

69 Burdsal Avenue
Richboro, Pa
August 24, 2013

Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RECEIVED

AUG 24 2013

RE: Gary Eckenrode v. PECO Energy Company
PUC Docket No. C-2012-2337839-Initial Decision

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Subject: EXCEPTIONS OF GARY ECKENRODE-COMPLAINANT

1. Pages 2, 6, 7 and 12 Granting PECO's Motion on Complainant's Evidentiary Information Request

It seemed entirely inappropriate for the PECO counsel in a Motion dated April 10, 2013 to the PUC Secretary to take the matter of my request for evidentiary information for my court appearance directly to the Honorable Commission, rather than let the Judge assigned to the case decide the issue initially on her own. This action by the PECO counsel served to have the effect of unduly pressuring and intimidating the Judge's decision and eventual ruling on my request for this information. This was not the proper venue or timing for the appeals process to be conducted in advance of any decision being made by the Judge and these actions by PECO's counsel seriously impeded my ability to present the preponderance of the evidence necessary to prove my case. At the court hearing the Judge seemed to give the impression that at least some of the information requested seemed to be relevant, but subsequently ruled none of it was admissible. My complaint hinged on my being provided information contained in my evidentiary request.

Furthermore, a motion issued by PECO for dismissal of my evidentiary request at the commencement of the hearing gave me inadequate time to fully examine or rebut that motion. I totally disagreed with the Judge's ruling that any and all aspects of my evidentiary request lacked relevancy. Much of that information was for records and information that only PECO could provide and in many cases information that PECO was already required to maintain (as per Complaint's Exhibit J). Other requested information went directly to PECO's response efforts to my outage and/or their potential business motivations for responding the way they did. Prior Docket information requested had to with previous responses and "lessons learned or not" by PECO during prior major storm events. Whereas, any Private correspondence between PECO and PUC defeats the "free and open" concept the "Public" expects and the PUC espouses.

Lastly, the first time I was made aware of my evidentiary opportunity was with the Hearing Notice scheduling on March 05, 2013. I contend that my evidentiary request was timely made in good faith and met both the spirit and intent of the evidentiary requirement as conveyed to me and that most if not all of the requested information in my evidentiary request was relevant and had both merit and purpose. The Court also could have allowed me to correct any minor technical deficiencies with regard to my evidentiary request, if the truth and fairness was the objective in this case, just as the Complainant had allowed late submittals (the Submission of Exhibit 24) from the Respondent for that purpose.

2. Pages 2 and 7, Ruling as to Denied Subpoena Capability

The information requested in item no. 1 above was incorrectly characterized by PECO's counsel as a subpoena. It was not a subpoena and was not identified as such. The Complainant relied on PA Code section 52 Paragraph 5.421 cited by PECO counsel that reads in part: "except that during a hearing in a proceeding, the application may be made *orally* on the record before the presiding officer, who will determine the necessity of issuing the subpoena. This was the right I was "preserving" at the hearing dependent upon the testimony and witness accounts that were offered during the hearing in order to be able to counter or rebut such testimony and witness accounts. If required. I contend the ruling as made at the commencement of the hearing prevented and eliminated that opportunity.

3. Page 8, Ruling, as to opportunity at hearing to address the issues that had been denied in the evidentiary request

The matter of my evidentiary request seemed to me to be an "as yet to be determined" (TBD) issue as part of the hearing. To my knowledge it was not an already decided issue at the hearing like the Subpoena decision had been. (See Subpoena item no. 2 above.) The Court ruling further indicated I had the opportunity to ask these same (evidentiary) questions during the hearing. I certainly did not get that impression at the hearing and much of the information I has requested was for documentation and records that PECO was not prepared or intending to provide, whether it was asked for or not.

4. Page 4, and 9, Number of Customer Outages

The focus and emphasis of the ruling was based predominantly on a "major storm" and a record 850,000 customers without power. (See Item 5 below for the disturbing increasing trend in outages) The unanswered question here that was never answered was why there were so many outages for PECO involving a storm that was nowhere near the disaster, calamity or catastrophic event that affected neighboring states of NY and NJ. So why exactly was it that so many PECO customers were adversely impacted remains an open and unanswered question, especially since fewer outages would likely mean quicker restoration of those with interrupted power if fewer outages had occurred overall.

Sadly and alarmingly, at the mediation discussion, preceding the hearing, the PECO representatives described their power loss and restoration performance as “phenomenal” with no need to apologize. At the hearing this same PECO representative proudly labeled PECO efforts with Sandy as.....would not change a thing and would do it exactly the same for the next major event. PECO also testified to the effect that *I was fortunate to only be without power for seven (7) days, while some were without power for up to thirteen (13) days.* With this type of mindset in place at PECO, it seems rather obvious that PECO is both content and satisfied that 850,000 customer can again lose power in the next event and that it can take some 13 days to restore in some cases, and yet somehow be spun as a phenomenal award worthy accomplishment not requiring or in need of any improvement whatsoever. It likewise cast serious doubt that the joint Utility/PUC “Lessons Learned” exercises from examining events like Sandy are little more a then “a going through the motions” endeavor rather than any actual effort on PECO’s part to seek or gain discernible improvements.

5. Page 6, Item 29 and Page 11, Discussion that ERT times were “driven” by PECO Operation Manager’s best estimates.

The PUC states (Complainant’s Exhibit G) “that electric outages has risen to a nine (9) year high and that the Commission also received numerous complaints from customers and state legislators on the lack of specific restoration information or in some cases, inconstant and misleading restoration information”. The unanswered questions is why are things apparently getting worse in terms of outages and their restoration duration and what did PECO do during Sandy to correct the inconsistent and misleading information issues cited in the past. What was made clear from the testimony at the hearing was that the same scenario of misleading information continued in PECO’s handling of Sandy. In fact, during the hearing the PECO witnesses testified that senior PECO management directed him to put out restoration times to mollify customers complaining about the lack of information whether such times were realistically achievable or not. Therefore, these ERTs were not based (or “driven”) on realistic (best estimates) assessments, but instead represented “made up, make believe expectations” for customer appeasement purposes only, as instructed by PECO management, but with no likely prospect or likelihood of actually being achieved.

6. Page 2 and Footnote 1, Order on Redaction Request

With the proliferation and widespread heightened awareness of identity theft, I find the need to display and disseminate my full account numbers and any other billing related data to be both inconceivable and cavalier. This is especially true when elsewhere in the hearings privacy issues seem to be feigned as a concern when restricting access to relevant information. My case involved PECO safety, reliability and service issues not my billings, accounts, usage or payments. There was absolutely no cause or reason whatsoever for PECO to provide that personal information as an Exhibit 1. In addition, when I tried to refer to this steady payment history information at the hearing I was prevented from doing so. So again, why is it even there in the first place?

Abuse orders alone are not the singular problem or concern when it comes to protecting information from misuse and therefore it should have been redacted as requested, as both protocol and commonsense should already logically dictate. Individuals should not have the limited choice of foregoing their personal information to dissemination as a deterrent to utilizing the PUC judicial process. In addition what's with all the secrecy surrounding certain "private" correspondence between PECO and the PUC, if everything is supposed to be as "free and open" as alluded to by this ruling?

7. Page 11, 12, PECO Outage Records and Durations versus Actual Outage and the Judge's Findings as to PECO's Reasonableness and Timeliness of Repairs

The Judge seemed quite fixated on my pressing a "partial" power prompt as a rationale for PECO belated response in restoring the downed wire affecting my power. Apparently, I was already "low priority" and this allegedly lowered it even more. What the Judge did not seem to cite at all however is all the more distressing. For instance, how is it that Judge can review PECO provided Exhibits 2, 3, 4, and 5 that shows PECO is without a clue as to the actual power outage (duration) status at my residence and ignore those facts completely? How can the Judge find the Respondent's actions "reasonable and timely as possible" when that Respondent's own records for the event are contradictory and wrong?

The discrepancy regarding the length of my outage as presented by PECO's own records by itself should send off alarm bells to both the Judge and the PUC regarding just how reliable and accurate the PECO "self-reporting" information actually is when it reports outage duration times that are considerably better than they actually are in reality as was in my case. Furthermore, if the Judge wanted validation concerning the existence of partial power or not she could have 1) allowed unidentified telephone transcripts of my like affected powerless neighbors to demonstrate the total lack of power or 2) allowed me to seek releases (acceptable to the Court) from such neighbors to satisfy any privacy concerns. Also, deductively if PECO has not fixed the downed wire (as abundantly reported to PECO, as being down since the evening of October 29, 2012) and that same wire was even subsequently cut by PECO to remove it from the road.....That begs the question, just how could or does "partial" power ever occur at my residence from PECO's or the Judge's perspective unless or until that downed wire was remedied, which it had notwhether bad prompt press or not.

Bottom line the power line affecting my power was downed by tree contact. It was not going to self-repair to the level of partial power or any other power level until it was repaired. Records prove conclusively this downed wire situation was promptly, duly and repeatedly reported to PECO by police, my neighbors and me. PECO has a duty to in turn promptly restore that power per the tariff. Also, as per Complainant's Exhibit I, a Joint Motion was issued by the Chairman and Vice Chairman on November 10, 2011 from the PUC which states "the Commission expects that customers experiencing service outages will be restored safely and in a reasonable amount of time." PECO and other utilities lobbied the PUC to exempt major storms and other events to enhance their reliability statistics. The intent here was not to shield or excuse PECO's performance in such events, but it seems clear this has been unintended consequence in granting such major event exceptions. This unintended windfall (freebie) tossed to PECO needs to be addressed by the PUC to prevent its continuing exploitation.

8. Pages 6, Items 30 and 31 and Page 11, The Problem is "Found" on November 5, 2012

The Judge's Finding of Fact reads as follows: "On November 5, 2012, the Respondent "found" the issue causing the Complaint's outage was a damaged wire to the transformer on his street. Once the damaged wire to the damaged transformer was "found" to be the issue, a crew was dispatched and service was restored."

Eureka. The Judge's Finding of Fact made it sound like PECO made some great find or discovery for the very first time on November 5, 2012. Namely, that this power line wire was down and in need of repair. In fact, this same downed wire had been reported to PECO (as noted above) on numerous occasions by numerous individuals, ever since October 29, 2012. In the interim, PECO had likewise belatedly assigned several watchers to this same wire, and tree/vegetation people responded to take the tree off the wire, a PECO person (lineman) had come to cut the wire off the street and several PECO assessors with clipboards had been dispatched to the scene as well. Each one of them from PECO had or should have had prior knowledge of this downed wire long and well before November 5, 2012. So why is downed wire finding of fact labeled as such a "surprise finding" on November 5, 2012? Coincidentally, I had driven to PECO's Warminster PA Facility on the morning of November 5, 2012 in person to find out why my power still had not been restored. It was after then and only then that that repair crews showed up to find ("found") and fix the damaged wire.....the question is why until then and what PECO actions or lack of actions preceded November 5, 2012. The evidence and PECO records seem to indicate that PECO did not even know the outage problem still existed on November 5, 2012 on a portion of Burdsal Avenue until my in person visit to PECO Facility that day. Also, where are the records and reports these various PECO representatives should have produced, as I asked for in my evidentiary request and hearing and that I am still awaiting? What is the reason for the PECO's secrecy regarding that information?

9. Page 3, Item 6 and Pages 10 and 11, low priority versus cancellation due to ping and no interruption status reported.

PECO's Exhibit 5, Customer Outages for Premises for the period 11/01/12 to 11/04/12 cites in the comments section "cancelled due to ping" what exactly does that statement mean and how does it relate or pertain to the "low priority" power restoration designation of my electrical service. Also, the wording listed under the cause section for this same timeframe states, "other no interruption to service". How can that be when the downed wire causing the outage was not repaired until the evening of November 5, 2012? In addition, why do the Judge and I both agree that my power was actually restored the evening of November 5, 2012, whereas this Exhibit 5 comment for that date cites "COMED Crew Reports AOK" some thirteen (13) plus hours earlier that morning at 5:59AM? How can that be?

10. Page 4, Items No. 12-16 and Page 10, Ruling that PECO tree trimming efforts were was reasonable.

According to the PUC, trees are said to be the major contributing factor in terms of both outages and restoration times. At the hearing PECO made broad base statements regarding its Tree/Vegetation control efforts, but once again, could or would not provide any proof to substantiate their claims. When I said I have not seen any routine cycled Vegetation control performed at my residence in years, PECO response was "you must have missed them". All in all PECO witnesses spoke in grandiose budget figures and backed up a offered spreadsheet with a few lies on it and planned cycles times for their Tree /Vegetation programs, the Judge goes on to references them in her ruling. But, when asked at the hearing to specifically produce evidence of what was actually accomplished on the Buckingham 353 Line or Burdsal Avenue Tree /Vegetation control wise, PECO could not produce a shred of evidence. However, just saying a program exists and was carried out does not mean it was actually performed or that it was performed well.

On July 18, 2013, well since the hearing on April 10, 2013, Tree/Vegetation control people were coincidentally on my street (Burdsal Avenue). However, they passed right by my house and that of my next door neighbor without even stopping. I went to the Tree/Vegetation people and PECO to ask why. The explanation was they don't do that type of line (secondary) versus primary. (They are supposedly coming back later only because I requested.) I did not "miss them before" as PECO testified at the hearing. More accurately they simply passed over me as they had done before. As for the Tree/Vegetation control that was done on my street this July 2013, I would like to invite the PUC to validate the 15 foot clearance the Judge cited in her ruling (Page 4, Item 15) was in fact accomplished. (Hint I don't believe it to be the case.)

PECO's lack of concern in addressing secondary lines when it comes to Tree/Vegetation control needlessly contributes to the number of outages during storm events and extends the duration of those outages for all concerned. When it comes to safety and reliability of my electric energy service, I would very much like to know how PECO's sponsorship of bobble head dolls giveaways at Phillie games and their other advertising at these games helps me or other PECO customers? (Also, please see the attached article, City Counsel Honors the Guy Who Gives Them Phillie Tickets). From my perspective, a far better place to spend those PECO sponsorships and ticket giveaway monies more wisely would seem to be Tree/Vegetation Control on secondary power lines.

11. Page 2, Ruling excluding Complaint's Exhibit M

The Judge excluded my Exhibit M from consideration at the request of PECO's counsel. The basis of that exclusion was that these Warwick Township articles were not relevant to my case. I completely disagree with that assessment for the following reasons and ask the that this Exhibit be readmitted: 1) PECO's own press release grouped Warwick Township in with my township (Northampton) as well as Buckingham and Warminster in a press release for its Tree/Vegetation control program. (See Attached) 2) Warwick Township is only 5 miles or a 10 minute drive time from my residence. 3) Warwick and Northampton townships are both within Lower Bucks County and served by PECO.

4) The distance of PECO's Buckingham 353 Line that serves my residence is much further away than Warwick. 4) The PECO Warminster facility that I visited in person to complain about my lack of power restoration on November 5, 2012 is about equally as far as Warwick. 5) By all accounts, trees and vegetation issues contributes heavily to both the number of outages and exasperate the problem by significantly adding to restoration times. 6) The Exhibit M importantly showed that the tree/vegetation control issue is not an isolated problem and that PECO was being called to task on that exact same issue (insufficient tree/vegetation control efforts) in Warwick. 7) More Extensive Outages and restoration times are prone to occur overall, when other nearby communities also experience shortcomings in PECO's tree/vegetation efforts.

12. Pages 2 and Footnotes No.3

Things are missing from my calls made to PECO aside from PECO's meaningless and misleading ERT's of "tomorrows" at 11:00PM that came and went by repeatedly. On at least two separate occasions I told PECO representatives I felt like I was living in a third country such as Afghanistan, Iran or Bangladesh when it came to restoring my electric power. Also, there was a PECO supervisor that called me around 7:30PM I believe on a Thursday to tell me a repair crew had been dispatched and was on its way to my street that night. I expressed doubt and I was rightas no one showed. The conversations are not listed. My objection was and remains that the Respondent's Exhibit 24 was not all inclusive and that Exhibits 3, 4 and 5 paints a different, inaccurate and inconsistent outage duration picture for each Exhibit.

13. Page 5, Items 21 and 22

A wire watch sent days after the wire had been down certainly did not "ensure" my public safety or that of anyone else's during that most critical period of need.

14. Page 11, Ruling that Respondent's actions were in "all respects reasonable"

I am not saying or claiming that PECO did everything wrong in their response to Sandy, but they certainly did some things incorrectly when it came to knowing the correct status of my power situation and in restoring my power and portions of Burdsal Avenue within a reasonable (shortest) period of time. To be clear, just saying PECO is phenomenal or receiving dubious awards for its restoration efforts or by expressed witness testimony of not wanting to change a thing in response to the next major event are certainly not the answers to these very serious outage and restoration problems. The Respondent's outage awareness, response and own inaccurate reported outage durations all point to actions that were not by any means "in all respects reasonable", let alone phenomenal. PECO's did not provide any evidence that its Tree/Vegetation programs demonstrated effectiveness at mitigating outages or that it followed the PUC's Report recommendations contained in Docket No. I-2011-2271989 (Complainant's Exhibit I). This Docket cites trees as "the major cause of all outages and especially long-duration outages" and goes on to say "tree trimming should be a primary concern for both the EDC's and the Commission for its effects on outages as well as its role in long-term outages". PECO also did not adhere to the PUC Report Dated February 2012 (Complainant's Exhibit G) with regard to rectifying "customer's receiving inconsistent or incorrect restoration and estimates from EDC's".

Especially when a PECO's own witnesses testified that PECO's senior management directed him to..... put something out there..... restoration wise (whether valid or not), in an effort to placate customer's complaints concerning the lack of restoration information during Sandy. PECO needs to own up to the facts and not continue to spin and pretend that their awareness and efforts at power restoration for at least one-half of Burdsal Avenue was both abysmal and botched during Sandy

Request to the Honorable Commission

A request is hereby made per these Exceptions to the Honorable Commission to revisit and appeal the findings discussion, rulings, orders and dismissal contained in the initial decision and to request that the Honorable Commission initiate its own Investigation into this Docket.

Based on all the above I am requesting the Honorable Commission address certain findings, rulings orders and the dismissal decision made by the Judge as contained in these Exceptions. Subchapter N, Electric Reliability Standards (Complainant's Exhibit J) describes reliable electrical service as essential to the health, safety and welfare of Commonwealth residents and sets standards and procedures for ensuring a safe and reliable electric system for the Commonwealth. The Subchapter N calls for "service that shall be reasonably continuous and without unreasonable interruptions or delay. It directs that EDCs shall strive to prevent interruptions of electric service and, when interruptions occur, restore service within the *shortest* reasonable time". The EDCs are required to perform a litany of record keeping activities to demonstrate its compliance with those requirements. One such section (h) titled Reporting requires that "an EDC shall, within 30 calendar days report to the Commission any problems it is having with its data gathering used to track and report reliability performance". Given the inaccuracies in PECO's documentation regarding the outage duration periods reported for Burdsal Avenue during Sandy and the actual duration of my power loss. I would like the Honorable Commission to confirm, 1) if PECO was in compliance with that reporting requirement and 2) what information, if any, PECO provided to the PUC.

Lastly, the (m) Recordkeeping requirements of Subchapter N specify that "an EDC shall maintain records of its inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs as required by subsection (n). The records shall be made available to the Commission upon request within 30 days." Examples of sufficient records are then listed. Paragraph 57.197 of Subchapter N titled, Reliability investigation and enforcement section (a) states "the Commission staff may initiate an investigation or *may do so upon complaint by an affected party* to determine whether an electric distribution company is providing service in accordance with paragraphs 57.193 and 57.194 (relating to transmission system reliability: and distribution system reliability)". Complainant hereby formally requests the Honorable Commission to initiate and conduct such investigation on behalf of this affected party.

Sincerely,

Gary Eckenrode

w/ Attachments

RECEIVED

AUG 24 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

City Council to honor the guy who gives them Phillies tickets

POSTED: FRIDAY, MAY 10, 2013, 12:32 PM

CP hasn't met **Ed McBride**, but doesn't doubt that he is an amiable guy, not to mention a savvy one. That said, it's probably not just his friendly nature that led every member of City Council to co-sponsor a resolution introduced yesterday honoring him "on the great occasion of his promotion to the position of Manager of Local Government Affairs for PECO." McBride also happens to be the guy whose name is all over PECO's generous corporate gift-giving to City Council members, in the form of Phillies tickets, Auto Show tickets, Flower Show tickets, Mann Music Center tickets, and tickets to fancy receptions at the Pennsylvania Society gathering. This, along with various lobbying efforts, appears to be what's described in the resolution as McBride's "years of dedicated service to The City Council of Philadelphia."



Here's the unofficial text.

Resolution

Honoring and congratulating Edward McBride on the occasion of his promotion to the position of Manager of Local Government Affairs at PECO and for his years of dedicated service to The City Council of Philadelphia.

WHEREAS, The Council of the City of Philadelphia is pleased and proud to join with PECO, family, and friends in honoring and congratulating Edward McBride on the great occasion of his promotion to the position of Manager of Local Government Affairs for PECO; and

WHEREAS, Edward McBride's early life was spent in West Philadelphia and at the age of 12, his family moved to the Mayfair section of the City. He is the eldest of five children. He and his wife Cathy now reside in Wayne, PA. They have been blessed with three adult children and eight grandchildren; and

WHEREAS, Edward McBride joined PECO in 1969 as a mechanic's helper and quickly advanced to the position of mechanic first class. Over the years, he held numerous positions throughout the company, including President of the company's Credit Union from 1989-1991; and

WHEREAS, In 1992, Mr. McBride joined PECO's Community Affairs department where he was responsible for managing the company's relationship with the City of Philadelphia. Mr. McBride was External Affairs Manager for Philadelphia County before his recent promotion to Manager of Local Government Affairs for the PECO service territory; and

WHEREAS, Mr. McBride currently serves on the board of Nazareth Hospital, as President and Chairman of the Variety Club of the Delaware Valley, and as Director and Chair of the Audit Committee of IGA Federal Savings Bank and First Penn Bank. He has served as Chairman of the Upper Merion Township Zoning Board, is a founding Board Member of the South Street Headhouse District, Director and Chairman of the Greater Northeast Philadelphia Chamber of Commerce, and was elected Township Supervisor and Chairman of the Board of Upper Merion Township; now therefore,

be it

RESOLVED, BY THE COUNCIL OF THE CITY OF PHILADELPHIA, That we

hereby honor and congratulate Edward McBride on the occasion of his promotion to the position of Manager of Local Government Affairs at PECO and for his years of dedicated service to The City Council of Philadelphia.

FURTHER RESOLVED, That an Engrossed copy of this resolution be presented to Mr.

Edward McBride, as evidence of the sincere sentiments of this legislative body.

Posted by Samantha Melamed @ 12:32 PM Permalink | Post a comment

PECO Invests \$4.8 Million in Preventative Tree Pruning in Bucks County

Project to improve electric service reliability for more than 59,000 customers

PECO is investing about \$4.8 million in preventative tree pruning along 764 miles of aerial electric lines in Bucks County to improve electric service reliability for more than 59,000 customers. Work began in mid-March and will continue through September. Preventative pruning around aerial power lines is vital to providing reliable electric service since vegetation causes about one-third of all electric outages.

Pruning will be performed in the Townships of Bedminster, Buckingham, Doylestown, New Britain, Newtown, Northampton, Plumstead, Solebury, Warminster, Warwick, and Wrightstown, and the Boroughs of Doylestown, Dublin, Ivyland, and New Hope.

"Our goal is to reduce the frequency of tree-related outages and keep the lights on for our customers," said Alex Brown, manager of Vegetation Management. "Preventative maintenance programs like tree pruning and other vegetation management play key roles in providing the safe and reliable electric service our customers expect."

In 2013, PECO will invest approximately \$33 million in its vegetation management program, which includes tree pruning and other vegetation removal around approximately 2,700 miles of aerial power lines on the electric distribution and transmission system across the service territory. The program also involves annual patrols of the system and pruning or clearing on a cyclical basis.

PECO's vegetation management crews are trained in proper arboricultural pruning techniques, which are defined in the American National Standards Institute (ANSI) A300 Standard. This standard takes into account the type and location of the tree in relation to the overhead wires and the health of the tree. PECO notifies property owners prior to work beginning in each community. Areas where line clearance work is completed experience fewer outages and a significant improvement in electric reliability.

Customers with questions should call 1-800-311-6345, ext. 915 for more information, or visit www.peco.com and click on the Trees and Powerlines link under the Customer Service/Service Request tab on the homepage.

###

Based in Philadelphia, PECO is an electric and natural gas utility subsidiary of Exelon Corporation (NYSE: EXC). PECO serves 1.6 million electric and 497,000 natural gas customers in southeastern Pennsylvania and employs about 2,400 people in the region. PECO delivered 76.5 billion cubic feet of natural gas and 37.5 billion kilowatt-hours of electricity in 2012. Founded in 1881, PECO is one of the Greater Philadelphia Region's most active corporate citizens, providing leadership, volunteer and financial support to numerous arts and culture, education, environmental, economic development and community programs and organizations.

If you are a member of the media and would like to receive PECO news releases via e-mail please send your e-mail address to PECO.Communication@exeloncorp.com.

Certificate of Service of Complainant Exceptions

I hereby certify that I have this day August 24, 2013 served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via US Mail to:

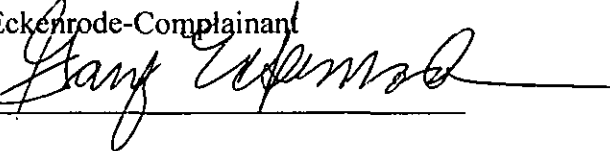
Administrative Law Judge Marta Guhl
801 Market Street
Suite 4063
Philadelphia, PA 19107

Shawane L. Lee
Counsel for PECO Energy Company
2301 Market Street S23-1
P.O. Box 8699
Philadelphia PA 19101-8699

Dated this August 24, 2013

By Gary Eckenrode-Complainant

Signature: _____

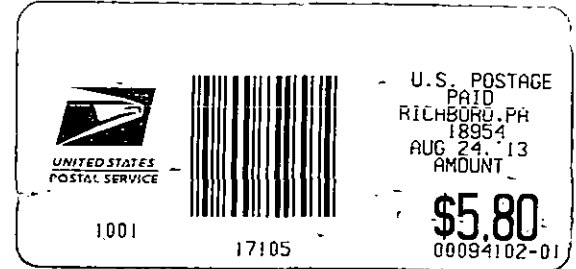


RECEIVED

AUG 24 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BARY ECKENRODE
9 Burdsal Avenue
Richboro, PA 18954



AUG 26 2013

Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

STANDARD
MAIL

