



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

Danielle Ross, Paralegal
Legal Department
Direct Dial: 215-684-6862
FAX: 215-684-6798
E-mail: danielle.ross@pgworks.com

September 9, 2019

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

Re: LaDonnia Smalls v. PGW, Docket No. C – 2019 – 3012114
LaDonnia Smalls v. PGW, Docket No. C – 2019 – 3012277

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.

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: LaDonnia Smalls (Regular Mail)
Wendy Vacca (PGW Mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LaDonnia Smalls

v.

Philadelphia Gas Works

:
:
:
:
:

Docket No. C-2019-3012114

And

LaDonnia Smalls

v.

Philadelphia Gas Works

:
:
:
:
:

Docket No. C-2019-3012277

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

Pursuant to 52 Pa. Code §5.61, 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 August 9, 2019, the Complainant filed a formal complaint with the Commission under LaDonnia Smalls v. PGW, Docket No. C-2019-3012114. That matter concerned the request for a reasonable payment agreement for the service at 614 W. Huntingdon Street, Philadelphia, Pennsylvania (Service Address). The Commission served PGW with that Complaint on August 15, 2019.
2. PGW has filed an Answer to that Complaint indicating that the Complainant is to be set up on a payment agreement of \$272 monthly beginning with the September 2019 due date.
3. On August 16, 2019, the Complainant also filed a formal complaint with the Commission under LaDonnia Smalls v. PGW, Docket No. C-2019-3012277. That matter concerned a request a payment agreement for usage at the Service Address. The Commission served PGW with that Complaint on August 20, 2019.

4. PGW has filed an Answer to that Complaint once again indicating that the Complainant is to be set up on a payment agreement of \$272 monthly beginning with the September 2019 due date.
5. Both matters at Docket No. C-2019-3012114 and Docket No. C-2019-3012277, 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. 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 LaDonnia Smalls v. PGW, Docket No. C – 2019 – 3012114 and LaDonnia Smalls v. PGW, Docket No. C – 2019 – 3012277 and have the hearing for both matters on the same date.

September 9, 2019

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.

September 9, 2019



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:

Ms. LaDonnia Smalls
614 W. Huntingdon Street
Philadelphia, PA 19133

September 9, 2019



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