



Exelon Business Services Company  
Legal Department  
2301 Market Street/S23-1  
Philadelphia, PA 19103  
215 568 3389 Fax  
www.exeloncorp.com

Direct Dial: 215.841.6841

July 9, 2014

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

**RE: Anthony Cortez v. PECO Energy Company**  
**PUC Docket No.: C-2014-2410180**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion for a Further Hearing* with regard to the matter referenced above.

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,

A handwritten signature in black ink, appearing to read "Shawane Lee", with a long, sweeping underline.

Shawane Lee  
Counsel for PECO Energy Company

cc: Anthony Cortez (via hand delivery)  
Darlene Heep, Adm. Law Judge (via email and facsimile)

sl/LO

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                            |   |                                  |
|----------------------------|---|----------------------------------|
| <b>ANTHONY CORTEZ</b>      | : |                                  |
| <b>Complainant</b>         | : |                                  |
|                            | : |                                  |
| v.                         | : | <b>DOCKET NO. C-2014-2410180</b> |
|                            | : |                                  |
| <b>PECO ENERGY COMPANY</b> | : |                                  |
| <b>Respondent</b>          | : |                                  |

**MOTION OF PECO ENERGY COMPANY FOR A FURTHER HEARING**

PECO Energy Company ("PECO Energy"), hereby requests a further hearing of the July 9, 2014 Initial Hearing and states the following:

1. A further hearing for this matter is scheduled to take place before Administrative Law Judge Darlene Heep ("ALJ Heep") on July 9, 2014 at 10:00 a.m.
2. The scope of the Complainant, Anthony Cortez's case is a dispute regarding foreign wiring and an allegation of high bills at his home.
3. Mr. Cortez additionally disputes revenue protection meter tampering fees assessed to his account.
4. PECO Energy conducted a field investigation at the Complainant's property on March 30, 2012 and May 15, 2014 to investigate his foreign wiring and high bill concerns and prepared high bill field reports with the company's findings.
5. In addition, a Revenue Protection technician went to the premises to investigate reports of meter tampering and theft of service on July 8, 2013 and September 24, 2013.
6. The high field investigation reports and the testimony of the High Bill Field foreman and Revenue Protection technician are critical to PECO's defense of this matter.

7. As a result of the thunder and lightning storms last night, both the High Bill Field Foreman and Revenue Protection Technician have been assigned as Level 5 – Operations (All Hands Required) and they are; therefore, unavailable for the hearing this morning.

8. The High Bill Field Foreman and Revenue Protection Technician have been assigned as critical staff to restore power to over 275,000 customers who lost power last night.

9. At the hearing today, PECO will present the testimony of Regulatory Assessor, Michael Begley who will testify to the Complainant's account statements, customer contacts and Data Raker data verifying meter tampering.

10. However, PECO has no alternative witnesses to testify to the high bill field reports or the tampering at the premises.

11. As a result, PECO Energy respectfully requests that a further hearing be conducted to introduce the following evidence:

(a) High Bill Field Reports, dated March 30, 2012 and May 15, 2014.

(b) Photographs taken by the High Bill Field Foreman at the Complainant's premises on May 15, 2014.

(c) Revenue Protection Customer Contacts dated July 8, 2013 and September 24, 2013.

12. PECO Energy would also like to present the testimony of the High Bill Field Foreman and Revenue Protection Technician who conducted the investigations to testify to and authenticate the above documentary evidence.

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

WHEREFORE, PECO Energy respectfully requests a further hearing of the July 9, 2014 hearing.

Respectfully Submitted,



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Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
Direct Dial: 215.841.6841  
Fax: 215.568.3389  
Shawane.Lee@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                            |   |                                  |
|----------------------------|---|----------------------------------|
| <b>ANTHONY CORTEZ</b>      | : |                                  |
| <b>Complainant</b>         | : |                                  |
|                            | : |                                  |
| v.                         | : | <b>DOCKET NO. C-2014-2410180</b> |
|                            | : |                                  |
| <b>PECO ENERGY COMPANY</b> | : |                                  |
| <b>Respondent</b>          | : |                                  |

**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.



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Shawane L. Lee

Date: July 9, 2014

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                            |   |                                  |
|----------------------------|---|----------------------------------|
| <b>ANTHONY CORTEZ</b>      | : |                                  |
| <b>Complainant</b>         | : |                                  |
|                            | : |                                  |
| v.                         | : | <b>DOCKET NO. C-2014-2410180</b> |
|                            | : |                                  |
| <b>PECO ENERGY COMPANY</b> | : |                                  |
| <b>Respondent</b>          | : |                                  |

**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:

Anthony Cortez  
4921 Longshore Avenue, Apartment A  
Philadelphia, PA 19135  
(Via Hand Delivery)



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Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
Direct Dial: 215.841.6841  
Fax: 215.568.3389  
[Shawane.Lee@exeloncorp.com](mailto:Shawane.Lee@exeloncorp.com)

Dated at Philadelphia, Pennsylvania, July 9, 2014.