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September 25, 2019

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

**RE: Nathan Schiery v. PECO Energy Company**  
**PUC Docket No. C-2019-3010507**

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 Eranda Vero, ALJ  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATHAN SCHIERY

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2019-3010507

**MOTION FOR CONTINUANCE OF HEARING DATE**

PECO Energy Company ("PECO"), pursuant to 52 Pa. Code § 1.15(b), hereby requests a continuance of the hearing date scheduled in this matter and states the following:

1. An in-person hearing for this matter is scheduled to take place on Monday, September 30 at 10:00 a.m.
2. PECO is requesting a continuance of the September 30 hearing date because of the unavailability of PECO witness, High Bill Foreman, Thomas Lerro and High Bill Field Technician, Aaron Saunders.
3. Mr. Lerro supervises Aaron Saunders, the high bill field technician who performed the field investigation at the Complainant's property.
4. As Mr. Saunder's supervisor, Mr. Lerro would normally testify to Mr. Saunder's high bill field reports.
5. Mr. Lerro is out of the office on disability and he is not expected to return before the hearing date.
6. The high bill field technician, Aaron Saunders, who conducted the field investigation has prescheduled vacation on September 30.
7. PECO therefore respectfully requests that the hearing be continued to a further date.

8. 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).

9. PECO avers that “good cause” exists to continue the scheduled hearing to another date because both of PECO’s witnesses are unavailable.

10. PECO has made an attempt to contact the Complainant, Nathan Schiery to obtain his consent; however, Mr. Schiery has not responded to the company.

11. PECO therefore respectfully requests that the further hearing be continued to a further date.

Respectfully Submitted,



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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**

NATHAN SCHIERY

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2019-3010507

**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.



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Shawane L. Lee

Date: September 25, 2019

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATHAN SCHIERY

v.

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DOCKET NO. C-2019-3010507

**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:

Nathan Schiery

Eranda Vero, Administrative Law Judge  
Pa. Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
*Via email*



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[Shawane.Lee@exeloncorp.com](mailto:Shawane.Lee@exeloncorp.com)

Dated at Philadelphia, Pennsylvania, September 25, 2019