



Exelon Business Services Company
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August 11, 2014

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

RE: William Spade v. PECO Energy Company
Docket Number: C-2014-2426968

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion for Continuance* with regard to the matter referenced above.

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,

A handwritten signature in black ink, appearing to read "Shawane Lee", with a long, sweeping underline.

Shawane Lee
Counsel for PECO Energy Company

sl/LO

cc: William Spade (via email & First Class Mail)
Darlene Heep, Adm. Law Judge (via facsimile & Email)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WILLIAM SPADE

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2014-2426968

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) This matter is scheduled for an in-person hearing on Tuesday, August 12, 2014 at 2:00 p.m. before Your Honor.
- 2) The formal complaint arises from an outage that occurred on February 5, 2014 at the Complainant's residence due to Ice Storm Nika.
- 3) The Complainant alleges that PECO Energy delayed putting his power back on and gave him different times regarding restoration of his service.
- 4) PECO Energy intends to presents the testimony of Operations Manager, Charles Crumbley to defend its case.
- 5) Mr. Crumbley is responsible for operations, dispatching field personnel and technicians and was the manager in charge during Ice Storm Nika.
- 6) Mr. Crumbley will testify to sixteen (16) exhibits showing data regarding the storm, including the repairs, manpower and resources dedicated to restoring the Complainant's service.
- 7) Mr. Crumbley is unavailable at 2:00 p.m. on August 12, 2014.
- 8) PECO Energy; therefore, requests a continuance of this matter to another hearing date.

- 9) PECO Energy avers a continuance is requested for “good cause” as Mr. Crumbley’s testimony is critical to the company’s defense.
- 10) PECO Energy attempted to contact the Complainant to obtain his consent and was not able to reach him.
- 11) Additionally because of the number of exhibits and witnesses the company intends to present, PECO Energy would request that the hearing be scheduled in the morning.
- 12) PECO Energy avers that a 2:00 p.m. hearing time will result in a further hearing, requiring the Complainant and PECO Energy to return for a second hearing date.

WHEREFORE, PECO Energy requests that Your Honor grant the company’s Motion for a Continuance rescheduling the hearing date.

Respectfully Submitted,



Shawane L. Lee
Counsel for PECO Energy Company
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Shawane.Lee@exeloncorp.com

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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: August 11, 2014

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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:

William Spade
634 Broad Acres Road
Penn Valley, PA 19072



Shawane L. Lee
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Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, August 11, 2014.