



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

**Graciela Christlieb, Senior Attorney
Legal Department**
Direct Dial: 215-684-6164
FAX: 215-684-6798
E-mail: graciela.christlieb@pgworks.com

September 14, 2022

VIA ELECTRONIC FILING

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

Re: Dawn Graham v. Philadelphia Gas Works; Docket No. C-2022-3032494

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' Motion to Continue with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

Enclosure

cc: Hon. Joel Cheskis, w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' foregoing Motion upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

Via Email

Dawn Graham

dawn456@msn.com

Date: September 14, 2022

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Dawn Graham,	:	
Complainant,	:	
v.	:	Docket No. C-2022-3032494
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

PHILADELPHIA GAS WORKS’ MOTION TO CONTINUE

Pursuant to 52 Pa. Code §5.103, Philadelphia Gas Works (“PGW” or “Respondent”) hereby files this Motion to Continue the evidentiary hearing in this matter, which is scheduled for Tuesday, September 20, 2022. In support of this Motion, PGW states as follows:

1. By notice dated August 2, 2022, the Commission scheduled an Initial Telephonic Hearing in this matter for Tuesday, September 20, 2022 at 10:00 a.m., before Administrative Law Judge Joel Cheskis.
2. PGW is still in the process of investigating the issues raised in the Complaint.
3. PGW’s investigation involves scheduling visits to the property and the testing of PGW equipment and PGW will not be able to conclude its investigation prior to the scheduled hearing date.
4. PGW has spoken with the Complainant, Dawn Graham, via telephone to discuss PGW’s request for a continuance in this matter; Ms. Graham has stated that she has no objection to PGW’s request and agrees that the matter should be continued so that PGW may conclude its investigation.

WHEREFORE, PGW respectfully requests that the Commission grant this Motion and continue the evidentiary hearing in this matter scheduled for Tuesday, September 20, 2022 to a later date.

Respectfully submitted,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire
Attorney I.D. 200760
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
Telephone: (215) 684-6164
graciela.christlieb@pgworks.com

Date: September 14, 2022

Counsel for PGW