

KASHKASHIAN & ASSOCIATES  
By: Arsen Kashkashian, Esquire  
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Attorney for Complainant

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GARY WOLFERT :  
Complainant :  
vs. : DOCKET NO.: C-2012-2315523  
PECO ENERGY COMPANY :  
Respondent :

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**RESPONSE TO NEW MATTER**

- 1) No answer is required since the allegation is a conclusion of law.
- 2) Denied. The only Complaint filed was with the PUC.
- 3) Admitted.
- 4) Denied. Once the decision was reported, the Complainant filed another appeal to the PUC. Complainant's income is limited to Social Security disability which income is less now than previously because \$246 a month is deducted for the Internal Revenue Service.
- 5) Admitted in part; Denied in part. It is admitted that Complainant defaulted however the default was because the payment plan was too high for the Complainant to meet. Complainant had a heart transplant operation in 2006 and he is limited to the income he receives from Social Security which is not enough to pay for electric. Complainant has to pay for prescription medications.

- 6) Denied. The Complainant's income is less than it was previously.
- 7) Admitted in part; Denied in part. The income of Complainant has now been decreased to \$1400 per month.
- 8) Admitted.
- 9) Denied. Complainant is entitled to a new payment plan because of his income decreasing and being limited.
- 10) Denied. The income of Complainant has now been decreased to \$1400 per month.
- 11) Denied. Complainant has had to pay for prescription medication and could not afford the PECO bill.
- 12) No answer is required since this is a conclusionary statement.
- 13) Denied. The fact is that a decrease in income has occurred.

KASHKASHIAN & ASSOCIATES

Date:

8/20/12

  
Arsen Kashkashian, Esquire  
Attorney for Complainant  
Gary Wolfert

VERIFICATION

I, GARY WOLFERT, verify that the statements made in the RESPONSE TO NEW MATTER are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. c.s. Section 4904 relating unsworn falsification to authorities.

DATE: 8-17-2012

BY: Gary A Wolfert

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CERTIFICATE OF SERVICE

I, Arsen Kashkashian, Esquire do hereby certify that I caused to be sent a true and correct copy of the foregoing Response to New Matter by United States Postal Service, first class mail, postage prepaid to the following at the address set forth below.

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

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

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Date: 8/20/12

  
Arsen Kashkashian, Esquire  
Attorney for Complainant  
Gary Wolfert

*Kashkashian & Associates*

*Attorneys at Law*

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Canal Works  
10 Canal Street  
Suite 204  
Bristol, PA 19007



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Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
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