

George B. Keahey, Esquire

1584 Conchester Rd.
Garnet Valley, Pa. 19060

Mailing Address:

P.O. Box 245, Drexel Hill, Pa. 19026

215-327-8440 Fax: 215 627 0360

gkeahey@aol.com

August 6, 2012

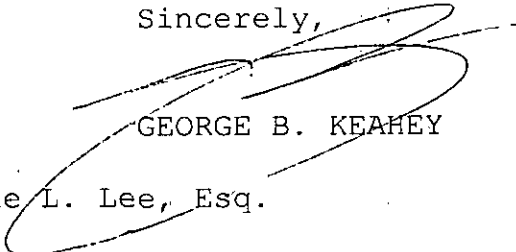
Rosemarie Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: Mellon v. Wilson C 2012 2314688

Dear Ms. Chiavetta:

Enclosed please find Complainant's Answer to PECO's new Matter which was served upon me on August 3, 2012.

Sincerely,



GEORGE B. KEAHEY

c.c.: Shawane L. Lee, Esq.

b.c.c.:

PA P.U.C.
SECRETARY'S BUREAU

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

JAMES MELLON

:

Complainant

:

No. C2012 2314688

:

vs.

:

:

PECO ENERGY COMPANY

:

:

Respondent

:

Complainant, James Mellon, by and through his counsel, George B. Keahey, hereby answers Respondent, PECO Energy Company's New Matter and aver as follows in support of the same:

1. Denied. Denied as stated. The document attached needs no interpretation and therefore "speaks for itself."

2. Denied. Denied as stated. The document attached needs no interpretation and therefore "speaks for itself."

3. Denied. Denied as a conclusion of law to which no response is required pursuant to the Pennsylvania Rules of Civil Procedure.

4. Admitted upon information and belief.

5. Admitted upon information and belief.

6. Admitted upon information and belief.

7. Denied. Denied as a conclusion of law to which no response is required pursuant to the Pennsylvania Rules of Civil Procedure. By way of further response, it is the province of the court/commission to interpret the statute not counsel.

8. Denied. Denied as a conclusion of law to which no response is required pursuant to the Pennsylvania Rules of Civil Procedure. By way of further response, pursuant to

Pennsylvania law, Complainant is only responsible for that portion of the foreign load attributable to landlord and not the portion attributable to the tenants. Afshasi v. PPL Electric Utilities Corporation, Docket No. C-20055547 (April 9, 2008).

9. Denied. Denied as a conclusion of law to which no response is required pursuant to the Pennsylvania Rules of Civil Procedure.

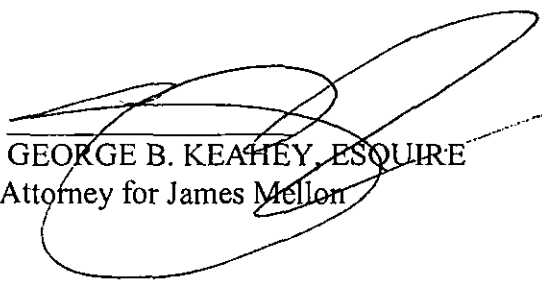
10. Denied. Denied as a conclusion of law to which no response is required pursuant to the Pennsylvania Rules of Civil Procedure. Admitted upon information and belief.

11. Denied. Denied as a conclusion of law to which no response is required pursuant to the Pennsylvania Rules of Civil Procedure.

12. Denied. Denied as a conclusion of law to which no response is required pursuant to the Pennsylvania Rules of Civil Procedure. By way of further response, see. Afshasi v. PPL Electric Utilities Corporation, Docket No. C-20055547 (April 9, 2008).

WHEREFORE, Answering Complainant, James Mellon, hereby demands judgment in her favor and against PECO Energy Company.

BY:


GEORGE B. KEAHEY, ESQUIRE
Attorney for James Mellon

DATE: August 6, 2012

CERTIFICATE OF SERVICE

I, George B. Keahey, Esquire, hereby certify that a true and correct copy of the foregoing pleading has been served on opposing counsel:

Shawane L. Lee, Esq.
PECO Energy Company
2301 Market Street, S-23
Philadelphia, Pa. 19103

by First Class United States Mail.

BY:



GEORGE B. KEAHEY, ESQUIRE

DATE: August 7, 2012

VERIFICATION

I, George B. Keahey, Esquire, verify that the averments of facts set forth in the foregoing are true to the best of my personal knowledge, information and belief. I understand that this verification is made subject to penalties of 19 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.


GEORGE B. KEAHEY, ESQUIRE

DATE: August 7, 2012

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George B. Keahey, Esquire
Venema, Proko & Keahey
210 S. 4th Street, 3rd Floor
Philadelphia, Pa. 19106

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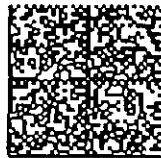
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PRESORTED
FIRST CLASS



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