



PHILADELPHIA GAS WORKS

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October 2, 2023

VIA ELECTRONIC FILING

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

Re: Brittney Raglin v. Philadelphia Gas Works,
Docket No. C-2023-3041889

Dear Secretary Chiavetta:

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

If you have any questions, please do not hesitate to contact me.

Very truly yours,

/s/Anita J. Murray
Anita J. Murray

/awm
encl.

cc (w/encl.): Special Agent Michael Mroczka via Email – micmroczka@pa.gov
Brittney Raglin via Federal Express Overnight Mail

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Philadelphia Gas Works' Motion To Continue Hearing 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 FEDERAL EXPRESS OVERNIGHT MAIL

Brittney Raglin
411 Delphine Street
Philadelphia, PA 19120

VIA EMAIL

Special Agent Michael Mroczka – micmroczka@pa.gov

Date: Oct. 2, 2023

/s/ Anita J. Murray
Anita J. Murray, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Brittney Raglin,	:	
Complainant,	:	
v.	:	Docket No. C-2023-3041889
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

PHILADELPHIA GAS WORKS’ MOTION TO CONTINUE HEARING

Philadelphia Gas Works (“PGW”), pursuant to 52 Pa. Code § 1.15 files this Motion to Continue the evidentiary hearing currently scheduled for October 11, 2023. In support thereof, PGW avers as follows:

1. Complainant, Brittney Raglin (“Complainant”) filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) on or about July 24, 2023 regarding the gas service provided by PGW to her home at 411 Delphine Street, Philadelphia, PA (“Service Address”).
2. In her Formal Complaint, Complainant averred that PGW: (1) is threatening or has terminated service; and (2) has placed incorrect charges on her bill. Complainant requested both an investigation and a payment arrangement.
3. In its Answer to the Formal Complaint filed on August 14, 2023, PGW admitted that it issued a shut off notice and that Complainant requested a payment arrangement. PGW denied the allegations regarding incorrect charges on her bill. PGW also averred that gas service was established at the Service Address as of May 1, 2015; gas service is provided through a functioning automatic meter reading device, the bills are based on actual meter reads, and that Complainant has had several PGW-issued payment arrangements as well as a Commission-issued payment arrangement, all of which were unsatisfied.

4. The Commission scheduled a telephonic evidentiary hearing in the above captioned matter for Wednesday, October 11, 2023 at 10:00 a.m. before Special Agent Michael Mroczka.
5. If the parties wish to use exhibits at the hearing, the proposed exhibit submission deadline is October 4, 2023.
6. In order to adequately investigate and prepare its defenses regarding a billing dispute and to comply with Complainant's request for an investigation, PGW needs to obtain physical possession of the gas meter and to perform meter testing.
7. On August 24, 2023, PGW's technician visited the Service Address in order to complete a meter exchange. However, no one was home to allow the technician access to the gas meter, so the exchange was rescheduled to September 27, 2023, and then to October 2, 2023.
8. On October 2, 2023, PGW's technician successfully performed the meter exchange at the Service Address. The gas meter is now undergoing testing at PGW's facility which is a several-day process. After the testing is completed, those results must be reviewed by PGW technicians.
9. The meter testing, and the review of those results, are not likely to be completed by the October 4, 2023 exhibit submission deadline and may not be ready for the October 11, 2023 hearing date.
10. On October 2, 2023, PGW spoke to Complainant over the phone about rescheduling the hearing. Complainant does not oppose PGW's request to continue the hearing to a later date.
11. Therefore, PGW respectfully requests that the October 11, 2023 hearing date be continued in order to allow for proper testing of the gas meter and for those results to be available for use in PGW's defense against the allegations asserted against it by Complainant.

WHEREFORE, Philadelphia Gas Works respectfully requests that the October 11, 2023 hearing date be continued and rescheduled.

Respectfully submitted,

/s/ Anita J. Murray

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Date: Oct. 2, 2023

Counsel for PGW