

Legal Department

Exelon Business Services Company
2301 Market Street/S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Telephone 215.841.4000
Fax 215.568.3389
www.exeloncorp.com

Direct Dial: 215.841.6841

June 10, 2011

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

**Re: Mary Bradley v. PECO Energy Company
PUC Docket No. C-2011-2238136**

Dear Ms. Chiavetta:

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

—	Answer (1 original)
—	Answer & New Matter (1 original)
—	Motion for Continuance (1 original)
<u>X</u>	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. 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**

MARY BRADLEY	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2238136
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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 Motion within 20 days from service of this notice, a ruling may be entered against you. Your response 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:
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

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

Dated at Philadelphia, PA, June 10, 2011



Tishekia E. Williams, Esq.
Counsel for PECO Energy Company
2301 Market Street, S-23-1
Philadelphia, PA 19103
Phone: (215) 841-6841
Tishekia.williams@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY BRADLEY	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2238136
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**RESPONDENT, PECO ENERGY COMPANY'S
MOTION FOR PARTIAL JUDGMENT ON THE PLEADINGS**

PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code § 5.102, respectfully requests that your Honorable Commission dismiss the instant complaint inasmuch as Complainant requests a payment agreement. Pursuant to 66 Pa.C.S. § 1405(c), Complainant is ineligible for a Commission ordered payment agreement. Therefore, Complainant fails to state a claim upon which relief can be granted.

1. On April 29, 2011, PECO Energy was served with a formal complaint filed by Mary Bradley ("Complainant") in the instant docket. A copy of the Complaint is attached hereto as Exhibit 1.

2. In her complaint, Complainant alleged that PECO Energy refused to grant her another medical extension despite her husband's condition and requested a payment agreement.

3. On or about May 19, 2011, PECO filed a timely Answer and New Matter. A copy of the Answer and New Matter is attached hereto as Exhibit 2.

4. In its response, PECO averred that Complainant is not eligible for a Commission issued payment agreement pursuant to 66 Pa.C.S. § 1405(c), because the arrearage was billed at the Customer Assistance Program ("CAP") discounted rate. PECO also denied that its refusal to

accept additional medical certificates is improper because Complainant failed to make equitable payments.

5. More specifically, PECO's New Matter alleged that Complainant has been enrolled in CAP since 2002. Pursuant to 66 Pa.C.S.§1405(c), no Commission issued agreement could be granted.

6. On May 23, 2011, Complainant filed a response to PECO Energy's New Matter. A copy of the response is attached hereto and marked as Exhibit 3.

7. Complainant's response to PECO's New Matter states that her husband is presently in a medical facility and that his treatments require electricity.

8. Complainant's response to Respondent's New Matter actually addresses PECO's refusal to accept additional medical extensions¹. As Complainant's CAP participation is undisputed, PECO requests that the facts stated in its New Matter be deemed admitted.

9. Customer assistance program rates shall be timely paid and shall not be the subject of payment agreements negotiated or approved by the Commission. 66 Pa. C.S. §1405(c).

¹ Complainant's response appears to be intended to prove that her husband's medical condition exists and requires electricity. To be clear, PECO does not dispute that Complainant's husband has a medical condition or that his treatments require electricity. Instead, PECO position is that Complainant is not eligible for additional medical extensions despite her husband's medical condition. Commission regulations do not provide for unlimited medical extensions in the absence of equitable payment. Commission regulations, 52.Pa.Code.§56.114, provide that service may not be terminated for the time period specified in a medical certification; the maximum length of a certification shall be 30-days. Further, §56.114 (2) provides that in instances where a ratepayer has not met the obligation to equitably make payments on all bills, the number of renewals is limited to two-30 days certifications. PECO avers that Complainant has not met her obligation to make payments on all bills and therefore no additional medical certification will be granted. Complainant received a medical extension on 7/26/10. At that time per balance was \$4,100.00. Two additional extensions were granted on 9/24/10 and 3/25/11. Total payments received since the July 2010 extension was granted equal \$3,055.91. Accordingly, Complainant must pay \$1,044.09 to receive an additional extension.

10. **WHEREFORE**, PECO Energy Company respectfully requests that your Honorable Commission dismiss the instant complaint inasmuch as Complainant is requesting a payment agreement on CAP rate arrears. Complainant fails to state a claim upon which relief can be granted.

Respectfully Submitted,

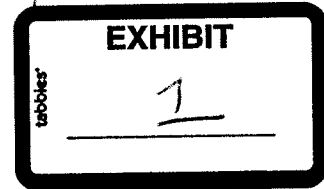
A handwritten signature in black ink, appearing to read 'Tishkia Williams', is written over a horizontal line.

Tishkia Williams
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
(215) 841-6841
Fax: 215.568.3389
tishkia.williams@exeloncorp.com



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

5/19



C-2011-2238136

DATE SERVED: April 29, 2011

PECO ENERGY COMPANY
C/O WARD L SMITH
ASSOCIATE GENERAL COUNSEL
PO BOX 8699
PHILADELPHIA PA 19101-8699

Dear Mr. Smith:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Mary Bradley. To defend yourself against the claims stated in the complaint, you must respond within twenty (20) days of the above date served by filing with the Commission, in writing, an Answer in accordance with 52 Pa. Code Section 5.61, either personally or through your attorney. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days of the above date served.

IF YOU FAIL TO ANSWER THE COMPLAINT WITHIN TWENTY (20) DAYS OF THE ABOVE DATE SERVED, THE CLAIMS AGAINST YOU MAY BE DEEMED ADMITTED, THE CASE MAY GO FORWARD IN YOUR ABSENCE, AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

\$6,324.71

April 29, 2011

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is fluid and cursive, with the first name "Rosemary" being larger and more prominent than the last name "Chiavetta".

Rosemary Chiavetta
Secretary

al

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: April 29, 2011

MARY BRADLEY

Complainant

v.

PECO ENERGY COMPANY

Respondent

Complaint Docket

No: **C-2011-2238136**

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: PECO ENERGY COMPANY

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. **The date served is the mailing date appearing at the top of this Notice.** Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

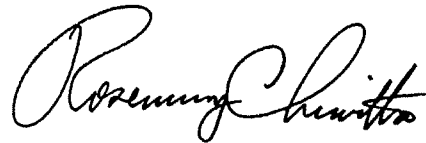
2. If you fail to either satisfy or settle this complaint, or to file an answer or other responsive pleading within twenty (20) days of the date served, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq. If you are a customer of a utility, an order may be entered which prescribes a

payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy or settle this complaint, you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq. If you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq. If you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



Rosemary Chiavetta
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

PENNSYLVANIA PUBLIC UTILITY COMMISSION

COPY

2011 APR 27 AM 9:40

SECRETARY'S BUREAU

Formal Complaint Form

Please print in ink or type.

1. CUSTOMER (COMPLAINANT) INFORMATION

Your name, mailing address, county, telephone number, utility account number and service address:

Name Mary Ellen Bradley

Street/P.O. Box 233 Darwin Blvd Apt # _____

City Sharon Hill State pa Zip 19079

County Delaware

Daytime Telephone Number Where We Can Contact You: 610 583 5157

E-mail Address (optional): _____

Utility Account Number 06138-01109
(from your bill) poco

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name _____

Street/P.O. Box _____

City _____ State _____ Zip _____

2. FULL NAME OF UTILITY COMPANY (RESPONDENT):

poco

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER

2011 APR 15 AM 10:13
SECRETARY'S BUREAU

TELEPHONE
(local, long distance)

(e.g., taxi, moving company, limousine)

4. COMPLAINT (check one)

A. In general, what is your complaint?

I want to oppose the company's proposed rate increase.

There are incorrect charges on my bill.

There is a reliability, safety or quality problem with my utility service.

I received a notice that my utility service is being terminated.

I would like a payment agreement.

Other (explain).

B. State the facts of your complaint.

Include any specific dates, times or places that may be important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

April 13, 2011

my spouse Louis Bradley
has a permanent Medical Condition
He is Blind. His right leg is
off. And his toes is off on the
left foot. He has diabetes.

He has to use the stair glides
to go to bed upstairs. He takes
14 different medicine. They will
not give me another agreement. They
want me to pay 1,800. for another agreement.
but I can't afford we are both on fixed
income. I paid \$500.00 April 11, 2011

I want you to order the Company to
give me another agreement I will pay
my Budget Amount plus \$50.00 month
until the bill is paid

They will not give me another
medical certificate

I had a feverish chill during
the winter month.

Mary Ellen Bradley

5. RELIEF

How do you want your complaint to be resolved? Use additional paper if you need more space.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a billing problem, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety or welfare?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES (includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. LEGAL REPRESENTATION (IF ANY)

If you are represented by a lawyer in this matter you must provide your lawyer's name, address, telephone number, and e-mail address, if known.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

E-mail Address (If Known) _____

9. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:
I, Mary Ellen Bradley, 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).

Mary Ellen Bradley April 25 2011
(Original Signature) (Date)

Title of authorized employee or officer (Not needed for residential accounts)

10. FILING

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
---	--

Facsimiles and/or electronic filings of the complaint will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your complaint for your records.

Legal Department

Exelon Business Services Company
2301 Market Street/S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Telephone 215.841.4000
Fax 215.568.3389
www.exeloncorp.com



Exelon[®]
Business Services
Company

Direct Dial: 215.841.6841

May 18, 2011

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

RECEIVED

MAY 19 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Mary Bradley v. PECO Energy Company
PUC Docket No. C-2011-2238136

Dear Ms. Chiavetta:

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

- Answer (Original)
- Answer & New Matter (original)
- Motion to Consolidate (original)
- Motion for Judgment on the Pleadings (original)
- Preliminary Objection (original)
- Exceptions (original)
- Reply Exceptions (original)
- Brief (original)
- Reply Brief (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,

A handwritten signature in black ink, appearing to read "Tishekia Williams".

Tishekia Williams
Counsel for PECO Energy Company
TW/adz
Enc.

Scheduling Recommendation: Call of the Docket Non Call of the Docket

Legal Department

Exelon Business Services Company
2301 Market Street/523-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Telephone 215.841.4000
Fax 215.568.3389
www.exeloncorp.com

Direct Dial: 215 841-6841

May 18, 2011

Mary Bradley
233 Garvin Boulevard
Sharon Hill, PA 19070

**Re: Mary Bradley v. PECO Energy Company
PUC Docket No C-2011-2238136**

Dear Ms. Bradley:

Enclosed is a copy of PECO Energy Company's response to the formal complaint filed in the above-referenced docket. The law requires PECO Energy to file an answer to your Public Utility Commission complaint. Keep these papers for your records. This is not a decision on your complaint. PECO's response may include a New Matter, Motion or Preliminary Objection. Please note that if you do not respond to a New Matter, Motion, or Preliminary Objection an unfavorable decision may be rendered against you. Responses to New Matters and Motions must be filed within 20 days. Responses to Preliminary Objections must be filed within 10 days. If there is no New Matter, Motion or Preliminary Objection included, no response is required.

Soon, the Public Utility Commission will schedule either a settlement conference or a hearing on your complaint. The Commission will let you know by mail whether there will be a conference or a hearing and will include instructions on what to do next. If the matter is set for hearing, the notice will provide you with information about the date, time and place of the hearing. If we are unable to resolve your complaint and have to proceed with a hearing, a judge will be at the hearing and will decide your complaint. You must call the Public Utility Commission if you have any questions about the hearing or if you cannot attend the hearing.

Thank you for your time and attention on this matter.

Very truly yours,



Tishekia Williams
Counsel for PECO Energy Company

Enc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY BRADLEY	:	
Complainant	:	
v.	:	DOCKET NO: C-2011-2238136
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

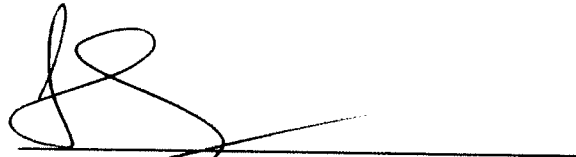
NOTICE TO PLEAD

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 New Matter within 20 days from service of this notice, a ruling may be entered against you. Your response 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:
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

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

Dated at Philadelphia, PA, May 18, 2011



Tishekia Williams
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103
(215) 841-6481
Tishekia.williams@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY BRADLEY	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2238136
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**ANSWER & NEW MATER
OF RESPONDENT, PECO ENERGY COMPANY**

On April 29, 2011, PECO Energy Company ("PECO Energy"), was served with a formal complaint filed by Pearl Evans (hereafter "Complainant"). Pursuant to 52 Pa. Code § 5.61, responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. PECO Energy denies that Complainant is entitled to a Commission-issued payment agreement. On July 12, 2002, Complainant was enrolled in the Customer Assistance Program ("CAP"), Tier E. Complainant was recertified on October 29, 2010. Complainant's next scheduled recertification date is October 29, 2012. Pursuant to 66 Pa.C.S. §1405(c), Complainant is not eligible for a Commission-issued agreement on CAP rate arrears.

On April 1, 2011, Complainant filed an informal complaint with the Bureau of Consumer Services ("BCS") at case 002809949. On April 6, 2011, the BCS rendered a

decision dismissing the Complaint due to a CAP arrearage of \$6,143.70. Complainant's present account balance is \$6,324.71.

By way of further answer, Complainant was granted medical extensions on 01/23/08, 04/23/08, 07/26/10, 09/24/10 and 03/25/11. On March 25, 2011, a medical certificate non-renewal letter was mailed to Complainant. PECO Energy denies the medical certificate non-renewal notice is improper. The Complainant was granted three (3) medical extensions and failed to make equitable payments.

5. This paragraph is a request for relief and no answer is required.
6. PECO Energy is without sufficient information to confirm or deny this statement.
7. Admitted.

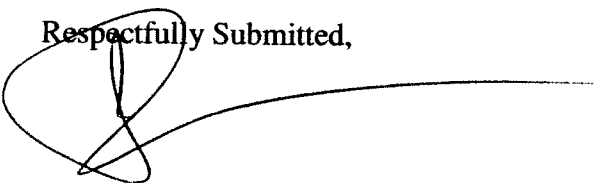
NEW MATTER OF RESPONDENT, PECO ENERGY COMPANY

PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code § 5.62(b), further responds to the Complaint and states:

1. Complainant has been enrolled in the CAP Rate Program since July 12, 2002.
2. Complainant was recertified on October 29, 2010.
3. Complainant currently receives a 25% discount on the first 500 kilowatts of electric service each month.
4. Complainant is scheduled for recertification on October 29, 2012.
5. PECO Energy avers that no further payment arrangements should be granted to Complainant. Section 1405(c) of the Public Utility Code provides that, "(c)ustomer assistance program rates shall be timely paid and shall not be the subject of payment agreements negotiated or approved by the commission."

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the instant Complaint.

Respectfully Submitted,



Tishekia Williams
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
(215) 841-6841
Fax: 215.568.3389
tishekia.williams@exeloncorp.com

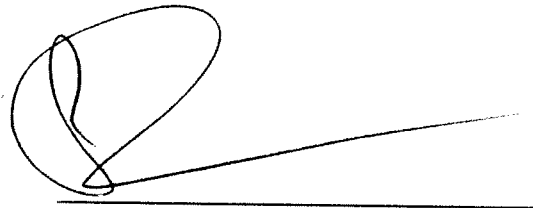
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY BRADLEY	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2238136
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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: May 18, 2011



Tishekia Williams

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

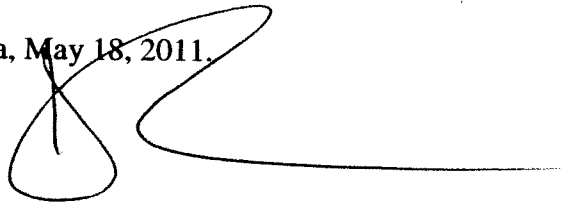
MARY BRADLEY	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2238136
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

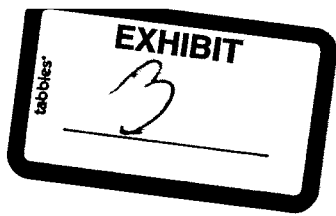
I, Tishekia Williams, hereby certify that I have this day served a copy of PECO Energy Company's Answer in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

MARY BRADLEY
233 Garvin Blvd.
Sharon Hill, PA 19079

Dated at Philadelphia, Pennsylvania, May 18, 2011.



Tishekia Williams
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
(215) 841-6841
Fax: 215.568.3389
Tishekia.Williams@exeloncorp.com



May 23 2011

Docket No. C 2011-22 38 136

New matter

Concerning my spouse

Louis Bradley

Mary Ellen Bradley

610-583 5157



nwmtns

0613801109

Delaware County Memorial Hospital
501 North Lansdowne Avenue
Drexel Hill, PA 19026-1186

Tel 610.284.8100

May 23, 2011

PECO
Customer Service
Medical Needs Dept

Dear Sir or Madam:

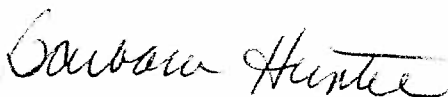
Mr. Louis Bradley of 233 Garvin Blvd. in Sharon Hill, Pa 19079 has been here since May 7, 2011.

Mr Bradley has been diagnosed with Cerebral Vascular Accident (stroke) which has severely impaired his ability to swallow. He now has a feeding tube which requires a pump and electricity. He will still require the feeding tube when he is discharged home.

If you have any questions regarding his medical condition please contact his primary care physician Dr Karl Schwabe at 610-853-2900.

If I can be of further help to you, please contact me at 610-394-1871.

Sincerely,



Barbara Hunter
Social Worker MSW

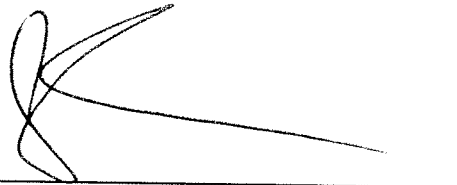
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY BRADLEY	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2238136
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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: June 10, 2011



Tishekia Williams

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MARY BRADLEY	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2238136
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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:

Mary Bradley
233 Garvin Boulevard
Sharon Hill, PA 19079

Dated at Philadelphia, Pennsylvania, June 10, 2011.



Tishekia Williams
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