

From The Desk of

**Richard J. Coppola**  
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*Richard J. Coppola*

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

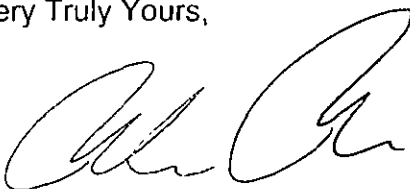
RE: Richard Coppola v. PECO Energy Company  
PUC Docket No.: F-2012-2325791

Dear Ms. Chiavetta,

Enclosed for filing with the Commission are the following documents in the matter referenced above along with their respective Certificates of Service.

1. Complainant's Request for Responses to Interrogatories, Set 2.

Very Truly Yours,



**Richard Coppola, Jr.**  
RJC/lg  
2013/01/25 09:05:44  
Via.: USPS with Delivery Confirmation  
Page 1 of 1 plus attachments  
Copy: File

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**2013 JAN 30 AM 10:19**  
**PA P.U.C.**  
**SECRETARY'S BUREAU**

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED

JAN 25 2013

Richard J. Coppola, Jr.  
P.O Box 99  
Langhorne, PA 19047

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Complainant

: No.: F-2012-2325791

v.

PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

: Administrative Law

Respondent

**COMPLAINANT'S INTERROGATORIES**  
**DIRECTED TO RESPONDENT, SET 2**

COMES NOW Complainant RICHARD COPPOLA and submits his Request for Interrogatories, Set 2 directed to Respondent PECO Energy Company pursuant to Pa. Code, Title 52, Chapter 5, ss 5.341 at Complainant's address; 25 Parkside Drive, Langhorne PA, 19047 within twenty (20) days from service of this request and that the following Interrogatories be answered fully, separately, and under oath by Respondent within twenty (20) days of the date of service of this Request.

**DEFINITIONS**

The following definitions shall apply to these Interrogatories:

The word "document" or "documents" shall include the plural and shall mean, without limitation, all written or printed matter of any kind, including the originals and all

non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, including, without limitation: specifications, drawings, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, telexes, teletypes, telefax, telecopies, minutes, agendas, contracts, reports, studies, surveys, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice and interoffice communications, offers, notations of any sort of conversations (including telephone conversations and meetings), bulletins, printed matter, computer printouts and records, invoices, work sheets, accountants' notes, work papers and all drafts, alterations, modifications, changes and amendments of any of the foregoing, graphic or oral records of representations of any kind (including, but not limited to, blueprints, diagrams, drawings, sketches, pictures, models, plans, specifications, details, photographs, charts, graphs, microfiche, microfilm, videotape, records, motion pictures) and electronic, mechanical or electric records or representations of any kind (including, but not limited to, tapes, cassettes, discs and records). "All documents" means every document as defined above, whether an original or a copy, and whether or not in your possession, custody or control, which is known to you and every document which can be located or discovered by reasonably diligent efforts. In each instance, specifically identify the document.

The word "person" means any natural or artificial person, including business entities and other legal entities.

Complainant is hereinafter referred to as Richard Coppola.

Respondent is hereinafter referred to as PECO Energy Company, aka "PECO"

The word "who" means any natural or artificial person, including business entities and other legal entities.

The word "Complaint" refers to Complainant's Complaint and any supplement or amendment thereto.

The terms "communication" or "communications", "correspondence" mean any transmission of information by one or more persons and/or between two or more persons by any means including, without limitation, telephone conversations, letters, telegrams, telexes, telecopies, computer linkups, written memoranda and face-to-face conversations. Where there is a request to identify a communication, state the type of communication (e.g., conversation, letter, telephone call, etc.), the date and time of the communication and all persons who participated in the communication or who observed, heard, read or otherwise received such communication at the time of its occurrence and the substance of the communication.

The words "state the type of" or "state all facts which support" or "state the subject matter" or "state the substance of the facts" shall mean to set forth in a clear and concise manner all facts relied upon by you, including an identification of all persons known to you or your representatives, who, as of the time the interrogatory is answered, have knowledge of the facts sought by the interrogatory.

The word "describe" shall mean to set forth fully and clearly every fact and/or event of which you have knowledge relevant to the answer called for by the interrogatory.

The words "identify" or "identification" shall mean, when referring to a natural person, to provide the following information:

- a. his or her full name;
- b. present or last address;
- c. the last date when such address was known or believed to be correct;
- d. his or her present or last known business affiliation, title and occupation;
- e. each of his or her positions, titles or job descriptions during the period of time covered by any answer referring to such person; and
- f. the person or persons he or she was representing or acting for or on behalf of during the period of time covered by any answer referring to such person.

The words "identify" or "identification" shall mean, when referring to a corporation, to provide the following information:

- a. the full legal name;
- b. the name of the jurisdiction under whose law, and/or rules it is incorporated; and
- c. the address of its principal place of business.

The words "identify" or "identification" shall mean, when referring to an entity other than a natural person or corporation (for example, association, partnership, etc), to provide the following information:

- a. the full legal name or description;
- b. the name of the jurisdiction under whose law, and/or rules it is organized; and
- c. the address of its principal place of business.

The words "identify" or "identification" shall mean, when referring to an oral communication or oral statement, to provide the following information:

- a. state the date of each oral communication or statement;
- b. state the place where each oral communication or statement occurred;
- c. identify the person making and listening to each oral communication or statement;
- d. identify all other persons present at the time each oral communication or statement was made;
- e. if the oral communication or statement was by telephone:
  1. identify each person participating in the telephone conversation; and
  2. identify the place where each person participating in the conversation was located at the time of the telephone call; and

3. summarize the substance of each oral communication or statement.

The words "identify" or "identification" shall mean, when referring to any act, to provide the following information:

- a. describe the substance of the event or events constituting each act;
- b. identify the location, date and persons involved; and
- c. identify any document arising from, reflecting, recording or relating to each act.

The words "identify" or "identification" shall mean, when used in reference to any document, to provide the following information:

- a. state the type of document (e.g., letter, memorandum, telegram, invoice, etc.);
- b. state its date;
- c. state its title (if any);
- d. describe its general subject matter and contents;
- e. identify its present location,
- f. identify its author or originator;

g. identify its present custodian; and

h. if the document is no longer in your possession, identify its last known custodian, describe the circumstances under which it passed from your control to that person and identify each person having knowledge of such circumstances and/or the present location of the document.

The words "identify" or "identification" shall mean, when used in reference to a thing other than a document, oral communication, act or person, to state the nature of the thing, its location, and to provide a description sufficient to distinguish it from other similar things.

The word "statement" shall mean:

a. a written statement signed or otherwise adopted or approved by the person making it, or:

b. a stenographic, mechanical, electrical or other recording, or a transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

The words "reasonable detail" shall mean:

a. explanation in detail to such a degree as to sufficiently convey and outline the requested information being a substantive and informative response to Plaintiff's request.



The word "pleading" or "pleadings" shall include the plural and shall mean any and all of the pleadings in this action.

### **INSTRUCTIONS**

1. In lieu of identifying any document in response to an interrogatory, you may attach to your response a true and correct copy of the document, setting forth the interrogatory or interrogatories to which the document is responsive.
2. Unless otherwise expressly stated, the period of time to which answers to these interrogatories pertain extends from 1/1/2000 to the date of serving your response to these Interrogatories.
3. Use additional sheets if necessary to fully and completely respond to the below Interrogatories.

### **INTERROGATORIES**

#### **Interrogatory No. 1:**

What individuals provided answers to Complainant's Request for Interrogatories, Set 1. Please list any and all individuals who provided any of the responses therein.

Response:

**Interrogatory No. 2:**

What individuals provided answers to Complainant's Request for Interrogatories, Set 2. Please list any and all individuals who provided any of the responses therein.

Response:

**Interrogatory No. 3:**

Within Respondent's objection to Complainant's request for continuance of the 1/23/13 "evidentiary" hearing, Respondent stated it would be calling "multiple witnesses". Please identify each and every witness you intended to call.

Response:

**Interrogatory No. 4:**

Within Respondent's objection to Complainant's request for continuance of the 1/23/13 "evidentiary" hearing, Respondent stated it would be calling "multiple witnesses". Please identify each and every witness you intend to call.

Response:

**Interrogatory No. 5:**

Within Respondent's objection to Complainant's request for continuance of the 1/23/13 "evidentiary" hearing, Respondent stated it would be providing multiple "exhibits" Please identify with specificity each and every exhibit you intended to provide and/or admit into evidence.

Response:

**Interrogatory No. 6:**

Within Respondent's objection to Complainant's request for continuance of the 1/23/13 "evidentiary" hearing, Respondent stated it would be providing multiple "exhibits" Please identify with specificity each and every exhibit you intend to provide and/or admit into evidence.

Response:

**Interrogatory No. 7:**

Within Respondent's objection to Complainant's request for continuance of the 1/23/13 "evidentiary" hearing, Respondent stated that Complainant was at the time of Respondent's objection was in "collection" and furthermore stated to be in a collection hold. Please describe with specificity the detail and basis of Complainant's collection hold.

Response:

Dated: 11/25/13



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Richard J. Coppola, Jr.  
Complainant  
(215) 497-1000  
(business - daytime phone)

(Mailing Address)  
25 Parkside Drive  
Langhorne, PA 19047

CERTIFICATION OF SERVICE

I, Richard J. Coppola, Jr., do hereby certify that a true and correct copy of

**COMPLAINANT'S INTERROGATORIES DIRECTED TO RESPONDENT, SET 2**

was served upon the Defendant by United States Postal Service and electronically in PDF file format, in accordance with the requirements of ss 1.54 on or about the below written date:

Dated: 1/25/13



---

Richard J. Coppola, Jr.  
Complainant  
(215) 497-1000  
(business - daytime phone)

(Mailing Address)  
25 Parkside Drive  
Langhorne, PA 19047

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JAN 25 2013

PA PUBLIC UTILITY COMMISSION  
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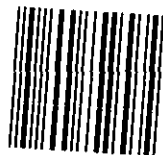
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

Respondent



Flat Rate Envelope

Apply Priority Mail Postage



1006

17105

U.S. POSTAGE  
PAID  
NEWTOWN, PA  
18940  
JAN 25, 13  
AMOUNT

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Return Address:  
P.O. Box 99  
Langhorne, PA 19047

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Rosemary Chiavetta, Secretary - PUC  
PO Box 3265  
Harrisburg PA 17105



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