

Legal Department

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July 9, 2010

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

**Re: Janice Jamal v. PECO Energy Company
PUC Docket No. F-2010-2174672**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission are the following documents and copies in the matter referenced above.

—	Answer (1 original)
<u>X</u>	Motion In Limine (1 original)
—	Motion for Judgment on the Pleadings (1 original)
—	Preliminary Objection (1 original)
—	Exceptions (1 original)
—	Reply Exceptions (1 original)
—	Brief (1 original)
—	Reply Brief (1 original)

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Also enclosed is an extra copy of this letter, which I request that you date stamp and return to me in the envelope provided as proof of filing. Thank you for your time and attention on this matter.

Very truly yours,



Tishekia Williams
Counsel for PECO Energy Company

TW/adz
Enc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANICE JAMAL :
 :
v. : **DOCKET NO. F-2010-2174672**
 :
PECO ENERGY COMPANY :

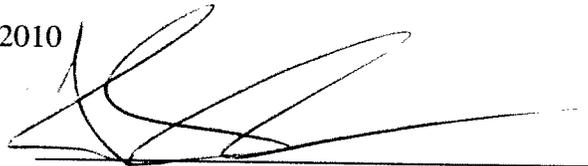
NOTICE TO PLEAD

Pursuant to 52 Pa. Code §§ 5.101 and 5.62(c), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Pleading within 20 days from service of this notice, the facts set forth by PECO Energy Company in the New Matter may be deemed to be true, thereby requiring no other proof. All pleadings, such as a Reply to Preliminary Objection and Reply to New Matter, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Tishekia Williams, and where applicable, the Administrative Law Judge presiding over the issue.

File with:
James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

With a copy to:
Tishekia Williams, Esq.
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, July 9, 2010



Tishekia Williams
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19101-8699
215-841-6863
tishekia.williams@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANICE JAMAL	:	
	:	
v.	:	DOCKET NO. F-2010-2174672
	:	
PECO ENERGY COMPANY	:	

RESPONDENT, PECO ENERGY COMPANY'S MOTION IN LIMINE

Respondent, PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code § 5.103, respectfully requests that this honorable Commission limit the issues to be developed at hearing to those pertaining to billing incurred within four years of filing the formal complaint, May 4, 2006 until present. Pursuant to 66 Pa.C.S. §1312, Complainant is limited to a four year time period for a refund of rates.

1. On or about May 4, 2010, Complainant filed a Formal Complaint against Respondent, PECO Energy Company, disputing unspecified charges for service provided to 103 Durham Street periodically between 1994 and 2006.

2. On May 27, 2010, Respondent filed an Answer and New Matter denying that Complainant had been improperly billed. The pleading was sent under cover letter explaining "[p]lease note that if you do not response to a New Mater, Motion, or Preliminary Objection an unfavorable decision may be rendered against you."

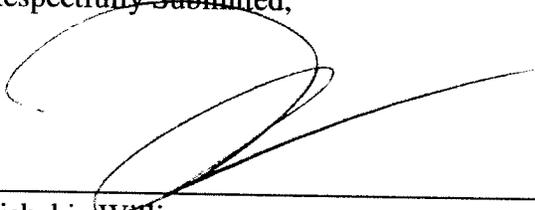
3. In its Answer and New Matter, Respondent raised the fact that Complainant's issues involve serve dating back 1994 and are barred by the limitation of actions and remedies. 66 Pa.C.S. § 1312.

4. To date, forty-two days have passed since PECO filed its Answer and New Matter. PECO has not been served with a response to its New Matter and requests that the facts stated therein be deemed admitted.

5. The statute provides a special limitation on remedies that prevents the Commission from issuing a refund for rates paid more than 4 years ago. 66 Pa.C.S. §1312.

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission limit the dispute to billing incurred from May 4, 2006 until present.

Respectfully Submitted,



Tishekia Williams
Counsel for PECO Energy Company
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tishekia.williams@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANICE JAMAL

v.

PECO ENERGY COMPANY

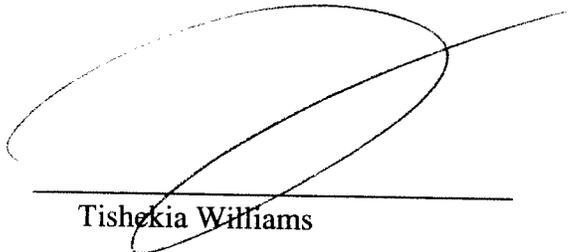
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DOCKET NO. F-2010-2174672

VERIFICATION

I, Tishekia Williams, 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.

Date: July 9, 2010



Tishekia Williams

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANICE JAMAL

v.

PECO ENERGY COMPANY

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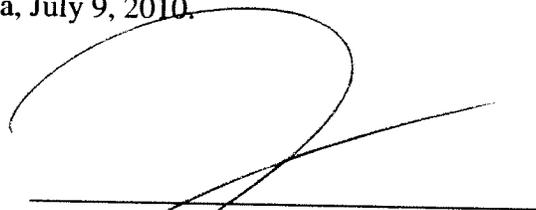
DOCKET NO. F-2010-2174672

CERTIFICATE OF SERVICE

I, Tishekia Williams, hereby certify that I have this day served a copy of PECO Energy Company's Answer in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Janice Jamal
406 W. Mt. Pleasant Ave. Apt. B-3
Philadelphia, PA 19119

Dated at Philadelphia, Pennsylvania, July 9, 2010.



Tishekia Williams
Counsel for PECO Energy Company
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