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May 13, 2016

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

RE: Mary Paul v. PECO Energy Company
Docket No. C-2015-2475355

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is a Motion for Continuance of Hearing Date.

Very truly yours,



Ward L. Smith
Counsel for PECO Energy Company

WS/ab
Enclosure

cc: Christopher P. Pell, ALJ
Darlene D. Heep, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Paul

v.

PECO Energy Company

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:
:
:
:

Docket No. C-2015-2475355

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.61, you are hereby notified that, within 20 days, you must answer the enclosed Motion for Continuance of Hearing Date. Please note, however, that PECO has requested that this matter be set for immediate oral argument. You must provide a full copy of any objection or answer to counsel for PECO. If you serve an objection or answers, you may not file the substance of such objection or answer with the Commission or the Administrative Law Judge; however, you must file a certificate of service with the Secretary of the Pennsylvania Public Utility Commission with the Administrative Law Judge, evidencing the service of such objection or answers on PECO.

File with:

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

With a copy to:

Ward L. Smith
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, May 13, 2016



Ward L. Smith
Counsel for PECO Energy Company
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Philadelphia, PA 19101-8699
215-841-6863
Ward.Smith@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY PAUL	:	
Complainant	:	
v.	:	DOCKET NO. C-2015-2475355
	:	
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 as follows:

1. An in person hearing for this matter is currently scheduled to take place on Tuesday, August 16, 2016 at 10:00 a.m.
2. The Complainant alleges in her formal complaint that she has electro-hypersensitivity and she has experienced health effects from the AMI meters installed in her neighborhood.
3. At the hearing, PECO will present the testimony of Dr. Mark Israel, M.D., Professor of Medicine, Dartmouth Medical School, to testify about medical and scientific studies of radio frequency fields and health, and that there is no reliable medical or scientific basis for concluding that radio frequency fields from PECO's AMI meters will cause or contribute to adverse health effects generally or to the specific conditions identified by Complainant.
4. At the hearing, PECO will present the testimony of Dr. Christopher Davis, Professor of Electrical and Computer Engineering, University of Maryland, to testify to the methods for determining a person's exposure to radio frequency fields; whether there is an established biophysical/ biological mechanism for how radio frequency fields from AMR or

AMI systems could cause adverse effects in humans; and how the radio-frequency fields from PECO's existing AMR system and new AMI system compare to the FCC's radio-frequency exposure standards for those devices and also to radio frequency field exposures encountered in everyday life.

5. Both witnesses work at universities, and schedule their vacations around the university schedule.

6. Dr. Israel is unavailable to testify on August 16th because he has a family vacation scheduled from August 15 – 26th.

7. Dr. Davis is unavailable to testify on August 16th because he has scheduled vacation for most of the month of August.

8. As PECO's expert witnesses are not available for the August 16th hearing, PECO requests a continuance of this matter.

9. The Prehearing Order in this matter, Ordering Paragraph 3, states that requests for a continuance are must be submitted no later than five days prior to the hearing, and will be granted "in rare situations where good cause exists." (Prehearing Order, citing 52 Pa. Code § 1.15).

10. This Motion is being submitted 95 days prior to the scheduled hearing.

11. PECO has not previously requested a continuance in this matter.

12. "Good cause" exists to continue the scheduled hearing to another date as two of PECO's expert witnesses are unavailable to testify the day of the scheduled hearing.

13. PECO contacted the Complainant regarding PECO's continuance request and she advised that she objects to the continuance.

14. PECO respectfully requests that the hearing be continued to a further date in September 2016. If this Motion is granted, PECO requests that Your Honors and the parties confer briefly by phone to determine a date for hearing that works for all involved.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Ward L. Smith', is written over a horizontal line.

Ward L. Smith
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY PAUL	:	
Complainant	:	
v.	:	DOCKET NO. C-2015-2475355
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

VERIFICATION

I, Ward Smith, 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.



Ward Smith

Date: May 13, 2016

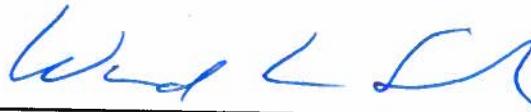
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Complainant	:	
v.	:	DOCKET NO. C-2015-2475355
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Ward Smith, hereby certify that I have this day served a copy of PECO Energy Company's Motion for a Continuance in the above matter upon all interested parties by mailing and emailing a copy, properly addressed and postage prepaid to:

Mary Paul
239 Honey Locust Drive
Avondale, PA 19311
Via First Class Mail



Ward Smith
Counsel for PECO Energy Company
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Fax: 215.568.3389
ward.smith@exeloncorp.com

Dated at Philadelphia, Pennsylvania, May 13, 2016.