



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

---

Danielle Leva, Paralegal  
Legal Department  
Direct Dial: 215-684-6862  
FAX: 215-684-6798  
E-mail: [Danielle.leva@pgworks.com](mailto:Danielle.leva@pgworks.com)

April 25, 2019

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

**Re: Teresa Purdy v. PGW, Docket No. F – 2019 – 3008484**

Dear Secretary Chiavetta:

The Philadelphia Gas Works (PGW) files a Motion for a Change from a Telephonic Hearing to an In-Person 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 this matter.

Sincerely,

Danielle Leva

Enclosure

cc: Administrative Law Judge Marta Guhl (Email)  
Wendy Vacca (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Teresa Purdy,</b>	:	
	:	
Complainant	:	
	:	
v.	:	<b>Docket No. F-2019-3008484</b>
	:	
<b>Philadelphia Gas Works,</b>	:	
	:	
Respondent	:	

**PGW’s Motion for a Change from a  
Telephonic Hearing to an In-Person Hearing**

Pursuant to 52 Pa. Code §1.15(b), the Respondent, Philadelphia Gas Works (PGW) hereby requests that the Initial Call-In Telephonic Hearing of this matter scheduled for Thursday, May 9, 2019 at 10:00 a.m. be changed to an In-Person Hearing at the same time and date. In the alternative, if there are no available hearing rooms at the Commission’s offices on the scheduled date, PGW requests a continuance of this matter to the next available date on which an In-Person Hearing may be scheduled.

In support of its motion, PGW states as follows:

1. On or about March 15, 2019, PGW was served with the Complaint filed in the above captioned matter, which is a dispute charges for unauthorized gas usage and meter tampering at 316 N. Salford Street, Philadelphia, Pennsylvania (“Service Address”).
2. On April 3, 2019, PGW filed its Answer to the Complaint averring that the unauthorized usage of gas was discovered on January 7, 2019 and that the charges for unauthorized usage of \$7,158.37 were from the period beginning February 24, 2015 through January 4, 2019.
3. By the Commission’s Notice dated April 4, 2019, this matter has been set for an Initial Call-In Telephonic Hearing on Thursday, May 9, 2019 at 10:00 a.m.
4. Providing testimony on behalf of PGW in matters concerning the discovery, documentation and billing of unauthorized usage presents a difficult burden where photographs and other demonstrative evidence must be described and explained in

detail by witnesses with personal knowledge of the events. An In-Person hearing facilitates the provision of clearer testimony and better understanding of the factual issues of all parties.

5. Therefore, the interests of justice and fairness are best served in this case by holding an In-Person Hearing in which the parties may more clearly explore and understand the circumstances surrounding the discovery of unauthorized usage at the Service Address.

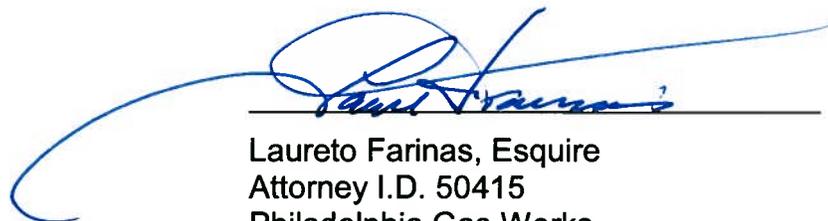
6. On April 25, 2019, PGW contacted the Complainant, Ms. Purdy, who indicates that she does not object to PGW's request for an In-Person Hearing on May 9, 2019 or in the alternative, another date for which an In-Person hearing may be scheduled.

7. PGW has not previously requested a continuance in this matter.

**WHEREFORE**, PGW requests that the Initial Call-In Telephonic Hearing of this matter scheduled for Thursday, May 9, 2019 at 10:00 a.m. before Administrative Law Judge Marta Guhl be changed to an In-Person Hearing at the same time and date. In the alternative, if there are no available hearing rooms at the Commission's offices on the scheduled date, PGW requests a continuance of this matter to the next available date on which an In-Person Hearing may be scheduled.

Respectfully submitted,

April 25, 2019



Laureto Farinas, Esquire  
Attorney I.D. 50415  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982

## VERIFICATION

I, Laureto Farinas, 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 Answer 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.

Dated: April 25, 2019



Laureto Farinas, Esquire

**CERTIFICATE OF SERVICE**

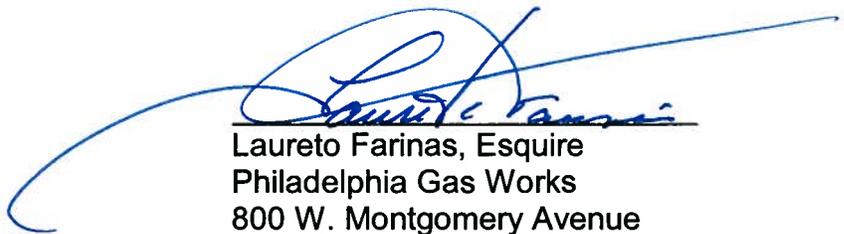
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, BY REGULAR MAIL IN ACCORDANCE WITH THE APPLICABLE REQUIREMENTS.

Service List:

For Complainant:

Teresa M. Purdy  
316 N. Salford Street  
Philadelphia, PA 19139

April 25, 2019



Laureto Farinas, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6982