



**PHILADELPHIA GAS WORKS**

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February 28, 2024

**VIA ELECTRONIC FILING**

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

Re: Sonceiray Bowman v. Philadelphia Gas Works; Docket No. C-2023-3041967

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: Special Agent Michael Mroczka, 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 AND FIRST CLASS MAIL**

Sonceiray Bowman  
6734 North Broad Street  
Philadelphia, PA 19126  
[angelabowman000@gmail.com](mailto:angelabowman000@gmail.com)

Date: February 28, 2024

/s/ Graciela Christlieb  
Graciela Christlieb, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sonceiray Bowman,	:	
Complainant,	:	
v.	:	Docket No. C-2023-3041967
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

**PHILADELPHIA GAS WORKS’  
MOTION FOR CONTINUANCE AND PREHEARING CONFERENCE**

Pursuant to 52 Pa. Code §§ 1.15 and 5.103, Philadelphia Gas Works (“PGW” or “Respondent”) hereby files this Motion to convert the evidentiary hearing scheduled for Thursday, March 7, 2024 into a prehearing conference pursuant to 52 Pa. Code § 5.222 to resolve the issue of representation before fixing a new date for an evidentiary hearing in this matter. In support of this Motion, PGW states as follows:

1. By notices dated August 22, 2023 and October 30, 2023 the Commission scheduled a telephonic hearing in this matter for October 25, 2023 and November 29, 2023, respectively.
2. On both October 25, 2023 and November 29, 2023, the Complainant’s sister, Angela Bowman appeared and was informed that she could not represent the Complainant in this matter.
3. On October 25, 2023, the Complainant was granted a continuance to seek counsel.
4. On November 29, 2023, the Complainant was granted a continuance to file an Amended Complaint and provide the Court and PGW with copies of her “Power of Attorney.”
5. In the Interim Order Granting Request for Continuance issued on November 29, 2023, the Presiding Officer in this matter, raised the question of whether Ms. Angela Bowman could pursue this matter on behalf of the Complainant.
6. PGW objects to Angela Bowman being permitted to act as an attorney for the Complainant.
7. By notice dated January 9, 2024, the Commission scheduled a telephonic hearing in this matter for Thursday, March 7, 2024.
8. PGW requests that the March 7, 2024 hearing date be converted to a prehearing conference to address the issue of representation so that both parties may state their positions regarding representation in this matter and obtain an order regarding the issue.
9. PGW has spoken to Angela Bowman regarding this request and Ms. Bowman is in agreement

that the issue of representation should be resolved prior to setting a new hearing date in this matter so that she and the Complainant are aware of whether they will need to continue to pursue representation through Community Legal Services in this matter.

WHEREFORE, PGW requests that the Commission grant PGW's Motion and convert the hearing scheduled for Thursday, March 7, 2024 in this matter into a prehearing conference to resolve the issue of representation before fixing a new date for an evidentiary hearing.

Respectfully submitted,

*/s/ Graciela Christlieb*

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Date: February 28, 2024

*Counsel for PGW*