § 1.15(b), Philadelphia Gas Works, the Respondent (PGW or the “Company”) hereby requests the rescheduling of this matter from a telephonic hearing to an In Person Hearing to be held at the Commission’s Philadelphia Offices. In support of its motion, PGW states as follows:

1. On or about December 21, 2015, the Commission served the Respondent, PGW with the Complaint filed in the above captioned matter.
2. On January 11, 2016, PGW filed an Answer to the Complaint in the above captioned matter.
3. By Notice dated January 20, 2016, the Commission scheduled a Telephonic Hearing in this matter for Thursday, March 17, 2016 at 10:00 a.m., before Administrative Law Judge Conrad A. Johnson, from the Commission’s Pittsburgh office.
4. PGW requests that the matter be scheduled for an In Person hearing as PGW anticipates that the hearing may require the introduction of physical evidence and the testimony of multiple witnesses that will be better managed at an In Person hearing.
5. PGW has contacted Mr. Ford, the Complainant, and was unable to leave a message.
6. At this time, PGW believes that there is a possibility that the parties will resolve the instance matter by settlement.
7. PGW has not previously requested a continuance in this matter.

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 Motion 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.

March 10, 2016


Laureto Farinas, Esquire

8. 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 March 17, 2015 at 10:00 a.m., in the above captioned matter be continued and rescheduled.

Respectfully submitted,

March 10, 2016



Laureto Farinas

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. William Ford
6900 Forrest Avenue
Philadelphia, PA 19138

March 10, 2016



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