

Angela M. Lorenz, Esquire  
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September 28, 2021

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

**RE: Denise Eubanks v. PECO Energy Company**  
**Docket Number: C-2021-3025997**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company'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: Honorable Darlene Heep, ALJ

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>DENISE EUBANKS</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2021-3025997</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	
	:	

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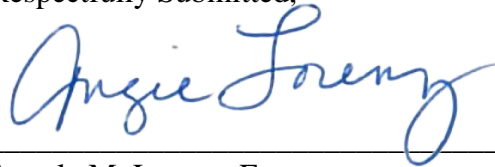
**MOTION FOR CONTINUANCE OF HEARING DATE,  
PECO ENERGY COMPANY TO FORMAL COMPLAINT**

PECO Energy Company (“PECO”), pursuant to 52 Code §1.15(b), hereby requests a continuance of the hearing date scheduled in this matter and states the following:

1. An telephonic hearing for this matter is scheduled to take place on Wednesday, October 13, 2021 at 10:00a.m.
2. PECO is requesting a continuance of the October 13, 2021 hearing date because of the unavailability of PECO Counsel, Angela Lorenz, Esq.
3. The undersigned is scheduled to appear for an administrative hearing before Workers’ Compensation Judge Joseph Grady on the same date and time as this matter has been scheduled. Additionally, the undersigned is also scheduled for an 11:30 oral argument before the Workers’ Compensation Appeal Board. Unfortunately, the undersigned cannot secure coverage for the above matters.
4. PECO therefore respectfully requests that the hearing be continued to a further date.
5. The undersigned has also indicated unavailability for the week of November 1 through November 7.

6. 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).
7. PECO avers that “good cause” exists to continue the scheduled hearing to another date because PECO counsel is unavailable.
8. Counsel for Complainant, Joline R. Price, Esquire, has no objection to this request.
9. PECO therefore respectfully requests that the October 13, 2021 hearing be continued to a futher date.

Respectfully Submitted,



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Angela M. Lorenz, Esq.  
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(215)618-3720  
[alorenz@griesinglaw.com](mailto:alorenz@griesinglaw.com)

Counsel on behalf of:  
PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>DENISE EUBANKS</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2021-3025997</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	
	:	

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**VERIFICATION**

I, Angela M. Lorenz, hereby declare that I am counsel on behalf of 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.

Date: September 28, 2021

  
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Angela M. Lorenz, Esq.

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>DENISE EUBANKS</b>	:	
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	:	
v.	:	<b>DOCKET NO. C-2021-3025997</b>
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<b>PECO ENERGY COMPANY</b>	:	
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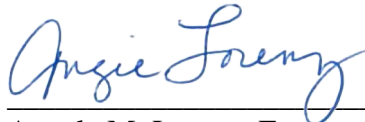
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**CERTIFICATE OF SERVICE**

I, Angela Lorenz, hereby certify that I have this day served a copy of PECO Energy Company's Answer in the above matter upon all interested parties via e-mail to:

Joline R. Price, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
Email: [jprice@clsphila.org](mailto:jprice@clsphila.org)

Dated: September 28, 2021



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