

---

Laily Sheybani

lsheybani@postschell.com  
215-587-1070 Direct  
215-587-1444 Direct Fax  
File #: 212602

June 3, 2025

***VIA ELECTRONIC FILING***

Matthew Homsher Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

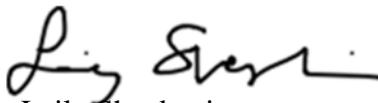
**Re: Edwin O'Connor v. PPL Electric Utilities Corporation**  
**Docket No. F-2025-3054767**

---

Dear Secretary Homsher:

Attached for filing is the Motion for Continuance of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Laily Sheybani

LS/dmc  
Attachment

cc: Pamela McNeal (*via email; w/attachment*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA EMAIL AND FIRST-CLASS MAIL

Edwin O'Connor  
232 Yankee Rd  
Lot 24  
Quakertown, PA 18951  
[edwin.oconnor@outlook.com](mailto:edwin.oconnor@outlook.com)

Dated: June 3, 2025

  
Laily Sheybani

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Edwin O'Connor,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. F-2025-3054767
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

---

**MOTION FOR CONTINUANCE OF PPL ELECTRIC UTILITIES CORPORATION**

---

**TO ADMINISTRATIVE LAW JUDGE VERO:**

PPL Electric Utilities Corporation (“PPL Electric” or “Company”) hereby files this Motion for a Continuance pursuant to Section 5.103 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.103, and requests that the evidentiary hearing scheduled for July 2, 2025, in the above-captioned Complaint proceeding be continued.

Good cause exists to grant a continuance in this matter because Counsel for PPL Electric is unavailable to appear on the hearing’s scheduled date and time.

In support of the instant Motion, PPL Electric avers as follows:

**BACKGROUND**

1. PPL Electric furnishes electric service to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a “public utility” and an “electric distribution company” as

defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

2. On April 25, 2025, the Company was served with the above-captioned Complaint via Secretarial Letter from the Commission.

3. In the Complaint, the Complainant alleged that there are incorrect charges on his electric service bills because the Company is allegedly not properly crediting his account for bills that he claims to have satisfied.

4. On May 15, 2025, PPL Electric filed an Answer to the Complaint, admitting in part and denying in part the factual basis of the Complainant's allegations.

5. On May 16, 2025, the Commission issued an Initial Call-In Telephonic Hearing Notice, scheduling an evidentiary hearing for 10:00 AM, July 2, 2025, before Administrative Law Judge Eranda Vero (the "ALJ").

6. On May 20, 2025, the ALJ issued a Prehearing Order confirming the date and time of the evidentiary hearing.

7. The evidentiary hearing for this matter is scheduled for 10:00 AM on July 2, 2025.

### **REQUEST FOR CONTINUANCE**

8. PPL Electric respectfully requests a continuance of the evidentiary hearing because counsel for PPL Electric has a direct scheduling conflict at 10:00 AM on July 2, 2025.

9. Section 1.15(b) of the Commission's regulations states:

(b) Except as otherwise provided by statute, requests for continuance of hearings or for extension of time in which to perform an act required or allowed to be done at or within a specified time by this title or by order of the Commission or the presiding officer, shall be by motion in writing, timely filed with the Commission, stating the facts on which the application rests, except that during the course of a proceeding, the requests may be

made by oral motion in the hearing before the Commission or the presiding officer. Only for good cause shown will requests for continuance be considered. The requests for a continuance should be filed at least 5 days prior to the hearing date.

52 Pa. Code § 1.15(b).

10. In addition, the Prehearing Order issued on May 20, 2025, provides the following:

You may request a continuance of the hearing if you have a good reason. Continuances will be granted only for good cause. **To request a continuance, you must submit a written request to me and every other party (a “motion”) at least five (5) days before the hearing.** Your motion should be served pursuant to paragraph 5 below. Your motion should include:

- (1) The case name, case number, and hearing date;
- (2) The reason you are requesting a continuance; and
- (3) State whether the other party(s) agrees to the request. If you do not know whether the other party(ies) agrees to the request, state that you do not know.

Prehearing Order, p. 2 (May 20, 2025).

11. Good cause exists to grant a continuance in this matter because counsel for the Company is unavailable on July 2, 2025.

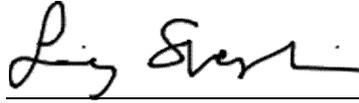
12. In email correspondence with the Complainant on May 19, 2025, Counsel for PPL Electric determined that the Complainant opposes a continuance.

13. Counsel for the Company is amenable to rescheduling the hearing to any date in August of 2025 with the exception of August 1, August 8, August 28, and August 29. Counsel for the Company has confirmed that the Company’s necessary witnesses are also available on those dates.

### **CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that a continuance of the hearing be granted in the above-captioned proceeding.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

---

Laily Sheybani (ID # 325704)  
Post & Schell, P.C.  
Three Logan Square  
1717 Arch Street, 24<sup>th</sup> Floor  
Philadelphia, PA 19103  
Phone: 215-587-1070  
Fax: 215-587-1444  
Email: [lsheybani@postschell.com](mailto:lsheybani@postschell.com)

Devin T. Ryan (ID # 316602)  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
Phone: 717-612-6052  
Fax: 717-731-1985  
E-mail: [dryan@postschell.com](mailto:dryan@postschell.com)

Date: June 3, 2025

Attorneys for PPL Electric Utilities Corporation