



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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Legal Department  
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July 2, 2020

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

**Re: Clivette Walker v. PGW, Docket No. C – 2020 – 3019256**  
**Clivette Walker v. PGW, Docket No. F – 2020 – 3019638**

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: Clivette Walker (Regular Mail)  
Jessica Glace (PGW Mail)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Clivette Walker** :  
 :  
 v. : **Docket No. C – 2020 – 3019256**  
 :  
**Philadelphia Gas Works** :

**And**

**Clivette Walker** :  
 :  
 v. : **Docket No. F – 2020 – 3019638**  
 :  
**Philadelphia Gas Works** :

**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 March 16, 2020, the Complainant filed a formal complaint with the Commission under *Clivette Walker v. PGW*, Docket No. C – 2020 – 3019256. That matter concerned the request for a reasonable payment agreement for the service at 2125 Granite Street, Philadelphia, Pennsylvania (Service Address). The Commission served PGW with that Complaint on or about March 20, 2020.
2. PGW filed an Answer to that Complaint on April 6, 2020 indicating that as PGW terminated gas service for nonpayment at the Service Address in April 2016 and discovered meter tampering and unauthorized usage in February 2020, the Complainant was not entitled a payment arrangement but must pay all outstanding balances for service to the Service Address before service could be restored.
3. On or about April 25, 2020, the Complainant also filed a formal complaint with the Commission under *Clivette Walker v. PGW*, Docket No. F – 2020 – 3019638. That matter also concerned a request a payment agreement for usage at the Service Address. The Commission served PGW with that Complaint on or about April 29, 2020

to which PGW filed an Answer to that Complaint on May 19, 2020 that was substantially the same as the answer to the Complainant's previous complaint.

4. In *Clivette Walker v. PGW*, Docket No. C – 2020 – 3019256, the Commission has scheduled a Call-In Telephonic Hearing for Thursday, July 23, 2020 before Special Agent Alphonso Arnold, III at 10:00 a.m. (See Appendix "A")

5. In *Clivette Walker v. PGW*, Docket No. F – 2020 – 3019638, the Commission has scheduled a Call-In Telephonic Hearing for Tuesday, August 18, 2020 before Administrative Law Judge Darleen D. Heep at 10:00 a.m. (See Appendix "B")

6. Both matters, *Clivette Walker v. PGW*, Docket No. C – 2020 – 3019256 and *Clivette Walker v. PGW*, Docket No. F – 2020 – 3019638, involve the same parties and revolve around the same factual events concerning the discovery of meter tampering and billing for unauthorized usage for gas service to the Service Address.

7. At the hearings for both of these matters, the witnesses for both parties would be the same. For PGW's presentation of its case, these witnesses include the PGW Technician who discovered the meter tampering and the witnesses explaining the calculation of the amount charged for the unauthorized usage.

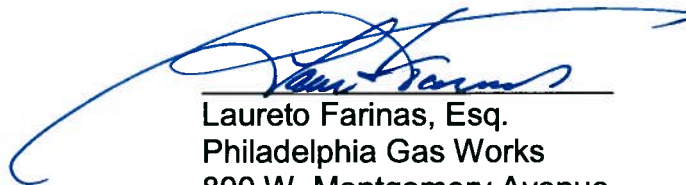
8. On June 24, 2020, counsel for PGW spoke with the Complainant regarding this motion. Ms. Walker indicated that she did not object to the consolidation of the above captioned matters and that she would prefer to keep the Initial Call-In Hearing Scheduled for July 23, 2020 before Special Agent Alphonso Arnold III. The consolidation of the above captioned matters removes the necessity for the hearing scheduled for August 18, 2020 before Administrative Law Judge Darlene D. Heep.

9. 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 *Clivette Walker v. PGW*, Docket No. C – 2020 – 3019256 and *Clivette Walker v. PGW*, Docket No. F – 2020 – 3019638 and have the hearing for both matters on Tuesday, July 23, 2020 before Special Agent Alphonso Arnold III.

Respectfully submitted,

July 2, 2020



Laureto Farinas, Esq.  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
215-684-6164

# Appendix “A”



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Office of Administrative Law Judge  
400 NORTH STREET, HARRISBURG, PA 17120  
May 15, 2020

IN REPLY PLEASE  
REFER TO OUR FILE

In Re: C-2020-3019256

(SEE ATTACHED LIST)

**Clivette Walker v. Philadelphia Gas Works**

Requests Payment Arrangements

**Initial Call-In Telephonic Hearing Notice**

This is to inform you that a hearing by telephone on the above-captioned case will be held as follows:

**Type: Call-In Telephonic Hearing**  
**Date: Thursday, July 23, 2020**  
**Time: 10:00 A.M.**  
**Presiding: Special Agent Alphonso Arnold III**  
400 North Street 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120  
Phone: 717.787.1399  
Fax: 717.787.0481

**At the above date and time, you must call into the hearing. If you fail to do so, your case will be dismissed. You will not be called by the Special Agent.**

To participate in the hearing,

- You must dial the toll-free number listed below
- You must enter the passcode when instructed to do so, also listed below
- You must speak your name when prompted
- The telephone system will connect you to the hearing

Toll-free Bridge Number: 877.725.8078  
Passcode: 48728696

If you have any witnesses you want to have present during the hearing, you must provide them with the telephone number and passcode.

*Attention: You may lose the case if you do not take part in this hearing and present facts on the issues raised.*

If you have any hearing exhibits to which you will refer during the hearing, one (1) copies must be sent to the Special Agent at [alphonarno@pa.gov](mailto:alphonarno@pa.gov) and one (1) copy each must be sent to every other party. All copies **must be received** at least five (5) business days **before** the hearing.

**You must serve the Special Agent with a copy of ANY document you file in this case.**

**Individuals** representing themselves are not required to be represented by an attorney. All others (corporation, partnership, association, trust or governmental agency or subdivision) **must** be represented by an attorney. An attorney representing you should file a Notice of Appearance **before** the scheduled hearing date.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. If appropriate, we may be able to provide you with a telephonic hearing instead of an in-person hearing. Please call the scheduling office at the Public Utility Commission at least five (5) business days prior to your hearing to submit your request.

If you require an interpreter to participate in the hearings, we will make every reasonable effort to have an interpreter present. Please email [dschleig@pa.gov](mailto:dschleig@pa.gov) at the Public Utility Commission at least ten (10) business days prior to your hearing to submit your request.

- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1.800.654.5988

The Public Utility Commission offers a free eFiling Subscription Service, which allows users to automatically receive an email notification whenever a document is added, removed, or changed on the PUC website regarding a specific case. Instructions for subscribing to this service are on the PUC's website at [http://www.puc.pa.gov/Documentation/eFiling\\_Subscriptions.pdf](http://www.puc.pa.gov/Documentation/eFiling_Subscriptions.pdf).

c:

SA Arnold  
Scheduler: C. Biggica  
Calendar File

**C-2020-3019256 - CLIVETTE WALKER v. PHILADELPHIA GAS WORKS**

CLIVETTE WALKER  
2125 GRANITE ST  
PHILADELPHIA PA 19124  
**267.444.1123**  
**ACCEPTS E-SERVICE**

LAURETO FARINAS ESQUIRE  
PHILADELPHIA GAS WORKS  
4TH FLOOR  
800 W MONTGOMERY AVENUE  
PHILADELPHIA PA 19122  
**215.684.6982**  
**ACCEPTS E-SERVICE**

# Appendix “B”



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Office of Administrative Law Judge  
400 NORTH STREET, HARRISBURG, PA 17120  
June 9, 2020

IN REPLY PLEASE  
REFER TO OUR FILE

In Re: F-2020-3019638

(SEE ATTACHED LIST)

**Clivette Walker v. Philadelphia Gas Works**

Appeal of BCS Decision - Billing Dispute/Payment Arrangements

**Initial Telephonic Hearing**

This is to inform you that a hearing by telephone on the above-captioned case will be held as follows:

**Type: Call-In Telephonic**  
**Date: Tuesday, August 18, 2020**  
**Time: 10:00 A.M.**  
**Presiding: Administrative Law Judge Darlene D. Heep**  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107  
Telephone: 215.560.2105  
Fax: 215.560.3133

**At the above date and time, you must call into the hearing. If you fail to do so, your case will be dismissed. You will not be called by the Administrative Law Judge.**

To participate in the hearing,

- You must dial the toll-free number listed below
- You must enter a PIN number when instructed to do so, also listed below
- You must speak your name when prompted
- The telephone system will connect you to the hearing

Toll-free Bridge Number: 1.866.953.0992  
PIN Number: 21268703

If you have any witnesses you want to have present during the hearing, you must provide them with the telephone number and PIN number.

***Attention:** You may lose the case if you do not take part in this hearing and present facts on the issues raised.*

If you have any hearing exhibits to which you will refer during the hearing, one (1) copy must be emailed to Pam McNeal, Legal Assistant at [pmcneal@pa.gov](mailto:pmcneal@pa.gov) and one (1) copy each must be sent to every other party. All copies **must be received** at least five (5) business days **before** the hearing.

**You must email the Legal Assistant with a copy of ANY document you file in this case.**

**Individuals** representing themselves are not required to be represented by an attorney. All others (corporation, partnership, association, trust or governmental agency or subdivision) **must** be represented by an attorney. An attorney representing you should file a Notice of Appearance **before** the scheduled hearing date.

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c:

ALJ Heep  
C. Biggica  
Calendar File

**F-2020-3019638 - CLIVETTE WALKER v. PHILADELPHIA GAS WORKS**

CLIVETTE WALKER  
2125 GRANITE ST  
PHILADELPHIA PA 19124  
267.444.1123  
**ACCEPTS E-SERVICE**

LAURETO FARINAS ESQUIRE  
PHILADELPHIA GAS WORKS  
4TH FLOOR  
800 W MONTGOMERY AVENUE  
PHILADELPHIA PA 19122  
215.684.6982  
**ACCEPTS E-SERVICE**

**VERIFICATION**

I, Laureto Farinas, 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.

July 2, 2020



Laureto Farinas

**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).

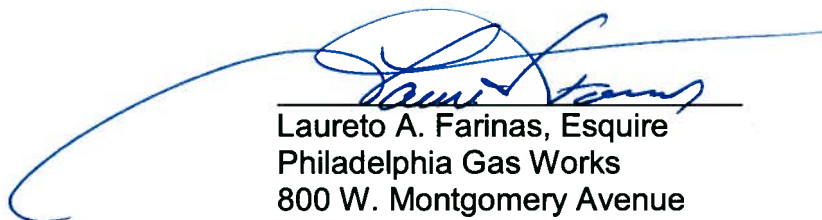
Service List:

For Complainant:

Ms. Clivette Walker  
2125 Granite Street  
Philadelphia, Pennsylvania 19124

[Ms.vettwalk46@outlook.com](mailto:Ms.vettwalk46@outlook.com)

July 2, 2020



Laureto A. Farinas, Esquire  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
(215) 684-6164