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March 15, 2018

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

RE: Nina Kinard v. PECO Energy Company
Docket No. F-2017-2640056

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,



Shawane Lee
Counsel for PECO Energy Company

SL/alb
Enclosure

cc: Honorable David A. Salapa, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NINA KINARD	:	
	:	
v.	:	DOCKET NO. F-2017-2640056
	:	
PECO ENERGY COMPANY	:	

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 Friday, March 16 at 10:00 a.m.
2. In her formal complaint, the Complainant disputes a tampering fee assessed to her account for illegal restoration of service.
3. After previous attempts to contact the Complainant, PECO was able to reach the Complainant today to comply with Your Honor's pre-hearing order. During the telephone conversation, the Complainant specifically denied meter tampering at her former service address.
4. PECO requires additional time to investigate the meter tampering issues in this matter. PECO was delayed investigating the issues because the company was unable to reach the Complainant and there were two recent winter storms that activated most of PECO's employees on storm duty.
5. In addition, the Revenue Protection technician who responded to the service address for tampering is still performing storm restoration duties and would need to be pulled out of the field to testify.

6. Further, in its preliminary investigation, PECO identified additional exhibits that will be helpful to clarify the issues in this matter. The Complainant would not have had the opportunity to review these additional exhibits prior to the scheduled hearing tomorrow.

7. Finally, PECO believes that with additional time and investigation, it is possible this matter could be resolved and the case will not need to proceed to hearing.

8. PECO spoke to the Complainant and she has consented to PECO's continuance request.

9. For the reasons set forth above, PECO requests a continuance of this matter to a further date.

Respectfully Submitted,



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

NINA KINARD

v.

PECO ENERGY COMPANY

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:
:
:

DOCKET NO. F-2017-2640056

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 15, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NINA KINARD	:	
	:	
v.	:	DOCKET NO. F-2017-2640056
	:	
PECO ENERGY COMPANY	:	

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:

Nina Kinard
P.O. Box 38396
Philadelphia, PA 19140

Administrative Law Judge David A. Salapa
Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
Via Email



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Dated at Philadelphia, Pennsylvania, March 15, 2018