



PHILADELPHIA GAS WORKS

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March 22, 2018

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

**Re: Ronald Brooks v. Philadelphia Gas Works, Docket No. F-2017- 2633508
& C-2017-2636820**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.81(a), the Philadelphia Gas Works hereby files a Motion to Consolidate the above captioned matters.

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: Ronald Brooks
Administrative Law Judge Marta Guhl
Administrative Law Judge Darlene D. Heep
Wendy Vacca

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Ronald Brooks :
 :
 v. : **Docket No. F – 2017 – 2633508**
 :
Philadelphia Gas Works :

And

Ronald Brooks :
 :
 v. : **Docket No. C – 2017 – 2636820**
 :
Philadelphia Gas Works :

**Philadelphia Gas Works’
Motion to Consolidate Formal Complaints**

Pursuant to 52 Pa. Code §5.81(a), the Philadelphia Gas Works (PGW) hereby files this Motion to Consolidate the above captioned matters. In support of its motion, PGW avers the following:

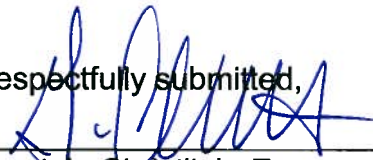
1. On October 130, 2017, Ronald Brooks filed a formal complaint with the Commission under Docket No. F-2017-2633508, wherein he requested restoration of service. The basis for Complaint is a balance attributed to theft of service at 1626 North Willington Street, Philadelphia, Pennsylvania (Service Address).
2. PGW filed an Answer to the Complaint on December 5, 2017, denying the material allegations of the Complaint.
3. On December 5, 2017, the Complainant filed a formal complaint with the Commission under Docket No. C-2017-2636820, wherein he appealed the Bureau of Consumer Services decision at BCS No. 3541289. The basis for the Complaint is the same as for F-2017-2633508: a balance attributed to theft of service at the Service Address. PGW has filed an Answer to that Complaint on August 25, 2014.
4. PGW filed an Answer to the Complaint on December 27, 2017, denying the material allegations of the Complaint.

5. Both matters involve the same parties and revolve around the same factual events concerning the billing for gas service to the Service Address.
6. The witnesses for both parties would be the same in both matters.
7. PGW has spoken to the Complainant regarding this request for consolidation and he is in agreement that the matters should be consolidated; he asks that both matters be scheduled on the date set for Docket No. F-2017-2633508, April 3, 2018, as he has already requested that day off from work to attend the hearing.
8. The principle of judicial economy would be served best if the hearing for both matters was conducted at one time as time and resources would be used efficiently in the disposition of these matters.

Wherefore, PGW respectfully requests that this Commission consolidate the matters and have the hearing for both matters on April 3, 2018.

March 22, 2018

Respectfully submitted,



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

VERIFICATION

I, Graciela Christlieb, hereby declare that I am counsel to the Philadelphia Gas Works and that, as such, I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Answer are true to the best of my knowledge, information, and belief and that I expect to be able to prove these at a hearing held in this matter. I make this verification subject to the penalties of 18. Pa. C.S. §4904, pertaining to false statements to authorities.

March 22, 2018



Graciela Christlieb

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. Ronald Brooks
1715 North Bouvier Street
Philadelphia, PA 19121

March 22, 2018



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