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May 8, 2013

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

**RE: Abraham Ituah v. PECO Energy Company
PUC Docket No.: C-2012-2338738**

Dear Ms. Chiavetta:

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

—	Answer
—	Answer & New Matter
<u>X</u>	Motion
—	Motion for Judgment on the Pleadings
—	Motion for Continuance
—	Preliminary Objection
—	Exceptions
—	Reply Exceptions
—	Main Brief
—	Reply Petition

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention on this matter.

Very truly yours,

Shawane Lee
Counsel for PECO Energy Company
SL/lo

cc: Abraham Ituah (via regular mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ABRAHAM ITUAH	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2012-2338738
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

MOTION OF PECO ENERGY COMPANY FOR A FURTHER HEARING

PECO Energy Company ("PECO Energy"), hereby requests a further hearing of the April 30, 2013 Initial Hearing and states the following:

1. An in person hearing for this matter was conducted before Administrative Law Judge Cynthia Fordham ("ALJ Fordham") on April 30, 2013 at 10:00 a.m.
2. The scope of the Complainant, Abraham Ituah's case, revolved around a public meter at his rental property located at 3765 North Bouvier Street, Philadelphia.
3. In his case in chief, Mr. Ituah testified that he did not request a public lighting meter account at his property and that he is not responsible for the charges incurred on the account.
4. During the hearing, the Complainant, Abraham Ituah, testified that the public lighting meter has never had appliances attached to it and the meter registers no usage for lighting or other electric items at the premises.
5. Mr. Ituah testified that the outdoor lighting was controlled by a first floor tenant's apartment unit and any hallway lighting is controlled by individual apartment units.
6. After the hearing, PECO Energy conducted a field investigation at 3765 North Bouvier Street.

7. PECO Energy prepared a field investigation report and took photographs of the public lighting meter and common area lighting at issue.

8. The field investigation report and photographs are critical to PECO Energy's defense of this matter and to refute the testimony of the Complainant.

9. PECO Energy respectfully requests that a further hearing be conducted to introduce the following evidence:

(a) High Bill Field Report, dated

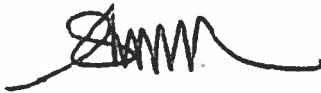
(b) Five Photographs of the public lighting at 3765 N. Bouvier Street

10. PECO Energy evidence would also like to present the testimony of the High Bill Field Foreman who conducted this investigation to testify regarding the evidence.

11. PECO Energy avers that the additional exhibits and testimony is required in order to properly defend this matter.

WHEREFORE, PECO Energy respectfully requests a further hearing of the April 30, 2013 hearing.

Respectfully Submitted,



Shawane L. Lee
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ABRAHAM ITUAH

Complainant

v.

PECO ENERGY COMPANY

Respondent

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:
:
:
:
:
:

DOCKET NO. C-2012-2338738

VERIFICATION

I, Shawane L. Lee, 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.



Shawane L. Lee

Date: May 8, 2013

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ABRAHAM ITUAH	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2012-2338738
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Shawane L. Lee, hereby certify that I have this day served a copy of PECO Energy Company's Motion in the above matter upon all interested parties by mailing and emailing a copy, properly addressed and postage prepaid to:

Abraham Ituah
P.O. Box 48024
Philadelphia, PA 19144



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Dated at Philadelphia, Pennsylvania, May 8, 2013.