



PHILADELPHIA GAS WORKS

800 West Montgomery Avenue • Philadelphia, PA 19122

**Graciela Christlieb, Senior Attorney
Legal Department**
Direct Dial: 215-684-6164
FAX: 215-684-6798
E-mail: graciela.christlieb@pgworks.com

March 13, 2025

VIA ELECTRONIC FILING

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

Re: Bradford Bartley v. Philadelphia Gas Works; Docket No. C-2024-3052559

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' 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. Christopher Pell, 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 the following 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

Bradford Bartley

p.k.logistics21@gmail.com

Date: March 13, 2025

/s/ Graciela Christlieb

Graciela Christlieb, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Bradford Bartley,	:	
Complainant,	:	
v.	:	Docket No. C-2024-3052559
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

PHILADELPHIA GAS WORKS' MOTION TO CONTINUE

Pursuant to 52 Pa. Code §1.15, Philadelphia Gas Works (“PGW”) hereby files this Motion to Continue the evidentiary hearing in this matter, which is scheduled for Thursday, April 10, 2025. In support of this Motion, PGW states as follows:

1. By notice dated January 15, 2025, the Commission scheduled a hearing in this matter for Thursday, April 10, 2025 at 10:00 a.m., before Deputy Chief Administrative Law Judge Christopher Pell.
2. A PGW witness, Mr. Albert Teti, is unavailable to call in on the scheduled day of the hearing due to a work conflict; Mr. Teti will be attending the Northeast Gas Association Conference out of state.
3. Mr. Teti is the PGW Revenue Protection Supervisor and is the investigator on this case; he is a necessary PGW witness.
4. Additionally, PGW is working with the Complainant to reach a resolution in this matter.
5. The parties have communicated regarding settlement of this matter, but have not yet reached an agreement.
6. PGW has spoken with Mr. Bradford to discuss this request to continue the hearing.
7. Mr. Bradford has stated that he does not object to PGW’s Motion.

WHEREFORE, PGW requests that the hearing scheduled for Thursday, April 10, 2025, in the above captioned matter be continued.

Respectfully submitted,

/s/ Graciela Christlieb

Graciela Christlieb, Esquire
Philadelphia Gas Works
800 W. Montgomery Avenue
Philadelphia, PA 19122
Telephone: (215) 684-6164
graciela.christlieb@pgworks.com

Date: March 13, 2025

Counsel for PGW