

GRIESING LAW LLC

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October 28, 2019

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

**RE: Krista McKiernan v. PECO Energy Company
PUC Docket No. C-2019-3013161**

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**

KRISTA MCKIERNAN

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2019-3013161

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 Tuesday, December 17, 2019 at 10:00 a.m.
2. PECO is requesting a continuance of the December 17, 2019 hearing date because of the unavailability of the undersigned.
3. The undersigned Counsel has an unavoidable, firm-mandated training which presents a conflict on that date and time.
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 is unavailable.
7. PECO has contacted the Complainant, Ms. McKeirnan, to obtain her consent. Ms. McKiernan has no objection to PECO's request.

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

Respectfully Submitted,

A handwritten signature in cursive script that reads "Angela Lorenz".

Angela M. Lorenz, Esq.
Counsel for PECO Energy Company
Griesing Law, LLC
1880 John F. Kennedy Blvd.,
Suite 1800
Philadelphia, PA 19103
215-618-3720
Alorenz@griesinglaw.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

KRISTA MCKIERNAN

v.

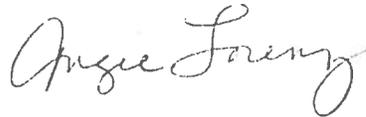
PECO ENERGY COMPANY

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DOCKET NO. C-2019-3013161

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 28, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

KRISTA MCKIERNAN

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2019-3013161

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:

Krista McKiernan
13 Creekside Drive
Pottstown, PA 19464

Darlene D. Heep, Administrative Law Judge
Pa. Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
Via email



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Philadelphia, PA 19103
215-618-3720
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Dated at Philadelphia, Pennsylvania, October 28, 2019