



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

Graciela Christlieb, Senior Attorney  
Legal Department  
Direct Dial: 215-684-6164  
FAX: 215-684-6798

March 29, 2018

**RECEIVED**

MAR 29 2018

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

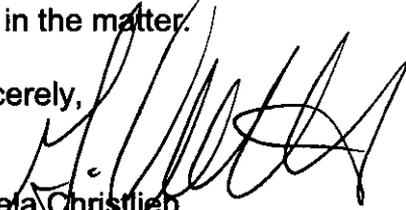
**Re: Tiara Murray v. Philadelphia Gas Works, Docket No. F-2017- 2639882**

Dear Secretary Chiavetta:

The Philadelphia Gas Works hereby files the original Motion to Reconsider, 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: Tiara Murray  
Tyra Jackson

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MAR 29 2018

Tiara Murray

v.

Philadelphia Gas Works

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Docket No. F- 2017 - 2639882

**Philadelphia Gas Works'  
Motion For Reconsideration**

The Philadelphia Gas Works ("PGW") hereby asks the Court to reconsider its granting of a continuance in the above captioned matter.

In support of this motion, PGW hereby avers the following:

1. On March 28, 2018, Marie Charles, an employee of PGW, contacted the Complainant and offered her a payment arrangement in an effort to settle the case. The Complainant rejected the terms of the offered payment arrangement.
2. On March 28, 2018, PGW received an email from the Complainant requesting a continuance of the hearing scheduled for April 2, 2018, attached hereto as Exhibit "A" wherein she alleged that Ms. Charles misrepresented herself as an unbiased third-party mediator attempting to assist Ms. Murray in entering a payment arrangement with PGW when, really, she was an attorney for PGW. The Complainant asked for a continuance in order to obtain legal representation so she could protect herself from Ms. Charles.
3. The Complainant did not contact PGW prior to submitting her request for a continuance.
4. On March 28, 2018, PGW sent the Court, via email, its objection to a continuance in this matter, wherein PGW argued that no good cause exists for a continuance as the Complainant's stated reason for needing a continuance is pretextual and the request was made in an effort to delay the hearing so that the collections hold on her account, which was generated by the open PUC matter and insulates her from service termination during the pendency of the case, would last longer.
5. In support of its argument, PGW supplied information about the Complainant's self-turn on as an example of the lengths the Complainant is willing to go to in an effort to keep from being without gas service.
6. PGW further stated that the Complainant's gas is now on as she had it restored using a medical certification.

7. Prior to having her gas restored under a medical certification, the Complainant paid the unauthorized usage charges on her account, which totaled \$49.37.

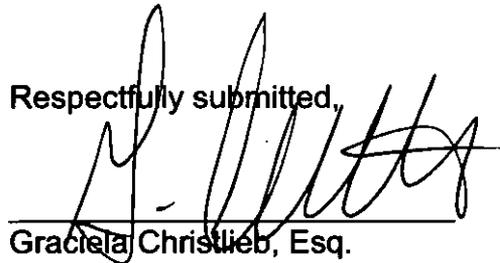
8. The Complaint does not raise theft or unauthorized usage as an issue in this case.

9. The exhibits submitted by PGW in anticipation of the April 2, 2018 hearing do not include information regarding theft or unauthorized usage because (1) PGW does not consider it to be a factor that affects the Complainant's request for a payment arrangement (PGW contacted her prior to the hearing to offer a payment arrangement), and (2) PGW has no intention of levying claims of theft or unauthorized usage against the Complainant during the course of the hearing.

**WHEREFORE**, PGW respectfully requests that the Court reconsider its granting of a continuance in this matter as PGW will not put the Complainant in the position of having to defend herself from claims of theft or unauthorized usage during the course of the hearing.

March 29, 2018

Respectfully submitted,



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Graciela Christlieb, Esq.  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

# EXHIBIT A

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**MAR 29 2018**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

3/28/2018

To: All Parties Involved

Judge Eranda Vero (Fax sent to 215-560-3133)

PGW - Graciela Christlleb (Fax sent to 215-684-6798)

Marie Charles

Re: Docket F - 2017- 2639882

Dear Judge Eranda Vero,

My name is Ms. Tiara J. Murray. I am writing this letter to request for a continuance in efforts to secure legal representation.

I apologize for the short notice, my initial intention was to appear in court without representation. However today I received a Telephone call from the opposing side and realized I am in dire need of representation. I was TRICKED by Them TODAY!

Today at 11 am I received a call from Ms. Marie Charles. I informed her I was working but would gladly call her on my lunch break at 12.

At approximately 12:20 I returned call as promised.

I asked the woman to state her title again and she said she was an administrative mediator whom assists PGW customers so that they do not have to go to court. She stated my court date was on April 2, 2018 and she would help me.

She said she would just ask a few questions and set a payment arrangement.

Believing Ms. Charles , I continued the conversation with her on the phone. Ms. Charles offered me an agreement to pay \$800 upfront and would give me 30 days to pay it. I kindly informed her I could not pay that amount. Possibly with a longer timeframe than 30 days but I simply do not have \$800 out of pocket to pay. I told her I would simply have to go to court and ask the judge for considerations. Ms. Charles refused any other arrangement and stated she would see me in court.

I later found out that she is the ATTORNEY for PGW. Her name is CC:d on the discovery docket. She is not an unbiased part, nor mediator

Understanding Gas is a necessity. Without gas, I will not have hot water. Please allow me a continuance to properly defend myself against an attorney who intentionally misrepresented herself to me today. Lawyers are privy of the laws and rules. I need to hire a Lawyer who can protect me from her.

Thank you for your for your time and consideration.

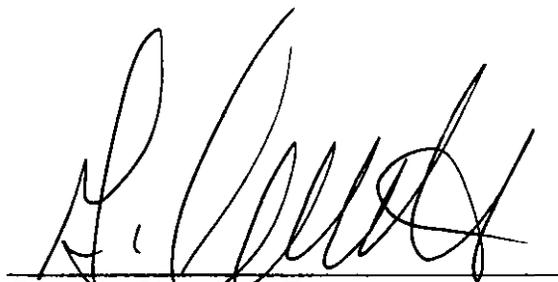
Respectfully,

*Ms. Tiara J. Murray*  
(267) 991-6500

**VERIFICATION**

I, Graciela Christlieb, hereby declare that I am counsel to the Philadelphia Gas Works; and that, as such, I am authorized to make the verification on its behalf that the facts set forth in the foregoing Motion 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.

Date: March 29, 2018



Graciela Christlieb, Esq.

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**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 § 1.54 (RELATING TO SERVICE BY A PARTICIPANT).

**Service List**

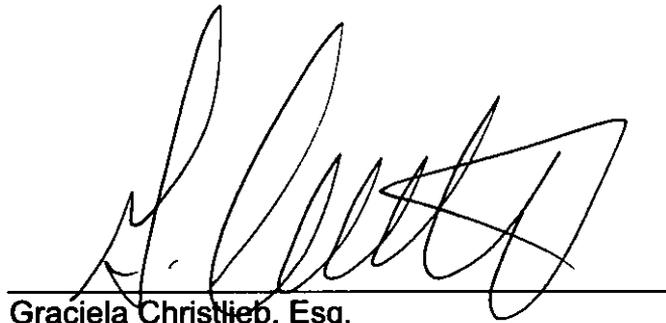
Tiara Murray  
6510 Saybrook Avenue  
Philadelphia, PA 19142

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**MAR 29 2018**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

March 29, 2018



Graciela Christlieb, Esq.  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122

00110

00152

**FedEx** Package  
Express **US Airbill**

FedEx Tracking Number **8119 2771 4245**

MUR4

Form ID No. **0215**

Facilitator's Copy

**1 From**  
Date 2/3/14

Sender's Name PHILADELPHIA GAS WORKS Phone 215 624 6141

Company PHILADELPHIA GAS WORKS

Address 800 W MONTGOMERY AVE

City PHILADELPHIA State PA ZIP 19122-2878

**2 Your Internal Billing Reference**

**3 To**  
Recipient's Name PHILADELPHIA GAS WORKS Phone 717 772-7777

Company PHILADELPHIA GAS WORKS

Address 4100 W. MONTGOMERY ST  
We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Subs/Room

Address \_\_\_\_\_  
Use this line for the HOLD location address or for continuation of your shipping address.

City PHILADELPHIA State PA ZIP 17120

0127717438



8119 2771 4245

**4 Express Package Service** \*To most locations. Packages up to 150 lbs. For packages over 50 lbs., see the FedEx Express Freight US Airbill.

Next Business Day	2 or 3 Business Days
<input type="checkbox"/> <b>FedEx First Overnight</b> Earliest next business morning delivery to select locations. Friday shipments will be delivered on Monday unless Saturday Delivery is selected.	<input type="checkbox"/> <b>FedEx 2Day A.M.</b> Second business morning.* Saturday Delivery NOT available.
<input type="checkbox"/> <b>FedEx Priority Overnight</b> Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.	<input type="checkbox"/> <b>FedEx 2Day</b> Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.
<input checked="" type="checkbox"/> <b>FedEx Standard Overnight</b> Next business afternoon.* Saturday Delivery NOT available.	<input type="checkbox"/> <b>FedEx Express Saver</b> 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?**  
Use box must be checked.

No     Yes As per attached Shipper's Declaration.     Yes Shipper's Declaration not required.     Dry Ice Dry Ice, 6 UN 1845

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.

Sender Acct. No. in Section 1 will be billed.     Recipient     Third Party     Credit Card

Total Packages \_\_\_\_\_ Total Weight \_\_\_\_\_ lbs.    Credit Card Auth. \_\_\_\_\_

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

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