

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANNA IRIZARRY	:	
Complainant	:	
	:	C-2025-3054565
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

MOTION FOR CONTINUANCE

Anna Irizarry (Complainant), by and through counsel Community Legal Services, Inc., hereby moves for an order continuing the hearing in this matter scheduled for July 21, 2025, pursuant to 52 Pa. Code § 1.15(b) and Special Agent Michael Mroczka’s May 15, 2025 Prehearing Order. As set forth below, this Motion is unopposed. In support of this motion, Complainant states as follows:

1. Complainant, proceeding *pro se*, initiated this proceeding as an appeal of the Bureau of Consumer Services March 21, 2025, Informal Complaint Decision (BCS Case No. 4049072) by Formal Complaint dated April 14, 2025.
2. Complainant has recently retained counsel to represent her in the above-captioned proceeding.
3. On July 14, 2025, attorneys from Community Legal Services, Inc., filed their Notice of Appearance on behalf of Complainant, serving the same on Respondent PECO Energy Company (PECO).
4. Complainant, through counsel, intends to amend her Formal Complaint pursuant to 52 Pa. Code § 1.81(a).

5. Complainant submits this motion for continuance of the July 21, 2025, hearing in order to permit her counsel to amend her Formal Complaint, conduct discovery and interview witnesses to prepare for an evidentiary hearing, in order to engage in settlement discussions, and in order to provide time for PECO's Answer to Complainant's amended Complaint.
6. Counsel for PECO has confirmed that PECO has no objection to this request for continuance.

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 requests the July 21, 2025, hearing be rescheduled.

Respectfully submitted,

/s/ Charlotte Edelstein
Charlotte Edelstein, Esq.

Community Legal Services, Inc.
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VERIFICATION

I, Charlotte Edelstein, hereby state that the facts set forth above in the Motion for Continuance, 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).

July 14, 2025

/s/ Charlotte Edelstein

CERTIFICATE OF SERVICE

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

Via Email Only

Michael Mroczka, Special Agent
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Office of Administrative Law Judge
400 North Street
Harrisburg, PA 17120
micmroczka@pa.gov

Khadijah Scott, Esq.
PECO Energy Company
2301 Market Street S23-1
Philadelphia, PA 19103
Khadijah.Scott@exeloncorp.com

Date: July 14, 2025



Charlotte E. Edelstein, Esquire