



**PHILADELPHIA GAS WORKS**

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November 27, 2019

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

**Re: Andrew Lupo v. PGW, Docket No. F – 2019 – 3013790**

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: Andrew Lupo  
Special Agent Alphonso Arnold III (Email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Andrew Lupo,**

Complainant

v.

**Philadelphia Gas Works,**

Respondent

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**Docket No. F-2019-3013790**

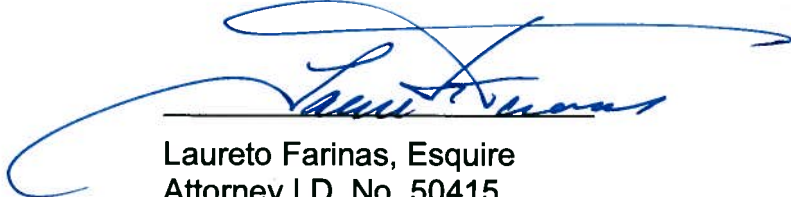
**NOTICE TO PLEAD**

**To: Andrew Lupo, 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 27, 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**

<b>Andrew Lupo,</b>	:	
	:	
Complainant	:	
	:	
v.	:	<b>Docket No. F-2019-3013790</b>
	:	
	:	
<b>Philadelphia Gas Works,</b>	:	
	:	
Respondent	:	

**PGW's Motion for Continuance of  
Hearing Scheduled for December 30, 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 10:00 a.m., December 30, 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 25, 2019, PGW was served with the Complaint filed in the above captioned matter, which is a billing dispute for the Complainant's residential account at his former residence, 1840 N. 16<sup>th</sup> Street, Philadelphia, Pennsylvania ("Previous Service Address"). The Complainant currently resides in Middlesex County, New Jersey.
2. On November 13, 2019, PGW filed its Answer to the Complaint averring that the Complainant is responsible for payment of the PGW bill rendered for service to the Previous Service Address.
3. By the Commission's Notice dated November 18, 2019, this matter has been set for an Initial Telephonic Hearing on Monday, December 30, 2019 at 10:00 a.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 26, 2019, counsel for PGW called the Complainant to have a settlement conference and to ask whether the Complainant objected to this request for a

continuance. Counsel for PGW left a voice mail to return the call. Later that day, the Complainant returned the call. After some discussion the parties were not able to reach a settlement.

6. The Complainant does not object to PGW's request for a continuance.

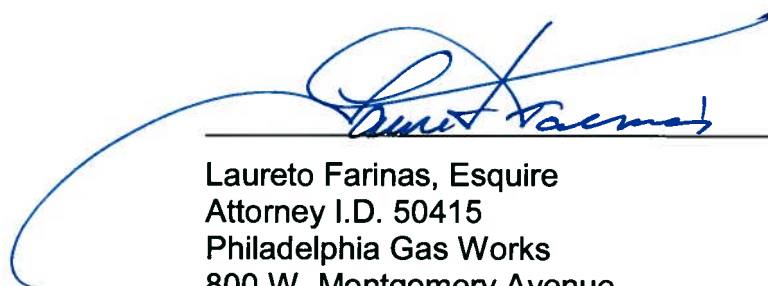
7. PGW has shown good cause for the grant of a continuance of the hearing of this matter. Therefore, the interests of justice and fairness are best served in this case by holding a Telephonic Hearing on a date after December 30, 2019 during which the parties may engage in further settlement discussions 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 30, 2019 at 10:00 a.m. be continued to a later date.

Respectfully submitted,

November 27, 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: November 27, 2019

  
Laureto Farinas, Esquire

**CERTIFICATE OF SERVICE**

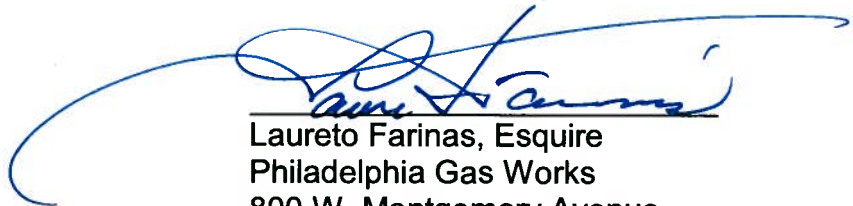
I HEREBY CERTIFY THAT I HAVE THIS DAY SERVED A TRUE COPY OF THE FOREGOING DOCUMENT UPON THE PARTICIPANTS LISTED BELOW, BY REGULAR MAIL IN ACCORDANCE WITH THE APPLICABLE REQUIREMENTS.

Service List:

For Complainant:

Andrew Lupo  
1 Anderson Way  
Monmouth Junction, NJ 08852

November 27, 2019



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