

**Legal Department**

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June 15, 2009

James McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

**Re: Mary Ellen Jones v. PECO ENERGY Company  
PUC Docket No. C-2008-2072916**

Dear Mr. McNulty:

Enclosed for filing with the Commission are the following documents and copies in the matter referenced above.

_____	Answer (Original and 3 copies)
_____	Motion to Consolidate (original and 3 copies)
<u>  X  </u>	Motion For Continuance of Hearing Date (original and 3 copies)
_____	Preliminary Objection (original and 3 copies)
_____	Exceptions (original and 9 copies)
_____	Reply Exceptions (original and 9 copies)
_____	Brief (original and 9 copies)
_____	Reply Brief (original and 9 copies)

Also enclosed is an extra copy of this letter, which I request that you date stamp and return to me in the envelope provided as proof of filing. I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties.

Very truly yours,

Tishekia E. Williams  
Counsel for PECO Energy Company

TEW/zyr

Enc.

cc: Mary Ellen Jones  
ALJ Guy M. Koster (Via FedEx and Fax)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY ELLEN JONES

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v.

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DOCKET NO. C-2008-2072916

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PECO ENERGY COMPANY

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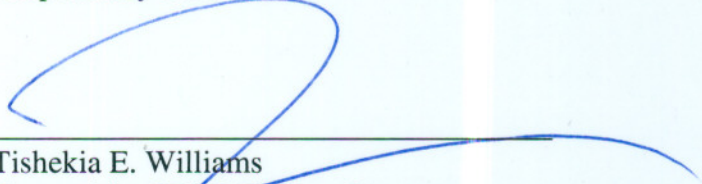
**MOTION FOR CONTINUANCE OF HEARING DATE**

PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code § 1.15(b), hereby requests a continuance of the hearing date scheduled in this matter and states the following:

1. By Order dated January 23, 2009, the instant matter was scheduled for hearing on March 3, 2009.
2. On February 25, 2009, Complainant's son, Sterling Jones, requested a continuance because the Complainant had a stroke and was unable to participate in the hearing.
3. By Order dated March 3, 2009, Complainant's request for continuance was granted. The hearing was rescheduled for May 27, 2009 at 2:00 PM.
4. On May 27, 2009, Complainant failed to appear at the hearing to prosecute her Complaint. Complainant's two sons appeared in her absence and stated that Complainant was ill and unable to participate in the hearing. Complainant was therefore granted a continuance.
5. A hearing for this matter is currently scheduled for Thursday, July 2, 2009 at 10:00 AM. I will be out of the office on the July 2, 2009 and therefore will be unable to attend the hearing.
6. PECO has attempted to contact the Complainant by telephone to obtain her concurrence, however, Complainant's telephone numbers are currently disconnected.

7. Therefore, PECO is requesting that the hearing date be continued to another date.

Respectfully Submitted,



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Tishekia E. Williams  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
Direct Dial: 215.841.6841;  
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Tishekia.Williams@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY ELLEN JONES

v.

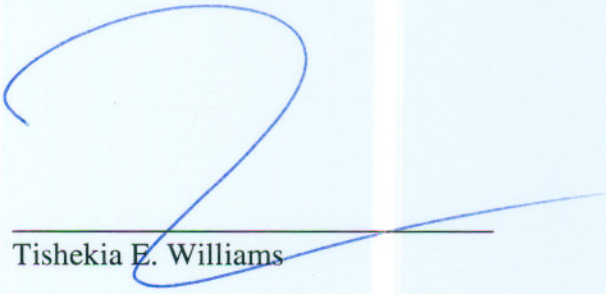
PECO ENERGY COMPANY

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DOCKET NO. C-2008-2072916

**VERIFICATION**

I, Tishekia E. Williams, hereby declare that I am counsel for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.



Tishekia E. Williams

Date: June 15, 2009

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY ELLEN JONES

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2008-2072916

**CERTIFICATE OF SERVICE**

I, Tishekia E. Williams, hereby certify that I have this day served a copy of PECO Energy Company's Motion in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Mary Ellen Jones  
228 S. 49<sup>th</sup> Street,  
Philadelphia, PA 19139

\_\_\_\_\_  
Tishekia E. Williams  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
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(215) 841-4220  
Fax: 215.568.3389  
Tishekia.Williams@exeloncorp.com

Dated at Philadelphia, Pennsylvania, June 15, 2009.