



PHILADELPHIA GAS WORKS

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March 15, 2016

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

Re: Christine Kauffman v. PGW, Docket No. F – 2016 – 2522647

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,

A handwritten signature in blue ink that reads 'Danielle Leva'.

Danielle Leva

Enclosure

cc: Christine Kauffman (Fed Ex)
Administrative Law Judge Marta Guhl (Email)
Wendy Vacca (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Christine Kauffman,	:	
Complainant	:	
v.	:	Docket No. F-2016-2522647
	:	
PHILADELPHIA GAS WORKS	:	
Respondent	:	

MOTION FOR CONTINUANCE OF HEARING

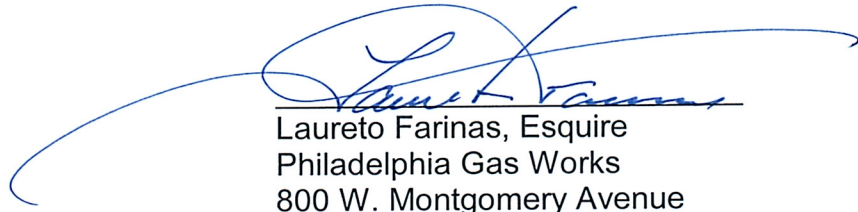
Pursuant to 52 Pa. Code § 1.15(b), Philadelphia Gas Works (hereinafter “Respondent” or “PGW”) hereby requests a continuance of the hearing in this matter scheduled for Friday, March 25, 2016, which falls on a day which PGW’s witness is unavailable as the business offices of PGW are closed on that day. In support thereof states as follows:

1. On or about January 8, 2016, Complainant filed a Formal Complaint against the PGW.
2. On January 28, 2106, PGW filed an Answer to the Complaint.
3. By notice dated February 10, 2016, the Commission has scheduled an Initial Call in Telephonic Hearing of this matter for Friday, March 25, 2016. That date is Good Friday on the Christian religious calendar.
4. PGW business offices are closed on March 25, 2016, making the PGW witness unavailable for testimony.
5. PGW has contacted the Complainant, through her sister, Lauri Damrell, to whom the Complainant has given authorization to speak with PGW on her behalf to discuss the matter. Ms. Damrell has indicated that the Complainant does not object to a continuance of this matter.
6. The Complainant, through Ms. Damrell, has requested additional account information in informal discovery that may lead to the amicable resolution of this matter after review of the materials and additional discussion by the parties.
7. PGW has shown good cause for the granting of a continuance of the hearing of this matter, pursuant to 52 Pa. Code § 1.15(b).

WHEREFORE, Complainant requests that the hearing scheduled for Friday, March 25, 2016, in this matter be continued.

March 15, 2016

Respectfully submitted,



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

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: March 15, 2016



Laureto Farinas
Laureto Farinas, Esquire

CERTIFICATE OF SERVICE

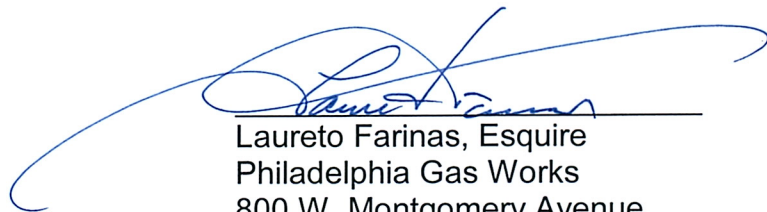
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Ms. Christine Kauffman
c/o Ms. Lauri Damrell
520 Woodside Oaks Drive
Sacramento, CA 95825

March 15, 2016



Laureto Farinas, Esquire
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