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October 13, 2009

Secretary James J. McNulty
Secretary's Bureau
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg , PA 17105-3265

**Re: Jones v. PECO, Docket No. C-2008-2072916
Request for Continuance of Hearing**

Dear Secretary McNulty:

Enclosed for eFiling is Mary Ellen Jone's Motion for Continuance of Hearing, with accompanying proposed order and certificate of service.

I have served a copy of this document on Administrative Law Judge Charles E. Rainey, Jr. and on all parties to the proceeding.

Respectfully submitted,

Thu B. Tran, Esq,
Energy Unit

Enclosures
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY ELLEN JONES
Complainant

v.

PECO ENERGY COMPANY
Respondent

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C-2008-2072916

Motion for Continuance of Hearing

Pursuant to 52 Pa. Code § 1.15(b), Mary Ellen Jones (hereinafter “Complainant”), through counsel Community Legal Services, Inc., hereby moves for a continuance of the hearing in this matter scheduled for October 20, 2009, and in support states as follows:

1. On October 22, 2008, Complainant, acting *pro se*, filed a Formal Complaint against PECO Energy Company (hereinafter “Respondent”).
2. On June 30, 2009, Thu B. Tran, Esq., of Community Legal Services, Inc, entered her appearance on behalf of Complainant.
3. Counsel for Complainant and counsel for Respondent have been in communication about informal discovery matters.
4. At Complainant’s request, PECO has agreed to conduct a high bill investigation of Complainant’s account, as well as, an assessment for Complainant’s eligibility for PECO’s Low Income Usage Reduction Program. Additional time is required to schedule the visits to Complainant’s home and complete the requested investigation and assessment.
5. On September 24, 2009, Complainant served her Interrogatories and Requests for Production of Documents, Set I, on Respondent.

6. Complainant's counsel requires additional time to receive and review Respondent's discovery responses, to conduct additional discovery if necessary, to attempt to negotiate a settlement, and to prepare properly for a hearing, should a hearing be necessary.
7. On October 13, 2009, Respondent's counsel stated to Complainant's counsel that Respondent agrees with this motion for change of the scheduled hearing date.

WHEREFORE, Complainant moves that the October 20, 2009 hearing be continued for at least 30 days.

Respectfully submitted,



Thu B. Tran, Esquire
Counsel for Complainant
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
215-981-3777

Counsel for Complainant

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY ELLEN JONES
Complainant

v.

PECO ENERGY COMPANY
Respondent

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C-2008-2072916

ORDER GRANTING MOTION FOR CONTINUANCE

Upon review of Complainant's Motion for Continuance of Hearing, and upon good cause shown, the hearing scheduled in this matter for October 20, 2009 is hereby continued to

_____, 20__.

Date

Administrative Law Judge

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY ELLEN JONES
Complainant

v.

PECO ENERGY COMPANY
Respondent

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C-2008-2072916

CERTIFICATE OF SERVICE

I hereby certify that I have this day, served a copy of the foregoing Motion for Continuance of Hearing upon the participants, listed below, in accordance with the requirements of 52 Pa.Code §1.54 (relating to service by a participant).

By First Class U.S. Mail, postage prepaid and/or facsimile and e-mail as indicated:

Administrative Law Judge Charles E. Rainey, Jr.
Pennsylvania Public Utility Commission
Suite 4063
801 Market Street
Philadelphia, PA 19107
Fax: 215-560-3133

Mary Ellen Jones
228 S. 49th Street
Philadelphia, PA 19139

Tishekia E. Williams, Esquire
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
tishekia.williams@exeloncorp.com

Dated this 13th day of October, 2009.



Thu B. Tran, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
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