

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANTONIO ROMEO	:	
Complainant,	:	DOCKET NO. C-2015-2479260
v.	:	
PECO ENERGY COMPANY	:	
Respondent.	:	

**ANSWER OF COMPLAINANT, ANTONIO ROMEO, TO PECO ENERGY
COMPANY’S NEW MATTER**

Complainant, Antonio Romeo, hereby responds to the New Matter of PECO Energy Company (“PECO”) as follows:

1. Denied as stated. By way of further response, the allegations in this paragraph purport to characterize and interpret complainant’s Formal Complaint, which speaks for itself.
2. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
3. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
4. Denied. By way of further response, PECO completely ignores complainant’s argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.
5. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
6. Denied. By way of further response, PECO completely ignores complainant’s argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.

7. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
8. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
9. Denied. By way of further response, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.
10. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
11. Denied. By way of further response, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.
12. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
13. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
14. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
15. Complainant is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and therefore denies the same.
16. Denied. By way of further response, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.

17. Denied. By way of further response, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.
18. Denied as stated and mischaracterizes complainant's Formal Complaint. By way of further response, the allegations in this paragraph purport to characterize and interpret complainant's Formal Complaint, which speaks for itself. Moreover, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.
19. Denied. By way of further response, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.
20. Denied. By way of further response, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.
21. Denied. By way of further response, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.
22. Denied. By way of further response, PECO completely ignores complainant's argument that Act 129 is preempted by federal law, which, on its own, entitles complainant to the relief requested.

WHEREFORE, complainant, Antonio Romeo, respectfully requests that the Public Utility Commission deny the affirmative relief requested by PECO in its New Matter, and grant complainant all of the requested relief in his Formal Complaint.

Dated: June 4, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'AR', is positioned above a horizontal line.

Antonio Romeo
Complainant