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August 28, 2025

VIA E-FILING

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

**RE: Greenfield Manufacturing Company v. PECO Energy Company
Docket No. C-2024-3050725**

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**

GREENFIELD MANUFACTURING COMPANY	:	
	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2024-3050725
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

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 Friday, October 17, 2025 at 10:00 a.m.
2. On August 14, 2024, PECO was served with a formal Complaint filed by the Complainant. The Complainant averred that it was not being compensated for peak load. The Complainant requested that it be compensated for negative peak load provided by its net generation.
3. On April 10, 2025, PECO was served with an Amended Complaint filed by the Complainant. The Complainant's Amended Complaint alleges that PECO does not properly credit it for negative peak load contribution, nor does it compensate or credit to per kW distribution charges, which is in violation of the AEPSA requirement that the Complainant be compensated in full retail value for excess generation.
4. PECO respectfully requests a continuance of the October 17, 2025, hearing date

because outside Counsel for PECO, Reger Rizzo & Darnall, LLP, will be entering an appearance in this matter. Outside counsel is out of state for a pre-planned engagement on October 17, 2025 and is unavailable.

5. The Prehearing Order in this matter states that requests for a continuance are only granted “where good cause exists.”

6. 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 17, 2025.

7. The Complainant has not indicated if it has an objection to the Continuance request.

8. The parties have agreed on proposed hearing dates: September 22, 2025 (p.m.); and October 3, 2025 (p.m.).

9. This is the Respondent’s first motion for continuance in this matter.

10. PECO respectfully requests that the hearing be continued to an alternative date in lieu of October 17, 2025.

Respectfully Submitted,



Khadijah Scott
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Philadelphia, PA 19103
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GREENFIELD MANUFACTURING COMPANY	:	
	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2024-3050725
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

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 28, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GREENFIELD MANUFACTURING COMPANY	:	
	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2024-3050725
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

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:

GREENFIELD MANUFACTURING COMPANY
9800 BUSTLETON AVENUE
PHILADELPHIA, PA 19115
Via Email: leny@gfm.biz

TODD STEWART, ESQUIRE
HMS LEGAL LLP
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Dated: August 28, 2025