

Angela M. Lorenz, Esquire
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October 9, 2019

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

**RE: Shanice Harper v. PECO Energy Company
PUC Docket No. C-2019-3011627**

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,



Angela Lorenz, Esq

Cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SHANICE HARPER	:	
	:	
v.	:	DOCKET NO. C-2019-3011627
	:	
PECO ENERGY COMPANY	:	

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 Friday, October 25, 2019 at 10:00 a.m.
2. PECO is requesting a continuance of the October 25, 2019 hearing date because of the unavailability of the undersigned Counsel for PECO.
3. The undersigned has a pre-scheduled, personal medical appointment for that date and time in Bucks County. Unfortunately, this appointment cannot be missed and was scheduled before Counsel's involvement in PECO matters. Due to this unavoidable scheduling conflict, the undersigned is unavailable on the hearing date.
4. PECO therefore respectfully requests that the hearing be continued to a further date.
5. 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).
6. PECO avers that "good cause" exists to continue the scheduled hearing to another date because Counsel for PECO is unavailable.

7. PECO has contacted the Complainant, Ms. Shanice Harper, to obtain her consent; Ms. Harper has no objection to PECO's request for a continuance.

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

Respectfully Submitted,



Angela M. Lorenz, Esq.
Counsel for PECO Energy Company
Griesing Law, LLC
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Suite 1800
Philadelphia, PA 19103
alorenz@griesinglaw.com
215-618-3720

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SHANICE HARPER

v.

PECO ENERGY COMPANY

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:
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:
:

DOCKET NO. C-2019-3011627

VERIFICATION

I, Angela M. Lorenz, 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.



Angela M. Lorenz

Date: October 9, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SHANICE HARPER

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2019-3011627

CERTIFICATE OF SERVICE

I, Angela M. Lorenz, 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:

Ms. Shanice Harper
46 Holland Avenue
Floor 1
Ardmore, PA 19003

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



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215-618-3720

Dated at Philadelphia, Pennsylvania, October 9, 2019