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April 14, 2021

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Lucy & Cassandra Scipio v. PECO Energy Company & Liberty Power Holdings LLC;  
Docket No. F-2020-3022548

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Motion for Continuance of Liberty Power Holdings LLC in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*Sarah C. Stoner*

Sarah C. Stoner

Enclosure

cc: Honorable F. Joseph Brady ([fbrady@pa.gov](mailto:fbrady@pa.gov)) w/ enc.  
Athena DelVillar ([sdelvillar@pa.gov](mailto:sdelvillar@pa.gov)) w/ enc.  
Cert. of Service w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the foregoing document, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via First Class Mail and/or Email**

Lucy & Cassandra Scipio

Khadijah Scott, Esq.  
PECO Energy Company  
2301 Market Street  
23<sup>rd</sup> Floor  
Philadelphia, PA 19103  
[khadijah.scott@exeloncorp.com](mailto:khadijah.scott@exeloncorp.com)

Dated: April 14, 2021

*Sarah C. Stoner*

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Sarah C. Stoner  
Counsel for Respondent  
Liberty Power Holdings LLC

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LUCY & CASSANDRA SCIPIO	:	
	:	
v.	:	DOCKET NO. F-2020-3022548
	:	
PECO ENERGY COMPANY &	:	
LIBERTY POWER HOLDINGS LLC	:	

**MOTION FOR CONTINUANCE**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE F. JOSEPH BRADY:

Liberty Power Holdings LLC (“Liberty Power”) files this Motion for Continuance, pursuant to Section 1.15 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations, 52 Pa. Code § 1.15. In support of this Motion, Liberty Power avers as follows:

1. On October 5, 2020, Lucy and Cassandra Scipio (“Complainant”) filed a Formal Complaint against Liberty Power and PECO Energy Company at the Commission.
2. By hearing notice dated March 16, 2021, a telephonic hearing was scheduled on the Complaint for April 22, 2021 at 10:00 a.m. Hearing exhibits are due five (5) business days in advance of the hearing.
3. Liberty Power’s only witness for the hearing has a scheduling conflict and is unavailable to appear at the hearing.
4. Requests for continuance may be granted by the presiding officer “for good cause” under Section 1.15 of the Commission’s regulations, 52 Pa. Code § 1.15.
5. Liberty Power submits that the scheduling conflict of its witness is “good cause” for granting a continuance.

6. Liberty Power has reached out to the Complainant regarding a rescheduling of the hearing. The Complainant has not responded to Liberty Power's request to reschedule. Liberty Power has not contacted counsel for PECO Energy Company as the company filed a Certificate of Satisfaction indicating that the complaint as against PECO Energy Company has been satisfied.

WHEREFORE, Liberty Power respectfully requests that ALJ Brady grant this Motion for Continuance, reschedule the hearing on the Formal Complaint to another mutually convenient date and time, and establish a new deadline for the filing of hearing exhibits.

Respectfully submitted,

*Sarah C. Stoner*

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Date: April 14, 2021

Attorneys for Liberty Power Holdings LLC