



**PHILADELPHIA GAS WORKS**

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August 7, 2025

**VIA ELECTRONIC FILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Jay Couzens (Pro Ventures Phila LLC) v. Philadelphia Gas Works;  
Docket No. F-2025-3055434

Dear Secretary Homsher:

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: Administrative Law Judge Erin L. Gannon, 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' 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

Jay Couzens  
Pro Ventures Phila LLC  
[marlanking@msn.com](mailto:marlanking@msn.com)

Date: August 7, 2025

/s/ Graciela Christlieb

Graciela Christlieb, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jay Couzens (Pro Ventures Phila LLC),	:	
Complainant,	:	
v.	:	Docket No. F-2025-3055434
	:	
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, August 21, 2025. In support of this Motion, PGW states as follows:

1. By notice dated July 1, 2025, the Commission scheduled a telephonic hearing in this matter for Thursday, August 21, 2025 at 10:00 a.m., before Administrative Law Judge Erin L. Gannon.
2. In the Complaint, Jay Couzens, (“Complainant”) indicated that there are incorrect charges on his bill for gas service to the Service Address.
3. PGW is in the process of investigating the issues raised by the Complainant, which requires coordinating with the Complainant to schedule a PGW field visit to the Service Address.
4. PGW will not be able to conclude its investigation prior to the scheduled hearing date.
5. PGW has spoken with the Complainant to discuss PGW’s request for a continuance in this matter; the Complainant has stated that he does not have an objection to PGW’s request.

WHEREFORE, PGW requests that the hearing scheduled for Thursday, August 21, 2025, in the above captioned matter be continued.

Respectfully submitted,

*/s/ Graciela Christlieb*

Graciela Christlieb, Esquire  
Philadelphia Gas Works  
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Philadelphia, PA 19122  
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Date: August 7, 2025

*Counsel for PGW*