



An Exelon Company

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September 5, 2017

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

RE: Edward McLaughlin v. PECO Energy Company
PUC Docket No. F-2017-2605650

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 horizontal flourish extending to the right.

Shawane Lee
Counsel for PECO Energy Company

SL/alb
Enclosure

cc: Honorable Darlene D. Heep, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EDWARD MCLAUGHLIN

v.

PECO ENERGY COMPANY

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DOCKET NO. F-2017-2605650

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. An in person hearing for this matter is currently scheduled to take place on Friday, September 15, 2017 at 1:30 p.m.
2. The Complainant alleges in his formal complaint that after he filed for bankruptcy on May 14, 2012, his PECO bill has been incorrect and PECO was not listed as a creditor in his bankruptcy.
3. The Complainant specifically requests that PECO drop his \$2,718.11 bill because the company erroneously assumed he included the company in a second bankruptcy filing.
4. The Complainant additionally requests that PECO refund a \$360.00 bankruptcy charge to him.
5. At the hearing, PECO will present the testimony of Business Analyst, Lisa Holland, who is PECO's bankruptcy specialist.
6. Ms. Holland is scheduled for a prepaid bankruptcy conference the day of the hearing.

7. The testimony of Ms. Holland is critical to PECO's defense, particularly as she is the company's bankruptcy specialist and she has technical knowledge of the Complainant's bankruptcy claims.

8. PECO has communicated with the Complainant and he has no objection to PECO's continuance request.

9. As PECO's key witnesses is not available for the September 15 hearing, 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
Counsel for PECO Energy Company
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Philadelphia, PA 19103
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Shawane.Lee@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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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: September 5, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EDWARD MCLAUGHLIN

v.

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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:

Edward McLaughlin
1136 Riverview Lane West
Conshohocken, PA 19428
Via First Class Mail
Via Email - ed@mainlineshirts.com

Administrative Law Judge Darlene D. Heep
Public Utility Commission
Office of Administrative Law Judge
801 Market Street, Suite 4063
Philadelphia, PA 19107
Via Email



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Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, September 5, 2017.