



An Exelon Company

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March 23, 2017

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

**RE: Wade De Loe v. PECO Energy Company
PUC Docket No. F-2016-2581905**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is a *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: Honorable Katrina L Dunderdale, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WADE DE LOE

v.

PECO ENERGY COMPANY

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DOCKET NO. F-2016-2581905

MOTION FOR CONTINUANCE OF HEARING DATE

PECO Energy Company ("PECO"), pursuant to 52 Pa. Code § 1.15(b), hereby request a continuance of the hearing date scheduled in this matter as follows:

1. A telephonic hearing for this matter is currently scheduled to take place on Wednesday, March 29 at 10:00 a.m.
2. The Complainant alleges in his formal complaint that PECO terminated service at his home after the company sent notices to a different address and did not provide him notice of the pending service termination.
3. During a recent conversation with the Complainant pursuant to Your Honor's pre-hearing order, the company determined there were AMI installation notification and access issues that gave rise to the issues raised in Complainant's formal complaint.
4. At the hearing, PECO will present the testimony of AMI Analyst, Fred Mahugu who will testify as to PECO's notification process for access to install AMI meters, his conversations with the Complainant and correspondence he sent to the Complainant.
5. Mr. Mahugu is unavailable on March 29 due to a previously scheduled significant medical appointment that day.

6. The testimony of Mr. Mahugu is critical to PECO's defense, particularly as he handled the Complainant's access and termination and communicated with the Complainant during an informal complaint filed with the Public Utility Commission.

7. Additionally, PECO is requesting the continuance because the company is presently working with the Complainant to resolve his meter and service issues. A company engineer is scheduled to meet with the Complainant to fix his issues. Therefore, PECO believes this matter will be resolved and the case will not need to proceed to hearing. PECO believes that with additional time, there may be resolution to this case.

8. PECO has been in communication with the Complainant, Wade De Loe and he has objected to PECO's continuance request.

9. As PECO's key witness is not available for the hearing date and the company requires additional time to attempt resolution of Mr. De Loe's complaint, PECO respectfully requests a continuance of this matter.

10. PECO Energy respectfully requests that the hearing be continued to a further date.

Respectfully Submitted,



Shawane L. Lee
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WADE DE LOE

v.

PECO ENERGY COMPANY

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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: March 23, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WADE DE LOE

v.

PECO ENERGY COMPANY

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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:

Wade De Loe
560 West 170th Street, Apartment 6B
New York, NY 10032
Via First Class Mail

Administrative Law Judge Katrina L. Dunderdale
Public Utility Commission
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh, PA 15222
Via Email



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Dated at Philadelphia, Pennsylvania, March 23, 2017.