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January 31, 2017

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

RE: Charles Reed v. PECO Energy Company
PUC Docket No.: C-2016-2569797

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion for Continuance* 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 in this matter.

Very truly yours,



Shawane Lee
Counsel for PECO Energy Company

cc: Certificate of Service

sl/LD

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CHARLES REED

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2016-2569797

MOTION FOR CONTINUANCE OF HEARING DATE

PECO Energy Company ("PECO Energy") and Charles Reed ("Complainant"), pursuant to 52 Pa. Code § 1.15(b), hereby request a continuance of the hearing date scheduled in this matter and state the following:

1. An in person Call of the Docket hearing for this matter is currently scheduled to take place on Thursday, February 2, 2017.
2. The Complainant, who is elderly, requests a payment agreement.
3. The parties believe this matter can be resolved with a company issued payment agreement if the Complainant receives LIHEAP funds and additional funds for a down payment.
4. The Complainant has advised that he requires time to apply for LIHEAP and to collect the additional funds for a down payment.
5. Accordingly, PECO Energy and the Complainant jointly request a continuance of this matter to give the Complainant time to apply for LIHEAP and to obtain funds for a down payment.
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 Energy avers that "good cause" exists to continue the scheduled hearing because the delay will likely resolve the case and obviate the need for a hearing.

8. PECO Energy and the Complainant therefore respectfully jointly request that the hearing be continued to a further date.

Respectfully Submitted,



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

CHARLES REED

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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: January 31, 2017.

**BEFORE THE
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CHARLES REED

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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:

Administrative Law Judge Darlene Davis Heep
Suite 4063
801 Market Street
Philadelphia, PA 19107
Via email

Charles Reed
1842 North 22nd Street
Philadelphia, PA 19121
Via Overnight Mail



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Dated at Philadelphia, Pennsylvania, January 31, 2017.