



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney
Legal Department
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October 11, 2017

RECEIVED

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

OCT 11 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: PGW v. Kelvin Thomas, Docket No. F – 2017 – 2611788

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §1.15(b) & 5.103, the Philadelphia Gas Works 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,


Graciela Christlieb, Esq.

cc: Kelvin Thomas
Administrative Law Judge Marta Guhl
Jessica Glace

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

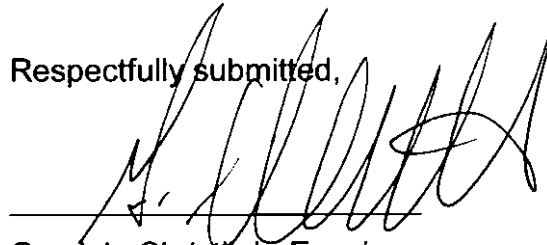
Philadelphia Gas Works	:	
Complainant	:	
v.	:	Docket No. F-2017-2611788
	:	
Kelvin Thomas,	:	
Respondent	:	

NOTICE TO PLEAD

To: Kelvin Thomas,

Pursuant to 52 Pa. Code §5.103, you are hereby notified to file a written response to the enclosed Preliminary Objections and Motion to Strike, within ten (20) days from service hereof or you may be deemed to be in default and relevant facts stated in these pleadings may be deemed admitted and a judgment may be entered against you.

Respectfully submitted,



October 11, 2017

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Philadelphia Gas Works	:	
Complainant	:	
v.	:	Docket No. F-2017-2611788
	:	
Kelvin Thomas,	:	
Respondent	:	

**MOTION FOR CONTINUANCE OF HEARING
AND CONSOLIDATION OF DOCKETS**

Pursuant to 52 Pa. Code § 1.15(b) & 5.103, Philadelphia Gas Works ("PGW"), the Complainant hereby submits this request for a continuance of the hearing in this matter, which is scheduled for Thursday, October 12, 2017 and Moves to consolidate the above captioned matter with Docket No. C-2017-2621275. In support of its motion, PGW states as follows:

1. On or about June 28, 2017, PGW filed a Complaint in the above captioned matter, which is an appeal of the Bureau of Consumer Services ("BCS") decision issued in Docket No. 3491811.
2. By Notice dated August 8, 2017, the Commission scheduled an In-Person Hearing in this matter for Thursday, October 12, 2017 at 10:00 a.m., before Administrative Law Judge Marta Guhl.
3. On or about August 14, 2017, the Respondent in this matter, Kelvin Thomas filed a Complaint under Docket No. C-2017-2621275 which is also an appeal of the BCS decision issued in Docket No. 3491811.
4. On or about October 2, 2017, the Respondent filed an Amended Complaint under Docket No. C-2017-2621275, which was served on PGW that same day.
5. PGW has not yet filed an Answer to the Amended Complaint filed on October 2, 2017.
6. By Notice dated October 11, 2017, the Commission scheduled an In-Person Hearing in the case at Docket No. C-2017-2621275 for Monday, January 15, 2018 at 10:00 a.m., before Administrative Law Judge Marta Guhl.

7. PGW has been unable to contact the Respondent regarding the Request for a Continuance and Motion to Consolidate.
8. Monday, January 15 is a federal holiday.
9. Both the matter at Docket No. F-2017-2611788 and Docket No. C-2017-2621275 are appeals of the BCS decision issued in Docket No. 3491811 and will involve the same set of facts, witnesses, and evidence.

WHEREFORE, Complainant requests that the hearing scheduled for Thursday, October 12, 2017, in the above captioned matter be continued and rescheduled so that this matter may be consolidated with the matter at Docket No. C-2017-2621275 and that both matters be scheduled for a hearing on a day that the Commission's offices are open.

Respectfully submitted,

October 11, 2017




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.

October 11, 2017



Graciela Christlieb, Esquire

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OCT 11 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

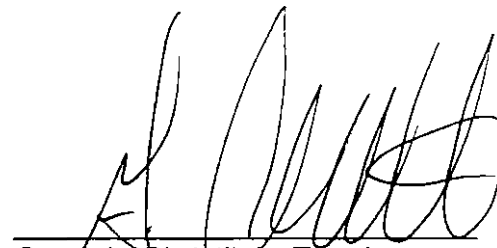
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

Service List:

For Complainant:

Kelvin Thomas
4446 North Gratz Street
Philadelphia, PA 19140

October 11, 2017



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

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OCT 11 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

034

102

FedEx Express **Package US Airbill**

FedEx Tracking Number

8119 2771 3385

Form ID No. 0215

1 From

Date 11/17/17

Sender's Name PHILADELPHIA GAS WORKS Phone 215 264 2124

Company PHILADELPHIA GAS WORKS

Address 300 W MONTGOMERY AVE Dept./Floor/Suite/Room

City PHILADELPHIA State PA ZIP 19106

2 Your Internal Billing Reference

3 To

Recipient's Name PHILADELPHIA GAS WORKS Phone 215 264 2124

Company PHILADELPHIA GAS WORKS

Address 300 W MONTGOMERY AVE Dept./Floor/Suite/Room

We cannot deliver to P.O. boxes or P.O. ZIP codes

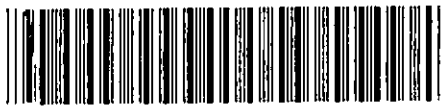
Address 300 W MONTGOMERY AVE

Use this line for the HOLD location address or for continuation of your shipping address

City PHILADELPHIA State PA ZIP 19106

Hold Weekday
FedEx location address REQUIRED. NOT available for FedEx First Overnight.

Hold Saturday
FedEx location address REQUIRED. Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.



8119 2771 3385

4 Express Package Service * To most locations. Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day

FedEx First Overnight
Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

FedEx 2Day A.M.
Second business morning.* Saturday Delivery NOT available.

FedEx 2Day
Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide

Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver

No Signature Required
Package may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery.

Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

One box must be checked

No Yes As per attached Shipper's Declaration Yes Shipper's Declaration not required Dry Ice Device 9, UN 1845 x _____ kg

Restrictions apply for dangerous goods — see the current FedEx Service Guide Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.

Sender Acct. No. as Section 1 will be billed. Recipient Third Party Credit Card Cash/Check

Total Packages _____ Total Weight _____ lbs. Credit Card Auth: _____

Your liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

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