

Legal Department

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July 21, 2010

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

Re: Rainey Richmond v. PECO Energy Company
PUC Docket No. F-2010-2187305

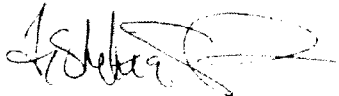
Dear Ms. Chiavetta:

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

—	Answer (1 original)
—	Motion for Continuance (1 original)
—	Motion for Judgment on the Pleadings (1 original)
<u>X</u>	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,



Tishkia Williams
Counsel for PECO Energy Company

TW/adz
Enc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RAINEY RICHMOND

v.

PECO ENERGY COMPANY

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:
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DOCKET NO. F-2010-2187305

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 Preliminary Objection of PECO Energy Company, within 10 days from service of this notice, and if you do not file a written response denying or correcting the enclosed New Matter 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:

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

With a copy to:

Tishekia E. Williams, Esq.
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, July 21, 2010



Tishekia E. Williams
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19101-8699
215-841-6841
Tishekia.williams@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RAINEY RICHMOND	:	
	:	
v.	:	DOCKET NO. F-2010-2187305
	:	
PECO ENERGY COMPANY	:	

PRELIMINARY OBJECTIONS OF RESPONDENT, PECO ENERGY COMPANY

Respondent, PECO Energy Company (“PECO Energy”), pursuant to 52 Pa. Code § 5.101(3) respectfully petitions this Honorable Commission to order Complainant to amend his Complaint to provide more specificity.

1. On July 12, 2010, Complainant filed a formal Complaint with the Pennsylvania Public Utility Commission alleging incorrect charges on his account.
2. On July 12, 2010, PECO Energy was served the above-mentioned formal Complaint.
3. The Complaint does not conform to the requirements of 52 Pa.Code §5.22 (a)(5),

which provides:

5.22. Content of formal complaint.

- a. A formal complaint must set forth the following:

...

- (5) A clear and concise statement of the act or omission being complained of including the result of any informal complaint or informal investigation.

4. A formal complaint must set forth “the act or thing done or omitted to be done” by a public utility “in violation, or claimed violation, of any law which the commission has jurisdiction to administer, or any regulation or order of the commission.” 66 Pa.C.S. §701; 52 Pa.Code §5.22

5. A complaint should contain information specific enough to allow the respondent to understand the allegations against it, in order to conduct a meaningful investigation of the allegations and to prepare a coherent response.

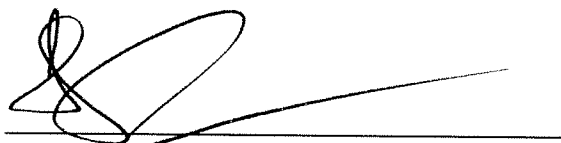
6. In the instant matter, Complainant did not provide any facts or assertions to support his complaint. The entire Complaint is comprised of a check next to the box in Paragraph 4 labeled "There are incorrect charges on my bill," and a statement "I have all the paper work." No remedy is requested in paragraph 5.

7. The complaint does not provide sufficient information to permit the Company to provide a meaningful response, or address the Complainant's concerns. Moreover, the complaint does not explain what the Complainants seek from the Commission.

8. Due to these infirmities in the Complaint, it is difficult to craft a targeted Answer. Accordingly, PECO Energy preliminarily objects to the Complaint pursuant to 52 Pa. Code § 5.101(a)(4).

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the instant Complaint pursuant to 52 Pa. Code § 5.101(a)(4).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Tishekia Williams", is written over a horizontal line. The signature is stylized with loops and a long tail.

Tishekia Williams
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
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(215) 841-6841
Tishekia.Williams@exeloncorp.com

**BEFORE THE
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DOCKET NO. F-2010-2187305

VERIFICATION

I, Tishekia Williams, hereby declare that I am an attorney representing 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.



Tishekia Williams

Date: July 21, 2010

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RAINEY RICHMOND	:	
	:	
v.	:	DOCKET NO. F-2010-2187305
	:	
PECO ENERGY COMPANY	:	

CERTIFICATE OF SERVICE

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

Rainey Richmond
5601 Spruce Street, 1st RR
Philadelphia, PA 19139

Dated at Philadelphia, Pennsylvania, July 21, 2010.



Tishekia Williams
Counsel for PECO Energy Company
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