

Legal Department  
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January 14, 2016

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

**RE: Lynne Crowding Piccolo v. PECO Energy Company**  
**PUC Docket No.: C-2015-2506979**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion Requesting a Telephonic 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**

**LYNNE CROWDING PICCOLO**                   :  
  **Complainant**                               :  
  :  
  :  
  :  
**v.**   :  
  :  
**PECO ENERGY COMPANY**               :  
  **Respondent**                               :  
  :

**DOCKET NO. C-2015-2506979**

**MOTION OF PECO ENERGY COMPANY  
REQUESTING A TELEPHONIC HEARING**

PECO Energy Company ("PECO Energy"), hereby requests that the in person hearing scheduled on January 22, 2016 at 10:00 a.m., be converted to a telephonic hearing and states the following:

1. An in person hearing is scheduled to take place Friday, January 22, 2016, before Administrative Law Judge Eranda Vero.
2. The Complainant alleges in her formal complaint that she sustained damage to her property arising from gas line work performed on her street.
3. To defend against these allegations, PECO intends to present the testimony of two witnesses, including an employee from the company Centrum who investigated Complainant's damage claims.
4. The Centrum employee is only available by telephone on the date of the hearing.
5. The Centrum employee's testimony is essential to PECO's defense of this matter and will clearly outline the issues in the complaint.
6. Accordingly, PECO Energy requests that the in person hearing be converted to a telephonic hearing to permit the Centrum witness to testify.

7. PEO has reached out to the Complainant and she has no objection to the hearing being held telephonically.

WHEREFORE, PECO requests that the in person hearing be converted to a telephonic hearing.

Respectfully Submitted,



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

**LYNNE CROWDING PICCOLO**  
**Complainant**

v.

**PECO ENERGY COMPANY**  
**Respondent**

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**DOCKET NO. C-2015-2506979**

**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.



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Shawane L. Lee

Date: January 14, 2016

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>LYNNE CROWDING PICCOLO</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2015-2506979</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

**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:

Lynne Crowding Piccolo  
198 Blanchard Road  
Drexel Hill, PA 19026  
Via email: [lynnecrowding@comcast.net](mailto:lynnecrowding@comcast.net)

Administrative Law Judge Eranda Vero  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
Via Email



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[Shawane.Lee@exeloncorp.com](mailto:Shawane.Lee@exeloncorp.com)

Dated at Philadelphia, Pennsylvania, January 14, 2016.