

A PARTNERSHIP
*Rieders, Travis, Humphrey, Harris,
Waters & Waffenschmidt*

161 WEST THIRD STREET
P.O. BOX 215
WILLIAMSPORT, PENNSYLVANIA 17703-0215
lawoffices@riederstravis.com
www.riederstravis.com

JEFFREY C. DOHRMANN
GARY T. HARRIS
JOHN M. HUMPHREY
CLIFFORD A. RIEDERS*
PA., N.Y. & D.C. Bars
RONALD C. TRAVIS
THOMAS WAFFENSCHMIDT
C. SCOTT WATERS

*Board Certified in Civil
Trial Advocacy, N.B.T.A.

PAMELA L. SHIPMAN
DONALD F. MARTINO
CHRISTIAN J. KALAUS
COREY J. MOWREY

KIMBERLY A. PAULHAMUS
Firm Manager

AME L. SHUMAN
Human Resource Manager

PHONE:

(570) 323-8711

FAX:

(570) 323-4192

(570) 567-1025

March 28, 2011

RECEIVED

MAR 28 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA. 17120

**Re: Clifford A. Rieders v. PECO Energy Company
Docket No. C-2011-2226076**

Dear Secretary Chiavetta:

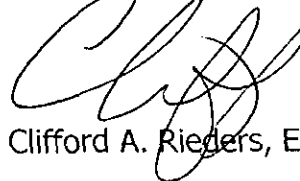
Enclosed for filing on behalf of Clifford A. Rieders, is the original Complainant's Reply to New Matter to the above-reference matter.

A copy has been forwarded to Respondent in accordance with the attached Certificate of Service.

Should you have any questions, please feel free to contact my office.

Very truly yours,

RIEDERS, TRAVIS, HUMPHREY, HARRIS,
WATERS & WAFFENSCHMIDT



Clifford A. Rieders, Esquire

CAR/dsb
Enclosure

cc: Dana Pirone Caroseela, Esquire
Edward P. Yim, Esquire
Michael A. Gruin, Esquire
Tishekia Williams

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CLIFFORD A. RIEDERS,
Complainant

vs.

PECO ENERGY COMPANY

Docket No.: C-2011-2226076

RECEIVED

MAR 28 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMPLAINANT'S REPLY TO NEW MATTER

8. Denied. Incorporated herein by reference as though fully set forth is Plaintiff's Complaint.

9. Cannot admit or deny who PECO's representation is.

10. It is true that PECO sent a field representative to Complainant's property to inspect the meter and to conduct a consumption analysis, but the person did not show up when he was supposed to and therefore Complainant cannot state what was done, if anything, at that field visit.

11. Cannot admit or deny whether a field visit occurred on January 11, 2011. Further, it cannot be admitted or denied what test was confirmed but on information and belief the meter could not have been functioning properly based upon the statements of PECO to Complainant that a refrigerator alone should generate 25% of the bills which were in fact incurred.

12. Specifically denied and proof thereof is demanded. PECO did suggest that all appliances, including the hot water heater, be turned off at Complainant's property when Complainant was not present for several months and this was done. PECO then indicated that the refrigerator alone could not have been consuming enough electricity to generate the bills which were in fact generated. However, PECO

acknowledged that all other utilities and electric had been severed. PECO acknowledged that it could not account for the consumption and it was suggested by Complainant that a new meter be installed. It is not known if this was ever accomplished.

REQUEST FOR RELIEF

It is denied that relief requested by PECO should be granted and, on the contrary, the relief requested by Complainant should be granted.

Respectfully submitted,

RIEDERS, TRAVIS, HUMPHREY, HARRIS
WATERS & WAFFENSCHMIDT



Clifford A. Rieders, Esquire PA 20962
Attorney for Complainant
161 West Third Street, P.O. Box 215
Williamsport, PA 17703-0215
Tel: (570) 323-8711
Fax: (570) 323-4192

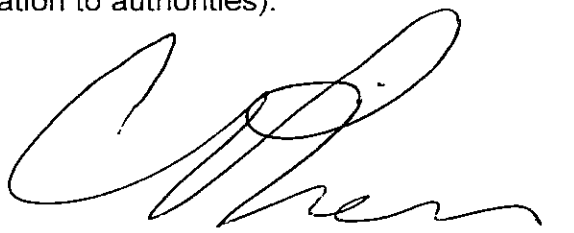
RECEIVED

MAR 28 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VERIFICATION

I, **CLIFFORD A. RIEDERS**, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) 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).

A handwritten signature in black ink, appearing to read 'C. A. Rieders', written over a horizontal line.

CLIFFORD A. RIEDERS

Date: *3/28/11*

RECEIVED

MAR 28 2011

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CLIFFORD A. RIEDERS,
Complainant

Docket No.: C-2011-2226076

vs.

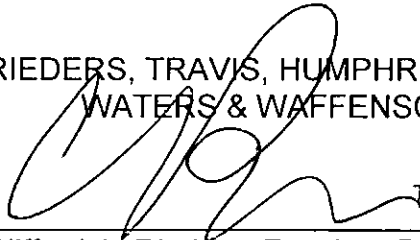
PECO ENERGY COMPANY

CERTIFICATE OF SERVICE

AND NOW comes Clifford A. Rieders, Esquire, Attorney for Complainant, and certifies that a copy of Reply to New Matter has been served upon Dana Pirone Carosella, Esquire, Edward P. Yim, Esquire, and Michael A. Gruin, Esquire, attorneys for PECO Energy Company, 1818 Market Street, 29th Floor, Philadelphia, PA 19103, via first class mail, postage prepaid, this 28 day of March, 2011.

Respectfully submitted,

RIEDERS, TRAVIS, HUMPHREY, HARRIS
WATERS & WAFFENSCHMIDT



Clifford A. Rieders, Esquire PA 20962
Attorneys for Complainant
161 West Third Street, P.O. Box 215
Williamsport, PA 17703-0215
Tel: (570) 323-8711
Fax: (570) 323-4192

RECEIVED

MAR 28 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

83

100

FedEx US Airbill

Express

FedEx Tracking Number

8748 1805 7897

Form ID No.

0215

Recipient

RECIPIENT: PEEL HERE

1 From This portion can be removed for Recipient's records.

Date 3/28/11 FedEx Tracking Number 874818057897

Sender's Name Clifford Rieders Phone _____

Company RIEDERS TRAVIS HUMPHREY

Address 161 W 3RD ST

Dept./Floor/Suite/Room

City WILLIAMSPORT State PA ZIP 17701-6407

2 Your Internal Billing Reference Cliff

3 To Recipient's Name Rosemary Chiavetta Phone _____

Company Pennsylvania Public Utility Commission

Address 400 North St. 2nd floor

We cannot deliver to P.O. boxes or P.O. ZIP codes

HOLD Weekday
FedEx location address
REQUIRED. NOT available for
FedEx First Overnight.

HOLD Saturday
FedEx location address
REQUIRED. Available ONLY for
FedEx Priority Overnight and
FedEx 2Day to select locations.

Address _____

City Harrisburg State Pa. ZIP 17120

0433871705



8748 1805 7897

4a Express Package Service

* To most locations. Packages

- FedEx Priority Overnight
Next business morning ** Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight
Next business afternoon. Saturday Delivery NOT available.
- FedEx First
Earliest next business day delivery to select cities.
- FedEx 2Day
Second business day ** Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Express Saver
Third business day. Saturday Delivery NOT available.

4b Express Freight Service

** To most locations. Packages

- FedEx 1Day Freight
Next business day ** Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected. FedEx 1Day Freight Booking No.
- FedEx 2Day Freight
Second business day ** Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx 3Day Freight
Third business day ** Saturday Delivery NOT available.

5 Packaging

* Declared value limit \$500.

- FedEx Envelope*
- FedEx Pak*
Includes FedEx Small Pak and FedEx Large Pak.
- FedEx Box
- FedEx Tube

6 Special Handling and Delivery Signature Options

- SATURDAY Delivery
NOT available for FedEx Standard Overnight, FedEx Express Saver, or FedEx First Overnight.
- No Signature Required
Package may be left without obtaining a signature for delivery.

Does this shipment contain a: One box must be checked

- No
- Yes
As per attached Shipper's Declaration.

Dangerous goods (including dry ice) cannot be shipped in a FedEx Express Drop Box.

7 Payment Bill to:

- Sender (Acct. No. in Section 7 will be billed)
- Recipient
- Third Party
- Credit Card
- Cash

Total Packages _____ Total Weight _____ lbs. Credit Card Auth. _____

*Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

fedex.com 1.800.GoFedEx 1.800.463.3339

CHIAVETA, R. PUC (CHIAVETA)
Carrier: FedEx
3/29/2011

RT 205 1
FZ 7897 03.29
Cargo Aircraft Only

605