



An Exelon Company

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

Direct Dial: 215.841.6841

July 25, 2016

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

**RE: Jannette Vasquez and Edwin Segarra Lagoa v. PECO Energy Company
PUC Docket No.: C-2016-2543324**

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", with a long, sweeping underline.

Shawane Lee
Counsel for PECO Energy Company

SL/alb
Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANNETTE VASQUEZ
EDWIN SEGARRA LAGOA

v.

PECO ENERGY COMPANY

:
:
:
:
:

DOCKET NO. C-2016-2543324

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. A hearing for this matter is currently scheduled to take place on Friday, July 29, 2016 at 10:00 a.m.
2. PECO is requesting a continuance of the July 29th hearing date because of the unavailability of PECO witness, High Bill Foreman, Thomas Lerro.
3. Mr. Lerro supervises the high bill field technician who performed the high bill field investigations at the Complainant's property. The high bill field technician, Lori Messere, has since retired from PECO. Accordingly, Mr. Lerro will testify to Ms. Messere's high bill field reports, which the company will produce at the hearing.
4. Mr. Lerro has previously scheduled vacation on Friday, July 29th and will be out of town on that date.
5. PECO therefore respectfully requests that the hearing be continued to a further date on August 1, 2nd 8th, 25th or 29th or 31st.
6. 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).

7. PECO avers that "good cause" exists to continue the scheduled hearing to another date because one of PECO's witnesses is unavailable.

8. PECO contacted the Complainant, Edwin Lagoa, and he objects to the company's continuance request as he has already taken time off from work that day.

9. PECO respectfully requests that the further hearing be continued to a further date on August 1, 2nd, 8th, 25th or 29th or 31st.

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**

JANNETTE VASQUEZ
EDWIN SEGARRA LAGOA

v.

PECO ENERGY COMPANY

:
:
:
:
:
:

DOCKET NO. C-2016-2543324

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: July 25, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANNETTE VASQUEZ
EDWIN SEGARRA LAGOA
v.
PECO ENERGY COMPANY

:
:
:
:
:

DOCKET NO. C-2016-2543324

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:

Jannette Vasquez
Edwin Segarra Lagao
1127 Olive Street
Coatesville, PA 19320

Eranda Vero, Administrative Law Judge
Pa. Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
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, July 25, 2016.