

Angela M. Lorenz, Esquire  
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December 10, 2019

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

**RE: Jesse Lee Keel, III v. PECO Energy Company**  
**PUC Docket No. C-2019-3012762**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is a refiled *Motion for Continuance of Hearing Date* with regard to the matter referenced above. The previously filed Motion did not contain a Certificate of Service.

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,



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Angela Lorenz, Esq

Cc: Certificate of Service



# PENNSYLVANIA

PUBLIC UTILITY COMMISSION

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Docket Number:	C-2019-3012762
Description:	Jesse Lee Keel, III - Motion
Transmission Date:	12/10/2019 3:35:06 PM
Filed On:	12/10/2019 3:35:06 PM
eFiling Confirmation Number:	1832054

### Uploaded File List

Jesse Lee Keel - Motion.pdf	Supporting Documentation	Motion
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Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

**RE: Jesse Lee Keel, III v. PECO Energy Company**  
**PUC Docket No. C-2019-3012762**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission are *PECO Energy'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,



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Angela Lorenz, Esq

Cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>JESSE LEE KEEL, III</b>	:	
<b>Complainant</b>	:	
	:	
<b>v.</b>	:	<b>DOCKET NO. C-2019-3012762</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**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 Wednesday, December 18, 2019 at 10:00 AM.
2. PECO is requesting a continuance of the December 18 hearing date because of the unavailability of Regulatory Assessor, Anna Mae Migliaccio.
3. Ms. Migliaccio is scheduled to testify before ALJ Vero on the same date and time, in another matter (Case # C-2019-3009765). The matter before ALJ Vero had been previously continued. Accordingly, Ms. Migliaccio will be unable to appear for the above hearing.
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 Ms. Migliaccio is unavailable.

7. PECO has attempted several times to contact the Complainant, Mr. Keel, at the information provided to PECO on the Formal Complaint, to obtain his consent. These attempts have been unsuccessful. Therefore, Complainant’s position is unknown at this time.

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

Respectfully Submitted,

A handwritten signature in blue ink that reads "Angie Lorenz". The signature is written in a cursive style.

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Angela M. Lorenz, Esq.  
Counsel for PECO Energy Company  
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Suite 1800  
Philadelphia, PA 19103  
215-618-3720  
[Alorenz@griesinglaw.com](mailto:Alorenz@griesinglaw.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>JESSE LEE KEEL, III</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2019-3012762</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**CERTIFICATE OF SERVICE**

I, Angela M. Lorenz, hereby certify that I have this day served a copy of PECO Energy Company's Motion for Continuance in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Jesse Lee Keel, III  
133 W. Rosemont Street, 2<sup>nd</sup> Floor  
Philadelphia, PA 19120

Dated at Philadelphia, Pennsylvania, December 10, 2019



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Angela M. Lorenz  
Counsel for PECO Energy Company  
Griesing Law, LLC  
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Philadelphia, PA 19103  
215-618-3720  
[alorenz@griesinglaw.com](mailto:alorenz@griesinglaw.com)