



An Exelon Company

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

Direct Dial: 215.841.6841

August 11, 2015

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

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

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *Motion of PECO Energy Company for a Continuance* 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 long horizontal flourish extending to the right.

Shawane Lee
Counsel for PECO Energy Company

cc: Certificate of Service

SL/alb
Enclosure

**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
FOR A CONTINUANCE**

PECO Energy Company ("PECO Energy"), hereby requests a continuance of the telephonic hearing scheduled on August 21, 2015, and hereby 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 seven (7) witnesses, including a meter engineer, voltage engineer, electric trouble man, electric trouble man supervisor, high bill field technician and an AMI installation technician.
4. PECO filed a motion requesting that this matter be converted to an in person hearing due to the number of witness and the complex and technical nature of the exhibits and testimony to be presented.
5. To date, PECO's motion to change the hearing to an in person hearing is pending.
6. Accordingly, a continuance is required to give the ALJ an opportunity to rule on PECO's Motion.

7. Additionally, PECO intends to present the testimony of the electric trouble man who responded to the Complainant's arcing allegations. The trouble man has prescheduled vacation on August 21, 2015 and is not available for the hearing.

8. PECO therefore respectfully requests that the hearing be continued for 30-60 days.

9. 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).

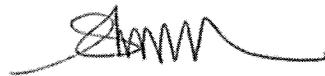
10. PECO avers that "good cause" exists to continue the scheduled hearing to another date because one of PECO's witnesses is unavailable and a Motion to transfer to an in person hearing is currently pending.

11. PECO contacted the Complainant, Colleen Van Baak, and she has consented to the continuance and advised that she joins in PECO's motion for a continuance.

12. PECO therefore respectfully requests that the hearing be continued to a further date in 30-60 days.

WHEREFORE, PECO requests that this Honorable Commission grant PECO Energy's Motion for a Continuance.

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**

COLLEEN VAN BAAK
Complainant

v.

PECO ENERGY COMPANY
Respondent

:
:
:
:
:
:
:

DOCKET NO. C-2015-2476567

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 11, 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



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

Dated at Philadelphia, Pennsylvania, August 11, 2015.