

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Gloria Woodard Estate c/o		:	
Frederick and Helena Woodard	:	:	
		:	
v.	:	:	C-2018-2641561
		:	
Philadelphia Gas Works	:		

REQUEST FOR CONTINUANCE

Your honor, I am Helena Woodard. I am the plaintiff in this case. I would like to request a continuance for 60 days.

On Friday, March 16, 2018, we received an order to obtain counsel to represent the Estate of Gloria Woodard. On Saturday, March 17, 2018, I contacted two Attorneys; our Estate/Probate Attorney and his colleague for assistance and neither were familiar with this process and referred me to Lawyer Referral Services.

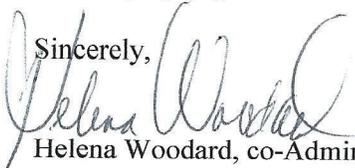
On Monday, March 19, 2018, I contacted the Pennsylvania Office of Consumer Advocate, which was established by the General Assembly in 1976 to represent the consumers of Pennsylvania in matters involving their utility service. I called and also sent an email message to kMarsilio, DLawrence, HBreitman and their general information. I received a call back from someone who identified himself as Joe, who told me that he would contact PGW. I have since then left voicemail and email messages for Joe, but unfortunately, he has not contacted me.

On Thursday, March 29, 2018, I received a call from the defendants Attorney. He explained why I needed an Attorney and asked if I wished to request more time to get an Attorney; and I responded yes. Unfamiliar with this process, the defendants Attorney offered information as to what I should do and said he would provide the fax telephone number. Thereafter, we discussed some of the issues, particularly the refund check. We agreed on a tentative settlement and the defendants Attorney assured me I would receive a copy of that letter. I did not receive his letter until Monday, April 2, 2018. I responded to the letter send on Monday, April 2, 2018.

After much consideration, I prefer to have this matter heard. Therefore, I am requesting a continuance of 60 days, if permissible. This will afford time to acquire an Attorney as ordered.

I humbly apologize for not being prepared, your Honor.

Sincerely,



Helena Woodard, co-Admin Gloria Woodard Estate

Encl: Email sent to defendants Attorney



GW Estate <glwoodardestate@gmail.com>

Re: Gloria Woodard Estate c/o Frederick & Helena Woodard v. PGW, C-2018-2641561

1 message

GW Estate <glwoodardestate@gmail.com>

Mon, Apr 2, 2018 at 9:27 PM

To: laureto.farinas@pgworks.com

Cc: GW Estate <glwoodardestate@gmail.com>, Fred Woodard <woodards4@comcast.net>

Mr. Farinas-- it was my pleasure speaking with you and Ms. Jones on March 29, 2018; this acknowledges the telephone conversation and receipt of the [attached](#) electronic version...

It's important to note that had PGW sent the refund to the correct address, the statement, "3. If not cashed"

By copy of the email message, we request that you revise the content of the letter dated April 2 2018 to Helena Woodard from Laureto Farinas based on the following:

"complete" settlement of all issues--

1. the letter does not address the fact that there was an admittance from PGW that the check was mailed out to the wrong address several times although the [attached](#) bill had the correct address. After several weeks of back and forth with PGW, we followed up and we were informed that the check that was sent in November was sent to the building we sold (910 S 19th St) and was being cancelled and re-issued. Please see the preceding emails from PGW's Steve Kernaghan Sr.

2. the letter refers to the "home address" and not the actual address, which is 1133 S 19th Street, Philadelphia, PA 19146. We're fearful --due to the chain of events with PGW since November 2017-- the check will not be sent to the correct address; events up to this point will be repeated and we will be waiting another 5-6 months.

3. the letter **does not mention that we have the right (within 10 days of receipt of this notice) to change our minds**

It's important to note--

- We are providing emails you need to consider to substantiate how we tried repeatedly with PGW to resolved this without involving PUC
- PGW clearly acknowledged they sent the check to the wrong address in November and December in spite of the fact we provided on more than 1 occasion the correct mailing address AND at the time the [attached](#) PGW bill had the correct mailing/billing address
- The comment in the letter, "if not cashed" is insulting
- We're in this position due to PGW incompetence
- We should not have to wait another 6 weeks for PGW to figure out what they did wrong
- Having to wait an additional 6 weeks when the estate has been waiting in excess of 5 months is unconscionable

Refer to the preceding emails--which are not all inclusive. We would be happy to forward all of the communications with PGW.

Our perception-- we have every reason to believe someone intentionally sent the refund to the wrong address. Because of our history with PGW, we also feel that it may have been retaliatory and that it will continue, even after this is resolved.

All things considered, the only resolution we will be satisfied with is to receive the refund check immediately.

Please revise the content of your [attached](#) letter and incorporate items 1, 2 and 3 above into the letter, taking all things into consideration; and provide us with a revised copy of the letter. PGW's willingness to makes these modifications affords the estate to move forward.

Also, please provide the general contact (fax) information you mentioned during the telephone conference for the ALJ Christopher P. Pell.

Thank you!

----- Forwarded message -----

From: **Kernaghan Sr, Steven A** <Steven.KernaghanSr@pgworks.com>

Date: Thu, Dec 28, 2017 at 12:24 PM

Subject: RE: Have Not Received a Check (PUC)

To: GW Estate <glwoodardestate@gmail.com>

Cc: Fred <woodards4@comcast.net>, Helena Woodard <helena_woodard@hotmail.com>, "Moser, Douglas A"



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Laureto A. Farinas, Senior Attorney
Legal Department
Direct Dial: 215-684-6982
FAX: 215-684-6798
E-mail: laureto.farinas@pgworks.com

April 2, 2018

Ms. Helena Woodard
Estate of Gloria Woodard
1133 S. 19th Street
Philadelphia, PA 19146

**RE: Gloria Woodard Estate c/o Frederick & Helena Woodard
v. Philadelphia Gas Works, Docket No. C-2018-2641561**

Dear Mrs. Woodard:

Pursuant to our settlement conference, held on March 29, 2018 with Tiffany Jones, Senior Customer Review Officer – PGW, this letter confirms the terms of the settlement of the above captioned matter.

In complete settlement of all issues in this matter, you have discussed your concerns with the accounts that are the subject of this complaint with PGW. The parties acknowledge and agree to the following:

1. Essentially, this matter involves the issuance of a refund in the amount of \$170.15 for gas use at 910 S. 19th Street, 1st Floor, Philadelphia, Pennsylvania PGW Acct. No. 0713756335 ("Service Address") The account is under the name of Gloria Woodard. You are the executors of the Estate of Gloria Woodard.
2. PGW (through Ms. Jones) will research the refund from the account of the Service Address in the amount of \$170.15 that was mailed on December 19, 2017. According to PGW records the check had not been cashed as of January 29, 2018. You have indicated that you have not received the check as of March 29, 2018.
3. If not cashed, PGW will re-issue the check and send it by FedEx to your home address. Ms. Jones informed you at the settlement conference that this process will take several weeks (up to 6 weeks).
4. You have indicated that you are satisfied with this resolution of your complaint and you no longer wish to pursue the above captioned matter against PGW.

If you need any additional information, please contact me at the direct dial number above. Thank you.

Sincerely,


Laureto Farinas

cc: Frederick & Helena Woodard (email: glwoodardestate@gmail.com)
Tiffany Jones (PGW Mail)
Wendy Vacca
Tyra Jackson



GW Estate <glwoodardestate@gmail.com>

E-Filing-E-Confirmation No 1715528

1 message

Leonard, Allyson <alleonard@pa.gov>

Tue, Apr 3, 2018 at 4:20 PM

To: "glwoodardestate@gmail.com" <glwoodardestate@gmail.com>

Good afternoon,

I am just contacting you to let you know that your e-filing has been rejected because all 3 documents must be filed as one PDF document. Please make the necessary correction & file again.

Thanks,

Allyson

Allyson E. Leonard

Legal Assistant 2

PUC Secretary's Bureau-C&A