

Karen O. Moury
717 237 4820
karen.moury@bipc.com

409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
T 717 237 4800
F 717 233 0852
www.buchananingersoll.com

November 12, 2014

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Binh Tran v. Respond Power LLC
Docket No. C-2014-2417540

Dear Secretary Chiavetta:

On behalf of Respond Power LLC, I have enclosed for electronic filing the Motion for Continuance of Respond Power LLC in the above-captioned matter.

Copies have been served on all parties as indicated in the attached certificate of service.

Very truly yours,



Karen O. Moury

KOM/tg
Enclosure

cc: Administrative Law Judge Ember S. Jandebuer (*via email and First-Class Mail*)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

BINH TRAN

v.

RESPOND POWER LLC

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Docket No. C-2014-2417540

MOTION FOR CONTINUANCE

TO ADMINISTRATIVE LAW JUDGE EMBER S. JANDEBEUR:

Respond Power LLC (“Respond Power”), by and through its counsel, Karen O. Moury, and Buchanan Ingersoll & Rooney PC, files this Motion for Continuance, pursuant to Section 1.15 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 1.15, and in connection therewith avers as follows:

1. Respond Power is an electric generation supplier (“EGS”) licensed by the Commission since August 18, 2010 at Docket No. A-2010-2163898 to supply electricity or electric generation services to the public within the Commonwealth of Pennsylvania.

2. On March 31, 2014, Binh Tran (“Complainant”) filed a Formal Complaint (“Complaint”) against Respond Power, alleging an increase in its variable price and claiming that he never authorized a switch from PECO Energy to Respond Power. The Complaint was served on Respond Power on April 23, 2014.

3. On June 11, 2014, Respond Power filed an Answer to the Complaint.

4. By Telephonic Hearing Notice dated October 8, 2014, the Commission scheduled an Initial Telephonic Hearing for November 19, 2014 at 10:00 a.m.

5. On November 4, 2014, the undersigned entered an appearance for Respond Power.

6. Requests for continuance may be granted by the presiding officer “for good cause” under Section 1.15 of the Commission’s regulations, 52 Pa. Code § 1.15.

7. Respond Power requests a continuance of the hearing now scheduled for November 19, 2014. The undersigned is currently scheduled to appear at a telephonic hearing at the same time on the same date in the matter of *Jennifer M. Tustin v. Respond Power LLC*, Docket No. C-2014-2417552. In addition, having been fairly recently engaged to represent Respond Power in this matter, the undersigned would have a greater opportunity to pursue a resolution that obviates the need for a hearing if a continuance is granted.

8. Respond Power is authorized to represent that the Complainant does not oppose this Motion for Continuance.

WHEREFORE, Respond Power LLC respectfully requests that the Commission grant this Motion for Continuance.

Respectfully submitted,

Dated: November 12, 2014



Karen O. Moury
PA Attorney I.D. # 36879
BUCHANAN INGERSOLL & ROONEY PC
409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
(717) 237-4820

Attorneys for Respond Power LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via First-Class Mail

Binh Tran
248 Fourtown Road
Lafayette Hill, PA 19444

Dated this 12th day of November, 2014.



Karen O. Moury, Esq.