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October 20, 2016

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

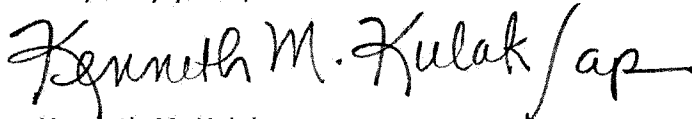
**Re: International Brotherhood of Electrical Workers, Local 614 v.
PECO Energy Company
Docket No. C-2016-2525801**

Dear Secretary Chiavetta:

Enclosed for filing is a **Joint Motion of PECO Energy Company and The International Brotherhood of Electrical Workers, Local 614, for a Continuance of the Procedural Schedule (the "Joint Motion")**, in the above-referenced matter.

As indicated on the enclosed Certificate of Service, a copy of the Joint Motion has been provided to Administrative Law Judge Cynthia Williams Fordham and all parties of record.

Very truly yours,



Kenneth M. Kulak

KMK/tp
Enclosures

c: Per Certificate of Service (w/encls.)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INTERNATIONAL BROTHERHOOD OF	:	
ELECTRICAL WORKERS, LOCAL 614	:	
	:	
v.	:	DOCKET NO. C-2016-2525801
	:	
PECO ENERGY COMPANY	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served copies of the **Joint Motion of PECO Energy Company and The International Brotherhood of Electrical Workers, Local 614, for a Continuance of the Procedural Schedule**, on the following persons, in the manner specified below, in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

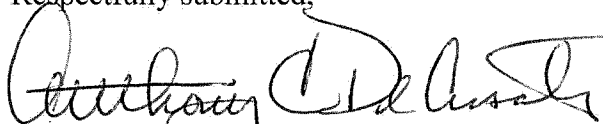
The Honorable Cynthia Williams Fordham
Administrative Law Judge
Pennsylvania Public Utility Commission
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cfordham@pa.gov

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Respectfully submitted,



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Counsel for PECO Energy Company

Dated: October 20, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INTERNATIONAL BROTHERHOOD OF	:	
ELECTRICAL WORKERS, LOCAL 614	:	
	:	
v.	:	DOCKET NO. C-2016-2525801
	:	
PECO ENERGY COMPANY	:	

**JOINT MOTION OF PECO ENERGY COMPANY AND THE
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 614
FOR A CONTINUANCE OF THE PROCEDURAL SCHEDULE**

Pursuant to 52 Pa. Code §§ 1.15(b) and 5.103, PECO Energy Company (“PECO”) and the International Brotherhood of Electrical Workers Local 614 (“Local 614”) hereby jointly move for a continuation of the current procedural schedule in this docket. As set forth herein, PECO and Local 614 are engaged in settlement discussions and a continuation of the existing procedural schedule will allow for additional discussions to occur. The Office of Consumer Advocate does not oppose this Motion.

I. PROCEDURAL HISTORY

1. A detailed procedural history of this case is set forth in prior Orders issued by Administrative Law Judge Cynthia W. Fordham (“ALJ Fordham”) and, therefore, is not necessary to repeat here. For present purposes, Local 614 filed its Complaint on January 25, 2016, and ALJ Fordham issued Prehearing Order #3 on June 7, 2016, which established a procedural schedule in this docket.

2. In accordance with Prehearing Order #3, Local 614 served its Direct Testimony on June 30, 2016.

3. On July 28, 2016, PECO filed a Motion for Extension of Time and Objections to Notices of Deposition Issued by Local 614.

4. On August 3, 2016, ALJ Fordham issued Prehearing Order #4, which revised the procedural schedule and established that PECO's Rebuttal Testimony would be served on September 29, 2016, with hearings scheduled for October 24-25, 2016.

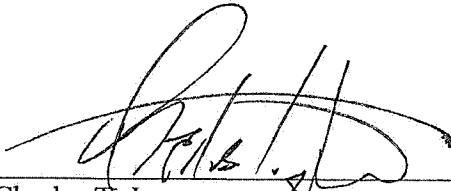
5. On September 28, 2016, the parties requested that ALJ Fordham further revise the procedural schedule to provide PECO and Local 614 with an opportunity to discuss settlement. Subsequently, ALJ Fordham directed that Rebuttal Testimony would be due on October 27, 2016. The parties also agreed to provide status updates to ALJ Fordham on October 14 and 21, 2016.

II. REQUEST FOR CONTINUANCE

6. As provided in the October 14, 2016 status update, PECO and Local 614 are engaged in settlement discussions and have agreed to continue such discussions, if necessary, through December 31, 2016. If PECO and Local 614 conclude that a settlement cannot be achieved on or before December 31, 2016, they agree to work with the OCA to develop a new procedural schedule for consideration by ALJ Fordham.

7. A further continuance of the current proceedings will save time and resources of the Commission while permitting PECO and Local 614 to work towards a resolution of outstanding issues between the parties. The OCA does not oppose a continuation of the procedural schedule.

WHEREFORE, for the foregoing reasons, the parties respectfully request that ALJ Fordham issue an Order granting the Joint Motion of PECO and Local 614 for a continuance of the procedural schedule.

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Counsel for PECO Energy Company

Dated: October 20, 2016

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