



Edward T. Fisher
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January 17, 2020

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

**RE: Mary Jo Schultz v. PECO Energy Company
PUC Docket No. F-2019-3013833**

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.

Sincerely Yours,

A handwritten signature in blue ink that reads "Edward T. Fisher".

Edward T. Fisher

EF/

Cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY JO SCHULTZ

v.

PECO ENERGY COMPANY

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DOCKET NO. F-2019-3013833

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, January 21, 2020 at 10:00 a.m.
2. PECO is requesting a continuance of the January 21, 2020 hearing date as PECO has been unable to perform field testing at the service address listed on Complainant's Formal Complaint.
3. PECO originally scheduled field visits and went out to the property on November 21, 2019 and January 15, 2020 to inspect wiring at the property and to investigate high bill allegations. Unfortunately, PECO was not able to access the property during these field visits. As a result, PECO has reached back out to the owner of the property. The owner has agreed to grant PECO access to the property. However, that access cannot be performed prior to the January 21, 2020 hearing.
4. Consequently, PECO would respectfully request a continuance of the hearing to a further date so that it may properly investigate the allegations of Complainant's Complaint.

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 PECO has been unable to gain access to the service address to fully investigate the allegations in the Complaint.

7. PECO has contacted the Complainant, Mary Jo Schultz, and she consents to this request for a continuance.

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

DATED: January 17, 2020

Respectfully Submitted,



Edward T. Fisher, Esquire
Counsel for PECO Energy Company
Griesing Law, LLC
1880 John F. Kennedy Blvd.
Suite 1800
Philadelphia, PA 19103
215-618-3720
efisher@griesinglaw.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY SHULTZ

v.

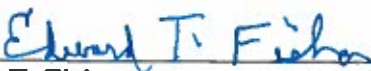
PECO ENERGY COMPANY

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DOCKET NO. F-2019-3013833

VERIFICATION

I, Edward T. Fisher, 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.



Edward T. Fisher

Date: January 17, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY JO SCHULTZ

v.

PECO ENERGY COMPANY

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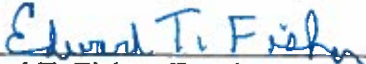
DOCKET NO. F-2019-3013833

CERTIFICATE OF SERVICE

I, Edward T. Fisher, 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/or emailing a copy, properly addressed and postage prepaid to:

Mary Jo Schultz
323 S. Chester Pike, 2nd Floor
Glenolden, PA 19036

Christopher P. Pell, Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
Via email



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215-618-3720
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Dated at Philadelphia, Pennsylvania, January 17, 2020