



**PHILADELPHIA GAS WORKS**

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March 12, 2020

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

**Re: Patricia and Jeffrey Smith v. PGW, Docket No. C – 2020 – 3018844**

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code §1.15, the Philadelphia Gas Works ("PGW") hereby files a Petition for an Extension of Time to File Answer to Complaint.

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: Patricia and Jeffrey Smith  
Joline Price, Esq.

Recommended for Call of the Docket

✓ Not recommended for Call of the Docket

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Patricia and Jeffrey Smith,**  
Complainants

v.

**Philadelphia Gas Works,**  
Respondents

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**Docket No. C-2020-3018844**

**Philadelphia Gas Works' Petition for an  
Extension of Time to File Answer to Complaint**

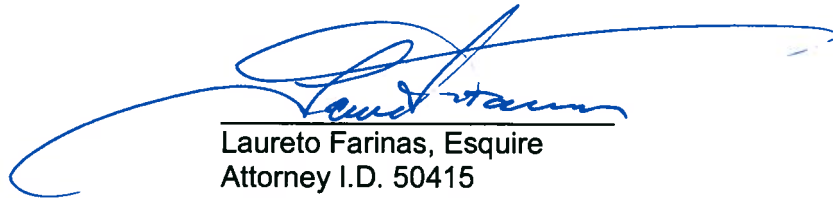
Pursuant to 52 Pa. Code §1.15, the Philadelphia Gas Works (PGW) hereby requests an extension of time in which to file an answer to the Complaint in the above captioned matter. PGW hereby avers the following:

1. On February 21, 2020, the Commission served PGW with the Complaint in the above captioned matter, setting due date for filing an Answer as March 12, 2020.
2. PGW and the Complainants' counsel, Joiline Price, Esq. of Community Legal Services have discussed several issues of this matter, including pending discovery requests, the stay of the Informal Decision from which this matter is an appeal and the due date of the Answer.
3. The parties have agreed that the due date for filing an Answer to the Complaint should be extended to March 20, 2020, as shown in the email attached hereto as Appendix "A."

**Wherefore**, PGW respectfully requests that this Commission allow the filing of the Answer to the Complaint in the above captioned matter to be extended to March 20, 2020.

Respectfully submitted,

March 12, 2020



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

# EXHIBIT A

## Farinas, Laureto A

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**From:** Joline Price <JPrice@clsphila.org>  
**Sent:** Wednesday, March 11, 2020 11:55 AM  
**To:** Farinas, Laureto A  
**Subject:** Smith v. PGW - Answer extension

**External Email Notice. This Email originates from outside of PGW.**

**Do not click on links or open attachments unless you recognize the sender.**

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Hi Laureto,

Following up with you as I called back but got your voicemail. We would be willing to agree to an extension on an answer through next Friday (3/20) with the caveats we discussed on the phone – that there be a stay on any termination activity, and that PGW would agree the complaint is a timely filed appeal of the BCS decision (or however you want to word it). If you can give me a call to discuss more, that would be appreciated – I can be reached at 215-981-3756.

Thanks,  
Joline



**Joline Price**

*Pronouns: she/her/hers*

Supervising Attorney

Energy Unit

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Philadelphia, PA 19102

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[www.clsphila.org](http://www.clsphila.org)



**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.

March 12, 2020



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, IN ACCORDANCE WITH THE REQUIREMENTS OF 52 PA CODE §1.54 (RELATING TO SERVICE BY A PARTICIPANT).

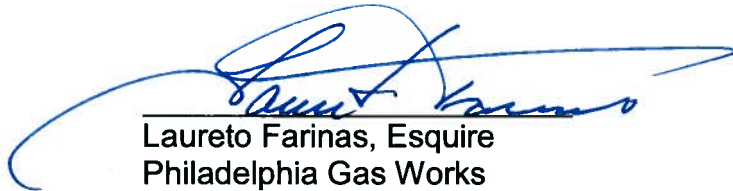
Service List:

For Complainants, Patricia & Jeffrey Smith:

Joline Price, Esq.  
Robert Ballenger, Esq.  
Josie Pickens, Esq.  
Community Legal Services  
1424 Chestnut Street  
Philadelphia, PA 19102

& by e-mail: [jprice@clsphila.org](mailto:jprice@clsphila.org)

March 12, 2020



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