



**PHILADELPHIA GAS WORKS**

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September 29, 2022

**VIA ELECTRONIC FILING**

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

**Re: Phyllis Young v. Philadelphia Gas Works; Docket No. C – 2022 – 3033915**

Dear Secretary Chiavetta:

Enclosed for electronic filing please 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/ Danielle Leva

Enclosure

cc: Hon. Marta Guhl, 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' Answer 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 Only**

Phyllis Young

[young.phyl@gmail.com](mailto:young.phyl@gmail.com)

Date: September 29, 2022

*/s/ Graciela Christlieb*

Graciela Christlieb, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Phyllis Young,	:	
Complainant,	:	
v.	:	Docket No. C-2022-3033915
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

**PHILADELPHIA GAS WORKS’ MOTION TO CONTINUE**

Pursuant to 52 Pa. Code §1.15, Philadelphia Gas Works (“PGW” or “Respondent”) hereby files this Motion to Continue the evidentiary hearing in this matter, which is scheduled for Thursday, October 6, 2022. In support of this Motion, PGW states as follows:

1. By notice dated August 11, 2022, the Commission scheduled a telephonic hearing in this matter for Thursday, October 6, 2022 at 10:00 a.m., before Administrative Law Judge Marta Guhl.
2. Counsel for PGW, Graciela Christlieb, Esq., has been out on sick leave since September 26, 2022 and is unlikely to return to work in time for the evidentiary hearing in this matter.
3. As a result of this absence, PGW will need additional time to prepare for the evidentiary hearing in this matter.
4. PGW has spoken with the Complainant, Phyllis Young, via telephone to discuss PGW’s request for a continuance in this matter; Ms. Young stated she could not provide an answer regarding PGW’s request due to be represented by an attorney.
5. PGW was unaware that Ms. Young was represented by counsel and asked for the attorney’s name and contact information. Ms. Young was unable to provide that information.

6. PGW requested that Ms. Young have her attorney contact PGW to discuss the request for a continuance.
7. As of this writing, PGW has received no further communication from Ms. Young or her attorney and, as such, is unable to state whether there is an objection to PGW's request.

WHEREFORE, PGW requests that the hearing scheduled for Thursday, October 6, 2022, in the above captioned matter be continued and rescheduled.

Respectfully submitted,

*/s/ Graciela Christlieb*

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Date: September 29, 2022

Counsel for PGW