



PHILADELPHIA GAS WORKS

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March 22, 2023

VIA ELECTRONIC FILING

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

Re: Anthony Pruitt v. Philadelphia Gas Works; Docket Nos. C-2022-3036558
& C-2023-3038933

Dear Secretary Chiavetta:

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

Sincerely,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire

Enclosure

cc: Hon. Eranda Vero, Pennsylvania Public Utility Commission, [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 Electronic Mail

Anthony Pruitt
tp Pruitt190.tp@gmail.com

Date: March 22, 2023

/s/ Graciela Christlieb

Graciela Christlieb, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Anthony Pruitt,	:	
Complainant,	:	
v.	:	Docket Nos. C-2022-3036558
	:	C-2023-3038933
Philadelphia Gas Works,	:	
Respondent.	:	

NOTICE TO PLEAD

To: Anthony Pruitt
tpruitt190.tp@gmail.com

Pursuant to Pa. Code § 5.103, you are hereby notified that any pleading intended to be responsive to the enclosed Motion to Consolidate shall be filed within twenty (20) days of service of this Notice.

All pleadings, such as a Reply to the Motion to Consolidate, must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for the Philadelphia Gas Works and, when applicable, the Administrative Law Judge presiding over the proceeding.

File with:
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission

With a copy to:
Marta Guhl, Administrative Law Judge
Pennsylvania Public Utility Commission

Date: March 22, 2023

/s/ Graciela Christlieb
Graciela Christlieb, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Anthony Pruitt,	:	
Complainant,	:	
v.	:	Docket Nos. C-2022-3036558
	:	C-2023-3038933
Philadelphia Gas Works,	:	
Respondent.	:	

PHILADELPHIA GAS WORKS’ MOTION TO CONSOLIDATE

Pursuant to 52 Pa. Code §§ 5.81 and 5.103, the Philadelphia Gas Works (“PGW” or “Respondent”) hereby files this Motion to Consolidate the evidentiary hearings in these matters. In support of this Motion, PGW states as follows:

1. On November 7, 2022, the Complainant filed the complaint at Docket No. C-2022-3036558 wherein he sought relief from the termination of his gas service and requested a payment agreement.
2. During the pendency of the matter at Docket No. C-2022-3036558, Mr. Pruitt filed an informal complaint at Bureau of Consumer Services (“BCS”) Docket No. 3884516 regarding recent unauthorized usage that has resulted in additional charges on his account.
3. The BCS rendered its decision at Docket No. 3884516 on January 30, 2023 and Mr. Pruitt has appealed that decision in a complaint at Docket No. C-2023-3038933, though that appeal is untimely.
4. At Docket No. C-2023-3038933, the Complainant again seeks relief from the termination of his gas service and requests a payment agreement.
5. PGW submits that these matters involve a common question of law or fact and that consolidation of these matters would avoid unnecessary cost and delay.
6. Neither of these matters currently has an evidentiary hearing scheduled.

WHEREFORE, PGW respectfully requests that the Commission grant this Motion and consolidate these matters into a single proceeding.

Respectfully submitted,

/s/ Graciela Christlieb

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Date: March 22, 2023

Counsel for PGW