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August 15, 2025

VIA E-FILING

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

RE: Anna Irizarry v. PECO Energy Company
Docket No. C-2025-3054565

Dear Mr. Homsher:

Enclosed for filing with the Commission is *PECO's Motion for Continuance of Hearing Date*.

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 in this matter.

Very truly yours,


Khadijah Scott, Esquire
Assistant General Counsel, PECO Energy Company

Encl.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANNA IRIZARRY

Complainant

v.

PECO ENERGY COMPANY

Respondent

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DOCKET NO. C-2025-3054565

MOTION OF PECO ENERGY COMPANY FOR CONTINUANCE OF HEARING DATE

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

1. A telephonic hearing in this matter is scheduled to take place on Wednesday, October 1, 2025 at 10:00 a.m.
2. On April 14, 2025, PECO was served with a formal Complaint filed by the Complainant requesting a payment agreement.
3. On August 12, 2025, PECO was served with an Amended Complaint filed by the Complainant. The Complainant's amended concerns involve whether she is entitled to a retroactive credit for a rate change of residential service to residential heating service based on a home energy audit that was performed in 2023. The Complainant also asserts, *inter alia*, that she is entitled to retroactive Customer Assistance Program (CAP) credits as well.
4. PECO is requesting a continuance of the October 1, 2025, hearing date because outside Counsel for PECO, Reger Rizzo & Darnall, LLP, will be entering an appearance in this matter. Outside counsel has a hearing before the Public Utility Commission in both the morning and afternoon of October 1, 2025 and is unavailable.
5. PECO respectfully requests a continuance from the Hearing date.
6. The Prehearing Order in this matter states that requests for a continuance are only

granted “where good cause exists.”

7. PECO avers that “good cause” exists to continue the scheduled hearing to another date because PECO’s outside counsel is unavailable on the presently scheduled date of October 1, 2025.

8. The Complainant does not have an objection to the Continuance request.

9. PECO therefore respectfully requests that the hearing be continued to a further date.

Respectfully Submitted,



Khadijah Scott
Counsel for PECO Energy Company
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Philadelphia, PA 19103
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ANNA IRIZARRY

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VERIFICATION

I, Khadijah Scott, hereby declare that I am counsel for 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.



Khadijah Scott

Date: August 15, 2025

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CERTIFICATE OF SERVICE

I, Khadijah Scott, hereby certify that I have this day served a copy of PECO Energy Company's Motion in the above matter upon all interested parties by emailing a copy, properly addressed to:

Charlotte Edelstein, Esq.
Community Legal Services, Inc.
1410 West Erie Avenue
Philadelphia, PA 19140
Via Email: CEdelstein@clsphila.org



Khadijah Scott
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Dated: August 15, 2025