



PHILADELPHIA GAS WORKS

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February 15, 2017

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

Re: Shawanda Hassam v. Philadelphia Gas Works, Docket No. F-2016- 2573765

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.103, the Philadelphia Gas Works ("PGW") hereby files a Motion 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,


Graciela Christlieb

cc: Mu'min F. Islam, Esq.
Administrative Law Judge Katrina L. Dunderdale

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Shawanda Hassan,	:	
Complainant	:	
v.	:	Docket No. F-2016-2573765
	:	
Philadelphia Gas Works,	:	
Respondent	:	

**MOTION TO CONVERT TELEPHONIC HEARING
TO AN IN-PERSON HEARING**

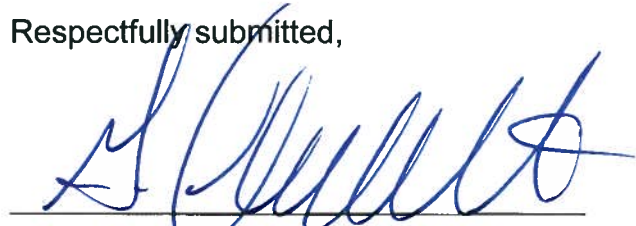
Pursuant to 52 Pa. Code § 5.103, Philadelphia Gas Works, the Respondent (“PGW”) hereby requests that the hearing in this matter be converted from a telephonic hearing to an in-person hearing. In support of its motion, PGW states as follows:

1. On November 2, 2016, the Commission served the Respondent with the Complaint filed in the above captioned matter, which is a theft bill.
2. On November 22, 2016, PGW filed an Answer to the Complaint in the above captioned matter.
3. By Notice dated January 12, 2017, the Commission scheduled a Telephonic Hearing in this matter for Tuesday, February 21, 2017 at 10:00 a.m., before Administrative Law Judge Katrina L. Dunderdale.
4. It is anticipated that the above captioned matter will require the testimony of several witnesses, the use of numerous documents, and the presentation of physical evidence.
5. The volume of oral and written testimony as well as the presentation and use of physical evidence necessitates that this matter be litigated in person so that both parties may effectively present their cases to the Court.
6. PGW has contacted the Complainant, through her attorney, Mu’min F. Islam, by telephone. Mr. Islam has indicated that he is in agreement with PGW’s request that this matter be scheduled for an in-person hearing.

WHEREFORE, given the number of potential witnesses, use of documentation, and presentation of physical evidence, PGW requests that the hearing scheduled for Thursday, June 26, 2014, 2014, in the above captioned matter be continued and rescheduled as an in-person hearing at the Commission's Philadelphia Office.

Respectfully submitted,

February 15, 2017



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.

February 15, 2017



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:

Mu'min F. Islam, Esq.
MFI Law Group, PLLC
1448 South Street
Suite 200
Philadelphia, PA 19146

February 15, 2017



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