

**STEVENS & LEE**  
**LAWYERS & CONSULTANTS**

1818 Market Street  
29th Floor  
Philadelphia, PA 19103  
(215) 575-0100 Fax (215) 851-0214  
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Direct Line: (215) 751-2890  
Email: dpc@stevenslee.com  
Fax: (610) 371-7978

June 14, 2011

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

Re: **Uncommon Properties, LP v. PECO Energy Company**  
**Docket No. F-2011-2239572**  
**Peter Crawford v. PECO Energy Company**  
**Docket No. F-2011-2239680**

Dear Secretary Chiavetta:

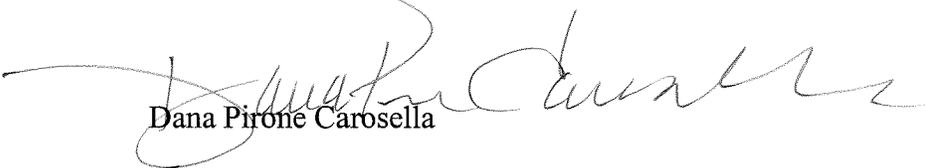
Enclosed for filing is PECO Energy Company's ("PECO") Motion to Consolidate the above-referenced actions. This document has been e-filed on the Pennsylvania Public Utility Commission's website.

A copy of the Motion has been served on the Complainants in accordance with the attached Certificate of Service.

If you have any questions, please feel free to contact me.

Very truly yours,

STEVENS & LEE

  
Dana Pirone Carosella

DPC:let

Enclosures

cc: Uncommon Properties, L.P. ATTN: Peter Crawford (w/encl.)  
Peter Crawford (w/encl.)

Philadelphia • Reading • Valley Forge • Lehigh Valley • Harrisburg • Lancaster • Scranton  
Williamsport • Wilkes-Barre • Princeton • Cherry Hill • New York • Wilmington

A PROFESSIONAL CORPORATION

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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UNCOMMON PROPERTIES, LP	:	
	:	
Complainant	:	Docket No. F-2011-2239572
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

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PETER CRAWFORD	:	
	:	
Complainant	:	Docket No. F-2011-2239680
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

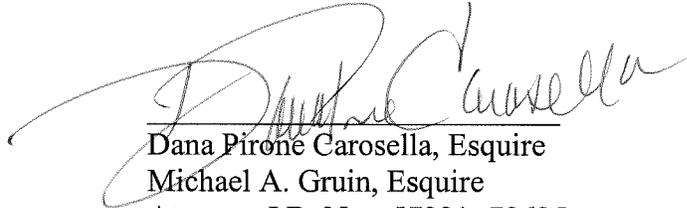
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**NOTICE TO PLEAD**

Pursuant to 52 Pa. Code § 5.103(c), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion of PECO Energy Company, within 20 days from service of this notice, a ruling may be entered against you. All pleadings, such as a Reply to Motions, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Edward Yim, 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:  
Dana Pirone Carosella, Esquire  
Stevens & Lee  
1818 Market Street, 29th Floor  
Philadelphia, PA 19103



Dana Pirone Carosella, Esquire  
Michael A. Gruin, Esquire  
Attorney I.D. Nos. 57221; 78625  
1818 Market Street, 29th Floor  
Philadelphia, PA 19103  
215-751-2890; 610-371-7978 fax  
dpc@stevenslee.com  
mag@stevenslee.com

Tishekia Williams  
PECO Energy Company  
2301 Market Street, S23-1  
PO Box 8699  
Philadelphia, PA 19101-8699  
(215) 841-6841; Fax: 215.568.3389  
Counsel for PECO

DATED: June 14, 2011

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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UNCOMMON PROPERTIES, LP	:	
	:	
Complainant	:	Docket No. F-2011-2239572
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

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PETER CRAWFORD	:	
	:	
Complainant	:	Docket No. F-2011-2239680
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

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**PECO ENERGY COMPANY’S MOTION TO CONSOLIDATE**

Pursuant to 52 Pa. Code §5.81(a), Movant on the Motion to Consolidate and Respondent on the Complaint, PECO Energy Company (“PECO”) moves this Honorable Commission to consolidate the matters of *Uncommon Properties, L.P. v. PECO Energy Company* at Docket No. F-2011-2239572 and *Peter Crawford v. PECO Energy Company* at Docket No. F-2011-2239680 because both complaints involve the identical parties and raise common questions of law and fact.

1. On or about April 26, 2011, Complainant Uncommon Properties, L.P., through its principal, Peter Crawford, filed a Formal Complaint with the Pennsylvania Public Utility

Commission (the “PUC”). Uncommon Properties, L.P. disputes the accuracy of the electric bills for the period of November 1, 2010 through February 6, 2011 in connection with a rental property it owns at 1924 N. Darien Street, Philadelphia, Pennsylvania. Uncommon Properties, L.P. claims that the amounts are too high. The basis for this belief is a comparison of other rental properties located on the same street which are owned either by Uncommon Properties, L.P. or its principal, Peter Crawford, which are alleged to be similar in size and refurbished in 2010, thus necessitating similar electric usage. Attached as **Exhibit A** is a copy of the filed Complaint.

2. Pursuant to 52 Pa. Code §5.62(b), PECO filed an Answer and New Matter to the Complaint. Attached as **Exhibit B** is a copy of the filed Answer and New Matter.

3. On or about April 26, 2011, Peter Crawford filed a Formal Complaint with the PUC. He disputes the accuracy of the electric bills for the period of November 1, 2010 through February 6, 2011 in connection with a rental property he owns at 2038 N. Franklin Street, Philadelphia, Pennsylvania. Peter Crawford claims that the amounts are too high. The basis for this belief is a comparison of another rental property he owns which was refurbished in 2010, and which is located on N. Darien Street, Philadelphia, Pennsylvania. He believes that because the property at issue and the comparison property are similar the electric usage must be similar too. Attached as **Exhibit C** is a copy of the filed Complaint.

4. Pursuant to 52 Pa. Code §5.62(b), PECO filed an Answer and New Matter to the complaint filed by Peter Crawford. Attached as **Exhibit D** is a copy of the filed Answer and New Matter.

5. PECO avers that judicial economy would be served by consolidating the complaints pursuant to 52 Pa. Code §5.81 (a), which states as follows:

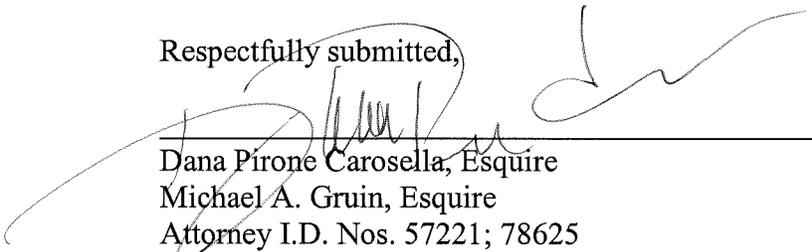
The (PUC) Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

6. Both complaints involve common issues of law and fact: they both dispute the accuracy of the charges on the accounts, the usage is compared to other rental properties owned by the Complainants, and the Complaints involve properties that were allegedly refurbished in 2010. The parties, as well as the relief sought in both complaints, are identical in that Uncommon Properties, L.P.'s principal is Peter Crawford, who filed a separate Complaint in his own name. Accordingly, the substantive and overarching legal and factual issues remain identical in each case.

7. PECO avers that the matters should be consolidated to save time, resources, and expense of trying these matters separately and neither Uncommon Properties, L.P. nor Peter Crawford will be prejudiced by the consolidation of the complaints.

**WHEREFORE**, PECO Energy Company respectfully requests that your Honorable Commission consolidate the matters because both the complaints involve common issues of law and fact.

Respectfully submitted,



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Dana Pirone Carosella, Esquire  
Michael A. Gruin, Esquire  
Attorney I.D. Nos. 57221; 78625  
1818 Market Street, 29th Floor  
Philadelphia, PA 19103  
215-751-2890; 610-371-7978 fax  
dpc@stevenslee.com  
mag@stevenslee.com

Tishkia Williams  
PECO Energy Company  
2301 Market Street, S23-1  
PO Box 8699  
Philadelphia, PA 19101-8699  
(215) 841-6841; Fax: 215.568.3389  
Counsel for PECO

Dated: June 14, 2011

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print or type.

1. CUSTOMER NAME (COMPLAINANT)

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

Name UNCOMMON PROPERTIES, LP

Street/P.O. Box 517 Apt # \_\_\_\_\_

City WASHINGTON CROSSING State PA Zip 18977

County BUCKS

Area Code/HOME Phone 215-896-3863

Area Code/WORK Phone \_\_\_\_\_

Utility Account Number 1283436010  
(from your bill)

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

SERVICE ADDRESS:

Name UNCOMMON PROPERTIES, LP

Street/P.O. Box 1924 N. DARIEN ST.

City PHILADELPHIA State PA Zip 19122

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PECO ENERGY

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

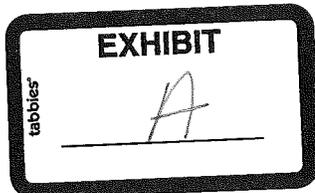
WATER

MOTOR CARRIER

(taxi, moving company, limousine)

TELEPHONE

(local, long distance)



RECEIVED

APR 26 2011

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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.

SEE PARAGRAPH 6 OF ATTACHED LETTER.

5. **RELIEF**

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

SEE PARAGRAPH 9 OF ATTACHED LETTER.

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) \_\_\_\_\_

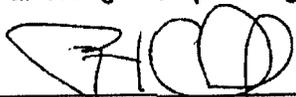
9.

### 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, PETER CRAWFORD, 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).



(Signature)

4/26/11

(Date)

PRINCIPAL

Title of authorized employee or officer

### 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 <sup>nd</sup> Floor Harrisburg, Pennsylvania 17120
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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.

# RECEIVED

APR 26 2011

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Uncommon Properties, LP  
PO Box 517  
Washington Crossing, PA 18977  
(214) 896-3863

February 17, 2011

Via Certified Mail, Return Receipt Requested  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

**RECEIVED**

APR 26 2011

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

Re: 1924 N. Darien St.  
Philadelphia, PA 19122

Dear Sir or Madam:

Uncommon Properties, LP is a ratepayer for electric service at a single-family house at 1924 N. Darien Street, Philadelphia, Pennsylvania.

The purpose of this letter is to contest the amounts billed for electric service at 1924 N. Darien Street for the period November 1, 2010 to February 6, 2011.

1. The name of the ratepayer is Uncommon Properties, LP, a Pennsylvania limited partnership.

2. The address of the ratepayer is PO Box 517, Washington Crossing, PA 18977-0517.

3. The address where service is being used is 1924 North Darien Street, Philadelphia, PA 19122.

4. The account number is 12834-36010.

5. PECO Energy Company is the utility company.

6. Brief statement of problem: 1924 North Darien Street (the "House") is a small 3 bedroom rowhouse with approximately 1,040 square feet of living space. It sits on a lot measuring only 13 feet by 45 feet. The House was renovated in 2010. As part of the renovation, a new central electric heating system and electric hot water heater were installed. A total of three persons currently reside in the House.

The thermostat is permanently set at 65 degrees and is kept behind a plastic case. No tampering with the thermostat has been observed since November.

The number of kilowatt hours recorded for the January billing cycle was 4,151 and for the February billing cycle was 4,347. (Attached hereto is a copy of the statement for February billing cycle.)

The ratepayer owns an identical property at 1921 North Darien Street with an identical heating and hot water system. The number of kilowatt hours recorded for this house for the January cycle was 1,469. (Attached hereto is a copy of billing statement for this cycle.) The tenants at that house have confirmed that their thermostat is kept at 63 degrees.

The ratepayer owns another property at 1917 North Darien Street with an identical heating and hot water system. Five persons reside at this house. The number of kilowatt hours recorded for this house for the February cycle was 1,643. (Attached hereto is a copy of the billing statement for this cycle.) The tenants at the house have confirmed that their thermostat is kept at 67 degrees.

The ratepayer personally observed the electric meters at both 1924 and 1921 Darien Street while the central heater was being operated. The electric meter at 1924 was turning two or three times as fast as the meter at 1921.

It is ratepayer's position that the number of kilowatt hours used at 1924 N. Darien is comparable to the number used at 1921 and 1917 North Darien St. and it should be billed accordingly.

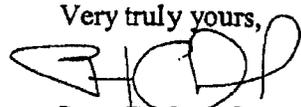
7. No previously complaints were filed with Public Utility Commission concerning this problem.

8. The problem was investigated by PECO Energy Company and the investigation was closed without any adjustments to ratepayer's account.

9. Ratepayer believes the actual kilowatt hours used at 1924 N. Darien St. are roughly the same as the number used at 1917 and 1921 N. Darien St. Therefore, ratepayer is seeking an adjustment to its bills for the November to February period, so that ratepayer is billed for approximately the same monthly usage as 1917 and 1921 N. Darien St.

Pennsylvania Public Utility Commission  
February 17, 2011  
Page 3 of 3

Should you have any questions or if you require further information, do not hesitate to contact me.

Very truly yours,  
  
Peter D. Crawford, Jr.

Enclosures

Name: UNCOMMON PROPERTIES LP  
 Account Number: 12834-36010

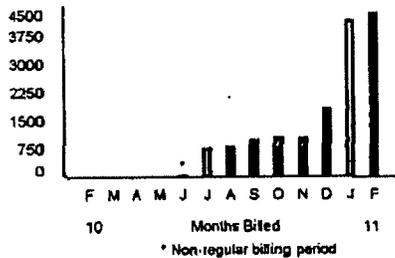
Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
02/06	015739427	DELIVERY SERVICES	Tot kWh	62141 Actual	66488 Actual	4347	1	4347

Total kWh Used ..... 4,347

**Electric Residential Heating Service - Current Period Detail**
**Service 01/06/2011 to 02/06/2011 - 31 days**

Customer charge				\$7.25
Distribution Charges	4,347 kWh	X	\$0.04020	174.75
State Tax Adjustment				-0.11
Sales tax				14.56
Stream Energy Charges / 877-369-8150				322.99
ENERGY CHARGE-4347KWH@0.074302 PER KWH				322.99
<b>Total Current Charges</b>				<b>\$519.44</b>

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	4,347	140.2	31	29
Last Month	4,151	118.6	35	33
Last Year	0	0.0	0	0

Avg kWh per Month	1,660
Total Annual kWh Usage	15,124



DO NOT MAIL THIS PORTION WITH YOUR PAYMENT



Emergency and Repairs: 1-800-841-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: UNCOMMON PROPERTIES LP  
Account Number: 12834-36010  
Phone Number: 215-896-3863  
Service Address: 1924 N DARIEN ST, PHILADELPHIA

**Billing Summary**

Bill Date	02/08/2011
Charges from previous bill	\$682.58
Total Other Charges	\$682.58
<b>Current Period Charges</b>	
Electric	\$519.44
Total New Charges	\$519.44
Total amount due on 03/02/2011.	\$1,202.02

**General Information**

Next scheduled meter reading: March 8, 2011  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date.

- Customer Self Service - Manage Your Account 24/7
- [www.peco.com/ebill](http://www.peco.com/ebill) - Go paperless; receive and pay your bill
  - [www.peco.com/service](http://www.peco.com/service) - Start, stop and transfer your service
  - [www.peco.com/SmartIdeas](http://www.peco.com/SmartIdeas) - Save energy and money
  - Pay by phone with credit/debit card at 1-877-432-9384 (\$3.50 fee)

Stream Energy, 1500 Market St. 12th Fl East, Philadelphia, PA 19102, 877-389-8150

**Message Center**

6.06% estimated Gross Receipts Tax of \$30.59 included in new charges.  
Your estimated electric price to compare is \$0.0667 per kWh

When paying in person, please bring the entire bill.

(continued on next page)



Return only this portion with your check made payable to PECO. Please write your account number on your check.

- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

12834 3601 0000 0000

23731 1 AB 0.357 23731023731048101 062 01 GXC14Y 1234 02082011  
UNCOMMON PROPERTIES LP  
PO BOX 517  
WASHINGTON XING PA 18977-0517

Account Number 12834-36010 Payment Receipt Stamp

Payment Amount

Please pay this amount by 03/02/2011 \$1,202.02

PECO - PAYMENT PROCESSING  
PO BOX 37629  
PHILADELPHIA PA 19101-0629

00000519440000068258

128343601000012020210611202025



Emergency and Repairs: 1-800-841-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: STEVEN GEORGE  
Account Number: 53052-54009  
Phone Number: 267-249-3427  
Service Address: 1921 N DARIEN ST, PHILADELPHIA

**Billing Summary**

Bill Date 01/06/2011  
Thank you for your payment of \$156.33

<b>Current Period Charges</b>	
Electric	\$226.88
<b>Total New Charges</b>	<b>\$226.88</b>
<hr/>	
<b>Total amount due on 01/28/2011</b>	<b>\$226.88</b>

**General Information**

Next scheduled meter reading: February 7, 2011  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date.

- Customer Self Service - Manage Your Account 24/7**
- [www.pECO.com/ebill](http://www.pECO.com/ebill) - Go paperless: receive and pay your bill
  - [www.pECO.com/service](http://www.pECO.com/service) - Start, stop and transfer your service
  - [www.pECO.com/SmartIdeas](http://www.pECO.com/SmartIdeas) - Save energy and money
  - Pay by phone with credit/debit card at 1-877-432-9384 (\$3.50 fee)

**Message Center**

New charges contain estimated total state taxes of \$16.42, including \$13.75 for State Gross Receipts Tax.  
Your electric price to compare is \$0.0977 per kWh.

When paying in person, please bring the entire bill.

(continued on next page)

Return only this portion with your check made payable to PECO. Please write your account number on your check.



- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384.  
A convenience fee will apply.

53052 5400 90000 0000

7196 1 AV 0.332 7186/0071 16/014782 028 01 0303VJ4 125 01072011  
STEVEN GEORGE  
1921 N DARIEN ST  
PHILADELPHIA PA 19122-2010



Account Number 53052-54009  
Payment Receipt Stamp

Payment Amount

Please pay this amount by 01/28/2011 \$226.88

PECO - PAYMENT PROCESSING  
PO BOX 37629  
PHILADELPHIA PA 19101-0629



00000226880000000000



530525400900002268810280226887



Emergency and Repairs: 1-800-831-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: STEVEN GEORGE  
 Account Number: 53052-54009

Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
01/05	080374115	General Service	Tot kWh	45162 Actual	46631 Actual	1469	1	1469

Total kWh Used ..... 1,469

**Electric Residential Service - Current Period Detail**

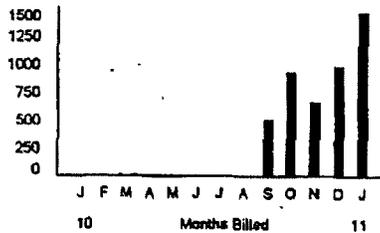
Service 12/02/2010 to 01/05/2011 - 34 days

Customer charge					\$5.60
Generation Charges	1,469 kWh	X	\$0.09173		134.75
All. Energy Portfolio Standard	1,469 kWh	X	0.00018		0.26
Transmission Charges	1,469 kWh	X	0.00576		8.46
Distribution Charges	1,469 kWh	X	0.05311		78.02
State Tax Adjustment					-0.21

**Total Current Charges**

**\$226.88**

13-Month Usage (Total kWh)



**Your Usage Profile.**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	1,469	43.2	34	33
Last Month	990	31.9	31	48
Last Year	0	0.0	0	0

Avg kWh per Month	914
Total Annual kWh Usage	4,574



DO NOT MAIL THIS PORTION WITH YOUR PAYMENT



Emergency and Repairs: 1-800-841-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: AHRUM MOON  
Account Number: 46867-26012  
Phone Number: 267-992-1149  
Service Address: 1917 N DARIEN ST, PHILADELPHIA

**Billing Summary**

Bill Date	02/07/2011
Charges from previous bill	\$75.99
Total Other Charges	\$75.99
<b>Current Period Charges</b>	
Electric	\$268.09
Total New Charges	\$268.09
<b>Total amount due on 03/01/2011</b>	<b>\$344.08</b>

**General Information**

Next scheduled meter reading: March 8, 2011  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date.

- Customer Self Service - Manage Your Account 24/7**
- [www.peco.com/ebill](http://www.peco.com/ebill) - Go paperless: receive and pay your bill
  - [www.peco.com/service](http://www.peco.com/service) - Start, stop and transfer your service
  - [www.peco.com/SmartIdeas](http://www.peco.com/SmartIdeas) - Save energy and money
  - Pay by phone with credit/debit card at 1-877-432-9384 (\$3.50 fee)

**Message Center**

New charges contain estimated total state taxes of \$19.40, including \$16.25 for State Gross Receipts Tax.  
Your electric price to compare is \$0.0992 per kWh.

When paying in person, please bring the entire bill.

(continued on next page)

Return only this portion with your check made payable to PECO. Please write your account number on your check.



- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384.  
A convenience fee will apply.

46867 2601 20000 0000

7275 1 AV 0.332 7275007275014812 027 01 03/01/11 1254 02082011  
AHRUM MOON  
1917 N DARIEN ST  
PHILADELPHIA PA 19122-2010

Account Number 46867-26012  
Payment Receipt Stamp

Payment Amount

Please pay this amount by 03/01/2011 \$344.08

00000268090000007599

PECO - PAYMENT PROCESSING  
PO BOX 37629  
PHILADELPHIA PA 19101-0629



468672601200003440810600344082



Emergency and Repairs: 1-800-641-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: **AHRUM MOON**  
 Account Number: **46867-26012**

Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
01/25	015885524	General Service	Tot kWh	38739 Estimate	39041 Estimate	302	1	302
02/06	338800668	General Service	Tot kWh	0 Actual	1341 Actual	1341	1	1341

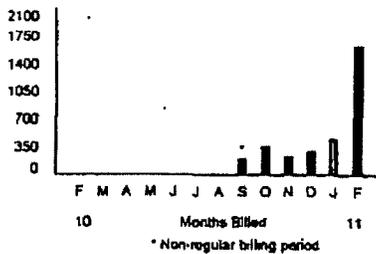
Total kWh Used ..... 1,643

**Electric Residential Service - Current Period Detail**

Service 01/06/2011 to 02/06/2011 - 31 days

Customer charge								\$7.25
Generation Charges		1,643 kWh	X	\$0.09070				149.02
Alt. Energy Portfolio Standard		1,643 kWh	X	0.00120				1.97
Transmission Charges		1,643 kWh	X	0.00730				11.99
Distribution Charges		1,643 kWh	X	0.05960				97.92
State Tax Adjustment								-0.06
<b>Total Current Charges</b>								<b>\$268.09</b>

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	1,643	53.0	31	29
Last Month	468	13.7	34	33
Last Year	0	0.0	0	0

Avg kWh per Month	530
Total Annual kWh Usage	3,238



DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

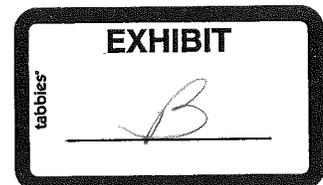
<hr/>	:	
UNCOMMON PROPERTIES, LP	:	
	:	
Complainant	:	Docket No. F-2011-2239572
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	
<hr/>		

**ANSWER OF PECO ENERGY COMPANY TO COMPLAINT**

On May 5, 2011, PECO Energy Company (“PECO”) was served with a Formal Complaint from Uncommon Properties, LP (“Complainant”), in the above captioned Docket Number. Pursuant to 52 Pa Code § 5.61, PECO hereby responds to the Complaint of the Complainant as follows:

**ANSWER**

1. Admitted in part; Denied in part. PECO admits that it provides electric service at 1924 North Darien Street, Philadelphia, PA (the “service property”) under account number 128346010. PECO also admits that Uncommon Properties, LP is the account holder for account number 128346010 and that it has identified its mailing address as stated in Paragraph 1 of the Complaint. PECO denies that the Complainant has the authority to prosecute a Complaint before the Pennsylvania Public Utility Commission (the “PUC”). Under the PUC’s regulation at 52 Pa. Code §§ 1.21-1.23, Uncommon Properties, LP is required to be represented by counsel in adversarial proceedings. The proceedings become adversarial upon the filing of an Answer to the Complaint. A Complaint filed by a non-individual can be dismissed for failure to be



represented by an attorney in an adversarial proceeding. *See, In Re: Checker Cab*, 49 Pa. PUC 159, 160 (1975), *Moore v. I. Berman and Cross, Inc.*, Pa. PUC 427, 428 (1975).

2. Admitted.

3. Admitted.

4. Admitted in part; Denied in part. PECO admits that the service property is a residential dwelling and that the number of kilowatt hours recorded for the January 2011 and February 2011 billing cycles are as stated in the billing statements. PECO denies that there are incorrect charges on Complainant's account. PECO also denies and there are any problems with the reliability, safety or quality of the utility service Complainant and/or its tenants have received at the service property. PECO denies that the Complainant owns another row house property located at 1917 North Darien Street, Philadelphia, PA for which PECO was the electric supplier. On the contrary, the principal of Uncommon Properties, LP, Peter Crawford, has already verified that he is the owner of the rental property at 1917 North Darien Street, Philadelphia, PA. See Formal Complaint filed against PECO in the matter captioned *Peter Crawford v. PECO*, F-2011-2239680. PECO can neither admit nor deny the number of other properties owned by the Complainant or Peter Crawford, the number of tenants who reside at 1917, 1921, and 1924 North Darien Street, Philadelphia, PA, the interior temperature the tenants have set the thermostats with respect to any of these aforementioned properties, observations made by the Complainant with respect to the meters, and when any of the aforementioned properties were refurbished. PECO denies that the number of kilowatt hours used at the two properties is "roughly the same", and denies that it is appropriate to issue an adjustment to the Complainant's bill for the November 2010 to February 2011 billing periods.

5. Paragraph 5 is a Request for Relief and no answer is required.

6. PECO can neither admit nor deny the allegations of this paragraph.

7. Admitted. By way of further answer, on February 4, 2011, PECO conducted a field investigation, at the Complainant's request, to confirm that the meter assigned to the service property was properly connected and recording accurate data. Based upon the results of the February 4, 2011 investigation, PECO verified that the meter was working properly and accurately reporting data for the rental property as reflected in recent readings and on the bills in question. The PECO field technician who performed the investigation confirmed for the Complainant that the demand for electricity during winter months generally increases and further confirmed that at least one of the tenants had an electric space heater.

On February 24, 2011, Complainant filed an informal complaint with the Bureau of Consumer Services (the "BCS") complaining about the high bills. The BCS properly dismissed the complaint on March 21, 2011. In the decision, the BCS relies upon the correctness of the findings obtained from the February 4, 2011 high bill field investigation before stating that the Complainant is responsible for the bills, which are correct. Attached hereto, marked as **Exhibit A** and attached hereto is a copy of the BCS Decision.

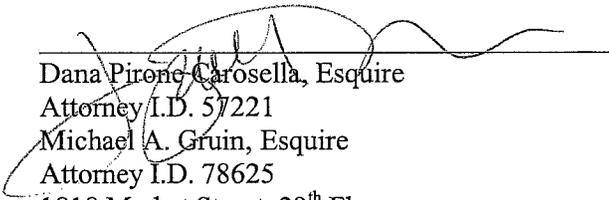
8. No response is required to this paragraph as it contains no information concerning the Complainant's legal counsel

9. No response is required to this paragraph which is the Complainant's Verification to the Complaint.

**REQUEST FOR RELIEF**

WHEREFORE, for all of the reasons stated herein, PECO respectfully requests that the Complaint be dismissed with prejudice and requests that this matter be scheduled for mediation.

Respectfully submitted,



\_\_\_\_\_  
Dana Pirone Carosella, Esquire

Attorney I.D. 57221

Michael A. Gruin, Esquire

Attorney I.D. 78625

1818 Market Street, 29<sup>th</sup> Floor

Philadelphia, PA 19103

215-751-2890

610-371-7978 fax

dpc@stevenslee.com

mag@stevenslee.com

Tishekia Williams

PECO Energy Company

2301 Market Street, S23-1

PO Box 8699

Philadelphia, PA 19101-8699

(215) 841-6841

Fax: 215.568.3389

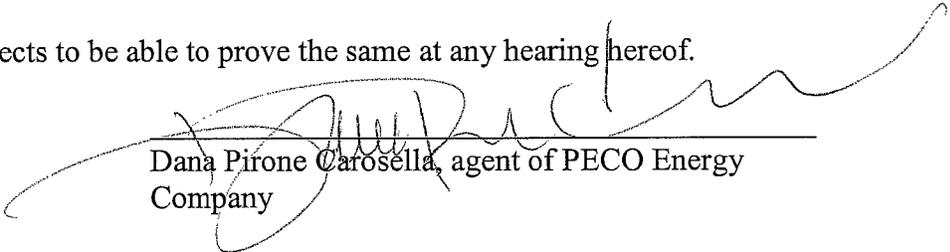
tishekia.williams@exeloncorp.com

DATE: May 25, 2011

COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF PHILADELPHIA :

**AFFIDAVIT**

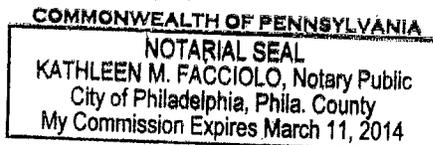
I, Dana Pirone Carosella, being duly sworn according to law, depose and say I am agent of PECO Energy Company and have been authorized to make this affidavit on its behalf and that the facts above set forth are true and correct to the best of my knowledge, information and belief, and PECO Energy Company expects to be able to prove the same at any hearing hereof.

  
Dana Pirone Carosella, agent of PECO Energy  
Company

Sworn and subscribed before me this  
25 day of May, 2011

  
Kathleen M. Facciolo  
Notary Public

My Commission Expires:



May 25, 2011

## BCS Decision Report

BCS Case #: 002796104                      Open Date: 2011-02-24  
Customer Name: UNCOMMON PROPERTIES INC  
Service Address: 1924 N DARIEN ST

PHILADELPHIA, PA 19122  
BCS Bill Account #: 1283436010                      Previous Case #:  
Violation Type: NO                      Chapter Type:  
Decision Type: W                      Section / Rule:  
Investigator Name: TERRY SEAVER

Decision Issued Date: 2011-03-21  
Case Closed Date: 2011-03-18

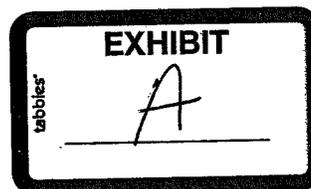
Letter Description:  
EGW PAR W/COMPLEX DISPUTE/NO PAYMENT AGREEMENT/LEVEL 2-4

Total Balance:	\$1046.31	Balance Date:	2011-03-18
Amount to Restore Service:	\$0.00	Amount to Continue Service:	\$0.00
Date Payment Due:		Regular Budget Amount:	\$262.00
Special Budget Payment:	\$0.00	Final Bill Monthly Payment:	\$0.00
Plus Arrears Payment:	\$0.00	End of Month Payment:	\$0.00
Current Monthly Payment:	\$0.00		

Payment Terms:

PAR Description:

Resolution Description:  
DECISION. INVESTIGATION BY THE PUC FOUND: SERVICE CONNECTED ON 6/1/2010 FOR THE CUSTOMER. THIS IS A LANDLORD RATEPAYER ACCOUNT. A HIGH BILL FIELD VISIT WAS SCHEDULED AND COMPLETED ON ON 2/4/11. CO VISITED PROPERTY VERIFIED LAST METER READ. DROPPED LOAD AND IDLED METER NO SIGN FOREIGN LOAD OR GROUND DISSIPATION. NO METER MIX. PASSING LOAD TEST WITH SPACE HEATER AND REFRIGERATOR VERIFIED THE ACCURACY OF THE METER. APPLIANCE ANALYSIS CONCLUDED POTENTIAL WINTER MONTHLY USAGE AT 4261 KWH. CURENT BAL = \$1046.31. BILLS CONSIDERED CORRECT AS RENDERED. CUST RESPONSIBLE FOR THE BALANCE. INFORMAL COMPLAINT DISMISSED.



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

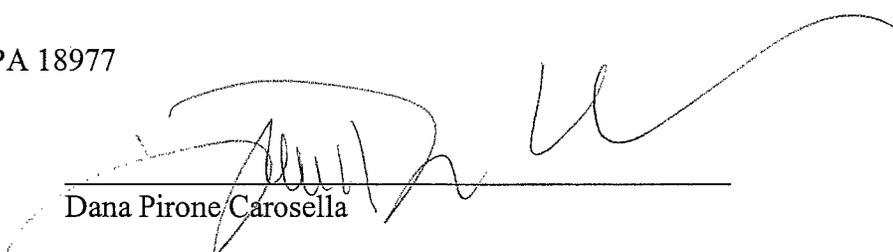
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UNCOMMON PROPERTIES, LP	:	
	:	
Complainant	:	Docket No. F-2011-2239572
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
Respondent	:	
<hr/>		

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Answer upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA First Class U.S. Mail

Uncommon Properties, LP  
P.O. Box 517  
Washington Crossing, PA 18977

  
\_\_\_\_\_  
Dana Pirone Carosella

Dated: May 25, 2011



# Pennsylvania Public Utility Commission

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Print this page for your records. The date filed on will be the current day if the filing occurs on a business day before or at 4:30 PM Harrisburg, PA time. It will be the next business day if the filing occurs after 4:30 PM Harrisburg, PA time or on weekends or holidays.

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eFiling Confirmation	
Docket Number:	F-2011-2239572
Description:	
Transmission Date:	5/25/2011 3:18:20 PM
Filed On:	5/25/2011 3:18:20 PM
eFiling Confirmation Number:	1464500

### Uploaded File List

File Name	Document Class	Document Type
Uncommon Properties LP v. PECO (F-2011-2239572) - Answer.pdf	Communication	Answer to Formal Complaint

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print or type.

1. CUSTOMER NAME (COMPLAINANT)

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

Name PETER CRAWFORD

Street/P.O. Box 51 CANAL RUN WEST Apt # \_\_\_\_\_

City WASHINGTON CROSSING State PA Zip 18977

County BUCKS

Area Code/HOME Phone 215-896-3863

Area Code/WORK Phone \_\_\_\_\_

Utility Account Number 6232957029  
(from your bill)

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

ADDRESS OF SERVICE:

Name \_\_\_\_\_

Street/P.O. Box 2038 N. FRANKLIN ST.

City PHILADELPHIA State PA Zip 19122

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PECO ENERGY

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER

(taxi, moving company, limousine)

TELEPHONE

(local, long distance)

RECEIVED

APR 26 2011



**Peter Crawford -- Docket #F-2239680**

Service address : 2038 N Franklin St. Philadelphia PA 19122

Service date: 07/09/10 residential Electric

*\*\*Residential Electric Heating*

**Complaint:** Bills too high from 11/01/10 to 02/06/11; comparing bills to his other property at 1917 N Darien St with what customer says have the same square footage and same # of occupants; wants bills adjusted to same monthly usage as 1917 N Darien St

**Company Position:** High bill field visit performed 02/04/11; passing load test on meter verified accuracy of meter, pot to use justified; rh heating was verified and changed; account coded landlord/tenant

**BCS Decision:** CLOSED WITH DECISION.... DECISION LETTER SENT ...DECIDED THAT:1.THIS INFORMAL COMPLAINT IS DISMISSED WITHOUT FURTHER ACTION AT THIS TIME.2.YOU MUST CONTACT THE COMPANY TO SCHEDULE THE METER TEST AND PAY THE FEE REQUIRED. 3.IF YOUR METER TESTS OUTSIDE THE ACCEPTABLE PARAMETERS AND YOU ARE NOT SATISFIED WITH THE COMPANY'S BILLING ADJUSTMENT YOU COULD FILE A NEW INFORMAL COMPLAINT ABOUT THAT MATTER. 4.IF YOU ARE UNABLE TO STAY CURRENT ON YOUR ACCOUNT YOU APPEAR TO BE ELIGIBLE FOR A PUC AGREEMENT TO PAY YOUR ARREARS OVER 6 MONTHS. IF YOU RECEIVE A TERMINATION NOTICE AND ARE UNABLE TO WORK OUT A PAYMENT ARRANGEMENT WITH THE COMPANY IT IS IMPORTANT THAT YOU CONTACT THE PUC PRIOR TO THE TERMINATION OF YOUR SERVICE TO BE ELIGIBLE FOR A PUC AGREEMENT.CONCLUDED THAT: 1.THE BILLINGS IN QUESTION ARE BASED ON ACTUAL METER READINGS AND ARE ASSUMED TO BE CORRECT AS RENDERED.2. THE COMPANY PROPERLY INVESTIGATED THIS MATTER IN ACCORDANCE WITH PA REGULATION AS FOUND AT 52 PA. CODE 56.151.3.THE COMPANY INVESTIGATION FOUND THAT THE USAGE AT THIS ADDRESS IS WITHIN THE POTENTIAL FOR USAGE THAT EXISTS AT THE PROPERTY WITH/FOR THE APPLIANCE FOUNDS IN USE AND THAT THEIR METER TESTED AS WORKING PROPERLY. 4.IN ACCORDANCE WITH PA REGULATION AS FOUND AT 52 PA. CODE 57.22 AND 57.23 AND THE COMPANY TARIFF FILING THEY WILL EXCHANGE/REMOVED THE METER AND TEST IT FOR A FEE OF 25.00. 5.THE COMPANY IS WILLING TO TEST THE METER IN ACCORDANCE WITH PA REGULATION AS FOUND AT 52 PA. CODE 57.24 AND CURRENT PUC PROCEDURES. UNDER THAT REGULATION THE METER IS TESTED AND IS CONSIDERED INACCURATE IF IT TESTS OUTSIDE THE ACCEPTABLE PARAMETERS (+/-2%). THE FINDS THAT IF THE METER TEST WITHIN THE ACCEPTABLE PARAMETERS THE BILLING THAT THE BILLING IS CONSIDERED CORRECT AS RENDERED; AND THAT IF THE METER TESTS OUTSIDE THE ACCEPTABLE PARAMETERS THE COMPANY IS REQUIRED TO ADJUST THE BILLING ACCORDINGLY.

A meter test was scheduled for 04/06/11 per customer's request; there was no Access no answer  
**Current Account Status: Open balance \$14,040.20 (accrued since 4/2001 due to poor payment history)**

**Current bill : \$213.04 due 05/31/11**

**Past due : \$1027.98**

**Customer has alt elec generation supplier.**

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.

PLEASE SEE ATTACHED  
LETTER (PARAGRAPH 6).

5. **RELIEF**

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

PLEASE SEE ATTACHED  
LETTER (PARAGRAPH 9).

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 \_\_\_\_\_

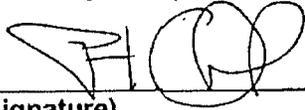
E-mail Address (If Known) \_\_\_\_\_

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, PETER CRAWFORD, 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).

  
(Signature)

4/26/11  
(Date)

\_\_\_\_\_  
Title of authorized employee or officer

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 <sup>nd</sup> 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.

RECEIVED

APR 26 2011

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Peter Crawford  
51 Canal Run West  
Washington Crossing, PA 18977  
(214) 896-3863

February 17, 2011

Via Certified Mail, Return Receipt Requested  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

**RECEIVED**

APR 26 2011

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: 2038 N. Franklin St.  
Philadelphia, PA 19122

Dear Sir or Madam:

I am a ratepayer for electric service at a single-family house at 2038 N. Franklin Street, Philadelphia, Pennsylvania.

The purpose of this letter is to contest the amounts billed for electric service at 2038 N. Franklin Street for the period November 1, 2010 to February 6, 2011.

1. The name of the ratepayer is Peter Crawford.
2. The address of the ratepayer is 51 Canal Run West, Washington Crossing, PA 18977-1155.
3. The address where service is being used is 2038 North Franklin Street, Philadelphia, PA 19122.
4. The account number is 62329-57029.
5. PECO Energy Company is the utility company.
6. Brief statement of problem: 2038 North Franklin Street (the "House") is a small rowhouse with approximately 1,800 square feet of living space. It sits on a lot measuring only 14 feet by 67 feet. The House was renovated in 2010. As part of the renovation, electric baseboards were installed in each room and an electric hot water heater was installed. A total of five persons currently reside in the House.

The number of kilowatt hours recorded for the January billing cycle was 6,775 and for the February billing cycle was 5,102. (Attached hereto is a copy of the statement for February billing cycle.)

The ratepayer owns a similar property at 1917 North Darien Street with the same square footage, the same number of occupants and a central electric heating system. The number of kilowatt hours recorded for this house for the February cycle was 1,643. (Attached hereto is a copy of the billing statement for this cycle.) The tenants at the house have confirmed that their thermostat is kept at 67 degrees.

The ratepayer personally observed the electric meter at the House with all baseboard heaters and appliances turned off except for the refrigerator. The meter was spinning rapidly. Ratepayer's electrician opined that the meter is not accurately recording electrical usage.

It is ratepayer's position that the number of kilowatt hours used at the House is comparable to the number used at 1917 North Darien St. and it should be billed accordingly.

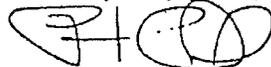
7. No previously complaints were filed with Public Utility Commission concerning this problem.

8. The problem was investigated by PECO Energy Company and the investigation was closed without any adjustments to ratepayer's account.

9. Ratepayer believes the actual kilowatt hours used at 2038 N. Franklin St. are roughly the same as the number used at 1917 N. Darien St. Therefore, ratepayer is seeking an adjustment to its bills for the November to February period, so that ratepayer is billed for approximately the same monthly usage as 1917 N. Darien St.

Should you have any questions or if you require further information, do not hesitate to contact me.

Very truly yours,



Peter Crawford

Enclosures



Emergency and Repairs: 1-800-941-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: PETER D CRAWFORD
Account Number: 62329-57029
Phone Number: 215-896-3863
Service Address: 2038 N FRANKLIN ST, PHILADELPHIA

Billing Summary

Table with 2 columns: Description and Amount. Rows include Bill Date (02/08/2011), Charges from previous bill (\$1,027.97), Total Other Charges (\$1,027.97), Current Period Charges (Electric \$591.31), Total New Charges (\$591.31), and Total amount due on 03/02/2011 (\$1,619.28).

General Information

Next scheduled meter reading: March 8, 2011
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date.

- Customer Self Service - Manage Your Account 24/7
- www.peco.com/ebill - Go paperless: receive and pay your bill
- www.peco.com/service - Start, stop and transfer your service
- www.peco.com/SmartIdeas - Save energy and money
- Pay by phone with credit/debit card at 1-877-432-9384 (\$3.50 fee)

Stream Energy, 1500 Market St 12th Fl East, Philadelphia, PA 19102, 877-369-8150

Message Center

New charges contain estimated total state taxes of \$15.38, including \$35.83 for State Gross Receipts Tax.

Your estimated electric price to compare is \$0.0667 per kWh

When paying in person, please bring the entire bill

(continued on next page)



Return only this portion with your check made payable to PECO. Please write your account number on your check.

- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

62329 5702 90000 0000

552 1 MB 0.379 05627005527001152 003 01 GXCD19V 1234 02022011
PETER D CRAWFORD
51 CANAL RUN W
WASHINGTON CROSSING PA 18977-1155

Account Number
62329-57029

Payment Receipt Stamp

Payment Amount box

Please pay this amount by 03/02/2011 \$1,619.28

00000591310000102797

PECO - PAYMENT PROCESSING
PO BOX 37629
PHILADELPHIA PA 19101-0629



623295702900016192810611619280



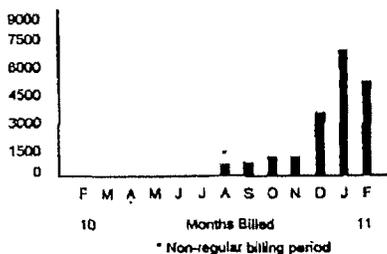
Emergency and Repairs: 1-800-341-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: PETER D CRAWFORD  
 Account Number: 62329-57029

Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
02/06	058641519	DELIVERY SERVICES	Tot kWh	19884 Actual	24986 Actual	5102	1	5102
Total kWh Used		5,102						

Electric Residential Heating Service - Current Period Detail				Service 01/06/2011 to 02/06/2011 - 31 days	
Customer charge					\$7.25
Distribution Charges		5,102 kWh	X	\$0.04020	205.10
State Tax Adjustment					-0.13
Stream Energy Charges / 877-369-8150					
ENERGY CHARGE-5102KWH@0.074302 PER KWH					379.09
<b>Total Current Charges</b>					<b>\$591.31</b>

13-Month Usage (Total kWh)



Your Usage Profile

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	5,102	164.5	31	29
Last Month	6,775	193.5	35	33
Last Year	0	0.0	0	0
Avg kWh per Month				2,720
Total Annual kWh Usage				19,045



DO NOT MAIL THIS PORTION WITH YOUR PAYMENT



Emergency and Repairs: 1-800-841-3141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: AHRUM MOON
Account Number: 46867-26012
Phone Number: 267-992-1149
Service Address: 1917 N DARIEN ST, PHILADELPHIA

Billing Summary

Table with 2 columns: Description and Amount. Rows include Bill Date (02/07/2011), Charges from previous bill (\$75.99), Total Other Charges (\$75.99), Current Period Charges (Electric \$268.09), Total New Charges (\$268.09), and Total amount due on 03/01/2011 (\$344.08).

General Information

Next scheduled meter reading: March 8, 2011
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date.

- Customer Self Service - Manage Your Account 24/7
- www.peco.com/ebill - Go paperless: receive and pay your bill
- www.peco.com/service - Start, stop and transfer your service
- www.peco.com/SmartIdeas - Save energy and money
- Pay by phone with credit/debit card at 1-877-432-9384 (\$3.50 fee)

Message Center

New charges contain estimated total state taxes of \$19.40, including \$18.25 for State Gross Receipts Tax.
Your electric price to compare is \$0.0992 per kWh.

When paying in person, please bring the entire bill.

(continued on next page)



Return only this portion with your check made payable to PECO. Please write your account number on your check.

- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

46867 2601 20000 0000

7275 1 AV 0.332 7275007275014812 027 01 0XCOV7 1234 02082011
AHRUM MOON
1917 N DARIEN ST
PHILADELPHIA PA 19122-2010

Account Number 46867-26012 Payment Receipt Stamp

Payment Amount box

Please pay this amount by 03/01/2011 \$344.08

PECO - PAYMENT PROCESSING
PO BOX 37629
PHILADELPHIA PA 19101-0629

00000268090000007599



468672601200003440810600344082



Emergency and Repairs: 1-800-841-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO equipment. For all other business, call 1-800-494-4000.

Name: AHRUM MOON  
Account Number: 46867-26012

**Meter Information**

Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
01/25	01588524	General Service	Tot kWh	36739 Estimate	39041 Estimate	302	1	302
02/08	336800668	General Service	Tot kWh	0 Actual	1341 Actual	1341	1	1341

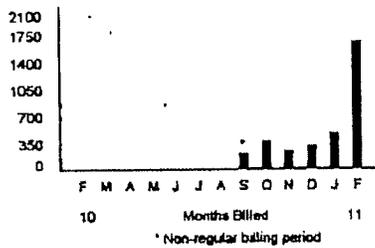
Total kWh Used ..... 1,643

**Electric Residential Service - Current Period Detail**

Service 01/06/2011 to 02/06/2011 - 31 days

Customer charge				\$7.25
Generation Charges	1,643 kWh	X	\$0.09070	149.02
Alt. Energy Portfolio Standard	1,643 kWh	X	0.00120	1.97
Transmission Charges	1,643 kWh	X	0.00730	11.99
Distribution Charges	1,643 kWh	X	0.05960	97.92
State Tax Adjustment				-0.06
<b>Total Current Charges</b>				<b>\$268.09</b>

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	1,643	53.0	31	29
Last Month	488	13.7	34	33
Last Year	0	0.0	0	0

Avg kWh per Month	539
Total Annual kWh Usage	3,239



DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETER CRAWFORD	:	
	:	
Complainant	:	Docket No. F-2011-2239680
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

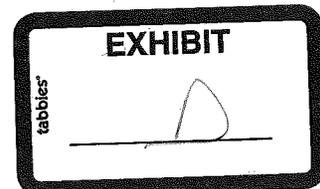
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**ANSWER OF PECO ENERGY COMPANY TO COMPLAINT**

On May 5, 2011, PECO Energy Company (“PECO”) was served with a Formal Complaint from Peter Crawford (“Complainant”), in the above captioned Docket Number. Pursuant to 52 Pa Code § 5.61, PECO hereby responds to the Complaint of the Complainant as follows:

**ANSWER**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part; Denied in part. PECO denies that there are incorrect charges on Complainant’s account. PECO also denies that there are any problems with the reliability, safety or quality of the utility service Complainant and/or his tenants have received at 2038 N. Franklin Street, Philadelphia, PA (the “service property”). PECO admits that the billing statements for January and February 2011 (per paragraph 6 of the Complainant’s letter to the Pennsylvania



Public Utility Commission (the "PUC") which is relied upon here) accurately reflect the number of kilowatt hours recorded, that being 6,775 and 5,102 respectively. PECO admits that the Complainant owns another row house property located at 1917 North Darien Street, Philadelphia, PA for which PECO was the electric provider for the February 2011 billing cycle (the "second property"). PECO can neither admit nor deny the number of tenants who occupy the second property, the interior temperature the tenants have set the thermostat with respect to the second property, and the observations made by either the Complainant or his electrician with respect to the meter. PECO denies that the number of kilowatt hours used at the two properties is "roughly the same", and denies that it is appropriate to issue an adjustment to the Complainant's bill for the November 2010 to February 2011 billing periods.

On February 4, 2011, PECO conducted a field investigation, at the Complainant's request, to confirm that the meter assigned to the service property was properly connected and recording accurate data. Based upon the results of the February 4, 2011 investigation, PECO verified that the meter was working properly, confirmed that there exists the potential for using the number of kilowatts stated in the bills for the period of November 1, 2010 through February 6, 2011 (in light of the appliances in use and the electric baseboard heating), and PECO also changed the coding on the account to note that it was a tenant-occupied, landlord-owned property.

On February 24, 2011, Complainant filed an informal complaint with the Bureau of Consumer Services (the "BCS"). The BCS properly dismissed the complaint without further action on March 21, 2011. In the decision the BCS properly notes that the bills were based upon actual meter readings and that the meter was working properly. Attached hereto, marked as **Exhibit A** and attached hereto is a copy of the BCS Decision.

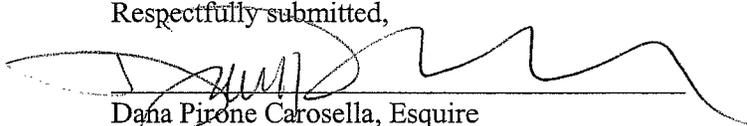
PECO continues to be willing to remove the meter at the service property, replace it with another meter, and test the current meter for accuracy in order to further assure the Complainant that the bills at issue are accurate. Indeed, on April 6, 2011, PECO's field technician was scheduled to meet the Complainant at the service property in order to remove the existing meter for testing. PECO was not able to remove the meter for testing because neither the Complainant nor anyone else who had access to the service property that day was present to allow PECO's employee to enter the service property.

5. Paragraph 5 is a Request for Relief and no answer is required.
6. Admitted.
7. Admitted.

**REQUEST FOR RELIEF**

WHEREFORE, for all of the reasons stated herein, PECO respectfully requests that the Complaint be dismissed with prejudice and requests that this matter be scheduled for mediation.

Respectfully submitted,



Dana Pirone Carosella, Esquire  
Attorney I.D. 57221  
Michael A. Gruin, Esquire  
Attorney I.D. 78625  
1818 Market Street, 29<sup>th</sup> Floor  
Philadelphia, PA 19103  
215-751-2890  
610-371-7978 fax  
dpc@stevenslee.com  
mag@stevenslee.com

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

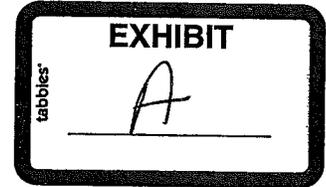
DATE: May 25, 2011

May 24, 2011

## BCS Decision Report

BCS Case #: 002796122                      Open Date: 2011-02-24  
Customer Name: PETER CRAWFORD  
Service Address: 2038 N FRANKLIN ST

PHILADELPHIA, PA 19122  
BCS Bill Account #: 6232957029                      Previous Case #:  
Violation Type: NO                                      Chapter Type:  
Decision Type: W                                        Section / Rule:  
Investigator Name: TIMOTHY PLATT



Decision Issued Date: 2011-03-21  
Case Closed Date: 2011-03-21

**Letter Description:**  
EGW PAR W/COMPLEX DISPUTE/NO PAYMENT AGREEMENT/LEVEL 2-4

Total Balance:	\$1619.28	Balance Date:	2011-03-03
Amount to Restore Service:	\$0.00	Amount to Continue Service:	\$0.00
Date Payment Due:		Regular Budget Amount:	\$0.00
Special Budget Payment:	\$0.00	Final Bill Monthly Payment:	\$0.00
Plus Arrears Payment:	\$0.00	End of Month Payment:	\$0.00
Current Monthly Payment:	\$0.00		

Payment Terms:

### PAR Description:

### Resolution Description:

CLOSED WITH DECISION.... DECISION LETTER SENT ...DECIDED THAT:1.THIS INFORMAL COMPLAINT IS DISMISSED WITHOUT FURTHER ACTION AT THIS TIME.2.YOU MUST CONTACT THE COMPANY TO SCHEDULE THE METER TEST AND PAY THE FEE REQUIRED. 3.IF YOUR METER TESTS OUTSIDE THE ACCEPTABLE PARAMETERS AND YOU ARE NOT SATISFIED WITH THE COMPANY'S BILLING ADJUSTMENT YOU COULD FILE A NEW INFORMAL COMPLAINT ABOUT THAT MATTER. 4.IF YOU ARE UNABLE TO STAY CURRENT ON YOUR ACCOUNT YOU APPEAR TO BE ELIGIBLE FOR A PUC AGREEMENT TO PAY YOUR ARREARS OVER 6 MONTHS. IF YOU RECEIVE A TERMINATION NOTICE AND ARE UNABLE TO WORK OUT A PAYMENT ARRANGEMENT WITH THE COMPANY IT IS IMPORTANT THAT YOU CONTACT THE PUC PRIOR TO THE TERMINATION OF YOUR SERVICE TO BE ELIGIBLE FOR A PUC AGREEMENT.CONCLUDED THAT: 1.THE BILLINGS IN QUESTION ARE BASED ON ACTUAL METER READINGS AND ARE ASSUMED TO BE



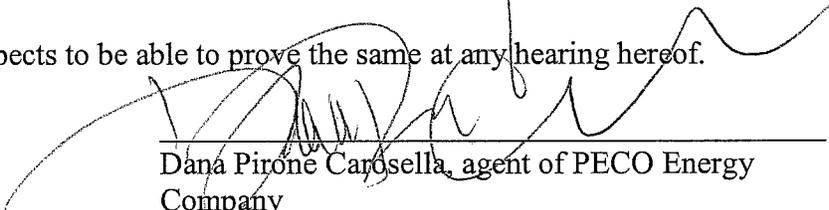
May 24, 2011

CORRECT AS RENDERED. 2. THE COMPANY PROPERLY INVESTIGATED THIS MATTER IN ACCORDANCE WITH PA REGULATION AS FOUND AT 52 PA. CODE 56.151.3. THE COMPANY INVESTIGATION FOUND THAT THE USAGE AT THIS ADDRESS IS WITHIN THE POTENTIAL FOR USAGE THAT EXISTS AT THE PROPERTY WITH/FOR THE APPLIANCE FOUNDS IN USE AND THAT THEIR METER TESTED AS WORKING PROPERLY. 4. IN ACCORDANCE WITH PA REGULATION AS FOUND AT 52 PA. CODE 57.22 AND 57.23 AND THE COMPANY TARIFF FILING THEY WILL EXCHANGE/REMOVED THE METER AND TEST IT FOR A FEE OF 25.00. 5. THE COMPANY IS WILLING TO TEST THE METER IN ACCORDANCE WITH PA REGULATION AS FOUND AT 52 PA. CODE 57.24 AND CURRENT PUC PROCEDURES. UNDER THAT REGULATION THE METER IS TESTED AND IS CONSIDERED INACCURATE IF IT TESTS OUTSIDE THE ACCEPTABLE PARAMETERS (+/-2%). THE FINDS THAT IF THE METER TEST WITHIN THE ACCEPTABLE PARAMETERS THE BILLING THAT THE BILLING IS CONSIDERED CORRECT AS RENDERED; AND THAT IF THE METER TESTS OUTSIDE THE ACCEPTABLE PARAMETERS THE COMPANY IS REQUIRED TO ADJUST THE BILLING ACCORDINGLY.

COMMONWEALTH OF PENNSYLVANIA :  
 : SS.  
COUNTY OF PHILADELPHIA :

**AFFIDAVIT**

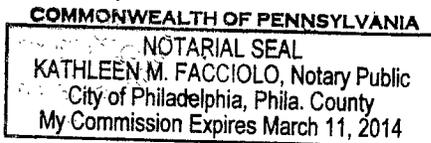
I, Dana Pirone Carosella, being duly sworn according to law, depose and say I am agent of PECO Energy Company and have been authorized to make this affidavit on its behalf and that the facts above set forth are true and correct to the best of my knowledge, information and belief, and PECO Energy Company expects to be able to prove the same at any hearing hereof.

  
\_\_\_\_\_  
Dana Pirone Carosella, agent of PECO Energy  
Company

Sworn and subscribed before me this  
25<sup>th</sup> day of May, 2011

  
\_\_\_\_\_  
Notary Public

My Commission Expires:



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

\_\_\_\_\_  
PETER CRAWFORD

Complainant

v.

PECO ENERGY COMPANY

Respondent

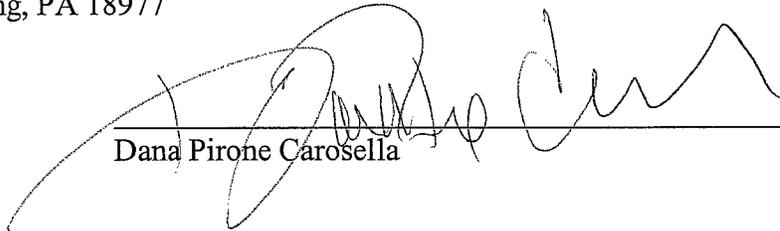
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: Docket No. F-2011-2239680  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Answer upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA First Class U.S. Mail

Peter Crawford  
51 Canal Run West  
Washington Crossing, PA 18977

  
\_\_\_\_\_  
Dana Pirone Carosella

Dated: May 25, 2011



# Pennsylvania Public Utility Commission

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eFiling Confirmation	
Docket Number:	F-2011-2239680
Description:	
Transmission Date:	5/25/2011 3:20:25 PM
Filed On:	5/25/2011 3:20:25 PM
eFiling Confirmation Number:	1464503

### Uploaded File List

File Name	Document Class	Document Type
Crawford v. PECO (F-2011-2239680) - Answer.pdf	Communication	Answer to Formal Complaint

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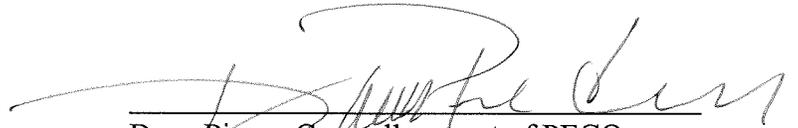


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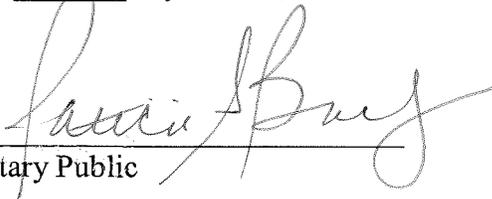
COMMONWEALTH OF PENNSYLVANIA :  
 : SS.  
COUNTY OF PHILADELPHIA :

**AFFIDAVIT**

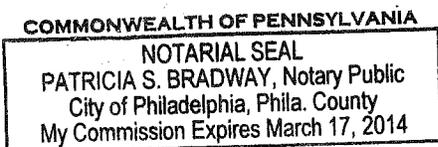
I, Dana Pirone Carosella, Esquire being duly sworn according to law, depose and say I am agent of PECO Energy Company and have been authorized to make this affidavit on its behalf and that the facts set forth in the foregoing Motion are true and correct to the best of my knowledge, information and belief, and PECO Energy Company expect to be able to prove the same at any hearing hereof.

  
\_\_\_\_\_  
Dana Pirone Carosella, agent of PECO  
Energy Company

Sworn and subscribed before me  
this 15<sup>th</sup> day of June, 2011

  
\_\_\_\_\_  
Notary Public

My Commission Expires:



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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UNCOMMON PROPERTIES, LP	:	
	:	
Complainant	:	Docket No. F-2011-2239572
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

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PETER CRAWFORD	:	
	:	
Complainant	:	Docket No. F-2011-2239680
	:	
v.	:	
	:	
PECO ENERGY COMPANY	:	
	:	
Respondent	:	

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Motion for Consolidation upon the party listed below, in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

VIA First Class U.S. Mail

Uncommon Properties, LP  
P.O. Box 517  
Washington Crossing, PA 18977  
ATTN: Peter Crawford

Peter Crawford  
51 Canal Run West  
Washington Crossing, PA 18977

  
\_\_\_\_\_  
Dana Pirohe Carosella

DATED: June 14, 2011