

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

Direct Dial: 215-841-6841

July 14, 2015

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

RE: Susan Kreider v. PECO Energy Company

PUC Docket No.: C-2015-2469655

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy'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,

Shawane Lee

Counsel for PECO Energy Company

SL/ab Enclosure

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

SUSAN KREIDER

DOCKET NO. C-2015-2469655

PECO ENERGY COMPANY

v.

MOTION FOR CONTINUANCE OF HEARING DATE

PECO Energy Company ("PECO"), 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. An in-person hearing for this matter is currently scheduled to take place on Wednesday, July 22, 2015 at 2:00 p.m.
- 2. PECO is requesting a continuance of the July 22nd hearing date because of the unavailability of counsel for PECO, Shawane L. Lee, Esquire.
- 3. Ms. Lee recently underwent surgery and is out of the office on short term disability returning July 27, 2015.
- 4. PECO's outside counsel is unavailable to cover the hearing and PECO wants Ms. Lee to handle the hearing due to her company knowledge of PECO's AMI meter program.
- 5. PECO therefore respectfully requests that the hearing be continued to July 29, 2015, or in the alternative, to a further date the week of July 27, 2015.
- 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 avers that "good cause" exists to continue the scheduled hearing to another date because PECO's lead counsel is unavailable.

- 8. PECO contacted the Complainant, Susan Kreider, to obtain her consent for a continuance to July 29, 2015. Ms. Kreider sent the attached correspondence on July 13, 2015, indicating that "it is okay by me." See Correspondence dated 7/13/15, attached hereto as Exhibit "1".
- 9. As the Complainant has no objection to PECO's continuance request, PECO respectfully requests that the hearing be continued to July 29th or, in the alternative, to a date the week of July 27th.

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

SUSAN KREIDER

:

v.

DOCKET NO. C-2015-2469655

PECO ENERGY COMPANY

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: July 14, 2015

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

SUSAN KREIDER :

:

v. : DOCKET NO. C-2015-2469655

:

PECO ENERGY COMPANY

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:

Susan Kreider 169 West Queen Lane Philadelphia, PA 19144

Darlene Davis Heep, Administrative Law Judge Pa. Public Utility Commission Suite 4063 801 Market Street Philadelphia, PA 19107 Via email

.

Shawane L. Lee Counsel for PECO Energy Company 2301 Market Street, S23-1 P.O. Box 8699 Philadelphia, PA 19101, 8600

Philadelphia, PA 19101-8699 Direct Dial: 215.841.6841

Fax: 215.568.3389

Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, July 14, 2015.

FAX TRANSMISSION COVER SHEET

| TO: | Shwane L. Lee, Counsel for PECO Energy |
|--|--|
| FAX #: | (215) 568-3389 |
| From: | Susan Kreider (215) 849-1698 |
| Date: | 13 July 2015 |
| Total number of pages faxed including cover sheet2_ | |
| Additional ir | Iformation |
| On Friday, 10 July 2015 @ 9115 AM I received a VM from Amy Boback. She states that you unable to keep the yearing dated 22 July 2015 and would like to reschedule | |
| lmy Boback. She states that you unable to keep the | |
| learing dated 22 July 2015 and would like to reschedule | |
| 07 27 JULY 2015, | |
| t is akay by me but of course this decision is ultimately p to the Honorable Judge Darlene D Heep's discretion | |
| <u> </u> | portable subjection Heep's discretion |
| PRAG | Susan Kreiden |
| The attached information is confidential and is intended only for the addressee named above. If you have received this transmission in error, kindly notify me by telephone. | |

TRANSMISSION VERIFICATION REPORT

TIME

: 07/06/2015 14:13

NAME FAX

TEL : SER.#: 000K1N153941

DATE, TIME FAX NO./NAME DURATION PAGE(S) MODE

07/06 13:58 92155683389 00:14:29 OK STANDARD

ECM

FAX TRANSMISSION COVER SHEET

TO:

Shwane L Lee, Counsel for PECO Energy

FAX#:

(215) 568 - 3389

From:

Susan Kreider (215) 849-1698

Date:

6 July 2015

Total number of pages faxed including cover sheet _

40 pages is correct, (SK

Additional information

Corrections to Statement faxed last week : my conversation with PECO Rep Rochelle was 2014

My July Invaice arrived last Monday and the estimated high so I will amend my reflect this