

Legal Department
2301 Market Street / S23-1
Philadelphia, PA 19103

Direct Dial: 215-841-6841

July 29, 2015

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

RE: Colleen VanBaak v. PECO Energy Company
PUC Docket No.: C-2015-2476567

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Motion Requesting An In Person Hearing* 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

cc: Certificate of Service

SL/lo

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

COLLEEN VAN BAAK	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2015-2476567
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**MOTION OF PECO ENERGY COMPANY
REQUESTING AN IN PERSON HEARING**

PECO Energy Company ("PECO Energy"), hereby requests that the telephonic hearing scheduled on August 21, 2015, be converted to an In Person hearing and states the following:

1. A telephonic hearing is scheduled to take place Friday, August 21, 2015, before Administrative Law Judge Katrina L. Dunderdale.
2. The Complainant alleges in her formal complaint that she has experienced “arcing episodes” “lights flickering” and “circuit failures” which have “fried” her electrical equipment.
3. To defend against these allegations, PECO intends to present the testimony of several witnesses, including a meter engineer, voltage engineer, high bill field technician and AMI installation technician.
4. PECO will also present exhibits with data in the form of voltage graphs that the witnesses will testify to.
5. Because of the technical nature of the testimony to be presented, PECO Energy requires the testimony to be presented in person.
6. Accordingly, PECO Energy requests that the telephonic hearing be converted to an In Person hearing because the hearing will involve multiple complex exhibits and witnesses.

7. The company will not be able to adequately present its case using the voltage data, graphs and records if the hearing is conducted telephonically.

8. Accordingly, PECO requests that the telephonic hearing be scheduled as an In Person hearing in the Philadelphia Administrative Law Judge offices.

9. PECO avers that the Complainant will not be substantially prejudiced if she is to appear in person in the Philadelphia office because her residence is only 37 minutes away from Philadelphia.

10. PECO has reached out to the Complainant and left several voicemail messages for her requesting her position on PECO's request. The Complainant has not responded.

WHEREFORE, PECO requests that the telephonic hearing be converted to an in person hearing in the Philadelphia Administrative Law Judge offices.

Respectfully Submitted,



Shawane L. Lee
Counsel for PECO Energy Company
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

COLLEEN VAN BAAK	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2015-2476567
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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 29, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

COLLEEN VAN BAAK	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2015-2476567
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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:

Colleen Van Baak
560 Mill Road
Yardley, PA 19067
Via Email – cmvanbaak@gmail.com

Administrative Law Judge Katrina L. Dunderdale
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh, PA 15222
Via Email



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Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, July 29, 2015.