



Exelon Business Services Company
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August 13, 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
PUC Docket No.: 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: Darlene Heep, Adm. Law Judge (via email & facsimile)
William Spade (via email and First Class Mail)

**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 was previously scheduled for an in-person hearing on Tuesday, August 12, 2014 at 2:00 p.m. before Your Honor.
- 2) On August 11, 2014, PECO Energy filed a Motion for Continuance, requesting a hearing date change due to the unavailability of Operations Manager, Charles Crumbley who is a critical witness in the case.
- 3) Your Honor granted PECO Energy's Motion for a Continuance and the hearing was rescheduled to take place on Monday, October 6, 2014 at 10:00 a.m.
- 4) PECO Energy's counsel, Shawane L. Lee, is scheduled to attend Exelon's Annual Attorney Meeting on October 6, 2014 and October 7, 2014 in Baltimore, Maryland.
- 5) Pursuant to 52 Pa.Code § 1.15(b), PECO Energy respectfully requests a change of the scheduled hearing date due to counsel's unavailability.
- 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 reached out to the Complainant to obtain his consent for the continuance but the company has not received a response.
- 9) PECO Energy therefore respectfully requests that the hearing be continued to a further 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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Philadelphia, PA 19101-8699
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Shawane.Lee@exeloncorp.com

**BEFORE THE
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WILLIAM SPADE

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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 13, 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 13, 2014.