



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

**Laureto A. Farinas, Senior Attorney**  
**Legal Department**  
Direct Dial: 215-684-6982  
FAX: 215-684-6798  
E-mail: [laureto.farinas@pgworks.com](mailto:laureto.farinas@pgworks.com)

July 31, 2020

Administrative Law Judge Angela T. Jones  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Suite 403  
801 Market Street  
Philadelphia, PA 19107

**RE: Mubarak Reed v. Philadelphia Gas Works, Docket No. F-2019-3014736**

Dear Judge Jones:

Pursuant to 52 Pa. Code §5.572(d), the parties to this matter, jointly request that the Commission grant a continuance in this matter of the Call-In Telephonic Hearing scheduled for 10:00 a.m. on August 5, 2020 in order to complete discovery.

If you need additional information about this matter, please contact me at my direct-dial number above. Thank you.

Sincerely,



Laureto Farinas

cc: Service List  
Wendy Vaca (PGW Mail)  
Tiffany Jones

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Mubarak Reed,</b>	:	
Complainant	:	
v.	:	<b>Docket No. F-2019-3014736</b>
	:	
<b>Philadelphia Gas Works,</b>	:	
Respondent	:	

**The Parties Joint Motion for a Continuance**

Pursuant to 52 Pa. Code §5.572(d), the parties to this matter, (Complainant, Mubarak Reed and Respondent, Philadelphia Gas Works (PGW)) hereby request that the Commission grant a continuance in this matter of the Call-In Telephonic Hearing scheduled for 10:00 a.m. on August 5, 2020.

In support of its motion, PGW states as follows:

1. On or about December 3, 2019, PGW was served with the Complaint filed in the above captioned matter, which is a dispute of charges for unauthorized gas usage and meter tampering at 1937 W. Rowan Street, Philadelphia, Pennsylvania (“Service Address”).
2. On December 23, 2019, PGW filed its Answer to the Complaint averring that the unauthorized usage of gas was discovered on September 25, 2019 and that the charges for unauthorized usage of \$1,388.57 were from the period beginning January 31, 2019 (date of ownership) through September 25, 2019.
3. By the Commission’s Notice dated December 24, 2020, this matter had been set for an Initial In-person Telephonic Hearing to have been held on February 14, 2020.
4. On or about January 27, 2020 the Complainant served discovery upon PGW, the responses to which would have been due after the February 14, 2020 hearing date.
5. The parties requested a continuance in order to conduct informal discovery.
6. The matter was continued by Commission order of February 5, 2020.
7. In March 2020, the parties complied with the City of Philadelphia’s mandate to “shelter in place,” where the parties made arrangements to work from home.

8. By letter dated March 25, 2020, PGW sent to the Complainant several PGW documents showing the discovery of and billing for unauthorized usage at the Service Address. PGW invited the Complainant to discuss the meaning of these documents in the course of informal discovery and whatever else would be needed.

9. By notice dated June 25, 2020, the Commission scheduled the matter to be heard by Call-In Telephonic hearing on Wednesday, August 5, 2020.

10. The Complainant did not contact PGW to discuss the documents in informal discovery until Sunday, July 26, 2020. The parties agreed to have a conference call on July 30, 2020.

11. In a conference call on July 30, 2020, the parties discussed the progress of discovery. The Complainant wanted more than what had been provided in March 2020 although those documents would have addressed much of the information requested in formal discovery. The Complainant was dissatisfied with informal discovery. The Complainant wanted return to the formal discovery requests.

12. At the end of the conference call of July 30, 2020, the parties agreed to jointly request one last continuance and to resume formal discovery as if propounded on July 30, 2020. The parties agreed that the delay in review and discussion of the informal discovery was partly attributed the disruption of routine schedules by the Covid – 19 pandemic.

13. The Complainant believes that the additional meter history and policy information will better assist him in understanding the issues.

14. PGW agrees to provide the responses to formal discovery as they are completed and not wait for the procedural deadline as some of the responses were near completion when the parties agreed to move to informal discovery.

15. The Complainant has paid the disputed amount and the gas service is on at the Service Address.

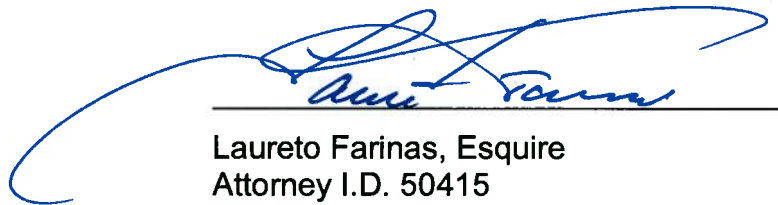
16. There is no immediate harm to either party in the continuance of this matter to complete formal discovery.

17. Therefore, the parties have shown that there is just cause for the granting of this request for a continuance.

**WHEREFORE**, PGW requests that the Call-In Telephonic Hearing of this matter scheduled for Wednesday, August 5, 2020 at 10:00 a.m. before Administrative Law Judge Angela T. Jones be continued to a new date to allow the parties to complete discovery.

Respectfully submitted,

July 31, 2020



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: July 31, 2020



Laureto Farinas, Esquire



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**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 Presiding Officer:

Pennsylvania Public Utility Commission  
Administrative Law Judge Angela Jones  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107

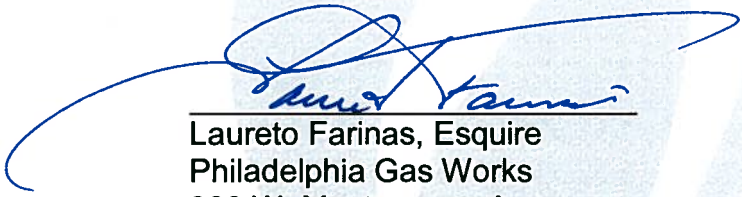
& by email

For Complainant:

Mr. Mubarak Reed  
1925 W. 67<sup>th</sup> Avenue  
Philadelphia, PA 19138

& by e-mail: [mubarakreed10@gmail.com](mailto:mubarakreed10@gmail.com)

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