

STEVENS & LEE
LAWYERS & CONSULTANTS

17 North Second Street
16th Floor
Harrisburg, PA 17101
(717) 234-1090 Fax (717) 234-1099
www.stevenslee.com

Direct Dial: (717) 255-7365
Email: mag@stevenslee.com
Direct Fax: (610) 988-0852

June 20, 2011

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

RE: Cassie Wright v. PECO Energy Company
Docket No. C-2011-2244487

Cassie Wright v. PECO Energy Company
Docket No. C-2011-2235720

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PECO is an original of its Motion to Consolidate the two matters referenced above. This document has been e-filed at the Pennsylvania Public Utility Commission's website. A copy has been served on the Complainant in accordance with the attached Certificate of Service.

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

Best Regards,

STEVENS & LEE


Michael A. Grupp

Encl.

cc: Certificate of Service

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**

CASSIE WRIGHT	:	
Complainant	:	
	:	
v.	:	Docket No. C-2011-2244487
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CASSIE WRIGHT	:	
Complainant	:	
	:	
v.	:	Docket No. C-2011-2235720
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

NOTICE TO PLEAD

To: CASSIE WRIGHT

You are hereby notified to file a written response to the attached Motion to Consolidate of PECO within twenty (20) days from the date of service of this notice. If you do not file a written response denying or correcting the enclosed Motion within twenty (20) days of service, the facts set forth by PECO may be deemed to be true, thereby requiring no other proof, and judgment may be entered against you. All pleadings, such as responses to the Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission:

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

You must also serve a copy of your response on the undersigned counsel for PECO.

STEVENS & LEE

Michael A. Gruin (I.D. No. 78625)
17 N. 2nd St., 16th Floor
Harrisburg, PA 17101
Tel. (717) 255-7365
Fax (610) 988-0852
COUNSEL FOR PECO

DATE: June 20, 2011

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CASSIE WRIGHT	:	
Complainant	:	
	:	
v.	:	Docket No. C-2011-2244487
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CASSIE WRIGHT	:	
Complainant	:	
	:	
v.	:	Docket No. C-2011-2235720
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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 *Cassie Wright v. PECO Energy Company* at Docket No. C-2011-2244487 and *Cassie Wright v. PECO Energy Company* at Docket No. C-2011-2235720 because both complaints involve the identical parties and raise common questions of law and fact.

1. On April 1, 2011, Cassie Wright (“Complainant”) filed a Formal Complaint against PECO, which was docketed at Docket No. C-2011-2235720. This Formal Complaint alleged a power quality issue, and also sought a payment arrangement. 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 Formal Complaint on May 4, 2011. PECO’s Answer and New Matter denied that there was a reliability, safety or quality problem with its equipment and service. PECO’s Answer and New Matter also indicated that the Complainant was removed from the CAP Program at her request

on August 31, 2010, but that no payment arrangement could be issued on her then-outstanding CAP arrears pursuant to 66 Pa.C.S.A. 1405 (c). The Complainant's second Formal Complaint is still pending before the Commission. Attached as **Exhibit B** is a copy of the filed Answer and New Matter.

3. On or about May 15, 2011, the Complainant filed another Formal Complaint against PECO, which was docketed at C-2011-2244487. This Complaint also alleged a power quality issue and sought a payment arrangement. Attached as **Exhibit C** is a copy of the Complaint filed at Docket No. C-2011-2244487.

4. Pursuant to 52 Pa. Code §5.62(b), PECO is filing an Answer and New Matter to the new Complaint contemporaneously herewith.

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 allege power quality issues and request a payment arrangement on the Complainant's outstanding balance. The parties, as well as the relief sought in both complaints, are identical. 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 further avers that the Complainant will not 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,



Michael A. Gruin (I.D. No. 78625)
Dana Pirone Carosella (I.D. No. 57221)
17 N. 2nd St., 16th Fl.
Harrisburg, PA 17101
Tel. (717) 255-7365
Fax (610) 988-0852
mag@stevenslee.com
dpc@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

Counsel for PECO Energy Company

Dated: June 20, 2011

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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 Cassie Wright

Street/P.O. Box 2966 Rosehill St. Apt #

City Philadelphia State PA Zip 19134

County

Daytime Telephone Number Where We Can Contact You: (215) 307-5934

E-mail Address (optional): cwgift@msn.com

Utility Account Number (from your bill) 06692-98006

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

RECEIVED
2011 APR-4 AM 10:57
P.U.C.
SECRETARY'S BUREAU

2. FULL NAME OF UTILITY COMPANY (RESPONDENT):

Peco Electric Company

3. TYPE OF UTILITY (check one)

- ELECTRIC
- GAS
- WATER
- TELEPHONE (local, long distance)
- STEAM HEAT
- WASTE WATER
- MOTOR CARRIER (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.

5. RELIEF " DURING THE WARMER MONTHS MY BILL IS

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

only \$30.00 a month.

I would like my complaint resolved by having a payment agreement, ~~that I can live with on a fixed income, I'm on a fixed income, and can only afford a \$100.00 a month for the electric bill.~~

* Peco lied and said that I was on the CAP rate program, I'm not on the CAP rate program. This is Perjury.

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 ~~Patricia~~ José

Street 1424 Chestnut Street

City Philadelphia State PA Zip 19102

Area Code/Phone Number 267-765-6486

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: Cassie Wright, 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).

Cassie Wright
(Signature)

4-1-14
(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, 2nd 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
2011 APR -4 AM 10:57
PA. P.U.C.
SECRETARY'S BUREAU

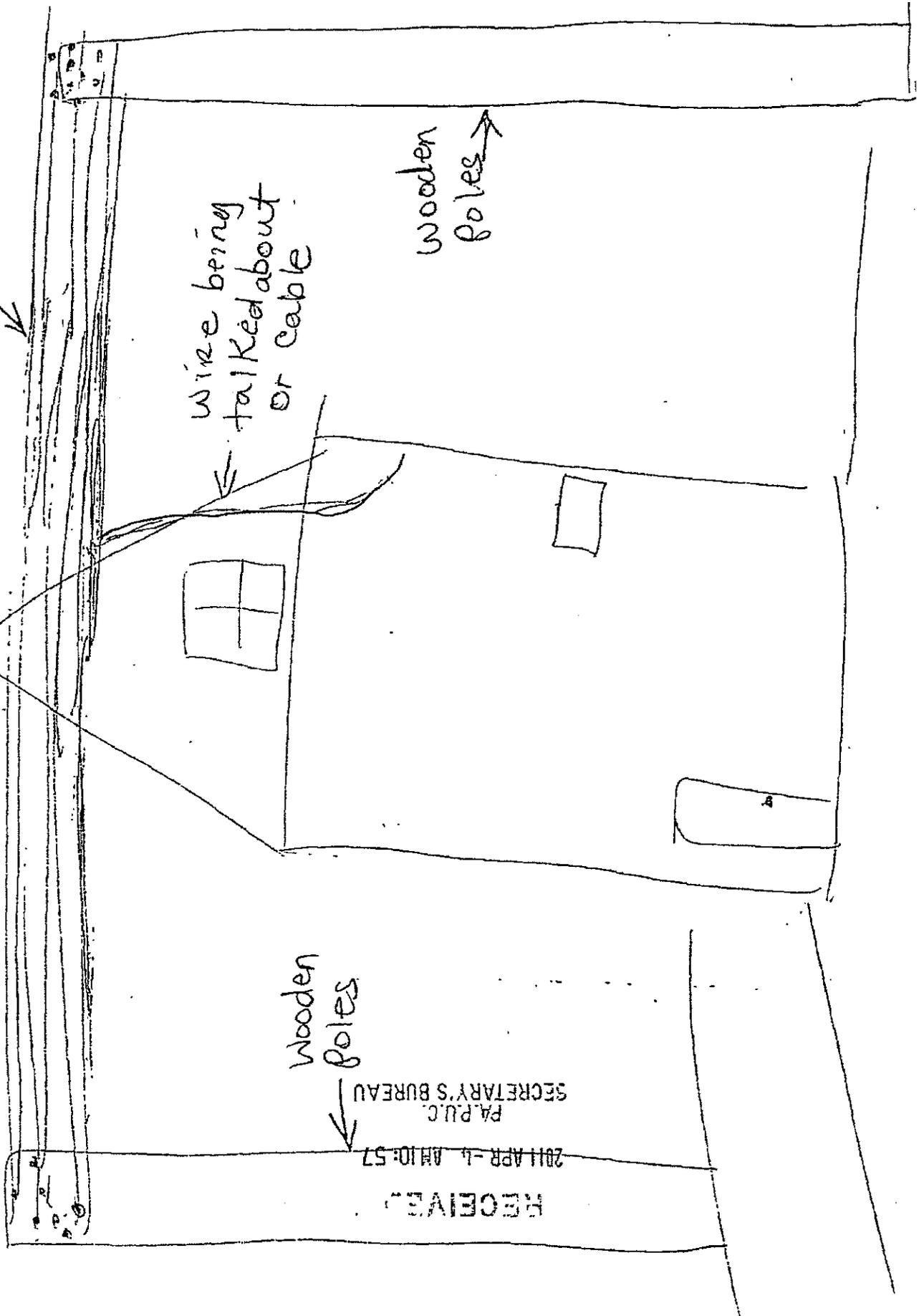
(street wires) Outside
power lines

Outside (street wires)
power line

Wire being
talked about
or cable

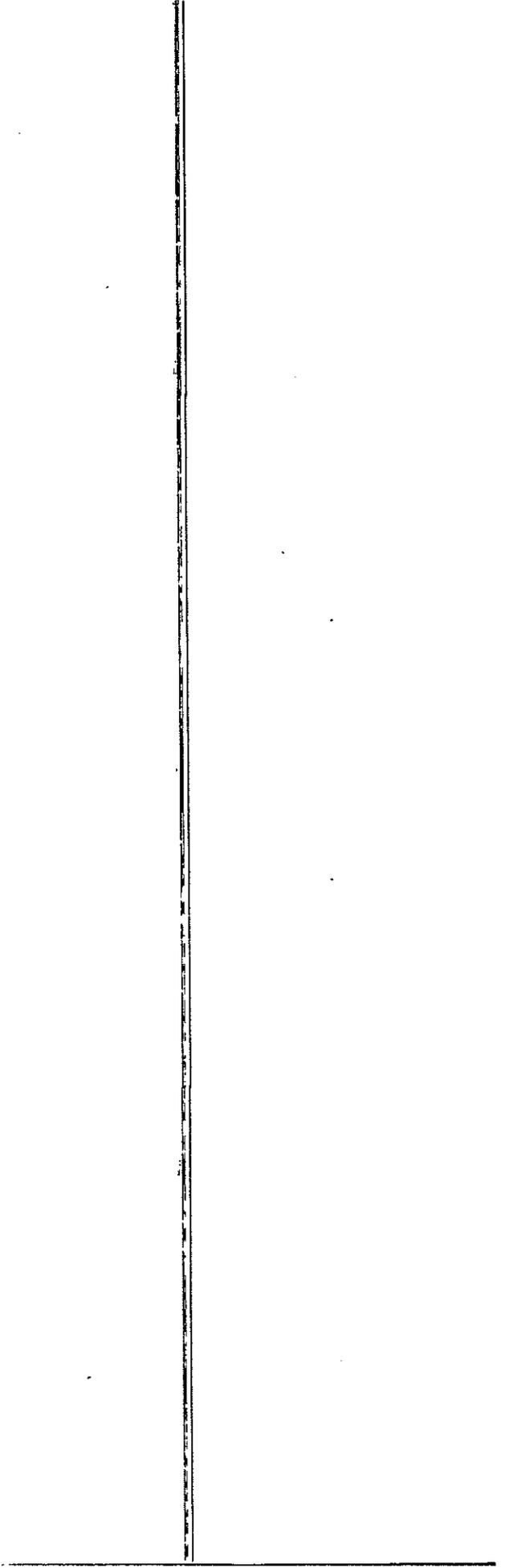
wooden
poles

wooden
poles



RECEIVED
2011 APR -6 AM 10:57
P.A.P.U.C.
SECRETARY'S BUREAU

Diagram of the "Street Wires"
Power lines Outside.



April 1, 2011

Dear Ms. Rosemary Chiavetta, Secretary,

My name is Cassie Wright, and I'm writing this letter to Appeal. On the grounds of perjury. I'm asking that the Judge Rule in my favor.

Peco Electric Company is a monstrous company, and quite frankly, I feel so small, and helpless against Peco. For the most part, all I have is my word. The truth is Peco is using fabrications.

They lied to the Judge about me being on their Cap Rate Program during the appeal. The fact, I was not, and I am not on the Cap Rate Program.

They lied about the down power lines being my responsibility. I've called an electrician, on two different occasions, and they both said, "that they can not, and will not tamper with 'Street Wires,' because they do not know where those wires go?"

April 1, 2011

I've tried Ms. Chiavetta to draw you a diagram of the down power lines ("street wires").

In addition, during the warmer months my electric bill is about \$30.00 a month. However, since July 2010, I've been paying \$100.00 a month to Peco Electric Company. Further more, my service has been at Partial Power since December 28th, 2010 of last year.

In closing, Ms. Rosemary, I just want to say that Peco has perjured itself, by lying to the Judge concerning my participation with the Cap Rate Program. "I AM NOT ON THE CAP RATE PROGRAM, WITH PECO ELECTRIC COMPANY."

Thank you, very very much for your time with this matter

Sincerely,

Cassie Wright

Classic Wright
4988 Rockhill Street
Philadelphia, PA 19134

RECEIVED
2011 APR - 4 AM 10:56
PA.P.U.C.
SECRETARY'S BUREAU



PHILADELPHIA PA 19101
ONE PAIR ZEPHIE PPA 58T

ATTN: Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Key Stone Building
400 North Street, Second Floor
Harrisburg, PA 17120

17120\$0211



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 4, 2011

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

**RE: Cassie Wright v. PECO Energy Company
PUC Docket No. C-2011-2235720**

Dear Ms. Chiavetta:

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

—	Answer (Original)
<u>X</u>	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,



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

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



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

May 4, 2011

Cassie Wright
2966 Rosehill Street
Philadelphia, PA 19134

**Re: Cassie Wright v. PECO Energy Company
PUC Docket No C-2011-2235720**

Dear Ms. Wright:

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**

CASSIE WRIGHT	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2235720
	:	
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 4, 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**

CASSIE WRIGHT	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2235720
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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

PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code § 5.61, responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. PECO Energy Company (hereafter "PECO" or "Company") denies that

Complainant is unable to pay her electric bill and proof thereof is demanded at time of hearing.

Complainant has a history of account delinquency including missed payments, late payments and defaulted payment agreements. Complainant's current account balance is \$2,631.17.

Complainant's account statement is attached as Exhibit 1.

On October 1, 2007, Complainant was enrolled in PECO's Customer Assistance Program ("CAP"), Tier D and scheduled for recertification on September 16, 2011. On August 31, 2010, Complainant was removed from PECO's CAP program at her request. Complainant's balance still includes CAP arrears in the amount of \$1,398.73. Pursuant to 66 Pa. C.S. §1405(c), Complainant is not entitled to Commission terms on CAP rate arrears.

On July 14, 2010, Complainant filed an informal complaint with the Bureau of Consumer Services ("BCS") at case 002711798. The BCS issued its decision on July 20, 2010. The BCS held that Complainant was enrolled in PECO's Customer Assistance Program ("CAP"), and the Commission cannot issue additional payment terms on CAP rates. A copy of the BCS decision is attached as Exhibit 2.

By way of further reply, PECO denies that there is a reliability, safety or quality problem with its service or equipment. PECO believes and therefore avers that the customer is experiencing partial power outages due to her own equipment or internal wiring. PECO technicians visited the property in January and February 2011 and found appropriate voltage at the meter and PECO facilities operating properly. Complainant was informed that the problem was likely caused by the service entrance cable, for which she is responsible under PECO's tariff, and referred to a private electrician. PECO denies that there is a problem with its equipment.

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.

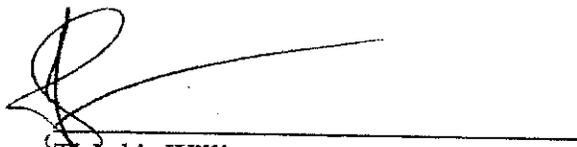
NEW MATTER OF RESPONDENT, PECO ENERGY COMPANY

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

1. Complainant was enrolled in the CAP Rate Program from October 1, 2007 until August 31, 2010.
2. . On August 31, 2010, Complainant was removed from PECO's CAP program at her request.
3. Complainant's balance includes CAP arrears in the amount of \$1,398.73.
4. PECO Energy avers Complainant is not eligible for a Commission issued agreement on CAP rate arrears. 66 Pa.C.S. § 1405(c) provides, "(c)customer 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

Page 1 of 2

Date: 05/04/11

PECO Account Activity Statement

CUAR038

*** Account Information ***

Account Number: 06692-98006
 Account Status: Active
 Requested By: CASSIE WRIGHT
 (215)307-5934 Extension:

Mail To: CASSIE WRIGHT
 2966 ROSEHILL ST
 PHILADELPHIA PA 19134

Current Bill: \$228.69
 Billed Prior: \$2402.48
 Balance Due: \$2631.17
 Service Address: 2966 ROSEHILL ST
 PHILADELPHIA PA 19134

Credit Amount: \$0.00
 Deposit Requested: \$0.00
 Deposit On-Hand: \$0.00

*** Current Account Status ***

Meter Bill Grp: 08
 Rate: Electric Residential Service

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	CUAR038X TOTAL BILL	BALANCE FORWARD	DATE	DUE DATE	KWH	CCI
05/06/09	Payment					\$100.00						
05/06/09	Payment Agreement					\$175.72						
05/12/09	ELECTRIC SERVICE	04/12/09 05/11/09	40185	013027569	\$404.67		\$2201.60	\$1793.55	06/03		3362	
05/12/09	DEFERRED PAYMENT AGREEMENT				\$3.38							
05/12/09	Regular Bill											
06/08/09	Reinstate AR from DPA- Cr				\$175.72							
06/08/09	Reinstate AR from DPA- Db				\$172.34							
06/08/09	Bill Out DPA due to Default											
06/10/09	Payment					\$100.00						
06/11/09	ELECTRIC SERVICE	05/11/09 06/10/09	40681	013027569	\$36.84							
06/11/09	Regular Bill											
07/13/09	ELECTRIC SERVICE	06/10/09 07/12/09	41256	013027569	\$42.03		\$2310.78	\$2273.94	07/06		496	
07/13/09	Regular Bill											
07/14/09	Payment					\$100.00						
08/03/09	Payment					\$100.00						
08/11/09	ELECTRIC SERVICE	07/12/09 08/10/09	41696	013027569	\$33.40							
08/11/09	Regular Bill											
09/10/09	ELECTRIC SERVICE	08/10/09 09/09/09	42171	013027569	\$35.64		\$2186.21	\$2152.81	09/02		440	
09/10/09	Regular Bill											
09/06/09	Payment					\$100.00						
09/09/09	ELECTRIC SERVICE	09/09/09 10/08/09	42563	013027569	\$30.33							
09/09/09	Regular Bill											
10/03/09	Payment					\$100.00						
10/09/09	ELECTRIC SERVICE	10/08/09 11/08/09	43815	013027569	\$126.28		\$2052.18	\$2021.85	11/03		392	
10/09/09	Regular Bill											
10/04/09	Payment					\$100.00						
2/10/09	ELECTRIC SERVICE	11/08/09 12/09/09	45756	013027569	\$217.22		\$2078.46	\$1952.18	12/01		1252	
2/10/09	Regular Bill											
2/10/09	Regular Bill											
1/05/10	LIHEAP Payment					\$235.00						
1/13/10	ELECTRIC SERVICE	12/09/09 01/12/10	48153	013027569	\$277.42		\$2195.68	\$1978.46	01/04		1941	
1/13/10	Regular Bill											
2/11/10	ELECTRIC SERVICE	01/12/10 02/10/10	49945	013027569	\$217.68		\$2238.10	\$1960.68	02/04		2397	
2/11/10	Regular Bill											
2/11/10	Regular Bill											
3/08/10	LIHEAP Payment					\$100.00						
3/12/10	ELECTRIC SERVICE	02/10/10 03/11/10	51686	013027569	\$210.10		\$2455.78	\$2238.10	03/05		1792	
3/12/10	Regular Bill											
1/06/10	LIHEAP Payment					\$100.00						
1/12/10	ELECTRIC SERVICE	03/11/10 04/11/10	52796	013027569	\$116.35		\$2565.88	\$2355.78	04/05		1741	
1/12/10	Regular Bill											
1/20/10	Payment Agreement											
1/20/10	LIHEAP Payment					\$135.16						
1/21/10	Miscellaneous					\$292.00						
1/21/10	Payment Agreement					\$20.00						
1/21/10	Transfer					\$496.68						
1/21/10	Debit Transfer Payment					\$20.00						
1/21/10	Paid In Advance					\$135.16						
1/11/10	ELECTRIC SERVICE	04/11/10 05/10/10	51689	013027569			\$2582.23	\$2465.88	05/04		1110	



psc exch
2

May 2, 2011

BCS Decision Report

BCS Case #: 002711798 Open Date: 2010-07-14
Customer Name: CASSIE WRIGHT
Service Address: 2966 ROSEHILL ST

PHILADELPHIA, PA 19134
BCS Bill Account #: 0669298006 Previous Case #: 2511534
Violation Type: NO Chapter Type:
Decision Type: W Section / Rule:
Investigator Name: JULIE CARLIN

Decision Issued Date: 2010-07-20
Case Closed Date: 2010-07-16

Letter Description:
EGW PAR W/SIMPLE DISPUTE/NO PAYMENT AGREEMENT/LEVEL 1

Total Balance: \$2515.82 Balance Date: 2010-07-14
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:
OFF; CU IS ON THE CAP PROGRAM; UNDER 1405 (C) THE PUC CAN'T ISSUE A PAR ON CAP RATES; THE PUC HAS DISMISSED 2 OTHER COMPLAINTS FOR THIS CUSTOMER RECENTLY FOR THE SAME REASON; CASE CLOSED; NO PUC PAR GIVEN. A LETTER HAS BEEN SENT TO CU WHICH EXPLAINS THAT THIS COMPLAINT HAS BEEN CLOSED. THE CO HAS BEEN ELECTRONICALLY NOTIFIED THAT THIS COMPLAINT HAS BEEN CLOSED.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CASSIE WRIGHT	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2235720
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

VERIFICATION

I, Tishkia 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 4, 2011



Tishkia Williams

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CASSIE WRIGHT	:	
Complainant	:	
v.	:	DOCKET NO. C-2011-2235720
	:	
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:

CASSIE WRIGHT
2966 Rosehill Street
Philadelphia, PA 19134

COMMUNITY LEGAL SERVICES
1424 Chestnut Street
Philadelphia, PA 19102

Dated at Philadelphia, Pennsylvania, May 4, 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



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

IN REPLY PLEASE
REFER TO OUR FILE

DATE SERVED: June 2, 2011

C-2011-2244487

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 Cassie Wright. 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.

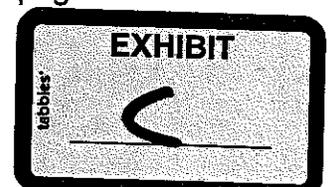
CUSTOMER OF A UTILITY

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.



June 2, 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 cursive script that reads "Rosemary Chiavetta". The signature is written in black ink and is positioned above the printed name and title.

Rosemary Chiavetta
Secretary

al

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: June 2, 2011

CASSIE WRIGHT

Complainant

v.

PECO ENERGY COMPANY

Respondent

Complaint Docket

No: C-2011-2244487

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

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 Cassie Wright

Street/P.O. Box 2966 Rosshill Street

City Philadelphia State PA Zip 19134

County

Daytime Telephone Number Where We Can Contact You: 267 816-4625

E-mail Address (optional): cwgift@msn.com

Utility Account Number (from your bill) 06692-98006

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):

Peco Electric Company

3. TYPE OF UTILITY (check one)

[X] ELECTRIC

[?] STEAM HEAT

[?] GAS

[?] WASTE WATER

[?] WATER

[?] MOTOR CARRIER

REC'D... 2011 MAY 19 AM 10:50 SECRETARY'S BUREAU



TELEPHONE

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

(local, long distance)

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.

On December 28th, 2010 the area of Phila had a major snowstorm which knock out the wires, and gave me partial power since December 28th, 2010. In addition, I called Peco about the power outage, and yes they did send a Peco worker, and he put tape on the wire and it did work for a while, until it stormed again. However, Peco refuse to correct the problem.

5. RELIEF

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

I would like the problem resolved by Peco fixing the down wires, and not just putting tape on it. I've had partial power since December the 28th, 2010.

Nevertheless, I also would like a payment agreement, because the power outage raised my electric bill.

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 Attorney José Hyman

Street 1424 Chestnut Street

City Philadelphia State PA Zip 19102

Area Code/Phone Number (215) 981-3700 ext 4962

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: Cassie Wright, 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).

Cassie Wright (Signature) 5/15/11 (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 nd 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.

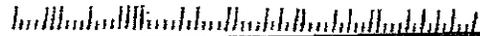
Keep a copy of your complaint for your records.

Cassie Wright
2966 Rosellil Street
Philadelphia, PA 19134



Secretary Of The Commission
2nd Floor, Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

171053265



**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CASSIE WRIGHT	:	
Complainant	:	
	:	
v.	:	Docket No. C-2011-2244487
	:	
PECO ENERGY COMPANY	:	
Respondent	:	
<hr/>		
CASSIE WRIGHT	:	
Complainant	:	
	:	
v.	:	Docket No. C-2011-2235720
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

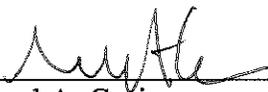
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Motion 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

Cassie Wright
2966 Rosehill Street
Philadelphia, PA 19134

Attorney Jose Hyman
Community Legal Services
1424 Chestnut St.
Philadelphia, PA 19102



Michael A. Grün

DATED: June 20, 2011