

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
Office of Administrative Law Judge
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

Re: C-2026-3060184
Nieves Abad v. UGI Utilities, Inc. – Gas Division

MOTION FOR CONTINUATION

TO: HONORABLE ADMINISTRATIVE LAW JUDGE KATRINA DUNDERALE,

Comes now, Nieves Abad, respectfully submits this Motion for Continuation in the matter of Abad v. UGI Utilities, Inc. – Gas Division, docket number C-2026-3060184.

Background for Motion for Continuance Regarding Gas Service Disruption

This motion arises from a series of grievances related to the complaint that the gas service to our residence was unjustly terminated during the winter months. The affected household includes young children, specifically two minors under the age of three, exacerbating the situation's urgency and severity.

Throughout the winter season, we faced significant hardships due to the lack of gas service, which rendered our heating system inoperative. The absence of heat not only created a perilous living environment for the children, who are particularly vulnerable to the harsh conditions of winter, but it also raised substantial health and safety concerns for all household members. The extended period of subzero temperatures posed risks of hypothermia, increased instances of respiratory issues, and other cold-related illnesses.

Attempts to resolve this issue through financial arrangements were made. However, our requests for a payment plan to address outstanding bills were dismissed without adequate consideration by the gas provider. This refusal to engage in a constructive dialogue regarding payment options significantly hindered our ability to maintain essential services during a critical time.

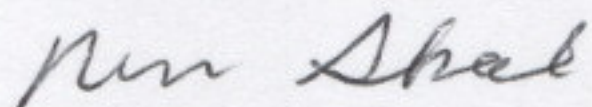
As a direct consequence of the gas service termination, we experienced an additional crisis when the pipes in our home froze due to prolonged exposure to cold temperatures. This catastrophe left us without water for extended periods, severely impacting our daily lives and the health standards essential for caring for young children. The freezing and subsequent thawing of pipes created further complications and repair expenses.

The inability to secure a functioning gas service during the winter months—combined with the dismissal of workable payment solutions—constitutes not just a breach of service provider obligations but also a neglect of the well-being of our family, particularly the children. This motion seeks to address these grievances, urge accountability from the gas service provider, and prompt appropriate remedies for the distress and damages suffered during this period.

In light of the aforementioned circumstances, we respectfully request that the court consider our motion for relief and hold the responsible parties accountable for their actions that jeopardized the health and safety of our family.

The Complainant requests that the Commission grants a continuation of the proceedings in this matter, specifically a new hearing date to be set for Thirty days from today's date to discuss further with our attorney and gather more evidence to provide to the Respondent. For the foregoing reasons, the Complainant respectfully requests that the Administrative Law Judge grant this Motion for Continuation and reschedule the hearing as appropriate.

Respectfully submitted,



Nieves Abad
747 Delaware st
Forest City PA, 18421
631-575-2348
Martjua3@aol.com
Dated 03/09/2026

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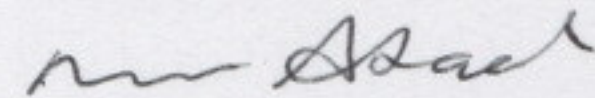
RE: Nieves Abad VS. UGI Utilities Inc, Gas Division
Docket No. C-2026-3060184

To Whom This May Concern,

NOTICE OF MOTION

PLEASE TAKE NOTICE that the Motion For Continuance will be presented to the Administrative Law Judge Katrina Dunderale on a date to be identified by the court pursuant to the Commission's motions practices.

Respectfully submitted,



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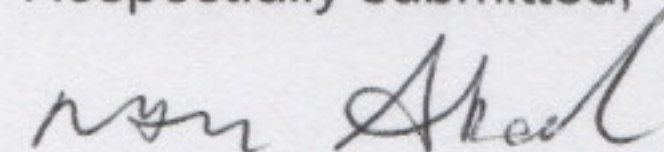
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RE: Nieves Abad VS. UGI Utilities Inc, Gas Division
Docket No. C-2026-3060184

To Whom This May Concern,

Attached for eService and electronic filing is my Motion For Continuance served Upon Respondent by Nieves Abad in the Above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



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Dated - April 09, 2026

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