



PHILADELPHIA GAS WORKS

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February 16, 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 §1.15(b), the Philadelphia Gas Works ("PGW") hereby files a Motion for a 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,


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 FOR CONTINUANCE OF HEARING

Pursuant to 52 Pa. Code § 1.15(b), and the computation of time outlined in 52 Pa. Code § 1.12, as well as the Prehearing Order issued on January 17, 2017, Philadelphia Gas Works, the Respondent (PGW) hereby submits this timely request for a continuance of the hearing in this matter, which is scheduled for Tuesday, February 21, 2017. 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. On Tuesday February 21, 2017, a necessary PGW witness, Naeem Tillman, will be unavailable to testify due to a work schedule conflict.
5. PGW appreciates that it is the policy of the Commission to encourage settlements and in the spirit of 52 Pa. Code § 5.231(a), the parties are actively pursuing a resolution; however, given the intricacies of the case, PGW does not foresee any resolution to this case being reached by the scheduled hearing date.
6. PGW has contacted the Complainant, through his attorney, Mu'min F. Islam, by telephone to discuss a continuance in this matter. Mr. Islam has no objection to the request for the continuance both because he understands that PGW's

witness is unavailable on the scheduled date, but also because he is in agreement with PGW that any meaningful attempt at a resolution will take more time.

WHEREFORE, Complainant requests that the hearing scheduled for Tuesday, February 21, 2017, in the above captioned matter be continued and rescheduled so that the parties may attempt to settle the matter without a hearing and, if a settlement is not reached, PGW may have all of its witnesses available.

February 16, 2017

Respectfully submitted,


A handwritten signature in blue ink, appearing to read 'G. Christlieb', written over a horizontal line.

Graciela C. 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 16, 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 16, 2017



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