

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 16, 2013

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17101

Re: Genevieve Marie Amen, Complainant  
v.  
PECO Energy Company  
Docket No. F-2013-2381581

Dear Secretary Chiavetta:

Enclosed for filing please find the Office of Consumer Advocate and Complainant's Motion for Continuance, in the above-referenced proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Sincerely yours,

A handwritten signature in black ink that reads "Dianne E. Dusman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Dianne E. Dusman  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 38308  
E-Mail: DDusman@paoca.org

Enclosures

cc: Certificate of Service  
Administrative Law Judge Mary D. Long  
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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Genevieve Marie Amen,	:	
Complainant	:	
	:	
v.	:	Docket No. F-2013-2381581
	:	
PECO Energy Company,	:	
Respondent.	:	

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OFFICE OF CONSUMER ADVOCATE and COMPLAINANT'S  
MOTION FOR CONTINUANCE

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Pursuant to 52 Pa. Code §§1.15 and 5.103, the Office of Consumer Advocate ("OCA") hereby moves that the Presiding Officer, Administrative Law Judge (ALJ) Mary Long grant a continuance of the telephonic hearing now scheduled in the above-captioned proceeding for Thursday, December 19, 2013 at 1:30 P.M. and represents in support thereof the following:

1. On August 26, 2013, Ms. Genevieve Marie Amen, of 220 West Montgomery Avenue, Haverford PA 19041 filed the Formal Complaint that initiated this proceeding.
2. PECO Energy Company (PECO) filed an Answer to Mr. Miller's Formal Complaint on September 11, 2013.
3. On October 2, 2013, the Commission issued a Hearing Notice, which was to be served via first-class mail. The Hearing Notice identified ALJ Long as the Presiding Officer and set an Initial Telephonic Hearing date of December 19, 2013 at 1:30 p.m.
4. The Complainant advised counsel for OCA that she had not received the Telephonic Hearing Notice.

5. The OCA has been attempting to assist Complainant Amen concerning her billing dispute since she first called the OCA in late August, 2013. The OCA was unaware of the scheduled hearing until PECO counsel's assistant mentioned the scheduled hearing during a conversation on December 9, 2013. Counsel for OCA promptly confirmed this by checking the PUC website and then reported this news to the Complainant, who was completely surprised.

6. Simultaneous with the submission of this Motion for Continuance, the OCA is filing a Notice of Intervention with a Public Statement, pursuant to 71 P.S. § 309-1, to become a party in this matter, in order to further assist the Complainant.

7. The OCA and Complainant have been waiting for certain documents to be provided by the Complainant's bank in order to prepare to press forward with the complaint. The Complainant first requested the documents in October 2013 and when Complainant learned on December 9, 2013 that a hearing had been scheduled, she requested those documents of the bank again, but has not received them.

8. To attempt to assist the Complainant, counsel for the OCA scheduled a call with counsel for PECO and its Regulatory Assessor on Friday, December 13, 2013. During that call, among other things, the OCA reported to Counsel and the Regulatory Assessor that the Complainant had been unaware of the scheduled hearing, because Complainant had not received the Hearing Notice in her case from the PUC.

9. The OCA also advised PECO counsel that Complainant Amen was nine months pregnant and was in the hospital awaiting decisions by her physicians about her care and treatment.

10. Complainant Amen requested and received a note from her doctor documenting her condition. In addition, her doctor scheduled her for an appointment on Thursday, December

19, 2013, at the Perinatal Testing Center in the Bryn Mawr Hospital, Bryn Mawr, PA which will preclude her from participating in a telephonic hearing that day. Copies of these documents, both signed by her physician, was provided to counsel for PECO earlier today and are attached to this Motion as Exhibit A.

11. Counsel for PECO has stated to OCA counsel via email that, having reviewed the documents, PECO does not object to the continuance.

12. Therefore, for all of the above reasons, the OCA hereby submits this Motion for Continuance and respectfully requests that the Presiding Officer continue the Telephonic Hearing for no less than sixty days. The OCA would also request that, because the recovery periods after childbirth can vary greatly, the OALJ consult with the parties before rescheduling the hearing.

13. This continuance would be in the public interest because it would enable the OCA to assist the Complainant in preparing for a hearing after timely notice and after she has had sufficient time to recover from childbirth. In addition, it would allow time for the OCA, the Complainant and PECO to discuss stipulations or the possibility of a settlement.

WHEREFORE, the Office of Consumer Advocate respectfully requests that the Administrative Law Judge grant a continuance for no less than sixty (60) days.

Respectfully submitted,



Dianne E. Dusman  
Juris No. 38308  
Senior Assistant Consumer Advocate  
Christy Appleby  
Assistant Consumer Advocate  
Juris No. 85824

Counsel for:  
Tanya J. McCloskey  
Acting Consumer Advocate

Office of Consumer Advocate  
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5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
(717) 783-5048

DATED: December 16, 2013

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**FedEx**Office<sub>SM</sub>

FedEx Kinko's is now FedEx Office

# Fax Cover Sheet

Date Monday December 16, 2013

Number of pages 14 (including cover page)

To:

From:

Name Liane Susman

Name \_\_\_\_\_

Company DCA

Company \_\_\_\_\_

Telephone \_\_\_\_\_

Telephone \_\_\_\_\_

Fax 714.483.4152

Comments Here are doctor slips as per our conversation  
also including my referral by my doctor for treatment.



7 90363 00711 1

Fax - Local Send



7 90363 00714 2

Fax - Domestic Send



7 90363 00720 3

Fax - International Send

fedex.com 1.800.GoFedEx 1.800.463.3339

EXHIBIT A

Catherine E. Bernardini, DO

License # OS009467L

1030 E. Lancaster Avenue  
Rosemont, PA 19010  
Telephone: (610) 525-3225  
Fax: (610) 525-4932

For Genevieve Amen

Address \_\_\_\_\_

Date 12-16-13

To Whom it may concern  
Genevieve is pregnant &  
is unable to travel

LABELS UNLESS CHECKED

RF 1 2 3 5 6 1 YP

D.E.A. # \_\_\_\_\_

IN THE ORIGINAL WORK AREA THERE IS AN REFLECTIVE WATER MARK ON BACK, HOLD AT AN ANGLE TO VIEW SECURITY FEATURES LISTED ON BACK

Lankenau Medical Center  
Bryn Mawr Hospital  
Paoli Hospital  
Riddle Hospital



*Back way to be possible submit.*

*Spoke to Colleen  
1:30 pm Bryn Mawr*

*Ask over perinatal / hist records*

Patient ID

PERINATAL TESTING CENTERS (PTC)

**CENTRAL SCHEDULING FOR ALL MAIN LINE HEALTH PERINATAL SITES. TO SCHEDULE AN APPOINTMENT, CALL ANY OF THE FOLLOWING NUMBERS:**

**484-476-3415 #1      484-476-3424 #1      484-565-1505 #1      484-337-3617 #1**

**Bryn Mawr Hospital** - 1\* Floor C- Wing  
Fax Number: 484-337-4358

**Paoli Hospital** - MOB I, Suite 109  
Fax Number: 484-565-1628

**Lankenau Hospital** - MOB South, Suite 419  
Fax Number: 484-476-4107

**Riddle Hospital** - 3<sup>rd</sup> floor/next to The Birth Place  
Fax Number: 610-627-4080

*Kmen* Last Name      *Genevieve* First Name      *Feb. 23, 1981* Date of Birth      *[scribble]* Social Security Number

**Patient Reminders:** Please review the following. Thank you and we look forward to your visit.

- Please arrive at least 10 minutes before your appointment time so we can register you for testing.
  - Bring this form, your insurance card and photo ID with you on the day of your testing.
  - If your insurance is an HMO, please make sure your OB Doctor's office properly completes and faxes to us any referrals. We are sorry but your testing cannot be done without the completed referrals.
  - If you are having an amniocentesis or CVS, please get a copy of your blood type and current antibody screen faxed to us prior to your appointment.
  - If you are late for your scheduled appointment, you may be asked to reschedule.
- No children under the age of 7 are permitted in the Perinatal Testing Centers at any time. Any child over the age of 7 must be accompanied by another adult.**

Visit our website at [www.mainlinehealth.org](http://www.mainlinehealth.org) and enter "perinatal" in the search box.

Physician Section: Please sign below and complete sections I and II (back) prior to patient's appointment.

<input type="checkbox"/>	<b>LOW RISK PATIENT</b> Screening Package (11-14 Weeks): Ultrasound, Nuchal Translucency, Sequential Screen
<input checked="" type="checkbox"/>	<b>HIGH RISK PATIENT</b> Screening Package (11 - 14 Weeks): Ultrasound, Nuchal Translucency, Non-Invasive Prenatal Testing
<input type="checkbox"/>	<b>ULTRASOUND ONLY</b> Screening (11-14 Weeks): First Trimester Ultrasound, Nuchal Translucency

CHECK S (SINGLE) or M (MULTIPLE)	S	M
Ultrasound, Complete ≥ 14 weeks *		
Ultrasound, Follow up *		
Ultrasound, Detailed Anatomy Survey *		
Ultrasound, Obstetrical Vaginal *		
Ultrasound, Fetal Doppler Evaluation *		
Ultrasound, < than 14 weeks *		
Fetal Echocardiogram, Initial		
Fetal Echocardiogram, Repeat		
Consult Perinatologist <i>Versor</i>		<input checked="" type="checkbox"/>

CHECK S (SINGLE) or M (MULTIPLE)	S	M
Non Stress Test, once*/with AFI if indicated		
Non Stress Test, weekly until delivery */with AFI if indicated		
Non Stress Test, semi-weekly until delivery */with AFI if indicated		
Amniotic Fluid Index (AFI)		
Amniocentesis		
Biophysical profile *		
Biophysical profile without NST *		
Chorionic Villus Sampling (CVS)		
Genetic Counseling		

With Perinatal consult if necessary

Physician Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Time \_\_\_\_\_

Patient Appointment List Notice

AMEN, GENEVIEVE Age: 32Y

Scheduled Appointments

12/19/2013 13:30 Thursday

Duration: 45 MIN

Consult/Ultrasound - Perinatal Testing Center

Location:

Bryn Mawr Hospital  
130 South Bryn Mawr Ave  
Bryn Mawr, PA 19010  
484-337-3000

CID: 000011108493 Issued by EAD

Referring Doctor:

Primary Resource: BMH PERINATAL US RM 1

Department: Perinatal Testing Center

↑  
 From this appointment on Thursday, I get admitted for  
 an external version. At that time they try to re-position  
 the baby or I then get an emergency c-section.  
 I will be in the hospital because I am labeled high risk  
 and going into labor. I will also be monitored

CERTIFICATE OF SERVICE

Re: Genevieve Marie Amen  
v.  
PECO Energy Company

Docket No. F-2013-2381581


I hereby certify that I have this day served a true copy of the foregoing Office of Consumer Advocate and Complainant's Motion for Continuance, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 16<sup>th</sup> day of December 2013.

SERVICE BY EMAIL and FIRST CLASS MAIL, POSTAGE PREPAID

Shawane Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Genevieve Marie Amen  
220 West Montgomery Avenue  
Haverford, PA 19041



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