



August 23, 2021

Via e filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

**Re: Motion for Continuance of Hearing
Eubanks v. PECO, C-2021-3025997**

Dear Secretary Chiavetta,

Please find enclosed a Motion for Continuance of Hearing for the Hearing scheduled for October 6, 2021 in the above referenced case. As noted in the enclosed Motion, counsel for PECO has indicated they do not object to a continuance in this matter.

A copy is being served upon counsel for PECO, pursuant to the attached Certificate of Service. Please contact me with any questions or concerns. I can be reached at (215) 981-3756 or by email at jprice@clsphila.org.

Respectfully submitted,

Joline R. Price, Esquire

Enclosure

Cc: Service List
Administrative Law Judge Darlene Heep (via email to dheep@pa.gov;
sdelvillar@pa.gov).

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North Philadelphia Law Center: 1410 West Erie Ave. | Philadelphia, PA 19140-4136 | Telephone: 215-227-2400

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|----------------------------|---|----------------------------------|
| Denise Eubanks | : | |
| Complainant | : | |
| v. | : | Docket No. C-2021-3025997 |
| | : | |
| PECO Energy Company | : | |
| Respondent | : | |

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the Motion for Continuance of Hearing upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email Only

Angela Lorenz, Esq.
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August 23, 2021

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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MOTION FOR CONTINUANCE OF HEARING

Pursuant to 52 Pa. Code § 1.15(b), Denise Eubanks (hereinafter “Complainant”), through counsel Community Legal Services, Inc., hereby moves for a continuance of the hearing in this matter scheduled for October 6, 2021 and in support thereof states as follows:

1. Complainant, through Counsel at Community Legal Services, Inc., filed a Formal Complaint against PECO on May 21, 2021.
2. PECO filed its Answer to the Formal Complaint on June 10, 2021, an Amended Answer to the Formal Complaint on July 6, 2021, and a Second Amended Answer to the Formal Complaint on August 4, 2021.
3. Complainant and PECO have engaged in both formal and informal discovery and continue to communicate regarding this Complaint.
4. A telephonic hearing on this matter is currently scheduled for October 6, 2021 at 10am.
5. Counsel for Complainant is unavailable October 6, 2021, due to forthcoming staff transitions and scheduling conflicts.
6. Counsel for PECO has indicated they have no objection to a change in hearing date. Counsel for PECO further noted that if the hearing is rescheduled to later in October or November, she is unavailable on the following days: October 11, 12, 19, 28 and November 1-5.

WHEREFORE, for the foregoing reasons, Complainant submits that there is good cause for a continuance of the hearing in this matter, within the meaning of 52 Pa. Code 1.15, and moves that the October 6, 2021 hearing be rescheduled.

Respectfully submitted,



Joline R. Price, Esquire
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Counsel for Complainant
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
jprice@clsphila.org
215-981-3756


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**BEFORE THE
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VERIFICATION

I, Joline Price, hereby state that the facts set forth above in the Motion for Continuance of Hearing, are true and correct and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).



Dated: August 23, 2021