



PHILADELPHIA GAS WORKS

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May 5, 2020

Rosemary Chiavetta Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 171-3265

RE: *Andrea Leiba v. Philadelphia Gas Works, Docket No. C-2020-3017429*

Dear Secretary Chiavetta:

The Philadelphia Gas Works ("PGW") files a Motion for Continuance of the hearing in the above captioned matter.

If additional information is required, please do not hesitate to contact me at my direct-dial number above. Thank you.

Sincerely,



Laureto Farinas

cc: Administrative Law Judge Eranda Vero (email)
Jessica Glace (PGW email)
Tiffany Jones

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Andrea Leiba,	:	
	:	
Complainant	:	
v.	:	Docket No. C-2020-3017429
	:	
	:	
Philadelphia Gas Works,	:	
	:	
Respondent	:	

Philadelphia Gas Works' Motion for a Continuance

Pursuant to 52 Pa. Code §5.572(d), the Respondent, Philadelphia Gas Works (PGW) hereby requests that the Commission grant a continuance of the Call-In Telephonic Hearing scheduled for May 11, 2020.

In support of its motion, PGW states as follows:

1. On or about February 4, 2020, 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 4902 Brown Street, Philadelphia, Pennsylvania ("Service Address").
2. On February 24, 2020, PGW filed its Answer to the Complaint averring that the unauthorized usage of gas was discovered on January 7, 2020 and that the charges for unauthorized usage of \$6,666.08 were from the period beginning June 1, 2017 through January 2, 2020.
3. There also charges for unauthorized gas usage at the Service Address in the amount of \$4,500.16 for the period from August 15, 2015 through May 30, 2017.
4. On January 2, 2020, PGW had abandon gas service to the Service Address at the main.
5. By the Commission's Notice dated February 26, 2020, this matter had been set for an Initial In-person Telephonic Hearing on Tuesday, March 31, 2020 at 10:00 a.m. This was later changed to a telephonic hearing due to the precautions taken to stop the spread of the COVID- 19 virus. The matter was continued by Commission order.
6. By Notice dated April 21, 2020, the Commission scheduled the matter to be heard by Call-In Telephonic hearing on
7. Providing testimony on behalf of PGW in matters concerning the documentation

and billing of unauthorized usage presents a difficult burden where photographs and other demonstrative evidence may be described and explained in detail by witnesses with personal knowledge of the events.

8. Due to the scheduling of work for essential PGW personnel during this period, the PGW witness who discovered the conditions is not available on the day of the telephonic hearing.

9. Therefore, the interests of justice and fairness are best served in this case by holding a Hearing that will allow PGW witnesses to participate fully and ideally in an In-Person hearing.

10. On May 5, 2020, PGW contacted the Complainant, Ms. Leiba, who indicates that she does not object to PGW's request for a continuance of the hearing scheduled for May 11, 2020.

WHEREFORE, PGW requests that the Call-In Telephonic Hearing of this matter scheduled for Tuesday, May 11, 2020 at 10:00 a.m. before Administrative Law Judge Eranda Vero be continued to a new date.

Respectfully submitted,

May 5, 2020

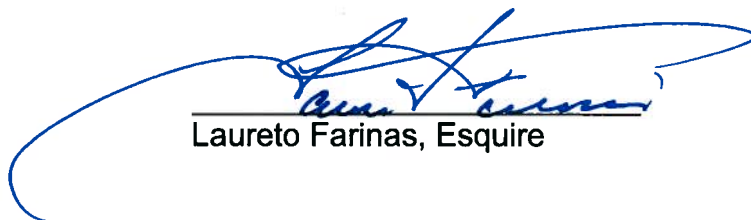


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VERIFICATION

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: May 5, 2020



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:

Ms. Andrea Leiba
4902 Brown Street
Philadelphia, PA 19139

May 5, 2020



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