

Legal Department
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April 18, 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.

PECO ENERGY COMPANY

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DOCKET NO. F-2017-2640056

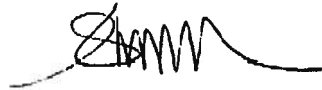
MOTION FOR CONTINUANCE OF HEARING DATE

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 Monday, April 23 at 1:00 pm.
2. In her formal complaint, the Complainant disputes a tampering fee assessed to her account for illegal restoration of service. The Complainant specifically denies meter tampering at her former service address.
3. The Revenue Protection technician who responded to the service address for tampering has a prescheduled vacation the week of the hearing and is unavailable to testify.
4. As PECO's key witness is unavailable to testify at the scheduled hearing, PECO requires a continuance to a further hearing date.
5. Without the testimony of PECO's key witness, the company will be prejudiced in its defense of the formal complaint.
6. PECO reached out to the Complainant via email and telephone but the company has been unable to reach the Complainant to obtain her position on the company's continuance request.

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

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Shawane L. Lee', with a long horizontal flourish extending to the right.

Shawane L. Lee
Counsel for PECO Energy Company
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Philadelphia, PA 19103
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Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

**BEFORE THE
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NINA KINARD

v.

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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: April 18, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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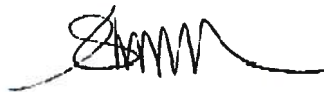
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DOCKET NO. F-2017-2640056

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
Nina.Kinard@gmail.com



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Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, April 18, 2018