



Exelon Business Services Company
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November 13, 2014

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

RE: Natesha M. Fenderson v. PECO Energy Company
PUC Docket No.: F-2014-2438574 and F-2014-2443804

Dear Ms. Chiavetta:

Enclosed for filing with the Commission are *PECO Energy Company's Answer to Complainants Response to Motion for Continuance* 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

sl/LO

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATESHA M. FENDERSON	:	
	:	
v.	:	DOCKET NO. F-2014-2438574
	:	DOCKET NO. F-2014-2443804
	:	
PECO ENERGY COMPANY	:	

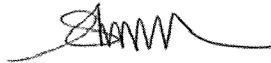
NOTICE TO PLEAD

Pursuant to 52 Pa. Code §§ 5.102, you are hereby notified that, if you do not file a written response denying or correcting the enclosed Response to Motion for Continuance of PECO Energy Company, within 20 days from service of this notice, a ruling may be entered against you. All 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:
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, Esq.
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, November 13, 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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATESHA M. FENDERSON	:	
	:	
v.	:	DOCKET NO. F-2014-2438574
	:	DOCKET NO. F-2014-2443804
	:	
PECO ENERGY COMPANY	:	

**PECO ENERGY'S ANSWER TO COMPLAINANT'S RESPONSE TO
MOTION FOR CONTINUANCE OF HEARING DATE**

PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code § 1.15(b), hereby responds to Complainant's response to PECO's request for a continuance of the hearing date and states the following:

1. Denied. Complainant, Ms. Fenderson, owes the company \$11,198.01 and incurred this balance by failing to pay her utility bill for an entire year. Ms. Fenderson does not make regular payments to her account. PECO requests a continuance because Ms. Fenderson has alleged meter issues. Senior Engineer, Dennis Fitti, will testify to the meter installation testing results; however, he is unavailable the day of the hearing. PECO cannot properly defend this matter with all the facts and objective testing data without the company's witness.

2. Denied. PECO has not performed any field investigations at Ms. Fenderson's residence and she is not cooperating with the company to perform a high bill field investigation. PECO's records demonstrate that the company visited the property in an effort to change Ms. Fenderson's gas meter.

3. Denied. The hearing is scheduled to take place November 20, 2014. If the hearing is cancelled, no one is forcing Ms. Fenderson to take that day off work.

4. Admitted. In order to properly investigate Ms. Fenderson's high bill and meter allegations, the company needs to conduct a high bill field investigation and meter instrument test. Ms. Fenderson has not cooperated with the company to schedule the investigation. Notwithstanding this, PECO has meter installation test results for the meters at Ms. Fenderson's residence and requires Senior Engineer, Dennis Fitti to testify to the results. Mr. Fitti is unavailable the date of the hearing.

5. Denied. PECO has not visited Ms. Fenderson's residence five times to conduct a field investigation. To date, PECO has not conducted any high bill field investigation at the Ms. Fenderson's residence. The company visited the residence to change and/or maintain the gas meter. The company has the right to present the evidence and witnesses it needs to defend this matter. Absent a high bill field report, the company must rely on meter test results from the installation of the meter. As such, the company requires witness Dennis Fitti to testify to meter test results.

6. There is no prejudice to Ms. Fenderson for continuing the case to another hearing date. During this formal complaint PUC process, PECO is holding collection on Ms. Fenderson's \$11,000 balance. Thus, the only prejudice is to the company and its ratepayers because the company cannot collect on this balance.

7. PECO Energy therefore respectfully requests that the hearing be continued to a further date. Additionally, based on the number of witnesses and the large balance and collection history at issue, the company requests a morning hearing.

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**

NATESHA M. FENDERSON

v.

PECO ENERGY COMPANY

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DOCKET NO. F-2014-2438574
DOCKET NO. F-2014-2443804

VERIFICATION

I, Shawane L. Lee, hereby declare that I am an attorney representing 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: November 13, 2014

Shawane L. Lee

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATASHEA M. FENDERSON

v.

PECO ENERGY COMPANY

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DOCKET NO. F-2014-2438574
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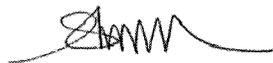
CERTIFICATE OF SERVICE

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

Nateshea M. Fenderson
323 Wilson Street
Bristol, PA 19007
Via email – Nateshea4@gmail.com

Administrative Law Judge Darlene D. Heep
801 Market Street, Suite 4063
Philadelphia, PA 19107
Via email

Dated at Philadelphia, Pennsylvania, November 13, 2014.



Shawane L. Lee
Counsel for PECO Energy Company
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Fax: 215.568.3389