



An Exelon Company

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August 5, 2015

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

RE: Abraham Ituah v. PECO Energy Company
PUC Docket No.: C-2012-2338738

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".

Shawane Lee
Counsel for PECO Energy Company

cc: Certificate of Service

SL/alb
Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ABRAHAM ITUAH	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2012-2338738
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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 Monday, August 10, 2015 at 10:00 a.m.
2. PECO is requesting a continuance of the August 10th hearing date because of the unavailability of PECO witness, High Bill Foreman, Thomas Lerro.
3. PECO requested a further hearing to present the high bill report, photographs and testimony of Thomas Lerro from a field investigation he conducted at the Complainant's rental property on May 7, 2013.
4. The high bill report and testimony was to address the Complainant's allegations that his public lighting meter never had any appliances attached to it and the meter registers no usage.
5. Mr. Lerro is out of the office on short term disability after suffering a health condition and he is not expected to return until September 2015.
6. PECO therefore respectfully requests that the hearing be continued to a further hearing the last week of September or in October 2015.

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 avers that “good cause” exists to continue the scheduled hearing to another date because PECO’s key witness is unavailable.

9. PECO contacted the Complainant, Abraham Ituah, to obtain his consent for the continuance request but we have been unable to reach him.

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

Respectfully Submitted,



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

ABRAHAM ITUAH
Complainant

v.

PECO ENERGY COMPANY
Respondent

:
:
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:
:

DOCKET NO. C-2012-2338738

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 5, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ABRAHAM ITUAH	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2012-2338738
	:	
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:

Abraham Ituah
P.O. Box 48024
Philadelphia, PA 19144
Via Overnight Mail

Cynthia Williams Fordham, Administrative Law Judge
Pa. Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
Via email



Shawane L. Lee
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Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, August 5, 2015.