



Exelon Business Services Company  
Legal Department

2301 Market Street/S23-1  
Philadelphia, PA 19103

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Direct Dial: 215.841.6841

October 24, 2014

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

**RE: Robert W. Coyne, Sr. v. PECO Energy Company**  
**PUC Docket No.: C-2014-2448576**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Preliminary Objections to Formal Complaint* 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: Certificate of Service

s/LO

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                             |   |                                  |
|-----------------------------|---|----------------------------------|
| <b>ROBERT W. COYNE, SR.</b> | : |                                  |
| <b>Complainant</b>          | : |                                  |
| <b>v.</b>                   | : | <b>DOCKET NO. C-2014-2448576</b> |
|                             | : |                                  |
| <b>PECO ENERGY COMPANY</b>  | : |                                  |
| <b>Respondent</b>           | : |                                  |

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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, October 24, 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>ROBERT W. COYNE, SR.</b> | : |                                  |
| <b>Complainant</b>          | : |                                  |
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|                             | : |                                  |
| <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 October 20, 2014, PECO Energy was served with a formal complaint filed by Robert W. Coyne, Sr. (hereafter “Complainant”). In the Complainant’s formal complaint, he states the reason for his complaint that PECO Energy promised him a discount for the winter months but the company reneged on the agreement and started charging him full price. See the Complainant’s formal complaint, attached hereto as Exhibit “1”.

2. In addition, the Complainant filed an informal complaint with the Bureau of Consumer Services (“BCS”) at case number 003225216, alleging that when he had his home built over 40 years ago he was offered a discount from PECO Energy for making his home totally electric. The Complainant stated that he did not know when or why the company discontinued the offer. See Case Details Report #003225216, attached hereto as Exhibit ”2”.

3. In his formal and informal complaint, the Complainant disputes the elimination of PECO’s discounted OP rate.

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

5. Commission procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil procedure.<sup>2</sup>

6. 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>3</sup>

7. A complaint must be able to recover under the law to survive a preliminary objection.<sup>4</sup>

8. All of the non-moving party's averments must be taken as true for the sake of deciding the preliminary objection.<sup>5</sup>

9. The court does not, however, need to accept, "unwarranted inferences from facts, argumentative allegations, or expressions of opinions."<sup>6</sup>

10. 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 if, in its opinion, a hearing is not necessary in the public interest.

11. 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.Comm. Ct. 2003), petition for allowance of appeal denied, 836 A.2d 123 (Pa. 2003).

12. Here, there are no genuine issues of fact and PECO Energy is entitled to judgment as a matter of law. Therefore, the complaint is legally insufficient and should be dismissed.

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<sup>2</sup> *Equitable Small Transportation Interveners v. Equitable Gas Co.*, 1994 Pa.PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994)

<sup>3</sup> 2006 Pa. PUC Lexis 111, \*7.

<sup>4</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>5</sup> *Id.* at 7-8.

<sup>6</sup> *Feingold v. McNulty*, 2009 Phila. Ct. Com. Pl LEXIS 167, \*3.

13. The Complainant disputes the phase out of PECO Energy's OP rate. The elimination of PECO Energy's OP rate was approved by the Commission as part of PECO's Default Service Program and Rate Mitigation Plan on June 9, 2009, docket number P-2008-2062739. The plan was previously approved by the Commission and is just, reasonable and lawful.

14. By way of background, in 1996 the Pennsylvania General Assembly enacted the Electricity Generation Customer Choice and Competition Act (Act), 66 Pa.C.S. §§2801-15. The Act allows Pennsylvanians to buy electric generation supply from licensed alternative suppliers by unbundling the generation portion of electric rates from the transmission and distribution portions.

15. The Act capped the generation portion of electric rates to ease the transition to competitive markets at 1996 levels. The rate cap was initially established under Section 2804 of the Act, and, after much litigation, settlements were reached in which the rate cap would expire for all PECO customers at the end of 2010.<sup>7</sup>

16. On September 10, 2008, PECO Energy filed its Default Service Program and Rate Mitigation Plan (DSP Petition) to establish rates, terms and conditions for the provision of default service for the period of January 1, 2011 through May 31, 2014, for those customers who do not take service from an alternative electric generation supplier (EGS) or whose contracted generation is not delivered.

17. PECO Energy's DSP plan is designed to ensure that PECO's default service customers have access to a reliable supply of generations and to help them manage the

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<sup>7</sup> The Commission has already ruled that it lacks the authority to extend the expired rate caps. See *Tshundy v. PPL Electric Utilities Cor.*, Docket No. C-2009-2092230 (Order entered August 21, 2009)(citing 66 Pa.C.S. 2804(4)).

transition from capped generation rates to market-priced rates that were to occur on January 1, 2011. PECO's DSP Petition was assigned Commission Docket P-2008-2062739.

18. The phase out of the residential OP was included as part of PECO's DSP Plan.

19. After extensive discovery, hearings, and the filing of testimony and rebuttal testimony in this matter, on March 10, 2009, a Joint Petition for Settlement was filed to request approval of PECO's DSP Plan as modified by the settlement.

20. By Order entered June 2, 2009 the Commission approved the Settlement and PECO's DSP Plan, as modified by the settlement.

21. The Commission has only those duties, powers, responsibilities and jurisdiction that were expressly or by necessary implication given to it by the Legislature. *Rogoff v. The Buncher Company*, 395 Pa. 477, 151 A.2d 83 (1959).

22. As the Commission recognized in *Tshundy v. PPL Electric Utilities Corp.*, Docket No. C-2009-2092230 (Order entered August 21, 2009), the Commission may not extend the rate caps, which expired in 2010, in order to prevent a generation rate increase.

23. Additionally, the Competition Act provides that default service rates must be based on prevailing market prices, not promotional discounts or subsidies; offering reduced rates for winter heating customers would require other default service customers to subsidize the Rate OP customers to cover the difference, and therefore would violate the Public Utility Code.

24. Commission precedent is clear and unambiguous on this issue. In *Dunham v. PPL Electric Utilities Corporation*, Docket No. C-2010-2155056, the Commission stated:

In *Diehl v. PPL Electric Utilities Corporation*, Docket No. C-2009-2149261 (Order entered April 1, 2011) (*Diehl*), we discussed the circumstances surrounding PPL's phase out of the RTS rate schedule:

In 2004, at Docket No. R-00049255, PPL filed a distribution rate case with the Commission. The

Commission's decision in that case on rate allocation among customer classes was appealed to the Commonwealth Court. As part of its review, the Commonwealth Court interpreted the Competition Act as requiring that rates for transmission, distribution and generation each be set separately, based on the cost of serving each separate class of customers. 66 Pa. C.S. § 2804(3). The Court ruled that subsidized rates (*e.g.*, the RTS rate) which do not cover their costs of service must be transitioned to cost-based rates. *See, Lloyd v. Pennsylvania Public Utility Commission, et al.*, 904 A.2d 1010 (Pa. Cmwlth. 2006). Thus, the RTS rate as it existed in the 1980s, at the time the Complainant constructed his home, could no longer continue to be offered.

*Dunham* Opinion and Order, entered July 1, 2011, at 4.

25. Similar conclusions were reached in several complaints before the Commission. See also, *Kupchinskas v. PECO Energy Company*, Docket No. C-2011-2253896; *Herting v PPL Electric Utilities Corporation*, Docket No. C-2010-2153688, Commission Final Order entered October 6, 2011; *Brickner v PPL Electric Utilities Corporation*, Docket No. C-2009-2105583, Commission Opinion and Order entered May 21, 2010; *Laudenslager v. Duquesne Light Company*, Docket No. C-2010-2156300, Commission Final Order entered June 29, 2011; *Sowatskey v Duquesne Light Company*, Docket No. C-2009-2144804, Commission Final Order entered January 11, 2011.

26. As the instant case involves the same legal question, the outcome should be the same. The complaint should be dismissed as legally insufficient under 52 Pa.Code §5.101(a)(4).

27. Assuming all of the Complainant's allegations are true, the Complainant is not entitled to relief under the law.

**REQUEST FOR RELIEF**

WHEREFORE, for all of the reasons stated herein, PECO respectfully requests that your Honorable Commission dismiss the instant complaint with prejudice.

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>ROBERT W. COYNE, SR.</b> | : |                                  |
| <b>Complainant</b>          | : |                                  |
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|                             | : |                                  |
| <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.

Date: October 24, 2014



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Shawane L. Lee

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                             |   |                                  |
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|                             | : |                                  |
| <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 Answer in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Robert W. Coyne, Sr.  
1545 Hollywood Avenue  
Langhorne, PA 19047

Dated at Philadelphia, Pennsylvania, October 24, 2014



---

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



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October 24, 2014

Robert W. Coyne, Sr.  
1545 Hollywood Avenue  
Langhorne, PA 19047

**RE: Robert W. Coyne, Sr. v. PECO Energy Company**  
**PUC Docket No.: C-2014-2448576**

Dear Mr. Coyne:

Enclosed is a copy of PECO Energy Company's response to the formal complaint filed in the above-referenced docket. The law requires PECO Energy to file an answer to your Public Utility Commission complaint. Keep these papers for your records. This is not a decision on your complaint. PECO's response may include a New Matter, Motion or Preliminary Objection. Please note that if you do not respond to a New Matter, Motion, or Preliminary Objection an unfavorable decision may be rendered against you. Responses to New Matters and Motions must be filed within 20 days. Responses to Preliminary Objections must be filed within 10 days. If there is no New Matter, Motion or Preliminary Objection included, no response is required.

Soon, the Public Utility Commission will schedule either a settlement conference or a hearing on your complaint. The Commission will let you know by mail whether there will be a conference or a hearing and will include instructions on what to do next. If the matter is set for hearing, the notice will provide you with information about the date, time and place of the hearing. If we are unable to resolve your complaint and have to proceed with a hearing, a judge will be at the hearing and will decide your complaint. You must call the Public Utility Commission if you have any questions about the hearing or if you cannot attend the hearing.

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  
SL/lo  
Encl.

# **EXHIBIT “1”**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

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.

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 Robert W. Coyne Sr.
Street/P.O. Box 1545 Hollywood Ave. Apt #
City Langhorne State PA Zip 19047
County Bucks

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

(215) 757-1254 (home) (215) 499-3417 (mobile)

E-mail Address (optional): moonstruck103@verizon.net

Utility Account Number (from your bill) 64542-00109

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
Street/P.O. Box
City State Zip

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

RECEIVED

OCT - 1 2014

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) We were promised by PECO a discount Budget payment for the winter months. They reneged on the agreement and started charging me full price. I have been totally disabled since 1992.

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.

we would like PECO to stop ~~taking~~ <sup>adding</sup> \$ 340.00 plus \$ 12.41 late payment ~~which is~~ which is being added to our monthly bill.

We were told by Public Utilities Commission to pay only the gas and electric which we were using for the month, which I did. but PECO continues to add additional monthly charges.

I am disabled and I have been in the hospital 5 times since January. I have not worked since 1992 and have a very limited income.

I would like you to please help me wipe out my latest Bill of \$2000.00 and I will continue to pay for the utilities I use, but I cannot afford all of the interest.

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.

I would also like to add that I am an honorably discharged veteran from the U.S. Air Force.

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.

I Spoke to ~~V. PECO~~ and was told to pay only the gas and electric that was used for the month which I did. But, PECO has continued to add additional monthly charges to my bill.  
*Public Utilities Commission*

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 [lawclinichb@mail.widener.edu](mailto:lawclinichb@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 \_\_\_\_\_

Street/P.O. Box \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Area Code/Phone Number \_\_\_\_\_

E-mail Address (if known) \_\_\_\_\_

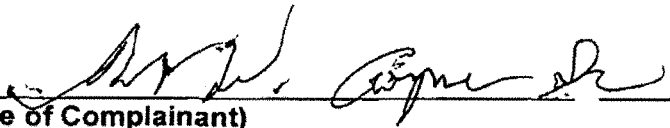
Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

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, Robert W. Coyne, Sr., 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).

 9/23/14  
(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.

10. **Two Ways to File Your Formal Complaint**

**Electronically.** You must create an account on the PUC's eFiling system, which may be accessed at <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.

Robert W. Coyne, Sr.  
1545 Holly wood Ave  
Langhorne PA 19047

**RECEIVED**

OCT - 1 2014

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

U.S. POSTAGE  
PAID  
RITCHIEVILLE, PA  
18954  
0094102-06  
\$16.95  
0094102-06



1007

**FOR DOMESTIC AND INTERNATIONAL USE**  
**PLACE MAILING LABEL HERE**



**PRIORITY  
MAIL  
EXPRESS™**



**DATE\***  
**TIME\***  
**DUED**

**UPON REQUEST**

**CUSTOMER USE ONLY**  
FROM: (PLEASE PRINT)  
Robert W. Coyne, Sr.  
1545 Hollingsworth  
Langhorne PA 19047  
PHONE: (717) 747-5411

**PAYMENT BY ACCOUNT** (if applicable)

**DELIVERY OPTIONS** (Customer Use Only)  
 SIGNATURE REQUIRED: The mailer must check the "Signature Required" box if the recipient requires the addressee's signature. Call 24 hours before pickup. (Additional fee, where applicable)  
 Return Receipt: The mailer must check the "Return Receipt" box if the addressee requires a return receipt. (Additional fee, where applicable)  
 No Saturday Delivery (delivered next business day)  
 Sunday/Holiday Delivery: Required (additional fee, where applicable)  
 10:30 AM Delivery: Required (additional fee, where applicable)  
 Return to USPS.com or local Post Office: (if applicable)

TO: (PLEASE PRINT)  
Secretary  
Pennsylvania Public Utility Commission  
400 North 12th Street  
Harrisburg, PA 17120  
PHONE: (717) 712-1111

**RECEIVED**  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU  
JANUARY 2014

**ORIGIN (POSTAL SERVICE USE ONLY)**

PO ZIP Code: 18951  
Scheduled Delivery Date (MM/DD/YYYY): 10/2/14  
 1-Day  
 2-Day  
 Military  
 DPO

Date Accepted (MM/DD/YYYY): 10/1/14  
 Scheduled Delivery Time:  
 10:30 AM  
 1:00 PM  
 1:00 NOON  
 10:30 AM Delivery Fee

Time Accepted: 17:34  
 AM  
 PM  
 Weight: 0.25 lbs  
 Flat Rate  
 Surcharges/Premiums:  
 Insurance Fee: \$ 16.95  
 Return Receipt Fee: \$  
 Live Animal Transportation Fee: \$  
 Total Package & Fees: \$ 16.95  
 Signature: [Signature]  
 Employee Signature: [Signature]

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU  
JANUARY 2014  
PSN 7500-02-000-0006  
3-ADDRESSEE COPY

WRITE FIRMLY TO MAKE ALL COPIES LEGIBLE

**EXHIBIT “2”**





**October 22, 2014**

04/17/2014 CALL PUC TO INQUIRE IF IT IS LEGAL FOR CO TO HAVE STOPPED  
DISCOUNT FOR CUST WITH TOTAL ELEC... ELIGIBLE TO PAY 340 PLUS 800 A MTH..