



Exelon Business Services Company  
Legal Department

2301 Market Street/S23-1  
Philadelphia, PA 19103

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September 19, 2014

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

**RE: Maxima Rodriguez v. PECO Energy Company**  
**PUC Docket No.: C-2014-2440677**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Preliminary Objections* 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 stylized flourish at the end.

Shawane Lee  
Counsel for PECO Energy Company

Scheduling Recommendation: **NOT CALL OF THE DOCKET**

sl/LO

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**MAXIMA RODRIGUEZ**  
**Complainants**  
v.

:  
:  
:  
:  
:  
:

**DOCKET NO. C-2014-2440677**

**PECO ENERGY COMPANY**  
**Respondent**

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**NOTICE TO PLEAD**

Pursuant to 52 Pa. Code §§ 5.101 and 5.62(c), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Preliminary Objection within 10 days from service of this notice, a ruling may be entered against you. Your response must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Shawane L. Lee, and where applicable, the Administrative Law Judge presiding over the issue.

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

With a copy to:  
Shawane L. Lee  
PECO Energy Company  
2301 Market Street, S-23  
Philadelphia, PA 19103

Dated at Philadelphia, PA, September 19, 2014



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Shawane L. Lee  
PECO Energy Company  
2301 Market Street, S-23  
Philadelphia, PA 19103  
(215) 841-6481  
[Shawane.Lee@exeloncorp.com](mailto:Shawane.Lee@exeloncorp.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MAXIMA RODRIGUEZ</b>	:	
<b>Complainants</b>	:	
v.	:	<b>DOCKET NO. C-2014-2440677</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**PRELIMINARY OBJECTION OF RESPONDENT,  
PECO ENERGY COMPANY**

Respondent, PECO Energy Company (“PECO Energy”), pursuant to 52 Pa. Code § 5.101(a)(4) respectfully petitions this Honorable Commission to dismiss the instant Complaint as legally insufficient.

1. On August 22, 2014, PECO Energy was served with a formal complaint filed by Maxima Rodriguez (hereafter “Complainant”). A copy of the Complaint is attached hereto as Exhibit “1”.

2. In her Complaint, Complainant states that the building where she operated her restaurant had foreign wiring.

3. The Complainant states that the property owner, Jessie Munoz, had a check cashing place next door to her business and her meter supplied electric service to the business.

4. The Complainant states that PECO Energy investigated her foreign wiring concerns and found that “most of the building’s wiring and load was running through [her] meter.”

5. The Complainant requests that the property owner, Jessie Munoz, pay part or all of the outstanding balance on the account.

6. PECO Energy simultaneously filed an Answer and the instant Preliminary Objection.

7. Pursuant to 52 Pa. Code § 5.101, preliminary objections may be filed against a complaint and dismissed for legal insufficiency. 52 Pa. Code § 5.101(a)(4).

8. Commission procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil procedure.<sup>1</sup>

9. In deciding preliminary objections, the Public Utility Commission must determine, based on the factual pleadings of the petitioner, if relief or recovery is possible.<sup>2</sup>

10. A complaint must be able to recover under the law to survive a preliminary objection.<sup>3</sup>

11. All of the non-moving party's averments must be taken as true for the sake of deciding the preliminary objection.<sup>4</sup>

12. The court does not, however, need to accept, "unwarranted inferences from facts, argumentative allegations, or expressions of opinions."<sup>5</sup>

13. Section 703 of the Public Utility Code, 66 Pa. C.S.A. § 703(b) provides that the Commission may dismiss any complaint without a hearing of, in its opinion, a hearing is not necessary to the public interest.

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<sup>1</sup> *Equitable Small Transportation Interveners v. Equitable Gas Co.*, 1994 Pa.PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994)

<sup>2</sup> 2006 Pa. PUC Lexis 111, \*7.

<sup>3</sup> *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. Ct. 1998) ("preliminary objection should be sustained only where it appears with certainty that, upon the facts averred, the law will not allow the plaintiff to recover").

<sup>4</sup> *Id.* at 7-8.

<sup>5</sup> *Feingold v. McNulty*, 2009 Phila. Ct. Com. Pl LEXIS 167, \*3.

14. A hearing is required only when there is a disputed question of fact, and is not required to resolve questions of law. Dee-Dee Cab, Inc. v. Pa.Pub. Util. Comm'n, 817 A.2<sup>nd</sup> 593 (Pa.Commw. Ct. 2003), petition for allowance of appeal denied, 836 A.2d 123 (Pa. 2003).

15. Here, there are no genuine issues of fact and PECO Energy is entitled to judgment as a matter of law with respect to all of the allegations in the Complaint.

16. PECO Energy was not required to transfer the Complainant's commercial account and balance to the property owner pursuant to 66 Pa. C.S. §§ 1529.1(a).

17. 66 Pa.C.S. § 1529.1 states:

**§ 1529.1. Duty of owners of rental property**

**(a) Notice to public utility.** - It is the duty of every owner of a residential building or mobile home park which contains one or more dwelling units, not individually metered, to notify each public utility from whom utility service is received of their ownership and the fact that the premises served are used for rental purposes.

**(b) History of account.** - Upon receipt of the notice provided in this section, if the mobile home park or residential building contains one or more dwelling units not individually metered, an affected public utility shall forthwith list the account for the premises in question in the name of the owner, and the owner shall thereafter be responsible for the payment for the utility services rendered thereunto. In the case of individually metered dwelling units, unless notified to the contrary by the tenant or an authorized representative, an affected public utility shall list the account for the premises in question in the name of the owner, and the owner shall be responsible for the payment for utility services to the premises.

**(c) Failure to give notice.** - Any owner of a residential building or mobile home park failing to notify affected public utilities as required by this section shall nonetheless be responsible for payment of the utility services as if the required notice had been given.

18. The Commission's regulations at 52 Pa Code § 1521 read as follows in the Definitions section:

“LANDLORD RATEPAYER.” One or more individuals or an organization listed on a gas, electric, steam, sewage or water utility's

records as the party responsible for payment of the gas, electric, steam, sewage or water service provided to one or more residential units of a residential building or mobile home park of which building or mobile home park the party is not the sole occupant. In the event the landlord ratepayer is not the party to a lease between the landlord ratepayer and the tenant, the term also includes the individual or organization to whom the tenant makes rental payments pursuant to a rental arrangement.

“RESIDENTIAL BUILDING.” A building containing one or more dwelling units occupied by one or more tenants. The term does not include nursing homes, hotels and motels or any dwelling of which the landlord ratepayer is the only resident.

“TENANT.” Any person or group of persons who are contractually obligated to make rental payments to the landlord ratepayer pursuant to a rental arrangement, including, but not limited to, an oral or written lease with the landlord ratepayer for a dwelling unit in a residential building or mobile home park which is provided gas, electric, steam, sewer or water as an included service under the rental agreement and who are not the ratepayers of the utility which supplied the gas, electric, steam, sewer or water service.

19. The statute at 66 Pa. C.S. § 1521 defines a residential building as a building containing one or more dwelling units occupied by one or more tenants. Therefore, the statute applies only to residential buildings.

20. In this case, the Complainant alleges in her formal complaint that she operated a restaurant at the premises and a check cashing business was connected to her meter.

21. The service and property at issue concerns commercial units and commercial service – not residential. The property in this proceeding is not a residential property governed by 66 Pa. C.S. § 1529.1. Shank v. PPL Electric Utilities Corporation, Docket No. C-2009-2087300 (Order entered August 1, 2009).

22. Furthermore, the statute at 66 Pa. C.S. § 1529.1 applies to tenants. In that section, a tenant is defined as a person who makes rental payments for a dwelling unit in a residential building.

23. The Complainant's formal complaint does not allege that she was renting a residential dwelling unit at the time the foreign wiring was discovered.

24. Therefore, 66 Pa.C.S. § 1529.1 did not apply to the Complainant's service address at the time foreign load was found.

25. Pursuant to 66 Pa.C.S. § 1529.1, PECO Energy had no duty to transfer the Complainant's utility account, including arrearages, to the property owner's name because she was not a residential tenant residing in a residential dwelling with an account for residential service.

26. PECO Energy's actions are consistent with Pennsylvania law.

27. The PUC is not the forum for the Complainant to raise what is essentially a dispute between a commercial property owner and commercial tenant, regarding the foreign wiring balance that should be attributable.

28. As stated in Edmund v. Corazzini, *supra* that is a matter to be resolved in the Court of Common Pleas as it is outside the Commission's jurisdiction.

29. Because the formal complaint alleging foreign wiring relates to a commercial property and commercial service by a commercial tenant, it does not fall within the purview of 66 Pa.C.S. § 1529.1. Accordingly, this complaint should be dismissed as a matter of law.

30. Accordingly, PECO Energy requests that the Commission dismiss the Complaint for legal insufficiency.

**REQUEST FOR RELIEF**

WHEREFORE, for the reasons set forth above, PECO Energy Company respectfully requests that your Honorable Commission summarily dismiss the Complainants' Complaint.

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  
(215) 841-6841  
Fax: 215.568.3389  
Shawane.Lee@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MAXIMA RODRIGUEZ</b>	:	
<b>Complainants</b>	:	
<b>v.</b>	:	<b>DOCKET NO. C-2014-2440677</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**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.

Date: September 19, 2014



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Shawane L. Lee

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MAXIMA RODRIGUEZ</b>	:	
<b>Complainants</b>	:	
<b>v.</b>	:	<b>DOCKET NO. C-2014-2440677</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**CERTIFICATE OF SERVICE**

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

Maxima Rodriguez  
173 West Lehigh Avenue  
Philadelphia, PA 19133

David H. Denenberg, Esquire  
1315 Walnut Street, 12<sup>th</sup> Floor  
Philadelphia, PA 19107

Dated at Philadelphia, Pennsylvania, September 19, 2014



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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  
(215) 841-6841  
Fax: 215.568.3389  
Shawane.Lee@exeloncorp.com

# **EXHIBIT “1”**

**O'Neill, Leslie:(BSC)**

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**From:** eServe@pa.gov  
**Sent:** Wednesday, September 03, 2014 10:01 AM  
**To:** Lee, Shawane L.:(BSC)  
**Cc:** O'Neill, Leslie:(BSC)  
**Subject:** PA PUC eServe Notice

**Importance:** High

Dear Shawane L Lee,

A(n) **Formal Complaint** has been served in this proceeding. This document is docketed as **C-2014-2440677**.

You may view this document at

**Formal Complaint**

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

RECEIVED

Filing this form begins a legal proceeding and you will be a party to the case. If you do not wish to be a party to the case, consider filing an informal complaint.

AUG 22 2014

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

To complete this form, please type or print legibly in ink.

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number:

Name Maxima Rodriguez

Street/P.O. Box 173 W Lchigh ave. Apt # 3rd Floor

City Philadelphia State PA Zip 19133

County

Telephone Number(s) Where We Can Contact You During the Day:

(718) 249-7012 (home) (718) 249-7012 (mobile)

E-mail Address (optional): hcollado1987@hotmail.com

Utility Account Number (from your bill) 31487-15078

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name Maxima Rodriguez El Buen Sazon Restaurant

Street/P.O. Box 2301 N. Front st

City Philadelphia State PA Zip 19133

2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

PECO Energy Company

3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- ELECTRIC                       WASTEWATER/SEWER  
 GAS                                       TELEPHONE/TELECOMMUNICATIONS (local, long distance)  
 WATER                                   MOTOR CARRIER (e.g. taxi, moving company, limousine)  
 STEAM HEAT

4. Reason for Complaint

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. Your complaint may be dismissed without a hearing if you do not provide specific information.

- The utility is threatening to shut off my service or has already shut off my service.
- I would like a payment agreement.
- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.
- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.

Other (explain).

The owner of this building where I had my restaurant had foreign wiring. I had to light bills which I was responsible for and it turned out that account 80969-95012 belong to the owner Mr. Jessie Muñoz. This account supplied light to his cashier next door to my business →

and account 31487-15078, as stated  
by PECO representative Mr. Robert Alicia  
"Most of the building's wiring and load"  
is <sup>was</sup> running through my meter that  
matches account number above.

Also, please find attached document  
given to me by Mr. Robert Alicea.

RECEIVED

AUG 22 2014

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

I want Mr. Jessie Muñoz to pay part if not the whole outstanding balance on this account because not only was I paying for his lighting in his cashier (Acct # 80969-95012 PECO) but now I was also supplying light to the rest of the building, which is really big, through my other account 31487-15078. On top of all of this he also went and made an illegal connection to my gas meter!!! PECO stated they cannot go after Mr. Jessie Muñoz, however they are able to supply all the pictures and illegal connections they found. My lawyer stated that it would be better to do a formal complaint

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

6. Protection From Abuse (PFA)

Has a court granted a "Protection From Abuse" order that is currently in effect for your personal safety or welfare? The PUC needs this information to properly process your complaint so that your identity is not made public.

Note: You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection From Abuse" order for your personal safety or welfare?

YES

NO

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

7. Prior Utility Contact

a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?

YES

NO

Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?

YES

NO

Note: You must contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.

c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why.

PECO stated that they cannot go after Mr. Jessie Muñoz for the foreign wiring because it's a commercial property & the law only covers Residential. However they will supply all information and pictures taken at the premises to help ~~etc~~ <sup>etc</sup> this resolved if my attorney called.

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.

## 8. Legal Representation

If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.

However, if you are interested in receiving legal representation, you may contact the Widener Harrisburg Civil Law Clinic located at 3605 Vartan Way, Harrisburg, PA 17110, by phone at 717-541-0320 or via email at [lawclinicb@mail.widener.edu](mailto:lawclinicb@mail.widener.edu).

For additional information see Widener Harrisburg's Civil Law Clinic's website <http://law.widener.edu/Academics/ClinicalProgramsandProfessionalTraining/Clinics/HarrisburgCivilLawClinic.aspx>. Based on your income, legal representation may be available to you at no cost or a reduced fee.

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, if known. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name David H. Denenberg  
Street/P.O. Box 1315 Walnut<sup>st</sup> 12<sup>th</sup> Floor  
City Philadelphia State PA Zip 19107  
Area Code/Phone Number 215-546-1345 ext. 105  
E-mail Address (if known) dddenenberg@adlawfirm.com

Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

RECEIVED

AUG 22 2014

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

9. Verification and Signature

You must sign your complaint. Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. If you **do not sign** the Formal Complaint, the PUC **will not accept** it.

**Verification:**

I Maxima Rodriguez, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Maxima R 8/21/14  
(Signature of Complainant) (Date)

\_\_\_\_\_  
Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept** it.

AUG 22 2014

10. Two Ways to File Your Formal Complaint

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Electronically.** You must create an account on the PUC's eFiling system, which may be accessed at [www.puc.pa.gov/efiling/default.aspx](http://www.puc.pa.gov/efiling/default.aspx).

Note: If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

**Mail.** Mail the completed form with your original signature and any attachments, by certified mail, first class mail, or overnight delivery to this address:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

Note: Formal Complaints sent by fax or e-mail will **not** be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.

PECO Energy Company

1-800-494-4000

**IMPORTANT NOTICE - REPAIRS OR ACCESS NEEDED**  
**Aviso Importante - Necesidad de Acceso o Reparaciones**

DATE Oct. 10, 2013

NAME <i>Maxima Rodriguez</i>	
ADDRESS <i>2301 N. Front St</i>	
TELEPHONE NUMBER	ACCOUNT NUMBER <i>31487-15078</i>

We could not install metering equipment at your property because of the reason we checked below:

- There are defects that must be repaired. You may need an electrician to make the repairs. You must have the repairs made within 30 days. If you do not have the repairs made within 30 days, we will shut off your service after we send you the required notices. Below is a list of the defects that need to be repaired.
- We need to get into your property. Please call us at 1-800-494-4000 or visit our PECO Energy Business Office to arrange for us to get into your property. Our office address is listed on the back of this notice. If you do not let us in within 30 days to install the metering equipment, we will shut off your service. We would first send you the required notices.

To talk about your service, please call us at 1-800-494-4000, or visit our PECO Energy Business Office listed on the back of this notice.

Customer's Or Responsible Adult's Signature <i>PECO Rep Roberto Alvar</i>	Telephone Number
--	------------------

Report by Inspector

*Most of building's wiring and load, is on this customer's meter. Additional load not belonging to this service, should be removed. See other side for more information.*

**ATENCION**  
Este es un mensaje muy importante. Si usted no lo entiende, favor de llamar al número de teléfono que aparece en este documento.

Maxima Rodriguez  
173 W. Lehigh Ave 3rd Fl  
Phila PA 19133

PLACE STICKER AT TOP OF ENVELOPE  
OF THE RETURN ADDRESS. FOLD A  
**CERTIFIED MAIL**

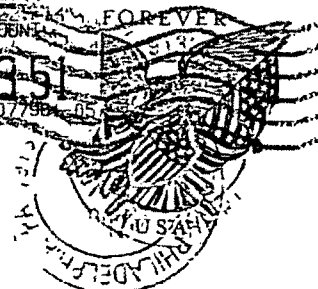


1000  
22 AUG 2014 4450

U.S. POSTAGE  
PAID  
PHILADELPHIA, PA

FOREVER  
AMOUNT

\$2.51  
000799-05



7014 0510 0001 4450 5519

**RECEIVED**

AUG 22 2014

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

17120007999

