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September 19, 2019

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

RE: Blanche Brown v. PECO Energy Company
PUC Docket No. F-2019-3011765

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's 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 Marta Guhl, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

BLANCHE BROWN	:	
Complainant	:	
	:	
v.	:	DOCKET NO. F-2019-3011765
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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 Thursday, September 26, 2019 at 10:00 a.m.
2. The Complainant alleges in her formal complaint that she has been billed incorrectly under PECO's Customer Assistance Program – Fixed Credit Option ("CAP-FCO"). The Complainant additionally alleges that PECO security removed her from the Main Office Building during her visit to discuss her CAP account.
3. Josie H. Pickens, Esquire of Community Legal Services entered an appearance in this matter on behalf of the Complainant.
4. Ms. Pickens served informal discovery requests on PECO and the company is in the process of compiling information responsive to the request.
5. PECO and Community Legal Services have had at least two resolution conference calls to discuss possibly resolving the case.
6. Based on the above, PECO respectfully requests a continuance of the hearing to a further date.

7. The Prehearing Order in this matter states that requests for a continuance are only granted “in rare situations where good cause exists.” (Prehearing Order, citing 52 Pa. Code § 1.15).

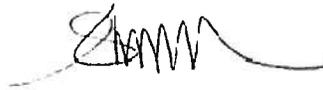
8. PECO avers that “good cause” exists to continue the scheduled hearing to another date because PECO requires additional time to obtain documentation and information for Community Legal Service’s discovery request.

9. Additionally, the company and Community Legal Services require additional time to address the above matters and resolution of these issues may resolve Ms. Brown’s complaint.

10. PECO conferred with Ms. Pickens and she has no objection to a continuance of this matter.

WHEREFORE, PECO respectfully requests that this Honorable Commission grant PECO Energy’s Motion for a Continuance.

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**

BLANCHE BROWN	:	
Complainant	:	
	:	
v.	:	DOCKET NO. F-2019-3011765
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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 18, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

BLANCHE BROWN	:	
Complainant	:	
	:	
v.	:	DOCKET NO. F-2019-3011765
	:	
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:

Josie Pickens, Esquire
Community Legal Services
1410 West Erie Avenue
Philadelphia, PA 19140

Blanche Brown
2034 Mountain Street
Philadelphia, PA 19145

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



Shawane L. Lee
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
Direct Dial: 215.841.6841
Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, September 18, 2019.