

**Danielle Leatherman
718 Rexton Drive
West Chester, PA 19380**

March 13, 2013

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Secretary
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building, 2nd Floor
Harrisburg, PA 17120

RE: C-2013-2343761

Dear Mr. or Ms. Secretary:

Please accept this application as a written request to subpoena Ms. Phylcia Harcum, dispute representative with PECO Energy Company, to appear at the hearing being held on April 17, 2013 *in regard to the above-referenced case*. Ms. Harcum is a key participant in this case whereas her testimony is imperative in explaining my exorbitant electric bills and why I have chosen to file action with the Pennsylvania Utility Commission.

When I first discovered this phenomenon, Ms. Harcum was the first PECO representative I came in contact with once the case was escalated to their dispute department. I spoke to Ms. Harcum on three separate occasions. She indicated there was "definitely something wrong" during all three conversations. This declaration was made only after Ms. Harcum completed some analytics which included usage and billing of other units in my apartment building, specifically the other five units on my end of the building. She was adamant that my bills were significantly higher than *all* five of the other units. However, due to privacy rules that protected the other tenants, she would not disclose specific data.

Since I was not able to obtain any specific data, I took it upon myself to research further by interviewing two of the other tenants that were included in the aforementioned analytics. After speaking to these tenants at great length, I discovered Ms. Harcum was correct in that their bills were much lower than ours by an average of \$75 to \$100 per month over the past year and a half, at the least. I also determined both sets of tenants possess the following specific characteristics, which are significantly similar to mine:

- 2 adult occupants
- same two-bedroom apartment unit (same layout, appliances, etc.)

- same work schedule (work during day)
- similar living habits (i.e. keep heat and A/C set very low, run dishwasher about once a week, blinds always drawn, etc.)

I discussed my findings with Ms. Harcum during the third phone conversation. She compared my numbers with the aforementioned analytics, confirmed again that my bills were much higher and stated that there was “definitely something wrong.” In light of Ms. Harcum’s passionate declarations, I insisted upon an investigation immediately. Please note, I am questioning the validity of the following processes that were part, or rather not part, of said investigation:

- the same technician was dispatched for both tests even though I insisted that a senior technician perform the second test; the first technician could have overlooked something or was simply not experienced enough to identify a potential problem
- I was not able to have the landlord’s private electrician present at the time of the second test; the technician was the only “qualified” person present to understand how all of the equipment operates, which by default would not be fair to rely on her assessment of the test results without a second professional opinion
- PECO’s methods during this process do not allow for testing of wires/lines behind walls or other hard-to-reach areas

Since PECO claims neither investigation resulted in any conclusive findings, Ms. Harcum’s testimony becomes even more imperative in this case. ***In addition, I am requesting that the records utilized in Ms. Harcum’s analytics be subpoenaed as part of this case for review in conjunction with her testimony.***

Finally, please file a response or objection to this application with the Commission and Administrative Law Judge Angela T. Jones within ten (10) days of service. If you require any additional information, please contact me directly at (717) 654-5949.

Respectfully,



Danielle T. Leatherman

cc: Administrative Law Judge Angela T. Jones
Ms. Shawane Lee, Esquire, Counsel for PECO Energy Company

From: (717) 654-5949
Danielle Leatherman

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Secretary

400 North Street

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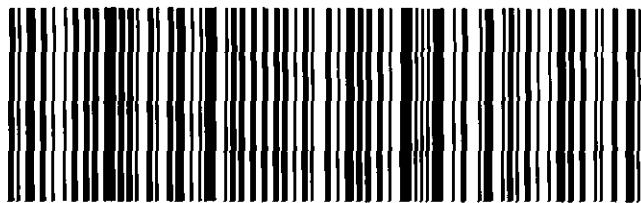
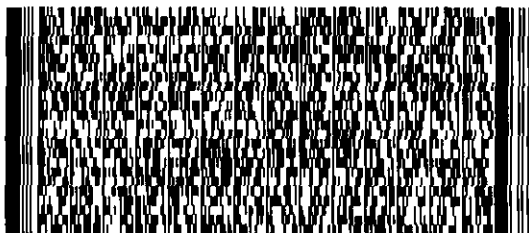
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