



**PHILADELPHIA GAS WORKS**

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January 21, 2025

**VIA ELECTRONIC FILING**

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

Re: 715 Condo Unit Owners Association v. PGW; Docket No. F-2024-3051640

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' and 715 Condo Unit Owners Association's Joint Motion to Continue in 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: The Hon. F. Joseph Brady, 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 this 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 ONLY**

715 Condo Unit Owners Association

c/o Joshua Bernstein, VP 715 Condo Unit Owners Association

[joshuabernstein@gmail.com](mailto:joshuabernstein@gmail.com)

Date: January 21, 2025

*/s/ Graciela Christlieb*

Graciela Christlieb, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

715 Condo Unit Owners Association,	:	
Complainant,	:	
v.	:	Docket No. F-2024-3051640
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

**JOINT MOTION TO CONTINUE**

Pursuant to 52 Pa. Code §1.15, the Philadelphia Gas Works (“PGW”) and Joshua R. Bernstein, the Vice President of the 715 Condo Unit Owners Association, hereby file this Joint Motion to Continue the evidentiary hearing in this matter, which is scheduled for Wednesday, January 29, 2025. In support of this Motion, PGW states as follows:

1. By notice dated November 15, 2024, the Commission scheduled a telephonic hearing in this matter for Wednesday, January 29, 2025 at 10:00 a.m., before Administrative Law Judge F. Joseph Brady.
2. Pursuant to 52 Pa. Code §5.231(a) and the Prehearing Order issued in this matter, PGW is working with the Complainant to reach a resolution in this case.
3. PGW and the Complainant need additional time to attempt to resolve this matter.
4. PGW and Mr. Bernstein are making this request jointly.

WHEREFORE, PGW and the 715 Condo Unit Owners Association request that the hearing scheduled for Wednesday, January 29, 2025, in the above captioned matter be continued.

Respectfully submitted,

*/s/ Graciela Christlieb*

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Date: January 21, 2025

*Counsel for PGW*