



An Exelon Company

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May 15, 2017

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

RE: Andrea McMurtrie v. PECO Energy Company
PUC Docket No. C-2016-2577882

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is a *Motion of PECO Energy Company Requesting an In Person Hearing* 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 Marta Guhl, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANDREA MCMURTRIE	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2016-2577882
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**MOTION OF PECO ENERGY COMPANY
REQUESTING AN IN PERSON HEARING**

PECO Energy Company ("PECO Energy"), hereby requests that the telephonic hearing scheduled on June 5, 2017, be converted to an In Person hearing and states the following:

1. A telephonic hearing is scheduled to take place Monday, June 5, 2017, before Administrative Law Judge Marta Guhl.
2. The Complainant alleges in her formal complaint that voltage irregularities and/or PECO's A/C Saver device caused her air conditioning unit to catch fire.
3. To defend against these allegations, PECO intends to present the testimony of several witnesses, including a meter/voltage engineer, Comverge technician, claims representative and A/C Saver program coordinator.
4. PECO will also present photographs of the alleged burned unit and exhibits with data in the form of voltage graphs that the witnesses will testify to.
5. Because of the technical nature of the testimony to be presented that includes several photographs and graphs, PECO Energy requires the testimony to be presented in person.
6. Accordingly, PECO Energy requests that the telephonic hearing be converted to an In Person hearing because the hearing will involve multiple complex exhibits and witnesses.

7. The company will not be able to adequately present its case using the voltage data, graphs, photographs and records if the hearing is conducted telephonically.

8. Accordingly, PECO requests that the telephonic hearing be scheduled as an In Person hearing in the Philadelphia Administrative Law Judge offices.

9. PECO avers that the Complainant will not be substantially prejudiced if she is to appear in person in the Philadelphia office because her residence in Collegeville, PA is commuting distance to Philadelphia.

10. PECO has reached out to the Complainant via email and left a voicemail message for her requesting her position on PECO's request. The Complainant has not responded.

WHEREFORE, PECO requests that the telephonic hearing be converted to an in person hearing in the Philadelphia Administrative Law Judge offices.

Respectfully Submitted,



Shawane L. Lee
Counsel for PECO Energy Company
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Philadelphia, PA 19103
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANDREA MCMURTRIE
Complainant

v.

PECO ENERGY COMPANY
Respondent

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:
:

DOCKET NO. C-2016-2577882

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: May 15, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANDREA MCMURTRIE	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2016-2577882
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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:

Andrea McMurtrie
11 Firethorn Drive
Collegeville, PA 19426

Administrative Law Judge Marta Guhl
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107



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Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, May 15, 2017.