

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ATLEY NATALONE
Complainant

v.

PECO ENERGY COMPANY
Respondent

RECEIVED

JAN 24 2012

Docket no. C-2011-2279466

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RESPONSE TO NEW MATTER OF ATLEY NATALONE

Complainant, Atley Natalone, was served with an Answer and New Matter from Respondent PECO Energy Company. Complainant hereby responds as follows:

1. Denies PECO Energy Company's responses to the formal complaint and denies all allegations in paragraph 9 of the New Matter.
2. Admits Paragraph 10 of the New Matter, upon the information provided.
3. With respect to Paragraph 11 of the New Matter, admits Complainant checked a form box and handwrote, but denies that the claim must be dismissed because there is no subject of a claim. Complainant also denies the allegation that PECO has "no proposed rate increased pending" as the 75% discount that is being eliminated translates to a rate increase of 375% on the electric generation charge. Respondent, PECO Energy Company is relying on a checked box; however the claim is also fully set forth in subparagraph B. of the Complaint.
4. Denies the allegations set forth in Paragraph 12 of the New Matter.
5. Complainant is without sufficient information to admit or deny the statements in Paragraph 13 of the New Matter, except that Complainant submits that there effectively has been a rate increase.
6. Complainant is without sufficient information to admit or deny the statements in Paragraph 14 of the New Matter.

7. Complainant is without sufficient information to admit or deny the statements in Paragraph 15 of the New Matter.
8. Complainant is without sufficient information to admit or deny the statements in Paragraph 16 of the New Matter.
9. Complainant is without sufficient information to admit or deny the statements in Paragraph 17 of the New Matter.
10. Complainant is without sufficient information to admit or deny the statements in Paragraph 18 of the New Matter.
11. Denies the allegations set forth in Paragraph 19 of the New Matter.
12. Admits the allegations set forth in Paragraph 20 of the New Matter, but denies the Complainant is female.
13. Denies the allegation that there is no claim in Paragraph 21 of the New Matter, as there has effectively been a rate increase.
14. Complainant is without sufficient information to admit or deny the statements in Paragraph 22 of the New Matter.
15. Complainant is without sufficient information to admit or deny the statements in Paragraph 23 of the New Matter.
16. Complainant is without sufficient information to admit or deny the statements in Paragraph 24 of the New Matter.
17. Denies the allegation that no relief may be granted to the Complainant in Paragraph 25 of the New Matter.
18. Denies the allegations in Paragraph 26 of the New Matter.
19. Complainant is without sufficient information to admit or deny the statements in Paragraph 27 of the New Matter.
20. Complainant is without sufficient information to admit or deny the statements in Paragraph 28 of the New Matter.

21. Complainant is without sufficient information to admit or deny the statements with respect to citations of the cases and Public Utility Code in Paragraph 29 of the New Matter, but Denies that there is no showing of "recent significant change in circumstances" by Complainant.
22. Complainant is without sufficient information to admit or deny the statements in Paragraph 30 of the New Matter.
23. Denies the statements set forth in Paragraph 31 of the New Matter. The statements set forth in the Complainant's Complaint are clear and speak for themselves.
24. Complainant is without sufficient information to admit or deny the statements in Paragraph 32 of the New Matter.
25. Complainant is without sufficient information to admit or deny the statements in Paragraph 33 of the New Matter.
26. Denies the allegations set forth in Paragraph 34 of the New Matter.
27. Denies the allegations set forth in Paragraph 35 of the New Matter.

REQUEST FOR RELIEF

WHEREFORE, Complainant respectfully submits that his Complaint states a cause of action against PECO Energy Company, and that there are alternative requests for relief therein. In addition, PECO Energy Company did not address the alternative requests for relief, and as a result, its request to dismiss the Complaint must be denied.

Verification:

I, Atley Natalone, 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. Section 4904 (relating to unsworn falsification to authorities).

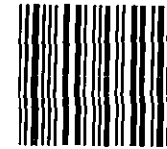
Atley Natalone
(Signature)

1/24/12
(Date)

Mr Atley L Natalone
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