



**PHILADELPHIA GAS WORKS**

800 West Montgomery Avenue • Philadelphia, PA 19122

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**Anita J. Murray, Esquire**  
**Senior Attorney**  
Legal Department  
Direct Dial: 215-684-6659  
Fax: 215-684-6798  
Email: [anita.murray@pgworks.com](mailto:anita.murray@pgworks.com)

March 17, 2025

**VIA ELECTRONIC FILING**

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

**Re: William Plange v. Philadelphia Gas Works, Docket No. F-2024-3052516**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Philadelphia Gas Works' Motion to Continue Hearing regarding 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.): William Plange via Email: [plangew@yahoo.com](mailto:plangew@yahoo.com)  
Hon. Marta Guhl via Email: [mguhl@pa.gov](mailto:mguhl@pa.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on the date below, I served a true and correct 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 EMAIL ONLY**

William Plange  
[plangew@yahoo.com](mailto:plangew@yahoo.com)

Hon. Marta Guhl  
[mguhl@pa.gov](mailto:mguhl@pa.gov)

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

Date: March 17, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

William Plange,	:	
Complainant,	:	
v.	:	Docket No. F-2024-3052516
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

**PHILADELPHIA GAS WORKS’ MOTION TO CONTINUE HEARING**

Philadelphia Gas Works (“PGW”), pursuant to 52 Pa. Code § 5.103, files this Motion to Continue the evidentiary hearing scheduled for March 25, 2025 in the above matter. In support thereof, PGW avers as follows:

1. Complainant, William Plange (“Complainant” or “Mr. Plange”) filed a Formal Complaint dated December 10, 2024, against PGW. In his Formal Complaint, Mr. Plange alleged that he needed more time to pay his gas bill and that he failed to receive any monthly gas bills before receiving a termination notice.
2. On January 2, 2025, PGW filed an Answer to the Formal Complaint. In the Answer, PGW admitted that it issued a termination notice and that Mr. Plange requested a payment arrangement. PGW further averred, *inter alia*, that he had prior payments agreements with both PGW and the Commission and then denied the remaining allegations.
3. On January 10, 2025, the Commission issued an Initial Telephonic Hearing Notice in this matter for Tuesday, March 25, 2025, at 10:00 a.m., before Administrative Law Judge Marta Guhl.
4. During the investigation into Mr. Plange’s allegations, PGW records for the subject property, 4507 North Broad Street, Philadelphia, PA (“Service Address”), identified the Service Address as a commercial, non-heating gas account with one meter. However, there is a possibility that there is residential gas usage, as Mr. Plange advised PGW, on or about October 8, 2024, that there is a residential unit above the first-floor store. Mr. Plange was unable to advise whether there were any gas appliances present and/or in use at the Service Address.

5. In order to determine whether there is residential gas usage at the Service Address and for a safety check, PGW needs to conduct an inspection of the meter and the commercial and residential units and any or all appliances located therein.
6. During the October 8, 2024, conversation, PGW informed Mr. Plange of the need for a property inspection. Mr. Plange then advised that the basement was flooded due to plumbing work but that he would provide dates for meter access shortly.
7. Since October, 2024, and on numerous occasions thereafter, PGW attempted to schedule an appointment for the inspection with Mr. Plange, but has been unsuccessful.
8. Finally, on March 3, 2025, Mr. Plange agreed to provide PGW access to the Service Address and the meter on March 19, 2025.
9. Two weeks later, on March 17, 2025, Mr. Plange contacted PGW to reschedule the property inspection. PGW agreed to move the inspection to March 20, 2025.
10. Although the inspection has finally been scheduled, the results of that inspection will not be available by either the exhibit filing deadline or by the hearing date.
11. Therefore, PGW requests that the hearing currently scheduled for March 25, 2025, be continued to a later date in order to give PGW adequate time to fully investigate the claims asserted against it and to prepare defenses against those claims.
12. Mr. Plange has been advised of this continuance request and has no objection to rescheduling the hearing.

WHEREFORE, PGW respectfully requests that the Commission grant this Motion and continue the evidentiary hearing in this matter to a later date.

Respectfully submitted,

Dated: March 17, 2025

/s/ Anita J. Murray

Anita J. Murray, Esquire  
Attorney I.D. 84703  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
Telephone: (215) 684-6659  
[anita.murray@pgworks.com](mailto:anita.murray@pgworks.com)  
Counsel for PGW