



PHILADELPHIA GAS WORKS

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June 22, 2018

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

Re:Shane Timbers v. PGW, Docket No. F – 2018 – 3002660
Re:Shane Timbers v. PGW, Docket No. F – 2018 – 3002400

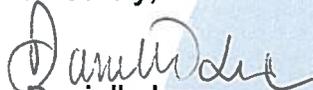
Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §5.61, the Philadelphia Gas Works ("PGW") hereby files the original Motion to Consolidate the above captioned matters.

Pursuant to 52 Pa. Code §5.102, you are hereby notified to file a written response to the enclosed Motion to Consolidate, within twenty (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

If additional information is required, please do not hesitate to contact the undersigned. Thank you for your assistance in the matter.

Sincerely,


Danielle Leva

Enclosure

cc: Shane Timbers (Regular Mail)
Wendy Vacca (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Shane Timbers	:	
	:	
Complainant	:	
v.	:	Docket No. F-2018-3002400
	:	
Philadelphia Gas Works,	:	
Respondent	:	

&

Shane Timbers	:	
	:	
Complainant	:	
v.	:	Docket No. F-2018-3002660
	:	
Philadelphia Gas Works,	:	
Respondent	:	

NOTICE TO PLEAD

To: Shane Timbers,

Pursuant to 52 Pa. Code §5.103, you are hereby notified to file a written response to the enclosed Motion for Consolidation of Dockets, within twenty (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,



June 22, 2018

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Shane Timbers	:	
	:	
Complainant	:	
v.	:	Docket No. F-2018-3002400
	:	
Philadelphia Gas Works,	:	
Respondent	:	
	:	
&	:	
	:	
Shane Timbers	:	
	:	
Complainant	:	
v.	:	Docket No. F-2018-3002660
	:	
Philadelphia Gas Works,	:	
Respondent	:	

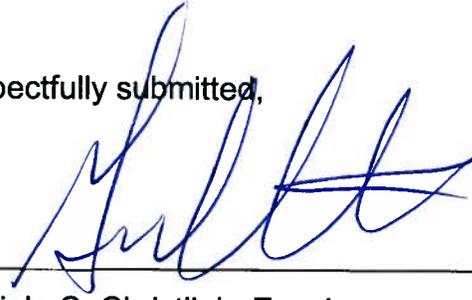
MOTION FOR CONSOLIDATION OF DOCKETS

Pursuant to 52 Pa. Code 5.103, Philadelphia Gas Works (PGW) hereby Moves to consolidate the above captioned matters. In support of its motion, PGW states as follows:

1. On May 14, 2018, Shane Timbers filed a Complaint in the above captioned matter, which is an appeal of the Bureau of Consumer Services (BCS) decision issued in BCS No. 3580823.
2. On or about August 14, 2017, Shane Timbers filed a Complaint under Docket No. C-2017-2621275, which is an appeal of the BCS decision issued in BCS No. 3602497.
3. Both matters are appeals of BCS decisions that relate to shut-off procedures under the Landlord Tenant Program and will involve the same set of facts, witnesses, and evidence.

WHEREFORE, Complainant requests that the Commission consolidate the above captioned matters.

Respectfully submitted,

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

June 22, 2018

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.

June 22, 2018



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:

Mr. Shane Timbers
5432 Gainor Road
Philadelphia, PA 19131

June 22, 2018



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