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February 26, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Florence Smalls v. PECO Energy Company & XOOM Energy Pennsylvania, LLC
Docket No. C-2016-2522456

Dear Secretary Chiavetta:

Enclosed please find a Motion for Continuance on behalf of XOOM Energy Pennsylvania, LLC in the above-captioned matter. A copy has been served in accordance with the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

STEVENS & LEE



Michael A. Gruin

Enclosures

cc: ALJ Katrina L. Dunderdale (via Email and First Class Mail)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

FLORENCE SMALLS	:	
	:	
v.	:	C-2016-2522456
	:	
PECO ENERGY COMPANY and	:	
XOOM ENERGY PENNSYLVANIA, LLC	:	

**XOOM ENERGY PENNSYLVANIA, LLC'S
MOTION FOR A CONTINUANCE**

AND NOW, Xoom Energy Pennsylvania, LLC (“XOOM”) by and through its attorneys Stevens & Lee, P.C., hereby files this Motion pursuant to 52 Pa Code § 1.15 to request a continuance of the hearing scheduled for March 11, 2016 in this matter, for the reasons set forth below:

1. On January 8, 2016, XOOM was served with a Formal Complaint (“Complaint”) filed by Florence Smalls (“Complainant”) against the PECO Energy Company (“PECO”) and XOOM
2. On January 14, 2016, XOOM filed its Answer to the Complaint, in which it denied the allegations of the Complaint.
3. On February 2, 2016, a Prehearing Order was issued, which scheduled this matter for an Initial Telephonic Hearing on March 11, 2016 before Administrative Law Judge Katrina Dunderdale.
4. XOOM’s primary fact witness will be away from her office and out of state attending to a family matter on March 11, 2016, and therefore is unavailable for the scheduled hearing.

5. Counsel for PECO has indicated that PECO does not object to a continuance of the hearing.

6. On February 25, 2016, counsel for XOOM attempted to contact the Complainant regarding a continuance request. The Complainant's adult son (Lawrence Smalls) responded to XOOM's counsel and indicated that he was the person who filed the Formal Complaint and who was responsible for the utility account at issue in the Complaint. Mr. Smalls indicated that he would be the person who would be attending the hearing as the Complainant in this matter, and that he did not object to a continuance of the hearing.

7. XOOM respectfully requests that the hearing be postponed due to the unavailability of the Company's witness as set forth above.

REQUEST FOR RELIEF

WHEREFORE, for all of the reasons stated herein, Respondent XOOM Energy Pennsylvania, LLC respectfully requests that the hearing in this matter be continued and rescheduled for a hearing date in April of 2016.

Respectfully submitted,



Michael A. Gruin, (I.D. No. 78625)
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Fax (610) 988-0852
COUNSEL FOR XOOM ENERGY
PENNSYLVANIA, LLC

DATE: February 26, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

FLORENCE SMALLS	:	
	:	
v.	:	C-2016-2522456
	:	
PECO ENERGY COMPANY and	:	
XOOM ENERGY PENNSYLVANIA, LLC	:	

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of February, 2016, a copy of the foregoing Motion has been served upon the persons listed below via First Class Mail in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Florence Smalls
1667 Wyoming Avenue
Philadelphia, PA 19140

Shawane L. Lee, Esquire
Exelon Business Services
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699



DATE: February 26, 2016

Michael A. Gruin