

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00	:	
2. BUREAU: ALJ	:	
3. SECTION(S):	:	
5. APPROVED BY:	:	4. PUBLIC MEETING DATE:
DIRECTOR:	:	00/00/00
SUPERVISOR:	:	
6. PERSON IN CHARGE:	:	7. DATE FILED: 08/05/05
8. DOCKET NO: C-20054895	:	9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: BUNTING, ELAINE POSTELL

RESPONDENT/APPLICANT: PECO ENERGY COMPANY

COMP/APP COUNTY: PHILADELPHIA

UTILITY CODE: 110550

ALLEGATION OR SUBJECT

COMPLAINANT STATES SHE NEEDS TO BE SET UP ON A BUDGET THAT WILL STILL ALLOW HER PAY HER OTHER BILLS.

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AUG 17 2005

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print or type.

C-20054895

1. CUSTOMER NAME (COMPLAINANT)

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

Name Elaine Postell-Bunting

Street/P.O. Box 1212 W. Lycoming St Apt #         

City Phila. State PA Zip 19140

County Phila.

Area Code/HOME Phone 215-329-9910

Area Code/WORK Phone 215-842-2000 x4561

Utility Account Number 2418-31-180021  
(from your bill)

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

Name N/A

Street/P.O. Box N/A

City          State          Zip         

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PECO

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER  
(taxi, moving company, limousine)

TELEPHONE  
(local, long distance)

519828  
Rev. Jan. 2005

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AUG 17 2005

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SECRETARY'S BUREAU  
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18

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. Because the monies that I have been paying is applied to the balance due, my special agreement is behind.
- Other (explain)

B. State the facts of your complaint.

Include any specific dates, times or places that are 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.

Formerly, I had 3 accounts with PECO. Separate meters. Same address. 1212 W. Lycoming Bl. Had meters taken out. Replaced with circuit breaker box. This eliminates the 2nd & 3rd floor account. PECO combined 2nd & 3rd Floor accounts to 1st Floor account which increased that bill. I wasn't given the option

5. RELIEF

(continued on back of page)  
What do you want the Public Utility Commission to do about your complaint? Use additional paper if you need more space.

What I need PUC to do is to mediate PECO & myself where we can agree on a more suitable payment where it doesn't conflict with other financial obligations.

to pay off those accounts separately, which I believe is unfair.

PECO, then began harassing me for payments starting in May. May 10th - I paid \$500.00. May 25th, \$200.00. June 9th 200.00. Again, July, ~~27th~~<sup>2005</sup> I paid the current charges which was \$47.13 as was informed to do after filing an informal complaint with PUC. <sup>BCS# 1939806</sup> I was told to pay only the ~~current~~ charges until I heard from them again. On July 20th which was the date the letter was mailed from PUC stating the outcome of the investigation, I was told to contact PECO & discuss payment arrangements for the balance due which is 534.09. PECO wouldn't make any payment arrangements with me to avoid suspension of service on August 11, 2005. I have totally exhausted all of my funds, & can't pay this by the 11th of August. Any payment arrangement other than what they are requesting is negotiable. For instance, \$50.00 monthly plus current bill. Your attention to this matter will be greatly appreciated.

Philo Pittall-Runtin

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company AND your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

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 or DCS determinations)  
NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. 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: Elaine Postell Bunting 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).

Elaine Postell Bunting (Signature) 8/2/2005 (Date)

**9. LEGAL REPRESENTATION (IF ANY)**

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name \_\_\_\_\_  
Street \_\_\_\_\_  
City \_\_\_\_\_ State MA Zip \_\_\_\_\_  
Area Code/Phone Number \_\_\_\_\_

**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	Secretary Pennsylvania Public Utility Commission 400 North Street Harrisburg, Pennsylvania 17120
--	---

Facsimiles and/or electronic filings of the complaint form 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.**

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: AUGUST 17, 2005

ELAINE POSTELL BUNTING

Complainant

VS.

PECO ENERGY COMPANY

Respondent

Complaint Docket

No: C-20054895

DOCUMENT  
FOLDER  
DOCKETED

AUG 17 2005

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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 of service is the mailing date as indicated by the date 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 this complaint or to file answer or other responsive pleading within twenty (20) days, 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.; and, 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 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.; and, 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.; and, 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.

James J. McNulty  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

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

DATE SERVED: AUGUST 17, 2005

C-20054895

PECO ENERGY COMPANY  
C/O WARD L SMITH ASSOCIATE GENERAL COUNSEL  
P O BOX 8699  
PHILADELPHIA PA 19101-8699

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by ELAINE POSTELL BUNTING. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. 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.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, 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.

DOCUMENT  
FOLDER

AUGUST 17, 2005

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

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

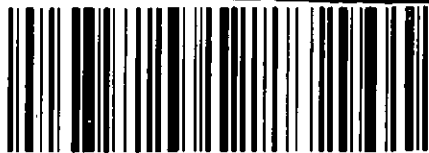
Very truly yours,

James J. McNulty  
Secretary

ddi

2. Article Number

SECTION ON DELIVERY  
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF RETURN ADDRESS



7160 3901 9843 0007 6822

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee) **Yes**

1. Article Addressed to:

*2-20054895*  
PECO ENERGY COMPANY  
C/O WARD L SMITH ASSOCIATE GENERAL  
COUNSEL  
P O BOX 8699  
PHILADELPHIA PA 19101-8699

A. Received by (Please Print Clearly)

B. Date of Delivery

*8/23/05*

C. Signature

*X Zulma Rodriguez*

Agent  
 Addressee

D. Is delivery address different from item 1?

YES, enter delivery address below.

Yes

No

**Legal Department**

Exelon Business Services Company  
2301 Market Street/ 523-1  
PO.Box 8699  
Philadelphia, PA 19101-8699

Telephone 215.841.5544  
Fax 215.568.3389  
www.exeloncorp.com

Business Services  
Company

# ORIGINAL

Direct Dial: 215.841.6841

August 30, 2005

## RECEIVED

AUG 30 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

**RE: Elaine Postell Bunting v. PECO Energy Company**  
**PUC Docket No. C-20054895**

Dear Mr. McNulty:

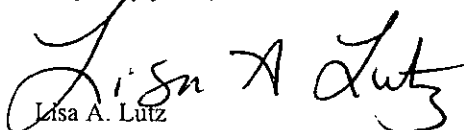
Enclosed for filing with the Commission are the following documents and copies in the matter referenced above.

<u>  X  </u>	Answer and New Matter (original and 3 copies)
<u>      </u>	Petition (original and 3 copies)
<u>      </u>	Answer and Motion (original and 3 copies)
<u>  X  </u>	Motion to Dismiss (original and 3 copies)
<u>      </u>	Reply to Motion/Petition (original and 3 copies)
<u>      </u>	Exceptions (original and 9 copies)
<u>      </u>	Reply Exceptions (original and 9 copies)
<u>      </u>	Brief (original and 9 copies)
<u>      </u>	Reply Brief (original and 9 copies)

## DOCUMENT FOLDER

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. I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties.

Very truly yours,

  
Lisa A. Lutz  
Counsel for PECO Energy Company

LAL/zr

Enc.

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

AUG 8 0 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

ELAINE POSTELL BUNTING

:  
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v.

DOCKET NO. C-20054895

PECO ENERGY COMPANY

ANSWER AND NEW MATTER 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.

DOCUMENT  
FOLDER

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SEP 1 2005

4. Admitted in part and denied in part. PECO Energy admits Complainant received a service termination notice due to the account delinquency. PECO Energy specifically denies that Complainant is unable to pay her electric bill and strict proof thereof is hereby demanded at time of hearing.

By way of further response, PECO Energy avers that Complainant's current outstanding balance is now \$264.22. The Complainant's average monthly bill is currently \$43.00 and Complainant's calculated budget payment is currently \$49.00.

- 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.

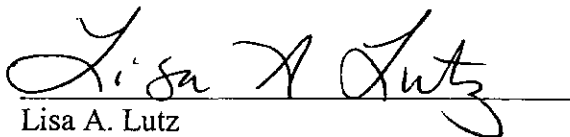
**NEW MATTER OF RESPONDENT PECO ENERGY COMPANY**

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

1. The Complainant is enrolled in the CAP Rate Program. The Complainant receives a 50% discount on the first 500 kilowatts of electric service of each month.
2. PECO Energy avers that no further payment arrangements should be granted to Complainant. Section 1405(d) of the Public Utility Code provides that absent a change in income, the Commission shall not establish or order a second or subsequent payment arrangement if a customer has defaulted on a previous agreement. 66 Pa. C.S. § 1405(c); Walton v. PECO Energy Company, Pa. PUC Docket Z-01593807, Initial Decision issued January 11, 2005.

**WHEREFORE**, PECO Energy Company respectfully requests that your Honorable Commission dismiss the instant Complaint. PECO Energy further requests that your Honorable Commission enter an Interim Order directing payment of current undisputed consumption charges, pursuant to 66 Pa. Code §1410(2), and reminding Complainant that PECO Energy Company is authorized to terminate service if Complainant fails to pay pursuant to Sections 56.174(3) and 56.81(1) of the Public Utility Code.

Respectfully Submitted,



Lisa A. Lutz  
Counsel for PECO Energy Company  
2301 Market Street, S23-1, P.O. Box 8699  
Philadelphia, PA 19101-8699  
Direct Dial: 215.841.6841; Fax: 215.568.3389  
[Lisa.Lutz@exeloncorp.com](mailto:Lisa.Lutz@exeloncorp.com)

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

AUG 30 2005

ELAINE POSTELL BUNTING

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

v.

DOCKET NO. C-20054895

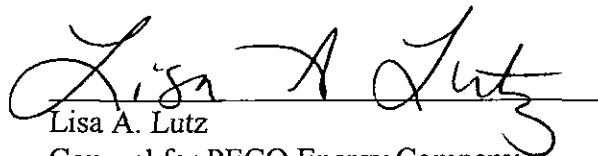
PECO ENERGY COMPANY

CERTIFICATE OF SERVICE

I, Lisa A. Lutz, 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:

ELAINE POSTELL BUNTING  
1212 W. Lycoming Street  
Philadelphia, PA 19140

Dated at Philadelphia, Pennsylvania, August 30, 2005.



Lisa A. Lutz  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
Direct Dial: 215.841.6841;  
Fax: 215.568.3389  
[Lisa.Lutz@exeloncorp.com](mailto:Lisa.Lutz@exeloncorp.com)

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ELAINE POSTELL BUNTING

v.

PECO ENERGY COMPANY

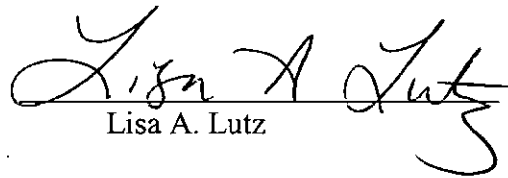
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DOCKET NO. C-20054895

VERIFICATION

I, Lisa A. Lutz, 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: August 30, 2005

  
Lisa A. Lutz

**Legal Department**

Exelon Business Services Company  
2301 Market Street/ 523-1  
P.O.Box 8699  
Philadelphia, PA 19101-8699

Telephone 215.841.5544  
Fax 215.568.3389  
www.exeloncorp.com

Business Services  
Company

ORIGINAL

Direct Dial: 215.841.6841

August 30, 2005

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AUG 30 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

**RE: Elaine Postell Bunting v. PECO Energy Company  
PUC Docket No. C-20054895**

Dear Mr. McNulty:

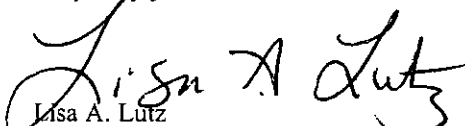
Enclosed for filing with the Commission are the following documents and copies in the matter referenced above.

- X   Answer and New Matter (original and 3 copies)
- Petition (original and 3 copies)
- Answer and Motion (original and 3 copies)
- X   Motion to Dismiss (original and 3 copies)
- Reply to Motion/Petition (original and 3 copies)
- Exceptions (original and 9 copies)
- Reply Exceptions (original and 9 copies)
- Brief (original and 9 copies)
- Reply Brief (original and 9 copies)

DOCUMENT  
FOLDER

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. I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties.

Very truly yours,

  
Lisa A. Lutz  
Counsel for PECO Energy Company

LAL/zr

Enc.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ELAINE POSTELL BUNTING :  
 :  
 v. : DOCKET NO. C-20054895  
 :  
 PECO ENERGY COMPANY :

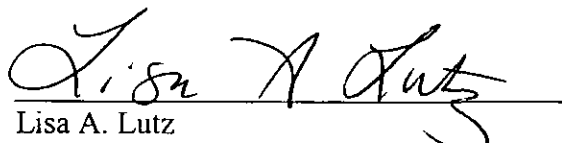
**NOTICE TO PLEAD**

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 Motion to Dismiss of PECO Energy Company, within 10 days from service of this notice, and if you do not file a written response denying or corrected the enclosed New Matter within 20 days from service of this notice, the facts set forth by PECO Energy Company in the New Matter may be deemed to be true, thereby requiring no other proof. All pleadings, such as a Reply to Motion to Dismiss and Reply to New Matter, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Lisa A. Lutz, and where applicable, the Administrative Law Judge presiding over the issue.

File with:  
James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

With a copy to:  
Lisa A. Lutz, Esq.  
PECO Energy Company  
2301 Market Street, S-23  
Philadelphia, PA 19103

Dated at Philadelphia, PA, August 30, 2005

  
\_\_\_\_\_  
Lisa A. Lutz  
Counsel for PECO Energy Company  
2301 Market Street S-23  
Philadelphia, PA 19101-8699  
215-841-6841  
[lisa.lutz@exeloncorp.com](mailto:lisa.lutz@exeloncorp.com)

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION AUG 30 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

ELAINE POSTELL BUNTING :  
:  
v. :  
:  
PECO ENERGY COMPANY :

DOCKET NO. C-20054895

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PECO ENERGY COMPANY'S MOTION TO DISMISS COMPLAINT

Respondent, PECO Energy Company ("PECO"), pursuant to 52 Pa. Code § 5.101 respectfully petitions this Honorable Commission to dismiss the instant Complaint for the following reasons:

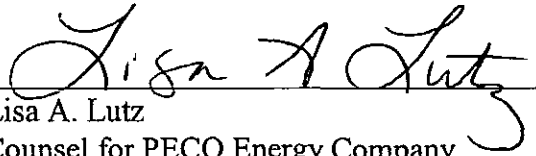
1. On or about August 2, 2005, Complainant filed a formal complaint with the Pennsylvania Public Utility Commission requesting the Commission to set or approve a payment agreement on Complainant's utility account.
2. On or about August 17, 2005, PECO Energy was served the above-mentioned formal Complaint.
3. Pursuant to 52 Pa. Code § 5.101(b), PECO is filing an Answer and New Matter to the Complaint contemporaneously with this Motion.
4. Complainant currently participates in the residential utility discount Customer Assistance Program ("CAP") and receives a monthly discount on her utility charges.
5. Complainant is requesting further payment arrangements that the Commission cannot establish. Section 1405(c) of the Public Utility Code provides that customer assistance program rates shall be timely paid and shall not be the subject of payment agreements negotiated

**DOCKETED**  
SEP 1 2005

or approved by the Commission. 66 Pa. C.S. § 1405(c); Walton v. PECO Energy Company, Pa. PUC Docket Z-01593807, Initial Decision issued January 11, 2005.

**WHEREFORE**, PECO Energy Company respectfully requests that your Honorable Commission dismiss the Complaint because further payment agreements on Complainant's outstanding utility account is not properly before this Honorable Commission.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Lisa A. Lutz", is written over a horizontal line.

Lisa A. Lutz  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
(215) 841-6841  
[lisa.lutz@exeloncorp.com](mailto:lisa.lutz@exeloncorp.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ELAINE POSTELL BUNTING

v.

PECO ENERGY COMPANY

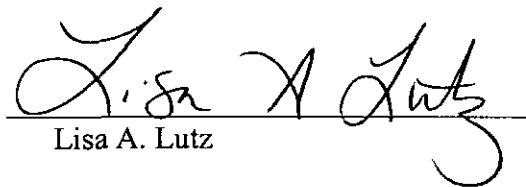
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DOCKET NO. C-20054895

**VERIFICATION**

I, Lisa A. Lutz, hereby declare that I am an attorney representing 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: August 30, 2005

  
\_\_\_\_\_  
Lisa A. Lutz

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ELAINE POSTELL BUNTING

v.

PECO ENERGY COMPANY

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DOCKET NO. C-20054895

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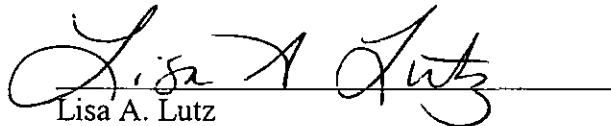
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of PECO Energy Company's Motion to Dismiss in the above matter upon all interested parties by mailing a copy thereof Certified mail, properly addressed and postage prepaid to:

ELAINE POSTELL BUNTING  
1212 W. Lycoming Street  
Philadelphia, PA 19140

Dated at Philadelphia, Pennsylvania, August 30, 2005.



Lisa A. Lutz  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
(215) 841-6841  
lisa.lutz@exeloncorp.com