



An Exelon Company

Legal Department  
2301 Market Street / S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Direct Dial: 215.841.6841

May 20, 2015

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

**RE: Natasha Rivera v. PECO Energy Company**  
**PUC Docket No.: C-2015-2469644**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion for Continuance of Hearing Date* 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 stylized flourish at the end.

Shawane Lee  
Counsel for PECO Energy Company

cc: Certificate of Service

SL/alb

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATASHA RIVERA	:	
	:	
v.	:	DOCKET NO. C-2015-2469644
	:	
PECO ENERGY COMPANY	:	

**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. A telephonic hearing for this matter is currently scheduled to take place on Wednesday, June 10, 2015, at 10:00 a.m.
2. PECO Energy's counsel, Shawane L. Lee, is scheduled for a medical procedure the day of the hearing.
3. PECO Energy's outside counsel has a scheduling conflict and is not available to cover the hearing.
4. 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.
5. Consistent with 52 Pa.Code § 1.15(b), PECO Energy respectfully requests a change of the scheduled hearing date due to counsel's unavailability.
6. PECO Energy has reached out to the Complainant, Natasha Rivera, to obtain her consent for the continuance and Ms. Rivera has no objection.
7. 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).

8. 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.

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

Respectfully Submitted,



---

Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
Direct Dial: 215.841.6841  
Fax: 215.568.3389  
Shawane.Lee@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATASHA RIVERA

v.

PECO ENERGY COMPANY

:  
:  
:  
:  
:

DOCKET NO. C-2015-2469644

**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: May 20, 2015

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATASHA RIVERA

v.

PECO ENERGY COMPANY

:  
:  
:  
:  
:

DOCKET NO. C-2015-2469644

**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:

Natasha Rivera  
2651 North 7th Street  
Philadelphia, PA 19133



---

Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
Direct Dial: 215.841.6841  
Fax: 215.568.3389  
[Shawane.Lee@exeloncorp.com](mailto:Shawane.Lee@exeloncorp.com)

Dated at Philadelphia, Pennsylvania, May 20, 2015.