



Direct Dial: 215.841.6841

September 23, 2013

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

Exelon Business Services Company

Legal Department

2301 Market Street/S23-1
Philadelphia, PA 19103

215 568 3389 Fax
www.exeloncorp.com

RE: Madelene Jacob v. PECO Energy Company
PUC Docket No.: C-2013-2345400

Dear Ms. Chiavetta:

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

- Answer
- Answer & New Matter
- Motion Objecting to Continuance Request
- Motion for Judgment on the Pleadings
- X Motion for Continuance
- Preliminary Objection
- Exceptions
- Reply Exceptions
- Main Brief
- Reply Petition

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention on this matter.

Very truly yours,

Shawane Lee
Counsel for PECO Energy Company
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MADELENE JACOB

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2013-2345400

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. An initial in-person further hearing for this matter is currently scheduled to take place on Friday, October 4, 2013, at 10:00 a.m.
2. PECO Energy's counsel, Shawane L. Lee, is scheduled to attend the Philadelphia Bench Bar Annual Conference from October 4 – October 5, 2013, in Atlantic City, New Jersey to fulfill her Continuing Legal Education requirements.
3. Pursuant to 52 Pa.Code § 1.15(b), a request for a change of the scheduled hearing date must be submitted by motion in writing, filed no later than five (5) days prior to the hearing with the Commission. The motion must state the facts upon which the request rests.
4. Consistent with 52 Pa.Code § 1.15(b), PECO Energy respectfully requests a change of the scheduled hearing date due to counsel's unavailability.
5. PECO Energy has reached out to the Complainant, Madelene Jacob, to obtain her consent for the continuance and Ms. Jacob has indicated that she objects to the continuance.
6. The Prehearing Order in this matter states that requests for a continuance are only granted "in rare situations where good cause exists." (Prehearing Order, citing 52 Pa. Code § 1.15).

7. PECO Energy avers that “good cause” exists to continue the scheduled hearing to another date because PECO Energy’s counsel, who is knowledgeable of the facts, circumstances and evidence, concerning the Complainant’s formal complaint against the company is not available to represent the company.

8. PECO Energy therefore respectfully requests that the hearing be continued to a further date.

Respectfully Submitted,



Shawane L. Lee
Counsel for PECO Energy Company
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P.O. Box 8699
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Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MADELENE JACOB

v.

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VERIFICATION

I, Shawane L. Lee, 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.



Shawane L. Lee

Date: September 23, 2013

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CERTIFICATE OF SERVICE

I, Shawane L. Lee, 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 and emailing a copy, properly addressed and postage prepaid to:

Madelene Jacob
P.O. Box 45832
Philadelphia, PA 19149



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Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, September 23, 2013.