



**PHILADELPHIA GAS WORKS**

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September 20, 2016

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

**Re: Bernice Wallace v. PGW, Docket No. C – 2016 – 2552456**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.103, the Philadelphia Gas Works (PGW) hereby files its Motion for a Stay of the 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: Administrative Law Judge Eranda Vero (Email)  
Bernice Wallace  
Wendy Vacca (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Bernice Wallace	:	
	:	
Complainant	:	
v.	:	Docket No. C-2016-2552456
	:	
Philadelphia Gas Works,	:	
Respondent	:	

**MOTION FOR STAY**

Pursuant to 52 Pa. Code § 5.103, Philadelphia Gas Works (PGW), hereby presents its Motion for a Stay of the hearing in this matter scheduled for Monday, September 26, 2016. In support of its motion, PGW states as follows:

1. On June 20, 2016, the Complainant filed a Complaint in the above captioned matter wherein she requested a payment arrangement.
2. On July 12, 2016, PGW filed an Answer to the Complaint.
3. By Hearing Notice dated August 15, 2016, the Commission scheduled an In-person Hearing in this matter for Monday, September 26, 2016 at 10:00 a.m., before Administrative Law Judge Eranda Vero.
4. The Complainant has filed a Chapter 7 bankruptcy petition in federal court and, on August 16, 2016, filed a Motion to Dismiss the bankruptcy proceeding.
5. PGW has both pre-petition and post-petition accounts for the Complainant.
6. PGW requests that this matter be stayed pending the resolution of the bankruptcy.

**WHEREFORE**, Complainant requests that the hearing scheduled for Monday, March 28, 2016, in the above captioned matter be continued and rescheduled.

Respectfully submitted,

September 20, 2016

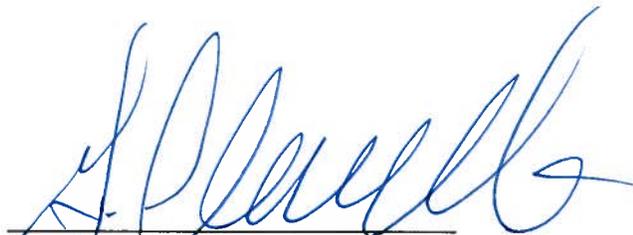


Graciela Christlieb, Esquire

**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 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.

September 20, 2016



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:

Bernice Wallace  
1157 Atwood Road  
Philadelphia, PA 19151

September 20, 2016



Graciela Christlieb, Esquire  
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