

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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SECRETARY'S BUREAU

MANIR CORPORATION :

Complainant :

vs. :

PECO ENERGY COMPANY :

Respondent :

DOCKET NO.: 2014-2443014

C-2014-2443014

**RESPONSE OF THE COMPLAINANT TO THE  
MOTION FOR JUDGMENT ON THE PLEADINGS OF RESPONDENT**

Complainant Manir Corporation, responds to the Motion For Judgment On The Pleadings of Respondent PECO Energy Company as follows:

**I. PROCEDURAL HISTORY:**

1 - 4. Admitted.

5. Admitted that the Complainant, that was not represented by counsel at the time failed to file a timely response to the New Matter. A response to the New Matter has been filed by its attorney.

**II. RELEVANT FACTS:**

6 - 8. Admitted.

**III. LEGAL ARGUMENT**

**A. Standard of Review**

9 - 12. Admitted.

**B. The Complainant Is Required To Be Represented By Counsel**

13 - 19. Admitted.

20. Denied. William C. MacMillan, Esquire, has entered his appearance on behalf of the Complainant.

21. Denied. The request should be denied since the Complainant is now represented by counsel.

**IV. CONCLUSION**

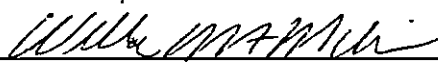
22. Denied. Respondent has been served with a response to the New Matter simultaneously with the service of the response to this Motion.

23. Denied. The undersigned counsel has entered an appearance for the Complainant.

WHEREFORE, Complainant Manir Corporation requests that the Honorable Commission deny the Motion for Judgment On the Pleadings of the Respondent.

Respectfully submitted,

BY:

  
\_\_\_\_\_  
WILLIAM C. MACMILLAN, ESQUIRE  
Attorney for Respondent Manir Corporation  
Attorney ID No.: 43460  
101 Hopkins Avenue  
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Haddonfield, New Jersey 08033  
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**VERIFICATION**

I, William C. MacMillan, Esquire, do hereby declare that I am counsel for Manir Corporation; 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 31, 2014

  
\_\_\_\_\_  
WILLIAM C. MACMILLAN, ESQ.

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