

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

BARBARA COOK	:	
Complainant	:	
	:	F-2025-3052862
	:	
PHILADELPHIA GAS WORKS	:	
Respondent	:	

MOTION FOR CONTINUANCE

Barbara Cook (Complainant), by and through counsel Community Legal Services, Inc. hereby moves for an order continuing the hearing in this matter scheduled for March 31, 2025, pursuant to 52 Pa. Code § 1.15(b) and Deputy Chief Administrative Law Judge (ALJ) Christopher Pell’s February 4, 2025 Prehearing Order. As set forth below, this Motion is unopposed. In support of this motion, Complainant states as follows:

1. Complainant, proceeding *pro se*, initiated this proceeding as an appeal of the Bureau of Consumer Services November 25, 2024, Informal Complaint Decision (BCS Case No. 4032717) by Formal Complaint dated December 31, 2024.
2. Complainant has recently retained counsel to represent her in the above-captioned proceeding.
3. On March 20, 2025, attorneys from Community Legal Services, Inc., filed their Notice of Appearance on behalf of Complainant, serving the same on Respondent Philadelphia Gas Works (PGW).

4. Complainant submits this motion for continuance of the March 31, 2025, hearing in order to permit her counsel to conduct discovery and interview witnesses to prepare for an evidentiary hearing, and in order to engage in settlement discussions.
5. Counsel for PGW has confirmed that PGW has no objection to this request for continuance.

WHEREFORE, for the foregoing reasons, Complainant submits that there is good cause for a continuance of the hearing in this matter, within the meaning of 52 Pa. Code § 1.15, and requests the March 31, 2025, hearing be rescheduled.

Respectfully submitted,

/s/ Charlotte Edelstein
Charlotte Edelstein, Esq.

Community Legal Services, Inc.
1410 West Erie Ave.
Philadelphia, PA 19140
214-227-4732
cedelstein@clsphila.org

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

BARBARA COOK	:	
Complainant	:	
	:	F-2025-3052862
	:	
PHILADELPHIA GAS WORKS	:	
Respondent	:	

VERIFICATION

I, Charlotte Edelstein, hereby state that the facts set forth above in the Motion for Continuance, are true and correct and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

March 20, 2025

/s/ Charlotte Edelstein

CERTIFICATE OF SERVICE

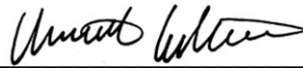
I hereby certify that this day I served a copy of Motion for Continuance upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

Christopher P. Pell
Deputy Chief Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, 4th Floor
Philadelphia, PA 19107
pmcneal@pa.gov

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

Date: March 20, 2025



Charlotte E. Edelstein, Esquire