



PHILADELPHIA GAS WORKS

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Danielle Leva, Paralegal
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November 26, 2019

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

Re: Michelle Bowser v. PGW, Docket No. C – 2019 – 3013592

Dear Secretary Chiavetta:

The Philadelphia Gas Works (PGW) files a Motion for Continuance of 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: Michelle Bowser
Special Agent Alphonso Arnold III (Email)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michelle Bowser,	:	
Complainant	:	
v.	:	Docket No. C-2019-3013592
	:	
Philadelphia Gas Works,	:	
Respondent	:	

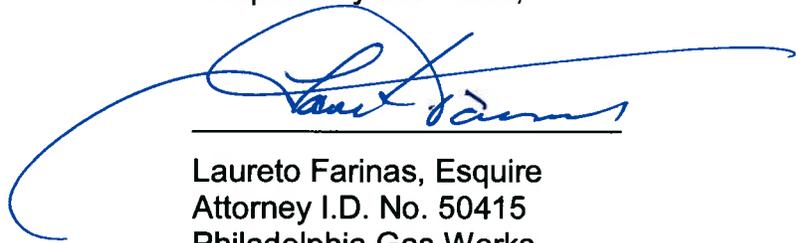
NOTICE TO PLEAD

To: Michelle Bowser, Complainant:

Pursuant to 52 Pa. Code §5.101, you are hereby notified to file a written response to the enclosed Motion for Continuance 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,

November 26, 2019



Laureto Farinas, Esquire
Attorney I.D. No. 50415
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
(215) 684-6982

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michelle Bowser,	:	
	:	
Complainant	:	
v.	:	Docket No. C-2019-3013592
	:	
Philadelphia Gas Works,	:	
	:	
Respondent	:	

**PGW's Motion for Continuance of
Hearing Scheduled for December 23, 2019**

Pursuant to 52 Pa. Code §5.103, the Respondent, Philadelphia Gas Works (PGW) hereby respectfully requests that the hearing in the above referenced matter scheduled for 1:00 p.m., December 23, 2019 be the continued as Respondent's counsel will be out of the country

In support of its motion, PGW states as follows:

1. On or about October 18, 2019, PGW was served with the Complaint filed in the above captioned matter, which is a request for a payment arrangement for the Complainant's residential account at 5826 N. Lambert Street, Philadelphia, Pennsylvania ("Service Address").

2. On November 6, 2019, PGW filed its Answer to the Complaint averring that the Complainant is eligible for a payment arrangement provided by decision of the Commission's Bureau of Consumer Services dated August 22, 2019 to which the Complainant maintains is not affordable.

3. By the Commission's Notice dated November 8, 2019, this matter has been set for an Initial Call-In Telephonic Hearing on Monday, December 23, 2019 at 1:00 p.m.

4. Counsel for PGW will be unavailable for that hearing as he has a prepaid holiday vacation out of the country from December 23, 2019 and will return on January 3, 2020.

5. PGW has attempted to engage the Complainant in settlement negotiations. On November 21, 2019 Ms. Patricia Bernard had a settlement conference with the

Complainant who indicated that she felt that PGW's request of a down payment to start a payment arrangement was unaffordable. After some discussion the parties were not able to reach a settlement.

6. On November 26, 2019, counsel for PGW contacted the Complainant regarding a continuance of the matter. The Complainant had indicated that she does not object to PGW's request for a continuance.

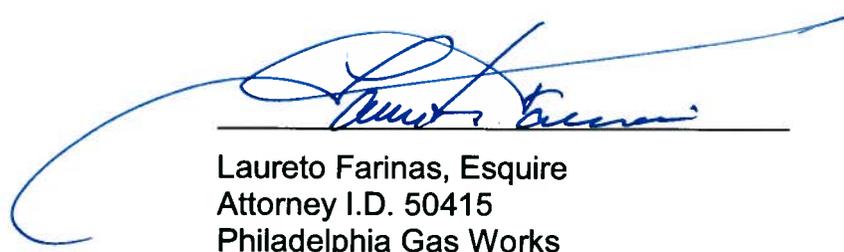
7. PGW has shown good cause for the grant of a continuance of the hearing of this matter. Therefore, the interests of justice and fairness are best served in this case by holding a telephonic Hearing on a date after December 23, 2019 during which the parties may engage in further settlement discussions prior to the continued hearing date.

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

WHEREFORE, PGW requests that the Initial Telephonic Hearing of this matter scheduled for Monday, December 23, 2019 at 1:00 p.m. be continued to a later date.

Respectfully submitted,

November 26, 2019

A handwritten signature in blue ink, appearing to read 'Laureto Farinas', is written over a horizontal line. The signature is stylized and extends to the left with a long, sweeping underline.

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: November 26, 2019



Laureto Farinas
Laureto Farinas, Esquire

CERTIFICATE OF SERVICE

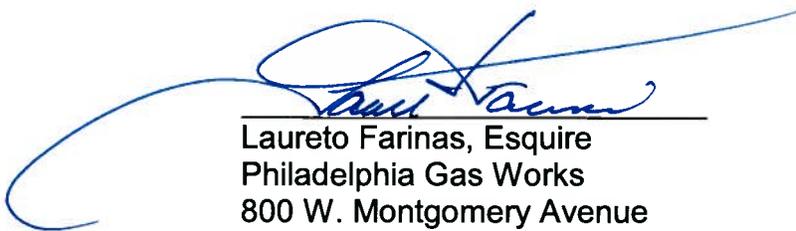
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, BY REGULAR MAIL IN ACCORDANCE WITH THE APPLICABLE REQUIREMENTS.

Service List:

For Complainant:

Michelle Bowser
5826 N. Lambert Street
Philadelphia, PA 19138

November 26, 2019



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