



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

October 24, 2014

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

**RE: Manir Corporation v. PECO Energy Company**  
**PUC Docket No.: C-2014-2443015**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion for Judgment on the Pleadings* 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: Manir Corporation (via First Class Mail)

s/LO

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MANIR CORPORATION</b>	:	
<b>Complainants</b>	:	
v.	:	<b>DOCKET NO. C-2014-2443015</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	


**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 Motion for Judgment on the Pleadings of PECO Energy Company within 10 days from service of this notice, a decision may be rendered against you. All pleadings, such as a Reply to Motion for Judgment on the Pleadings, 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:  
Rosemarie Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

With a copy to:  
Shawane L. Lee, Esq.  
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  
Counsel for PECO Energy Company  
2301 Market Street S-23  
Philadelphia, PA 19101-8699  
215-841-6863  
Shawane.Lee@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MANIR CORPORATION</b>	:	
<b>Complainants</b>	:	
<b>v.</b>	:	<b>DOCKET NO. C-2014-2443015</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

**RESPONDENT, PECO ENERGY COMPANY'S  
MOTION FOR JUDGMENT ON THE PLEADINGS**

Respondent, PECO Energy Company (“PECO Energy”), pursuant to 52 Pa. Code § 5.102(a) respectfully petitions this Honorable Commission to dismiss the instant Complaint for the following reasons:

**I. PROCEDURAL HISTORY:**

1. On or about September 2, 2014, Complainant, Manir Corporation filed a Formal Complaint with the Pennsylvania Public Utility Commission (“PUC”).
2. On September 17, 2014, the above-mentioned Formal Complaint was served on PECO Energy. A copy of Complainant’s Formal Complaint is attached hereto as (Exhibit 1).
3. On October 3, 2014, PECO Energy filed an Answer & New Matter to the Formal Complaint. A copy of PECO Energy’s Answer & New Matter is attached hereto as (Exhibit 2).
4. Pursuant to 52 Pa. Code § 5.63, Complainant had twenty days from the filing date of PECO’s New Matter on October 3, 2014, to respond.

5. To date, over twenty (20) days have passed since PECO filed its New Matter on October 3, 2014. As Complainant has failed to timely respond to the New Matter, PECO is filing this Motion seeking Judgment on the Pleadings.

## **II. RELEVANT FACTS:**

6. In its Complaint, the Complainant alleges that it operates a business (Manir Corporation) at 285 Commerce Drive, Fort Washington, PA 19034.

7. The Complainant alleges that it is has an account with PECO Energy for commercial electric service under account number 85687-01607.

8. The Complainant is disputing their electricity bill from December 2013 to April 2014 and the accuracy of their meter.

## **III. LEGAL ARGUMENT**

### **A. Standard of Review**

9. The Commission's regulations at 52 Pa. Code §5.102(a) permits any party to move for summary judgment or judgment on the pleadings after the pleadings are closed, but within such time as to not delay a hearing.

10. Under 52 Pa. Code §5.102(d)(1), the presiding officer will grant the motion if the pleadings, depositions, answers to interrogatories, admissions and affidavits show that there is no genuine issue as to a material fact and that the moving party is entitled to judgment as a matter of law.

11. The moving party bears the burden of showing that no genuine issue of material fact exists and that it is entitled to judgment as a matter of law. The Commission

must view the record in the light most favorable to the non-moving party, giving that party the benefit of all reasonable inferences. First Mortgage Co. of Pennsylvania v. McCall, 459 A.2d 406 (Pa. Super. 1983).

12. The provision at 52 Pa. Code §5.102(c) serves judicial economy by avoiding a hearing where no factual dispute exists. If no factual issue pertinent to the resolution of the case exists, a hearing is unnecessary. Lehigh Valley Power Committee v. Pennsylvania Public Utility Commission, 563 A.2d. 557 (Pa. Cmwlth. 1989).

**B. The Complainant's Complaint should be dismissed because Manir Corporation is a commercial customer; and the Complainant is required to be represented by counsel.**

13. The Complainant, Manir Corporation is a commercial customer operating a Best Western Hotel at the service address at issue.

14. Manir Corporation was incorporated in the Commonwealth of Pennsylvania on August 25, 1986. See Pennsylvania Department of State Corporation Search, attached hereto as (Exhibit 3).

15. The corporate registered office address listed for Manir Corporation with the Pennsylvania Department of State is the service address – 285 Commerce Drive, Fort Washington, PA 19023. See (Exhibit 3).

16. As a commercial customer and corporation, Complainant is required to be represented by counsel in adversarial proceedings before the Commission.

17. The proceedings become adversarial at the time when respondent files an Answer. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney

in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975).

18. On October 3, 2014, PECO Energy filed an Answer with New Matter to the Complainant's Complaint. See (Exhibit 2).

19. Once PECO Energy filed the Answer with New Matter the current PUC matter became adversarial. See 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc.

20. To date, the Complainant Corporation has not had counsel enter an appearance for this matter.

21. Accordingly, PECO Energy requests that the Commission dismiss the Complainant's Complaint for failure to be represented by counsel, or in the alternative, designate a date certain the Complainant must have counsel enter an appearance.

#### **IV. CONCLUSION**

22. PECO Energy has not been served with a response to its New Matter, and therefore it requests that the facts stated therein be deemed admitted. 52 Pa.Code §5.63(b) (providing that facts in new matter may be deemed admitted if there is no reply).

23. The Complainant has had no attorney enter an appearance; and therefore, the Complaint against PECO Energy should be dismissed, or in the alternative, a date certain set for Complainant's counsel to enter an appearance.

**WHEREFORE**, PECO Energy Company respectfully requests that your Honorable Commission dismiss the Complainant's Complaint or set a date certain for Complainant's counsel to enter an appearance.

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MANIR CORPORATION</b>	:	
<b>Complainants</b>	:	
<b>v.</b>	:	<b>DOCKET NO. C-2014-2443015</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: October 24, 2014

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Shawane L. Lee

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MANIR CORPORATION</b>	:	
<b>Complainants</b>	:	
<b>v.</b>	:	<b>DOCKET NO. C-2014-2443015</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:

Manir Corporation  
285 Commerce Drive  
Fort Washington, PA 19034

Dated at Philadelphia, Pennsylvania, October 24, 2014



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Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
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 17, 2014 12:01 PM  
**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-2014-2443015**.  
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**

*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 MANIR CORPORATION

Street/P.O. Box 285 COMMERCE DRIVE  
City: Fort Washington

State Pennsylvania Zip 19034

County Montgomery

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

(215) 542 7930

E-mail Address (optional): ravi@bwfortwashington.com

Utility Account Number (from your bill) 85687-01607

**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 \_\_\_\_\_

RECEIVED  
2014 SEP -2 AM 11:25  
PA. P.U.C.  
SECRETARY'S BUREAU

**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

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).

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**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.

From December 2013 till April 2014, the electricity bill was 3 times higher than what we used pay since 20 yrs. Our actual kw used is supposed to be around 50,000kw but during Dec'13 till April'14 our kw used shot up to 123,000kw(copy attached). That's unacceptable to us. We complaint to PECO to check the meter but they insisted that nothing wrong in it. Please order PECO to do the reassessment for the aforesaid period of faulty meter reading and refund the money.

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.

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.



Name: MANIR CORPORATION  
Account Number: 85687-01607  
Phone Number: 215-542-7932  
Service Address: 285 COMMERCE DR, FT WASHINGTON

Your major account rep is BUSINESS ACCT SRVCS. If you have any questions about this bill please contact us at 800-220-7326 or by writing PECO, 2301 Market St, N4-3, Philadelphia, PA 19103-1380.

**Billing Summary**

Bill Date	04/08/2014
Thank you for your payment of \$15,000.00	
Charges from previous bill	\$63,755.21
Late payment charge	\$222.34
<b>Total Other Charges</b>	<b>\$63,977.55</b>
<b>Current Period Charges</b>	
Electric	\$12,720.54
<b>Total New Charges</b>	<b>\$12,720.54</b>
<b>Total Amount Due on 04/30/2014</b>	<b>\$76,698.09</b>

**General Information**

Next scheduled meter reading: **May 6, 2014**  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date. Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de la fecha de vencimiento.

- Customer Self Service - Manage Your Account 24/7**
- [www.peco.com/ebill](http://www.peco.com/ebill) - Go paperless: receive and pay your bill
  - [www.peco.com/service](http://www.peco.com/service) - Start, stop and transfer your service
  - [www.peco.com/SmartIdeas](http://www.peco.com/SmartIdeas) - Save energy and money
  - Pay by phone with credit/debit card at 1-877-432-9384 (\$2.35 fee)

AP Gas & Electric, 6161 Savoy Drive, Suite 500, Houston, TX 77036, 877-544-4857

**Message Center**

5.90% estimated Gross Receipts Tax of \$708.04 included in new charges.  
Your estimated electric price to compare is \$0.0878 per kWh. This may change in March, June, September and December. For more information and supplier offers visit [www.PAPowerSwitch.com](http://www.PAPowerSwitch.com).

When paying in person, please bring the entire bill.

(continued on next page)

Return only this portion with your check made payable to PECO. Please write your account number on your check.



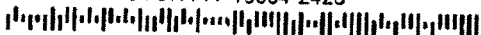
- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

85687 0160 70000 0000

4100 1 AV 0.378 4100004100/008402 017 01 GXFW5Y 2 04092014

MANIR CORPORATION  
285 COMMERCE DR  
FT WASHINGTON PA 19034-2423



Account Number  
**85687-01607**

Payment Receipt Stamp

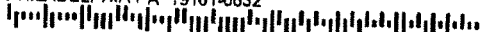
Payment Amount

Please pay this amount by 04/30/2014

\$76,698.09

00012720540006375521

PECO - PAYMENT PROCESSING  
PO BOX 37632  
PHILADELPHIA PA 19101-0632



856870160700000000041200000009

Name: **MANIR CORPORATION**  
 Account Number: **85687-01607**

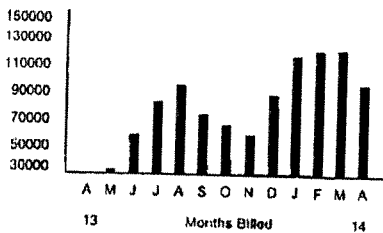
Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
04/06	004307457	General Service	Tot kWh	11094 Actual	11256 Actual	162	600	97200
04/06	004307457	General Service	On Pk Kw	0.00 Actual	0.33 Actual	0.33	600	199.80
04/06	004307457	General Service	GS Off Pk kW	0.00 Actual	0.34 Actual	0.34	600	201.60

Total kWh Used ..... 97,200      Distribution kW - Measured ..... 199.8

**Electric Commercial Service 100kW-500kW - Current Period Detail**      **Service 03/06/2014 to 04/06/2014 - 31 days**

Customer Charge					\$56.44
Distribution Charges					991.01
Distribution Charges	199.80	kW	X	\$4.96000	991.01
Energy Efficiency Charge	97,200	kWh	X	0.00410	398.52
State Tax Adjustment	97,200	kWh	X	0.00240	233.28
Sales tax					-3.53
AP Gas & Electric Charges / 877-544-4857					100.55
Commodity Charge 97200 KWH @ 0.10622202					10,324.78
Sales Tax					619.49
<b>Total Current Charges</b>					<b>\$12,720.54</b>

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	97,200	3,135.4	31	43
Last Month	123,000	4,241.3	29	31
Last Year	30,000	1,034.4	29	42

Avg kWh per Month	85,200
Total Annual kWh Usage	1,022,400

DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

Name: MANIR CORPORATION  
Account Number: 85687-01607  
Phone Number: 215-542-7930  
Service Address: 285 COMMERCE DR, FT WASHINGTON

Your major account rep is BUSINESS ACCT SRVCS. If you have any questions about this bill please contact us at 800-220-7326 or by writing PECO, 2301 Market St, N4-3, Philadelphia, PA 19103-1380.

**Billing Summary**

Bill Date 02/08/2013  
Thank you for your payment of \$13,520.10

**Current Period Charges**

Electric \$3,369.64  
Total New Charges \$3,369.64  
Total Amount Due on 03/04/2013 \$3,369.64

**General Information**

Next scheduled meter reading: March 7, 2013  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date. Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de la fecha de vencimiento.

Customer Self Service - Manage Your Account 24/7  
- [www.peco.com/ebill](http://www.peco.com/ebill) - Go paperless: receive and pay your bill  
- [www.peco.com/service](http://www.peco.com/service) - Start, stop and transfer your service  
- [www.peco.com/SmartIdeas](http://www.peco.com/SmartIdeas) - Save energy and money  
- Pay by phone with credit/debit card at 1-877-432-9384 (\$3.50 fee)

AP Gas & Electric, 6161 Savoy Drive, Suite 500, Houston, TX 77036, 877-544-4857

**Message Center**

Estimated Meter Reading.  
5.90% estimated Gross Receipts Tax of \$51.40 included in new charges.  
Thank you for making an arrangement to pay your bill. Should you have any questions regarding this arrangement, please call the number on your bill.  
Your estimated electric price to compare is \$0.0917 per kWh

When paying in person, please bring the entire bill.

(continued on next page)

Return only this portion with your check made payable to PECO. Please write your account number on your check.



- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

85687 0160 70000 0000

11692 1 AT 0.381 11892011892024019 043 01 GXERVK 02082013  
MANIR CORPORATION  
285 COMMERCE DR  
FT WASHINGTON PA 19034-2423  
[Barcode]

Account Number 85687-01607  
Payment Receipt Stamp

Payment Amount [ ]

Please pay this amount by 03/04/2013 \$3,369.64

PECO - PAYMENT PROCESSING  
PO BOX 37629  
PHILADELPHIA PA 19101-0629

[Barcode]

00003369640000000000

856870160700033696430633369646

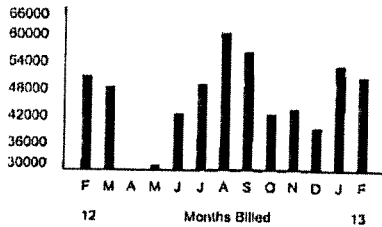
Name: **MANIR CORPORATION**  
 Account Number: **85687-01607**

Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
02/06	004307457	General Service	Tot kWh	9818 Estimate	9903 Estimate	85	600	51000
02/06	004307457	General Service	On Pk Kw	0.00 Estimate	0.18 Estimate	0.18	600	93.60
02/06	004307457	General Service	GS Off Pk kW	0.00 Estimate	0.17 Estimate	0.17	600	100.80

Total kWh Used ..... 51,000      Distribution kW - Measured ..... 93.6

Electric Commercial Service 100kW-500kW - Current Period Detail			Service 01/07/2013 to 02/06/2013 - 30 days	
Customer Charge				\$61.92
Distribution Charges		93.60 kW	X \$4.96000	464.26
Distribution Charges		51,000 kWh	X 0.00410	209.10
Energy Efficiency Charge		51,000 kWh	X 0.00270	137.70
State Tax Adjustment				-1.83
Sales tax				52.27
<b>AP Gas &amp; Electric Charges / 877-544-4857</b>				
Commodity Charge 51000 KWH @ 0.04525000				2,307.75
Sales Tax				138.47
<b>Total Current Charges</b>				<b>\$3,369.64</b>

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	51,000	1,700.0	30	38
Last Month	53,400	1,570.5	34	41
Last Year	51,000	1,700.0	30	39

Avg kWh per Month	45,750
Total Annual kWh Usage	549,000

DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

Name: MANIR CORPORATION  
Account Number: 85687-01607  
Phone Number: 215-542-7930  
Service Address: 285 COMMERCE DR, FT WASHINGTON

Your major account rep is BUSINESS ACCT SRVCS. If you have any questions about this bill please contact us at 800-220-7326 or by writing PECO, 2301 Market St, N4-3, Philadelphia, PA 19103-1380.

**Billing Summary**

Bill Date	01/10/2013
Thank you for your payment of \$5,724.64	
Charges from previous bill	\$5,740.64
Late payment charge	\$169.95
<b>Total Other Charges</b>	<b>\$5,910.59</b>

**Current Period Charges**

Electric	\$7,779.46
<b>Total New Charges</b>	<b>\$7,779.46</b>

<b>Total Amount Due on 02/01/2013</b>	<b>\$13,690.05</b>
---------------------------------------	--------------------

**General Information**

Next scheduled meter reading: **February 6, 2013**  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date. Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de la fecha de vencimiento.

**Customer Self Service - Manage Your Account 24/7**  
- [www.peco.com/ebill](http://www.peco.com/ebill) - Go paperless: receive and pay your bill  
- [www.peco.com/service](http://www.peco.com/service) - Start, stop and transfer your service  
- [www.peco.com/SmartIdeas](http://www.peco.com/SmartIdeas) - Save energy and money  
- Pay by phone with credit/debit card at 1-877-432-9384 (\$3.50 fee)

North American Power and Gas, 20 Glover Avenue, 3rd Floor, Norwalk, CT 06851, 888-313-9086

**Message Center**

Estimated Meter Reading.  
5.90% estimated Gross Receipts Tax of \$55.25 included in new charges.  
Your estimated electric price to compare is \$0.0917 per kWh

When paying in person, please bring the entire bill.

(continued on next page)



Return only this portion with your check made payable to PECO. Please write your account number on your check.

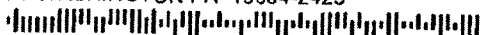
- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384.  
A convenience fee will apply.

85687 0160 70000 0000

18259 1 AT 0.371 18259018259037181 088 01 GXENUQ 2 01112013

MANIR CORPORATION  
285 COMMERCE DR  
FT WASHINGTON PA 19034-2423



Account Number **85687-01607** Payment Receipt Stamp

Payment Amount

Please pay this amount by 02/01/2013 **\$13,690.05**

00007779460000574064

PECO - PAYMENT PROCESSING  
PO BOX 37632  
PHILADELPHIA PA 19101-0632



856870160700000000030320000007



Name: MANIR CORPORATION  
 Account Number: 85687-01607

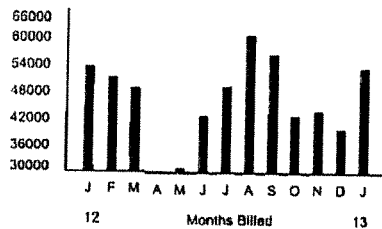
Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
01/07	004307457	General Service	Tot kWh	9729 Estimate	9818 Estimate	89	600	53400
01/07	004307457	General Service	On Pk Kw	0.00 Estimate	0.18 Estimate	0.18	600	105.00
01/07	004307457	General Service	GS Off Pk kW	0.00 Estimate	0.16 Estimate	0.16	600	96.00

Total kWh Used ..... 53,400      Distribution kW - Measured ..... 105.0

**Electric Commercial Service 100kW-500kW - Current Period Detail**      **Service 12/04/2012 to 01/07/2013 - 34 days**

Customer Charge				\$54.50
Distribution Charges	105.00 kW	X	\$4.96000	520.80
Distribution Charges	53,400 kWh	X	0.00410	218.94
Energy Efficiency Charge	53,400 kWh	X	0.00270	144.18
State Tax Adjustment				-1.97
Sales tax				56.19
<b>North American Power and Gas Charges / 888-313-9086</b>				
GENERATION 53.400 KWH @ 0.1199				6,402.66
Sales Tax				384.16
<b>Total Current Charges</b>				<b>\$7,779.46</b>

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	53,400	1,570.5	34	41
Last Month	38,600	1,200.0	33	44
Last Year	53,400	1,570.5	34	42

Avg kWh per Month	45,750
Total Annual kWh Usage	549,000



DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

Name: MANIR CORPORATION  
Account Number: 85687-01607  
Phone Number: 215-542-7930  
Service Address: 285 COMMERCE DR, FT WASHINGTON

Your major account rep is BUSINESS ACCT SRVCS. If you have any questions about this bill please contact us at 800-220-7326 or by writing PECO, 2301 Market St, N4-3, Philadelphia, PA 19103-1380.

**Billing Summary**

Bill Date	12/07/2012
Charges from previous bill	\$5,724.64
Late payment charge	\$83.84
<b>Total Other Charges</b>	<b>\$5,808.48</b>

**Current Period Charges**

Electric	\$5,740.64
<b>Total New Charges</b>	<b>\$5,740.64</b>
<b>Total Amount Due on 12/31/2012</b>	<b>\$11,549.12</b>

**General Information**

Next scheduled meter reading: January 7, 2013  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date. Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de la fecha de vencimiento.

**Customer Self Service - Manage Your Account 24/7**  
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- [www.peco.com/service](http://www.peco.com/service) - Start, stop and transfer your service  
- [www.peco.com/SmartIdeas](http://www.peco.com/SmartIdeas) - Save energy and money  
- Pay by phone with credit/debit card at 1-877-432-9384 (\$3.50 fee)

North American Power and Gas, 20 Glover Avenue, 3rd Floor, Norwalk, CT 06851, 888-313-9086

**Message Center**

Estimated Meter Reading.  
5.90% estimated Gross Receipts Tax of \$39.39 included in new charges.  
Your estimated electric price to compare is \$0.1005 per kWh

When paying in person, please bring the entire bill.

(continued on next page)

Return only this portion with your check made payable to PECO. Please write your account number on your check.



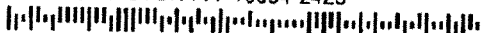
- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

85687 0160 70000 0000

18364 1 AT 0.371 18364/018364/037437 066 01 GX6J2V 5 12082012

MANIR CORPORATION  
285 COMMERCE DR  
FT WASHINGTON PA 19034-2423



Account Number  
85687-01607

Payment Receipt Stamp

Payment Amount

Please pay this amount by 12/31/2012

\$11,549.12

00005740640000572464

PECO - PAYMENT PROCESSING  
PO BOX 37632  
PHILADELPHIA PA 19101-0632



856870160700000000023660000000

Name: MANIR CORPORATION  
 Account Number: 85687-01607

**Meter Information**

Read Date	Meter Number	Load Type	Reading Type	Motor Reading		Difference	Multiplier X	Usage
				Previous	Present			
12/04	004307457	General Service	Tot kWh	9863 Estimate	9729 Estimate	66	600	39600
12/04	004307457	General Service	On Pk Kw	0.00 Estimate	0.11 Estimate	0.11	600	67.20
12/04	004307457	General Service	GS Off Pk kW	0.00 Estimate	0.12 Estimate	0.12	600	70.20

Total kWh Used ..... 39,600      Distribution kW - Measured ..... 67.2

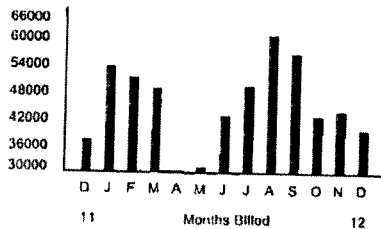
**Electric Commercial Service 100kW-500kW - Current Period Detail**

Service 11/01/2012 to 12/04/2012 - 33 days

Customer Charge					\$57.48
Distribution Charges					
Distribution Charges	67.20 kW	X	\$4.96000		333.31
Energy Efficiency Charge	39,600 kWh	X	0.00430		170.28
State Tax Adjustment	39,600 kWh	X	0.00270		106.92
Sales tax					-0.33
North American Power and Gas Charges / 888-313-9086					40.06
GENERATION 39,600 KWH @ 0.1199					
Sales Tax					4,748.04
<b>Total Current Charges</b>					<b>284.88</b>

**\$5,740.64**

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	39,600	1,200.0	33	44
Last Month	43,800	1,460.0	30	60
Last Year	37,200	1,200.0	31	51

Avg kWh per Month	45,750
Total Annual kWh Usage	549,000

DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

Name: MANIR CORPORATION  
Account Number: 85687-01607  
Phone Number: 215-542-7930  
Service Address: 285 COMMERCE DR, FT WASHINGTON

Your major account rep is BUSINESS ACCT SRVCS. If you have any questions about this bill please contact us at 800-220-7326 or by writing PECO, 2301 Market St, N4-3, Philadelphia, PA 19103-1380.

**Billing Summary**

Bill Date 01/08/2014  
Charges from previous bill \$10,408.84  
Total Other Charges \$10,408.84

**Current Period Charges**

Electric \$14,822.91  
Total New Charges \$14,822.91  
Total Amount Due on 01/30/2014 \$25,231.75

**General Information**

Next scheduled meter reading: February 6, 2014  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date. Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de la fecha de vencimiento.

- Customer Self Service - Manage Your Account 24/7
- [www.peco.com/ebill](http://www.peco.com/ebill) - Go paperless: receive and pay your bill
- [www.peco.com/service](http://www.peco.com/service) - Start, stop and transfer your service
- [www.peco.com/SmartIdeas](http://www.peco.com/SmartIdeas) - Save energy and money
- Pay by phone with credit/debit card at 1-877-432-9384 (\$2.35 fee)

AP Gas & Electric, 6161 Savoy Drive, Suite 500, Houston, TX 77036, 877-544-4857

**Message Center**

5.90% estimated Gross Receipts Tax of \$830.97 included in new charges.  
Your estimated electric price to compare is \$0.0907 per kWh. This may change in March, June, September and December. For more information and supplier offers visit [www.PAPowerSwitch.com](http://www.PAPowerSwitch.com).

When paying in person, please bring the entire bill.

(continued on next page)



An Exelon Company

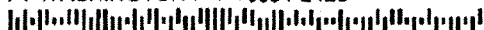
Return only this portion with your check made payable to PECO. Please write your account number on your check.

- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

85687 0160 70000 0000

828 1 AV 0.357 0828/000828/001683 004 01 GXFMH# 25 01092014  
MANIR CORPORATION  
285 COMMERCE DR  
FT WASHINGTON PA 19034-2423



Account Number  
85687-01607

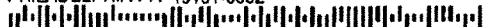
Payment Receipt Stamp

Payment Amount

Please pay this amount by 01/30/2014 \$25,231.75

00014822910001040884

PECO - PAYMENT PROCESSING  
PO BOX 37632  
PHILADELPHIA PA 19101-0632



856870160700000000040300000000



Name: MANIR CORPORATION  
 Account Number: 85687-01607

Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
01/06	004307457	General Service	Tot kWh	10489 Actual	10685 Actual	196	600	117600
01/06	004307457	General Service	On Pk Kw	0.00 Actual	0.34 Actual	0.34	600	205.80
01/06	004307457	General Service	GS Off Pk kW	0.00 Actual	0.37 Actual	0.37	600	223.20

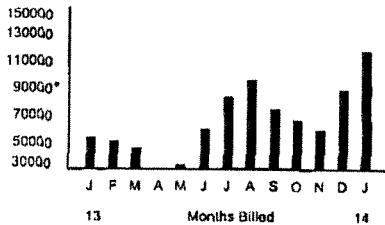
Total kWh Used ..... 117,600      Distribution kW - Measured ..... 205.8

**Electric Commercial Service 100kW-500kW - Current Period Detail**      **Service 12/03/2013 to 01/06/2014 - 34 days**

Customer Charge				\$72.51
Distribution Charges	205.80 kWh	X	\$4.96000	1,020.77
Distribution Charges	117,600 kWh	X	0.00410	482.16
Energy Efficiency Charge	117,600 kWh	X	0.00240	282.24
State Tax Adjustment				-3.90
Sales tax				111.23
AP Gas & Electric Charges / 777-544-4857				
Commodity Charge 117600 KWH @ 0.08893197				10,458.40
Monthly Charge				1,772.00
Sales Tax				627.50

**Total Current Charges** **\$14,822.91**

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	117,600	3,458.8	34	37
Last Month	89,400	2,709.0	33	46
Last Year	53,400	1,570.5	34	41

Avg kWh per Month	67,200
Total Annual kWh Usage	806,400



DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

Name: MANIR CORPORATION  
Account Number: 85687-01607  
Phone Number: 215-542-7930  
Service Address: 285 COMMERCE DR, FT WASHINGTON

Your major account rep is BUSINESS ACCT SRVCS. If you have any questions about this bill please contact us at 800-220-7326 or by writing PECO, 2301 Market St, N4-3, Philadelphia, PA 19103-1380.

**Billing Summary**

Bill Date 12/05/2013  
Thank you for your payment of \$7,517.71  
Overpayment \$-9.30  
Total Other Charges \$-9.30

**Current Period Charges**

Electric \$10,418.14  
Total New Charges \$10,418.14  
Total Amount Due on 12/27/2013 \$16,408.84

**General Information**

Next scheduled meter reading: January 7, 2014  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date.  
Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de la fecha de vencimiento.

**Message Center**

5.90% estimated Gross Receipts Tax of \$585.80 included in new charges.  
Your estimated electric price to compare is \$0.0907 per kWh. This may change in March, June, September and December. For more information and supplier offers visit www.PAPowerSwitch.com.

- Customer Self Service - Manage Your Account 24/7**
- [www.peco.com/ebill](http://www.peco.com/ebill) - Go paperless: receive and pay your bill
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AP Gas & Electric, 6161 Savoy Drive, Suite 500, Houston, TX 77036, 877-544-4857

When paying in person, please bring the entire bill. (continued on next page)



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To pay by phone call 1-877-432-9384. A convenience fee will apply.

85687 0160 70000 0000

810 1 AV 0.357 0810000810001648 004 01 GXFV1 356 12082013  
MANIR CORPORATION  
285 COMMERCE DR  
FT WASHINGTON PA 19034-2423

Account Number 85687-01607 Payment Receipt Stamp

Payment Amount

Please pay this amount by 12/27/2013 \$10,408.84

PECO - PAYMENT PROCESSING  
PO BOX 37632  
PHILADELPHIA PA 19101-0632

00010418140000000000

85687016070000000000336100000000

Name: MANIR CORPORATION  
 Account Number: 85687-01607

Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Motor Reading		Difference	Multiplier X	Usage
				Previous	Present			
12/03	004307457	General Service	Tot kWh	10340 Actual	10489 Actual	149	600	89400
12/03	004307457	General Service	On Pk Kw	0.00 Actual	0.29 Actual	0.29	600	171.00
12/03	004307457	General Service	GS Off Pk kW	0.00 Actual	0.32 Actual	0.32	600	189.60

Total kWh Used ..... 89,400      Distribution kW - Measured ..... 171.0

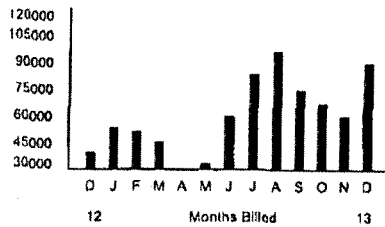
**Electric Commercial Service 100kW-500kW - Current Period Detail**      **Service 10/31/2013 to 12/03/2013 - 33 days**

Customer Charge				\$73.58
Distribution Charges	171.00 kW	X	\$4.96000	848.16
Distribution Charges	89,400 kWh	X	0.00410	366.54
Energy Efficiency Charge	89,400 kWh	X	-0.00550	-491.70
State Tax Adjustment				-1.67
Sales tax				47.70
AP Gas & Electric Charges	877-544-4857			
Commodity Charges	89400 kWh @ 0.08234698			7,361.82
Monthly Charge				1,772.00
Sales Tax				441.71

**Total Current Charges**

**\$10,418.14**

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	89,400	2,709.0	33	46
Last Month	59,400	2,048.2	29	60
Last Year	39,600	1,200.0	33	44

Avg kWh per Month	61,650
Total Annual kWh Usage	742,200



DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

Name: MANIR CORPORATION  
Account Number: 85687-01607  
Phone Number: 215-542-7930  
Service Address: 285 COMMERCE DR, FT WASHINGTON

Your major account rep is BUSINESS ACCT SRVCS. If you have any questions about this bill please contact us at 800-220-7326 or by writing PECO, 2301 Market St, N4-3, Philadelphia, PA 19103-1380.

**Billing Summary**

Bill Date	03/10/2014
Charges from previous bill	\$59,727.63
Late payment charge	\$222.34
<b>Total Other Charges</b>	<b>\$59,949.97</b>

**Current Period Charges**

Electric

**Total New Charges**

**\$19,027.58**  
**\$19,027.58**

**Total Amount Due on 04/01/2014**

**\$78,977.55**

**General Information**

Next scheduled meter reading: April 7, 2014  
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date. Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de la fecha de vencimiento.

**Message Center**

5.90% estimated Gross Receipts Tax of \$1,059.09 included in new charges.  
Your estimated electric price to compare is \$0.0878 per kWh. This may change in March, June, September and December. For more information and supplier offers visit www.PAPowerSwitch.com.

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- Pay by phone with credit/debit card at 1-877-432-9384 (\$2.35 fee)

AP Gas & Electric, 6161 Savoy Drive, Suite 500, Houston, TX 77036, 877-544-4857

When paying in person, please bring the entire bill.

(continued on next page)



An Exelon Company

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- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384.  
A convenience fee will apply.

85687 0160 70000 0000

4080 1 AV 0.378 4080104080005407 016 01 GXFT3X 2 03112014  
MANIR CORPORATION  
285 COMMERCE DR  
FT WASHINGTON PA 19034-2423



Account Number  
**85687-01607**

Payment Receipt Stamp

Payment Amount

Please pay this amount by 04/01/2014

**\$78,977.55**

00019027580005972763

PECO - PAYMENT PROCESSING  
PO BOX 37632  
PHILADELPHIA PA 19101-0632



856870160700000000040910000002



Name: **MANIR CORPORATION**  
 Account Number: **85687-01607**

**Meter Information**

Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
03/06	004307457	General Service	Tot kWh	10889 Actual	11094 Actual	205	600	123000
03/06	004307457	General Service	On Pk Kw	0.00 Actual	0.41 Actual	0.41	600	246.00
03/06	004307457	General Service	GS Off Pk kW	0.00 Actual	0.41 Actual	0.41	600	243.00

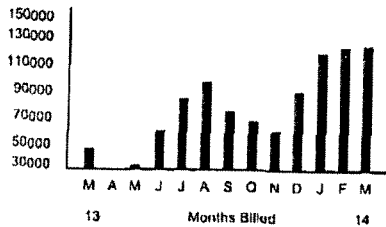
Total kWh Used ..... 123,000      Distribution kW - Measured ..... 246.0

**Electric Commercial Service 100kW-500kW - Current Period Detail**

Service 02/05/2014 to 03/06/2014 - 29 days

Customer Charge				\$54.59
Distribution Charges				
Distribution Charges	246.00	kW	X \$4.96000	1,220.16
Energy Efficiency Charge	123,000	kWh	X 0.00410	504.30
State Tax Adjustment	123,000	kWh	X 0.00240	295.20
Sales tax				-4.36
AP Gas & Electric Charges / 877-544-4857				124.20
Commodity Charge 123000 KWH @ 0.12911098				15,880.65
Sales Tax				952.84
<b>Total Current Charges</b>				<b>\$19,027.58</b>

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	123,000	4,241.3	29	31
Last Month	122,400	4,080.0	30	30
Last Year	45,600	1,572.4	29	37

Avg kWh per Month	79,800
Total Annual kWh Usage	955,200

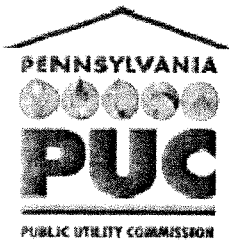
DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

BEST WESTERN  
285 COMMERCE DRIVE  
FORT WASHINGTON PA 19034



SECRETARY  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET  
HARRISBURG, PENNSYLVANIA 17120

## **EXHIBIT “2”**



**PENNSYLVANIA**  
PUBLIC UTILITY COMMISSION

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**eFiling Successfully Transmitted**



Your filing has been electronically received. Upon review of the filing for conformance with the Commission's filing requirements, a notice will be issued acknowledging such compliance and assigning a Docket Number. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

Print this page for your records. The date filed on will be the current day if the filing occurs on a business day before or at 4:30 PM Harrisburg, PA time. It will be the next business day if the filing occurs after 4:30 PM Harrisburg, PA time or on weekends or holidays.

*If your filing **exceeds 250 pages**, you are required to submit **one paper copy of the filing within 3 business days of submitting the electronic filing. This paper copy can be mailed to: Secretary, Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, 2nd Floor, Harrisburg, PA 17120 . Please print a copy of this page and attach it to the paper copy of your filing as the first page.***

eFiling Confirmation	
Docket Number:	C-2014-2443015
Description:	Manir Corporation - PECO Energy Company Answer and New Matter to Formal Complaint
Transmission Date:	10/3/2014 1:39:06 PM
Filed On:	10/3/2014 1:39:06 PM
eFiling Confirmation Number:	1566605

**Uploaded File List**

File Name	Document Class	Document Type
Manir Corporation - Answer and New Matter.pdf	Communication	Answer to Formal Complaint

PECO ENERGY  
EXHIBIT



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

October 3, 2014

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

**RE: Manir Corporation v. PECO Energy Company**  
**PUC Docket No.: C-2014-2443015**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Answer and New Matter 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 stylized flourish at the end.

Shawane Lee  
Counsel for PECO Energy Company

Scheduling Recommendation: **NOT CALL OF DOCKET**

s/LO

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**MANIR CORPORATION**

**Complainant**

v.

**PECO ENERGY COMPANY**

**Respondent**

**DOCKET NO. C-2014-2443015**

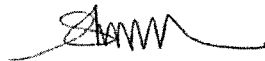
**NOTICE TO PLEAD**

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 New Matter of PECO Energy Company within 10 days from service of this notice, a decision may be rendered against you. All pleadings, such as a Reply to New Matter, 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:  
Rosemarie Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

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

Dated at Philadelphia, PA, October 3, 2014



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Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street S-23  
Philadelphia, PA 19101-8699  
215-841-6863  
Shawane.Lee@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MANIR CORPORATION</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2014-2443015</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**ANSWER OF RESPONDENT,**  
**PECO ENERGY COMPANY**

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On September 17, 2014, 2014, PECO Energy Company ("PECO Energy") was served with a formal complaint filed by Manir Corporation (hereafter "Complainant") in the above captioned docket. Pursuant to 52 Pa. Code § 5.61, PECO responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.
4. Unless specifically admitted herein, PECO Energy denies all material allegations of fact and conclusions of law in the instant complaint.

In the Formal Complaint, the Complainant states that from December 2013 to April 2014, the electricity bill was three times higher than what the company has paid over the past 20 years. The Complainant states that they have requested PECO Energy to check their meter but the company has insisted there is nothing wrong with the meter. The Complainant requests that the PUC order PECO to reassess their bill for a faulty meter and refund their money. PECO Energy specifically denies that the Complainant is being overcharged or there are any meter issues or

billing errors on the Complainant's utility bills. The Complainant's meter concerns have been investigated.

Preliminarily, PECO Energy avers that the Complainant is a commercial customer operating a business at the premises. The Complainant has a corporate name registered with the Pennsylvania Department of State Bureau of Corporations. See Complainant's corporate name with the Pennsylvania Department of State, attached hereto as Exhibit "1". As a commercial customer, Complainant is required to be represented by counsel in adversarial proceedings before the Commission.<sup>1</sup> PECO Energy's records reveal the following:

The Complainant established commercial electric service at 285 Commerce Drive, Fort Washington, PA 19034 under account number 85687-01607. See Account Activity Statement, attached hereto as Exhibit "2".

On December 16, 2013, the Complainant contacted PECO Energy and complained of high bills at their commercial establishment, which is a Best Western Hotel. On December 26, 2013, a technician went to the Complainant's premises and performed a seal and meter check to determine if the meter was operating properly. The technician determined the meter was functioning properly. In addition, the Complainant was being billed on actual meter readings. On February 25, 2014, PECO Energy performed an instrument meter test on the Complainant's meter. The meter tested within acceptable limits.

The Complainant's current balance is \$7,912.22. See Account Activity Statement, attached hereto as Exhibit "2". PECO Energy avers that the company addressed the

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<sup>1</sup> The proceedings become adversarial at the time when respondent files an Answer. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975). Accordingly, PECO request that the Commission establish a date certain by which Complainant is required to have an attorney enter an appearance in this matter.

Complainant's high bill issues during the December 26, 2013 meter and seal test and the February 25, 2014 instrument meter test. Based on the meter check and instrument test, there are no issues with the Complainant's meter.

5. Denied.

6. Admitted.

7. Denied.

8. Denied. PECO is without knowledge or information sufficient to form a belief as to the truth of this averment and, therefore, such allegation is deemed denied.

9. Paragraph 9 is a Verification and Signature to which no response is required.

10. Paragraph 10 contains information regarding Filing, to which no response is required.

**NEW MATTER OF RESPONDENT, PECO ENERGY COMPANY**

PECO Energy, pursuant to 52 Pa. Code § 5.62(b), further responds to the Complaint and states:

1. The Complainant is a commercial customer operating a business at the address at issue. See Pennsylvania Department of State Corporate Search, attached hereto as Exhibit "1".

2. It is well-established law that commercial customers are not entitled to the payment agreement provisions codified under of 66 Pa.C.S §1405 and 52 Pa. Code.Chp 56. While the Commission is authorized under the Public Utility Code to establish payment arrangements that provide for the eventual payment of a residential customer's entire outstanding balance, Mill v. Pa. Public Utility Commission, 67 Pa. Commonwealth

Ct. 597, 602, n. 4, 447 A.2d. 1100 (1982), neither the Commission's regulations nor the Public Utility Code establishes a similar right for a commercial or industrial customer.

3. As a commercial customer, the Complainant is required to be represented by counsel in adversarial proceedings before the Commission. The proceedings become adversarial at the time when respondent files its Answer.

4. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975).

**WHEREFORE**, PECO Energy Company respectfully requests that your Honorable Commission dismiss the instant Complaint.

Respectfully Submitted,



---

Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19101-8699  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MANIR CORPORATION</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2014-2443015</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.



Date: October 3, 2014

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Shawane L. Lee

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MANIR CORPORATION</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2014-2443015</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:

Manir Corporation  
285 Commerce Drive  
Fort Washington, PA 19034

Dated at Philadelphia, Pennsylvania, October 3, 2014



---

Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19101-8699  
(215) 841-6841  
Fax: 215.568.3389  
Shawane.Lee@exeloncorp.com

# **EXHIBIT “1”**



**Corporations**

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- Order Certified Documents
- Order Business List
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- Search for Images

**Business Entity Filing History**

**Date:** 10/3/2014 (Select the link above to view the Business Entity's Filing History)

**Business Name History**

Name	Name Type
MANIR CORPORATION	Current Name

**Business Corporation - Domestic - Information**

**Entity Number:** 936674  
**Status:** Active  
**Entity Creation Date:** 8/25/1986  
**Registered Office Address:** 285 COMMERCE DR  
 FORT WASHINGTON PA 19034-0  
 Montgomery  
**Mailing Address:** No Address

**Officers**

**Name:** RAVI BHAKTA  
**Title:** President  
**Address:** ARVIND BHAKTA P O BOX 564  
 GWYNEDD VLY PA 19437-46

**Name:** ARVIND BHAKTA  
**Title:** Secretary  
**Address:** ARVIND BHAKTA P O BOX 564  
 GWYNEDD VLY PA 19437-46

**Name:** ARVIND BHAKTA  
**Title:** Treasurer  
**Address:** ARVIND BHAKTA P O BOX 564  
 GWYNEDD VLY PA 19437-46

**Name:** BHAKTA BHAKTA  
**Title:** Vice President  
**Address:** ARVIND BHAKTA P O BOX 564  
 GWYNEDD VLY PA 19437-46

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PECO ENERGY  
EXHIBIT **I**

**EXHIBIT "2"**

CUAR038

PECO Account Activity Statement

Date: 09/24/14  
Page: 1 of 3

\*\*\* Account Information \*\*\*

Account Number: 85687-01607  
Account Status: Active  
Requested By: MANIR CORPORATION  
(215)542-7932 Extension:

Mail To: MANIR CORPORATION  
285 COMMERCE DR  
FT WASHINGTON PA 19034

Current Bill: \$7912.22  
Billed Prior: \$0.00  
Balance Due: \$7912.22  
Service Address: 285 COMMERCE DR  
FT WASHINGTON PA 19034

\*\*\* Current Account Status \*\*\*

Credit Amount: \$0.00  
Deposit Requested: \$0.00  
Deposit On-Hand: \$0.00  
Meter Bill Grp: 04  
Rate: Supplier Electric Comm Serv CMA 100-500KW

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH	KW
10/04/12	ELECTRIC SERVICE	09/03/12 10/02/12	9590	004307457	\$845.44		\$845.44		10/26	42600	88
10/04/12	ELE-North American Power and Gas				\$4736.86		\$4736.86				
10/04/12	Regular Bill										
11/06/12	ELECTRIC SERVICE	10/02/12 11/01/12	9663	004307457	\$854.34	\$5582.30	\$5582.30		10/26	42600	88
11/06/12	ELE-North American Power and Gas				\$4870.30		\$4870.30				
11/06/12	Regular Bill										
12/04/12	Late Payment Charge				\$83.84		\$83.84		11/28	43800	88
12/07/12	ELECTRIC SERVICE	11/01/12 12/04/12	9729	004307457	\$707.72		\$707.72				
12/07/12	ELE-North American Power and Gas				\$5032.92		\$5032.92				
12/20/12	Regular Bill										
01/07/13	Late Payment Charge				\$86.11	\$5724.64	\$5724.64				
01/10/13	ELECTRIC SERVICE	12/04/12 01/07/13	9818	004307457	\$992.64		\$992.64				
01/10/13	ELE-North American Power and Gas				\$6786.82		\$6786.82				
01/10/13	Regular Bill										
01/16/13	Late Payment Charge				\$169.95	\$13690.05	\$13690.05				
01/25/13	Payment				\$923.42	\$13520.10	\$13520.10	\$5910.59	02/01	53400	105
02/08/13	ELECTRIC SERVICE	01/07/13 02/06/13	9903	004307457	\$2446.22		\$2446.22				
02/08/13	ELE-AP Gas & Electric				\$879.70	\$3369.64	\$3369.64		03/04	51000	93
03/06/13	Regular Bill				\$2187.20		\$2187.20				
03/11/13	ELECTRIC SERVICE	02/06/13 03/07/13	9979	004307457	\$599.26		\$599.26				
03/11/13	ELE-AP Gas & Electric				\$1438.95	\$3341.95	\$3341.95		04/02	45600	91
03/11/13	Regular Bill										
04/09/13	Payment				\$599.26		\$599.26				
04/10/13	ELECTRIC SERVICE	03/07/13 04/05/13	10029	004307457	\$26.44		\$26.44				
04/10/13	ELE-AP Gas & Electric				\$689.59	\$1763.16	\$1763.16		05/02	30000	60
05/07/13	Late Payment Charge				\$1611.62		\$1611.62				
05/08/13	ELECTRIC SERVICE	04/05/13 05/06/13	10085	004307457	\$425.92		\$425.92				
05/08/13	ELE-AP Gas & Electric				\$4490.97	\$4090.81	\$4090.81	\$1789.60	05/30	33600	74
05/20/13	Regular Bill										
05/22/13	Late Payment Charge				\$1323.83		\$1323.83				
06/07/13	CANCELED ELECTRIC SERVICE	05/06/13 06/04/13	10131	004307457	\$1749.75		\$1749.75				
06/07/13	CANCELED ELE-AP Gas & Electric										
06/26/13	Regular Bill										
07/08/13	Estimated Bill										

PECO Account Activity Statement

Date: 09/24/14  
Page: 2 of 3

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH	KW
07/09/13	ELECTRIC SERVICE	05/06/13 06/04/13	10085	004307457	\$542.76		\$542.76				
07/09/13	ELE-ADDITIONAL METER		9707	004307457							
07/09/13	Regular Bill				\$2849.12						
07/12/13	ELECTRIC SERVICE	06/04/13 07/04/13	9846	004307457	\$634.35		\$1642.13		07/31	59400	108
07/12/13	ELE-AP Gas & Electric				\$4000.28		\$6276.76		08/05	83400	126
07/17/13	Payment					\$1642.13					
08/06/13	ELECTRIC SERVICE	07/04/13 08/04/13	10006	004307457	\$680.01		\$15585.38		08/28	96000	141
08/06/13	ELE-AP Gas & Electric				\$10270.74						
08/12/13	Regular Bill				\$69.52						
08/23/13	Payment					\$15585.38					
09/06/13	ELECTRIC SERVICE	08/04/13 09/01/13	10130	004307457	\$679.26		\$7332.67		09/30	74400	138
09/06/13	ELE-AP Gas & Electric				\$6583.89						
09/25/13	Payment					\$7329.67					
10/04/13	ELECTRIC SERVICE	09/01/13 10/02/13	10241	004307457	\$720.74		\$8451.84		10/28	66600	145
10/04/13	ELE-AP Gas & Electric				\$7728.10						
10/07/13	Late Payment Charge				\$0.05						
10/21/13	Payment					\$8451.84					
11/04/13	ELECTRIC SERVICE	10/02/13 10/31/13	10340	004307457	\$624.37		\$7508.41		11/26	59400	124
11/04/13	ELE-AP Gas & Electric				\$6883.99						
11/19/13	Regular Bill				\$842.61	\$7517.71					
11/19/13	Payment										
12/05/13	ELECTRIC SERVICE	10/31/13 12/03/13	10489	004307457	\$9575.53		\$10408.84		12/27	89400	171
12/05/13	ELE-AP Gas & Electric				\$1965.01						
01/08/14	Regular Bill				\$12857.90						
01/08/14	ELE-AP Gas & Electric	12/03/13 01/06/14	10685	004307457	\$222.34		\$25231.75		01/30	117600	205
02/04/14	Late Payment Charge				\$2259.21						
02/07/14	ELECTRIC SERVICE	01/06/14 02/05/14	10889	004307457	\$32236.67		\$59949.97		03/03	122400	259
02/07/14	ELE-AP Gas & Electric				\$2194.09						
03/10/14	Regular Bill				\$16833.49						
03/10/14	ELECTRIC SERVICE	02/05/14 03/06/14	11094	004307457	\$1776.27		\$78977.55		04/01	123000	246
03/10/14	ELE-AP Gas & Electric				\$10944.27						
03/21/14	Payment					\$15000.00					
04/08/14	ELECTRIC SERVICE	03/06/14 04/06/14	11256	004307457	\$1776.27		\$76698.09		04/30	97200	199
04/08/14	ELE-AP Gas & Electric				\$10944.27						
04/29/14	Payment					\$15000.00					
05/07/14	ELECTRIC SERVICE	04/06/14 05/05/14	11359	004307457	\$1170.22		\$68689.03		05/29	61800	130
05/07/14	ELE-AP Gas & Electric				\$5820.72						
05/28/14	Payment					\$15000.00					
06/03/14	Late Payment Charge				\$1007.82						
06/06/14	ELECTRIC SERVICE	05/05/14 06/04/14	11467	004307457	\$1195.83		\$68196.85		06/30	64800	132
06/06/14	ELE-AP Gas & Electric				\$5749.18						
06/06/14	Regular Bill					\$75141.86					

CUAR038

PECO Account Activity Statement

Date: 09/24/14  
Page: 3 of 3

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH	KW
06/23/14	Payment										
06/27/14	Late Payment Charge					\$15000.00					
06/27/14	Payment Agreement					\$1007.82					
06/27/14	SPECIAL PAYMENT AGREEMENT					\$59134.04					
07/03/14	Payment				\$6945.01						
07/09/14	ELECTRIC SERVICE	06/04/14	07/07/14	11586	004307457	\$1241.21	\$6930.94				
07/09/14	ELE-AP Gas & Electric					\$6787.65					
07/09/14	SPECIAL PAYMENT AGREEMENT					\$13047.26					
07/25/14	Regular Bill						\$7530.19		07/31	71400	132
08/07/14	ELECTRIC SERVICE	07/07/14	08/05/14	11736	004307457	\$1441.15					
08/07/14	ELE-AP Gas & Electric					\$8099.75					
08/07/14	SPECIAL PAYMENT AGREEMENT					\$13047.26					
08/11/14	Regular Bill						\$22588.16		08/29	90000	141
08/28/14	Payment					\$13047.26					
09/08/14	ELECTRIC SERVICE	08/05/14	09/04/14	11869	004307457	\$1338.29	\$22588.16				
09/08/14	ELE-AP Gas & Electric					\$6573.93					
09/08/14	SPECIAL PAYMENT AGREEMENT					\$13047.26					
09/08/14	Regular Bill						\$7912.22		09/30	79800	138

# **EXHIBIT “3”**



**Corporations**

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**Business Entity Filing History**

**Date:** 10/3/2014 (Select the link above to view the Business Entity's Filing History)

**Business Name History**

Name	Name Type
MANIR CORPORATION	Current Name

**Business Corporation - Domestic - Information**

**Entity Number:** 936674  
**Status:** Active  
**Entity Creation Date:** 8/25/1988  
**Registered Office Address:** 285 COMMERCE DR  
 FORT WASHINGTON PA 19034-0  
 Montgomery  
**Mailing Address:** No Address

**Officers**

**Name:** RAVI BHAKTA  
**Title:** President  
**Address:** ARVIND BHAKTA P O BOX 564  
 GWYNEDD VLY PA 19437-46

**Name:** ARVIND BHAKTA  
**Title:** Secretary  
**Address:** ARVIND BHAKTA P O BOX 564  
 GWYNEDD VLY PA 19437-46

**Name:** ARVIND BHAKTA  
**Title:** Treasurer  
**Address:** ARVIND BHAKTA P O BOX 564  
 GWYNEDD VLY PA 19437-46

**Name:** BHAKTA BHACTA  
**Title:** Vice President  
**Address:** ARVIND BHAKTA P O BOX 564  
 GWYNEDD VLY PA 19437-46