



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney  
Legal Department  
Direct Dial: 215-684-6164  
FAX: 215-684-6798  
graciela.christlieb@pgworks.com

September 30, 2016

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

**Re: Alan Serge v. PGW, Docket No. F – 2016 – 2554243**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §1.15(b), the Philadelphia Gas Works (PGW) hereby 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 the matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Graciela Christlieb", is written over a large, light blue, stylized flame or leaf graphic that occupies the right side of the page.

Graciela Christlieb, Esq.

cc: Alan Serge (FedEx)  
Special Agent Tiffany Tran (Electronic Mail & FedEx)  
Joyshalyn Moore (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Alan Serge	:	
	:	
Complainant	:	
v.	:	Docket No. F-2016-2554243
	:	
Philadelphia Gas Works,	:	
Respondent	:	

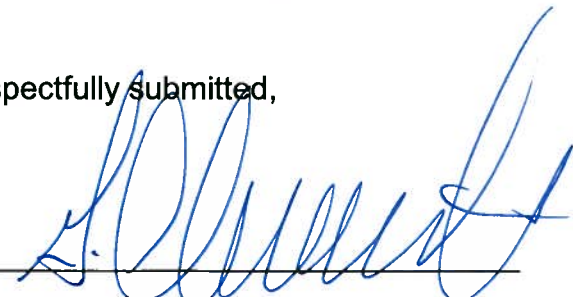
**MOTION FOR CONTINUANCE OF HEARING**

Pursuant to 52 Pa. Code § 1.15(b), Philadelphia Gas Works, the Respondent (PGW) hereby requests a continuance of the hearing in this matter scheduled for Tuesday, October 4, 2016. In support of its motion, PGW states as follows:

1. By Notice dated August 8, 2016, the Commission scheduled a Telephonic Hearing in this matter for Tuesday, October 4, 2016 at 10:00 a.m., before Special Agent Tiffany Tran.
2. The attorney representing PGW in this matter will be unavailable on Tuesday, October 4, 2016, as she has been subpoenaed to be in Municipal Court Criminal Division on that date. A redacted copy of the subpoena is attached hereto as Exhibit "A."
3. PGW has attempted to contact Mr. Serge, the Complainant, by telephone, but as been unable to speak with him.

**WHEREFORE**, Complainant requests that the hearing scheduled for Tuesday, October 4, 2016, via telephone in the above captioned matter be continued and rescheduled.

Respectfully submitted,


  
\_\_\_\_\_  
Graciela C. Christlieb, Esquire

September 30, 2016

**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 30, 2016



Graciela Christlieb, 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:

Mr. Alan Serge  
1413 Vista Street, Apt. 2  
Philadelphia, PA 19111

September 30, 2016



Graciela Christlieb, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6164

THE CITY AND COUNTY OF PHILADELPHIA THE COMMONWEALTH OF PENNSYLVANIA

BRING THIS SUBPOENA WITH YOU TRAIGA ESTA CITA CON USTED

# WITNESS SUBPOENA

Case Number	Commonwealth (El Estado) vs	PID
[REDACTED]	[REDACTED]	[REDACTED]

THE PHILADELPHIA MUNICIPAL COURT  
CRIMINAL DIVISION  
COURT OF COMMON PLEAS OF PHILADELPHIA  
TRIAL DIVISION CRIMINAL SECTION  
CRIMINAL JUSTICE CENTER, 1301 FILBERT ST.

**GRACIELA CHRISTLIB**

[REDACTED]  
Philadelphia

PA [REDACTED]

Note:

APPEAR IN		
ON		AT
Date Fecha	Courtroom Corte Sala	Time Hora
10-04-2016	Courtroom 4G 1501 Arch St	09:00 AM

You are commanded by the COURT to appear in this case, at the precise time and place indicated above. This subpoena shall be continuing and shall remain in force until the termination of the above criminal proceeding.

Usted esta ordenado por la Corte a comparecer como testigo en este caso en el sitio y hora. Esta cita sera continua y quedara vigente hasta la terminacion de los actos criminales arriba mencionado.



*Marsha A. Spill*  
President Judge, Municipal Court



*Theresa Wad Skoger*  
President Judge, Court of Common Pleas

This subpoena, dated 09-29-2016, supercedes any previous subpoena regarding this case.

For additional information, please see other side.

Return this portion IMMEDIATELY.  
Use the return prepaid envelope.



Devuelva esta tarjeta IMMEDIATAMENTE.  
Use el sobre proveado que esta estampillado.

Case# Commonwealth vs.

[REDACTED] [REDACTED]

Date	Room	Time
10-04-2016	Courtroom 4G	09:00 AM

Lead Charge:  
**Robbery-Infrict Threat Imm Bod Inj**

Unit: JC

Please list phone number and time you can be contacted. Si por alguna razon este caso tiene que ser continuado deje el numero de telefono y hora donde pueda ser notificado.

I acknowledge receipt of this subpoena. I will appear as scheduled. Yo admito haver recibido esta cita comparecere como es ordenado.

Home: Work: Cell:

[REDACTED]

Signature of Witness/Firma del Testigo

Email: \_\_\_\_\_

GRACIELA CHRISHIOR

Comments: \_\_\_\_\_

ADA:

[REDACTED]

Return to: Pre-Trial, District Attorney's Office, Three South Penn Square, Philadelphia, PA 19107