

November 1, 2013

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pa. 17120

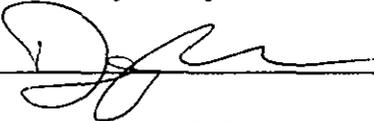
Re: Daniel Vermeychuk v. PECO ENERGY  
PUC Docket No: ~~2013-2388323~~ C-2013-2388323

Dear Ms. Chiavetta:

Please find enclosed for filing with the Commission the Complainants Preliminary Objections to the Respondant PECO ENERGY Answer.

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 in this matter.

Very Truly Yours,



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Daniel Vermeychuk

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

DANIEL VERMEYCHUK :  
Complainant :  
v. :  
PECO ENERGY COMPANY :  
Respondent :

DOCKET NO. C - 2013-2388323

PRELIMINARY OBJECTIONS  
OF COMPLAINTANT

On October 29, Complainant was served with the Answers to a Formal Complaint filed by the Complainant which was filed for the legal action taken for the replevin of meters at the 2336 Providence Ave. address. Unless specifically admitted herein the Complainant denies all material allegations of the facts and conclusions as presented by the Respondent in their Answer as incorrect and designed to present Complainant in a false light before an actual hearing and evidence is presented in this matter.

Preliminary objections may be filed by any party to any pleading and are limited in this matter to the failure of a pleading to conform to law or rule of court or the inclusion of scandalous or impertinent matter, the pendency of a prior action, and failure to exercise or exhaust a statutory remedy.

4. Complainant uses Answer number four to provide the Court with a rambling rendition of the Respondents position without regard for admissible and non admissible evidence, scandalous and impertinant matter and assumes that all billings in this matter are correct and active and sent in the normal course of business. Further assuming that all statutory requirements

of the Pennsylvania Code have been met as well as the applicable Statute of Limitations.

Such examples of these objections contained in Respondents Answer include statements such as an allegation that Complainant made no payments since 2005 when their own exhibit only shows account balances to the year 2007. Additionally, any action in 1997 is not relevant in a 2013 case action.

The 2006 action mentioned in the Answer was an action to the Pennsylvania Supreme Court that is only relevant in the fact that although payment arrangements were made that about 6 months later PECO Energy came to Complainants fully occupied multifamily building without any reason or fact and disconnected the entire building from utility service, electric and gas taking down the power line to the pole and disconnecting the gas line in the street while a building was demolished two lots away and would not return to restore service.

Not only did Respondent destroy 30 years of Complainants labor, power was disconnected to five units and five tenants without notice with all the tenants were forced into shelters, destroyed Complainants ability to function or pay Respondents agreement on time. Complainant went to Court of Common Pleas and got a Court Order for Respondents to return the utility service. For over a month Respondant ignored the Court Order as the Complainant stood in the back yard of that property awaiting over a dozen promised reconnection dates that were not kept, many time calling dispatch who said Respondents were at the property or that there was no equipment available while in fact Complainant was physically there waiting with his son.

Complaints to as many supervisors were made and the PUC ( Complainant does not have access to Complaint files) and Respondants finally showed up. The damage had already been done. Five kitchens and bathrooms were destroyed by vandals taking copper pipes, all the paper in all of the rooms was ruined due to humidity conditions, a total loss of tenants, income of over

\$ 10,000.00 a year for the last seven years and loss of the building and wiring and equipment in excess of over an additional \$ 100,000.00. Five fully functional units with an excellent rental history.

On July 12, 2013 Complainant filed an additional informal Complaint with the PUC. As per the Pennsylvania Code there wasn't any compliance with 52 Pa.C.S. 56.332, as to notice of termination, Pa.C.S. 56.339 the use of termination as a collection device, and Pa C.56.331a(4)(v) if a dispute has been filed there may be no termination and were ignored which is the failure to exercise or exhaust a statutory remedy.

Complainant asserts with the Respondants past behavior that the termination of the service and removal of the meters will be replayed again as because of the size of the Respondant no one is ever held responsible as has been admitted as such under oath. Further that after the denial of Complainants informal complaint Ms. Julia Byndas, a supervisor in the BCS on two occasions failed to advise Complainant that there was available a Formal Complaint process which she is required to do. A call to a second party at BCS questioning this behavior was corrected.

Complainant preliminarily objects to the matters set forth as to scandalous material, non relevant materials and miss use of statutory remedies in this matter.

Respectfully Submitted,



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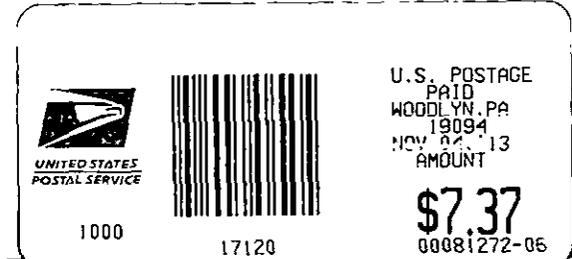
Daniel Vermeychuk  
P.O. Box 305  
Wallingford, Pa. 19086







RETURN RECEIPT  
REQUESTED



Daniel P. Vermeychuk  
P.O. Box 305  
Wallingford, Pa. 19086



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From:

*D Vermeychuk*  
*P.O. Box 305*  
*Wallingford, Pa 19086*

To:

*Ms. Rosemary Chiavetta Se*  
*PUC*  
*Commonwealth Keystone Bldg.*  
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