



An Exelon Company

Legal Department
2301 Market Street / S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Direct Dial: 215.841.6841

July 13, 2015

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

RE: Roxanne McKinnion v. PECO Energy Company
PUC Docket No.: C-2015-2485443

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: Certificate of Service

SL/alb
Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROXANNE MCKINNION

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2015-2485443

NOTICE TO PLEAD

To: Roxanne McKinnion

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 within 20 days from service of this notice, the facts set forth by PECO Energy Company may be deemed to be true, thereby requiring no other proof. All pleadings, such as a Reply to Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Shawane Lee, and where applicable, the Administrative Law Judge presiding over the issue.

Failure to respond to this Motion could result in the dismissal of your case.

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, Esquire
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated: July 13, 2015



Shawane L. Lee
Counsel for PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19101-8699
Tel. (215) 841-6841
Fax. (215) 568-3389
shawane.lee@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROXANNE MCKINNION

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2015-2485443

MOTION FOR JUDGMENT ON THE PLEADINGS

PECO Energy Company ("PECO"), pursuant to 52 Pa. Code §5.102, respectfully requests that your Honorable Commission dismiss the instant complaint inasmuch as Complainant requests a payment arrangement. No factual dispute has been raised in the pleadings. Pursuant to 66 Pa.C.S. §1405(c), Complainant is ineligible for a Commission-ordered payment agreement, and thus Complainant fails to state a claim upon which relief can be granted. Therefore, PECO is entitled to judgment as a matter of law.

1. On or about May 29, 2015, Complainant filed a Formal Complaint against Respondent, PECO, requesting to receive a Commission-ordered payment agreement. A copy of Complainant's Formal Complaint is attached hereto as Exhibit 1.
2. PECO was served with the Formal Complaint on June 2, 2015.
3. On May 26, 2015, PECO filed an Answer, New Matter and Notice to Plead. A copy of PECO's Answer and New Matter is attached hereto as Exhibit 2.
4. PECO averred in its New Matter that Complainant was enrolled in its Customer Assistance Program (CAP) on June 14, 2003 under Tier D. New Matter ¶1.
5. PECO averred that Complainant was removed from the program on May 07, 2013. New Matter ¶2.
6. PECO averred that Complainant reenrolled in the program on October 24, 2014 under Tier D. New Matter ¶3.

7. PECO averred that Complainant is due to recertify in the CAP program on October 24, 2016. New Matter ¶4.

8. PECO averred that the Complainant's balance is \$2,119.27. New Matter ¶5.

9. PECO averred that the Complainant's entire balance is comprised of CAP arrears. New Matter ¶6.

10. PECO averred that Complainant is actively enrolled in the CAP program. ¶7.

11. As the entire balance consists of CAP arrears, PECO averred that no agreement may be issued under 66 Pa.C.S. §1405(c). New Matter ¶9.

12. To date, 20 days have passed since PECO filed its New Matter.

13. PECO 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).

14. Under 66 Pa.C.S. §1405(c), the Commission is precluded from establishing a payment agreement for customers participating in CAP. Section 1405(c) states as follows: "Customer assistance program rates shall be timely paid and shall not be the subject of payment agreements negotiated or approved by the commission."

15. 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. 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.

16. 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).

17. 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).

18. The pleadings in this case reveal the following:

- a. There is no factual dispute that (a) Complainant is enrolled in CAP, (b) the entire past due balance is CAP arrears, (c) the sole relief Complainant seeks is a Commission-ordered payment agreement.
- b. Under 66 Pa.C.S. §1405(c), the Commission is prohibited from ordering a payment agreement for an account holder whose past due balance consists of CAP arrears. Therefore, the Commission cannot grant the sole relief Complainant seeks.

19. Because no factual dispute exists and the Complaint fails to state a claim for which relief can be granted, PECO is entitled to judgment as a matter of law.

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the instant complaint with prejudice, as it relates to a request for a prohibited payment agreement on CAP arrears, and the Complaint therefore fails to state a claim upon which relief can be granted.

Respectfully submitted,



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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROXANNE MCKINNION

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2015-2485443

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Motion for Judgment on the Pleadings upon the party listed below, in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

VIA First Class Mail
Roxanne McKinnion
1417 S. 19th Street
Philadelphia, PA 19146



Shawane L. Lee

DATED: July 13, 2015

EXHIBIT 1

Botak, Amy:(PECO)

From: eServe@pa.gov
Sent: Tuesday, June 02, 2015 2:00 PM
To: Lee, Shawane L.:(PECO)
Cc: Botak, Amy:(PECO)
Subject: [EXTERNAL] 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-2015-2485443**.
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.*

PECO ENERGY
EXHIBIT 1

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print in ink or type.

1. CUSTOMER (COMPLAINANT) INFORMATION

Your name, mailing address, county, telephone number, utility account number and service address:

Name Roxanne McKinnon

Street/P.O. Box 1417 50.19th St Apt # —

City Philadelphia State Pa Zip 19146

County Philadelphia

Daytime Telephone Number Where We Can Contact You: (215) 755-2837

E-mail Address (optional): dashabazza@yahoo.com

Utility Account Number 31250-00306
(from your bill)

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name —

Street/P.O. Box —

City — State — Zip —

2. FULL NAME OF UTILITY COMPANY (RESPONDENT):

PECO Energy Company Ad ^{6/2/15}

3. TYPE OF UTILITY (check one)

ELECTRIC

GAS

WATER

TELEPHONE
(local, long distance)

STEAM HEAT

WASTE WATER

MOTOR CARRIER

(e.g., taxi, moving company, limousine)

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

MAY 29 2015

RECEIVED

4. COMPLAINT (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.
- Other (explain).

B. State the facts of your complaint.

Include any specific dates, times or places that may be important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

I'm writing this statement on the behalf of my mother Roxanne McKinnon because she is suffering from early stages of dementia. Somehow she has lost her place on the CAP Program, and it is not being made clear to me Omar Shabazz, the older son on how my mother Roxanne got put off the Program. PECO was informing me that in order for my mother to get back on the CAP Program she would have to pay 400.00 + plus that she don't have at the present time, I'm doing a formal complaint because I have exhausted all other avenues with P.ECO, and my mothers lights are about to be shut off. Could some one at the Secretary P PUC help me with this matter before her lights be shut off?

5. RELIEF

How do you want your complaint to be resolved? Use additional paper if you need more space.

as stated earlier, if my mother could pay either a little more money to be put back on the CAP Program or be aloud some time to get the 400.00 plus dollars, This is the only way I can see this matte being resolved. Thank you for honoring my Trime

Qmm A. Shabazz

6. PROTECTION FROM ABUSE

Answer the following 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 billing problem, 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

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES (includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. LEGAL REPRESENTATION (IF ANY)

If you are represented by a lawyer in this matter you must provide your lawyer's name, address, telephone number, and e-mail address, if known.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

E-mail Address (If Known) _____

9. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:

I Omar A Shabazz ^{son of} Roxanne McKinon 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).

Omar A. Shabazz
(Signature)

5/29/2015

(Date)

Title of authorized employee or officer

10. FILING

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
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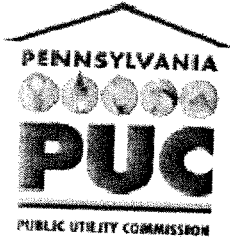
RECEIVED
MAY 29 2015
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Facsimiles and/or electronic filings of the complaint 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 complaint for your records.

EXHIBIT 2



PENNSYLVANIA PUBLIC UTILITY COMMISSION

CONSUMERINFO UTILITY&INDUSTRY FILING&RESOURCES ABOUTPUC CONTACTUS

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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-2015-2485443
Description:	Roxanne McKinnion - PECO Energy Group Answer to the Formal Complaint
Transmission Date:	6/22/2015 9:32:03 AM
Filed On:	6/22/2015 9:32:03 AM
eFiling Confirmation Number:	1596329

Uploaded File List

File Name	Document Class	Document Type
Roxanne McKinnion - Answer to Formal Complaint.pdf	Communication	Answer to Formal Complaint

PECO ENERGY
EXHIBIT **2**



An Exelon Company

Legal Department
2301 Market Street / S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Direct Dial: 215-841-6841

June 22, 2015

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

RE: Roxanne McKinnion v. PECO Energy Company
PUC Docket No.: C-2015-2485443

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy's Answer to the 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 horizontal flourish extending to the right.

Shawane Lee
Counsel for PECO Energy Company

SL/ab

cc: **CALL OF THE DOCKET**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROXANNE MCKINNON

Complainant

v.

PECO ENERGY COMPANY

Respondent

DOCKET NO. C-2015-2485443

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 20 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, June 22, 2015



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**

ROXANNE MCKINNON
Complainant

v.

PECO ENERGY COMPANY
Respondent

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DOCKET NO. C-2015-2485443

ANSWER OF RESPONDENT,
PECO ENERGY COMPANY

On June 2, 2015, PECO Energy Company ("PECO Energy") was served with a formal complaint filed by Roxanne McKinnon (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, Complainant's son (Omar Shabazz) states that PECO has threatened to terminate his mother's service. Mr. Shabazz additionally states that PECO has removed his mother from the Customer Assistance Program ("CAP") and is requesting \$400.00 for her to go back onto the program. The Complainant requests a payment agreement to prevent service termination. PECO Energy avers

that the Complainant is actively enrolled in the CAP program and requests dismissal pursuant to 66 Pa. C.S. §1405(c).

The Complainant established service at 1417 S. 19th Street, Philadelphia, PA 19146 under account number 31250-00306. See Account Activity Statement, attached hereto as Exhibit "1". The Complainant was originally enrolled in PECO Energy's Customer Assistance Program ("CAP") on June 14, 2003 under Tier D. The Complainant has been enrolled in the CAP program since this time. Over the years, she was removed from the program for failing to recertify but reenrolled in the program shortly after she was removed. She was last removed from the program on May 7, 2013; however, she reenrolled in the program on October 24, 2014 under Tier D. She is next scheduled to recertify in the program on October 24, 2016. The Complainant is actively enrolled in the CAP program. See CAP History, attached hereto as Exhibit "2". Her entire balance is comprised of CAP arrears.

On April 21, 2015, the Complainant filed an informal complaint with the Bureau of Consumer Services ("BCS") at case number 003336597, requesting a payment agreement to prevent her service from being terminated. See Case Details Report #003336597, attached hereto as Exhibit "3". The BCS issued a Decision Report on April 24, 2015 dismissing the case pursuant to 66 Pa. C.S. §1405(c). See BCS Decision Report #003336597, attached hereto as Exhibit "4".

The Complainant's balance is \$2,119.27, which is comprised entirely of CAP arrears. See Exhibit "1". The Complainant is not entitled to a PUC ordered payment agreement on her balance. 66 Pa.C.S. § 1405(c) provides that, "(c)ustomer assistance program rates shall be timely paid and shall not be the subject of payment agreements negotiated or approved by the

commission.” Consequently, pursuant to 66 Pa.C.S. § 1405(c), the PUC has no jurisdiction to give the Complainant a payment agreement.

5. Denied.
6. Admitted
7. Admitted.
8. PECO Energy neither admits nor denies the allegations in paragraph 8. 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 Company ("PECO Energy"), pursuant to 52 Pa. Code § 5.62(b), further responds to the Complaint and states:

1. The Complainant was originally enrolled in PECO Energy's Customer Assistance Program ("CAP") on June 14, 2003 under Tier D.
2. The Complainant was removed from the program on May 7, 2013.
3. The Complainant reenrolled in the program on October 24, 2014 under Tier D.
4. The Complainant is next scheduled to recertify in the program on October 24, 2016.
5. The Complainant's balance is \$2,119.27.
6. The Complainant's entire balance is comprised of CAP arrears.
7. The Complainant is actively enrolled in the CAP program.

8. 66 Pa.C.S. § 1405(c) provides that, “(c)ustomer assistance program rates shall be timely paid and shall not be the subject of payment agreements negotiated or approved by the commission.”

9. Consequently, pursuant to 66 Pa.C.S. § 1405(c), the PUC has no jurisdiction to give the Complainant and Ms. Moore a payment agreement.

10. PECO Energy avers that the Complainant’s complaint should be dismissed pursuant to 66 Pa. C.S. §1405(c).

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

ROXANNE MCKINNON
Complainant

v.

PECO ENERGY COMPANY
Respondent

DOCKET NO. C-2015-2485443

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: June 22, 2015



Shawane L. Lee

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ROXANNE MCKINNON
Complainant

v.

PECO ENERGY COMPANY
Respondent

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DOCKET NO. C-2015-2485443

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:

Roxanne McKinnon
1417 S. 19th Street
Philadelphia, PA 19146

Dated at Philadelphia, Pennsylvania, June 22, 2015.



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

PECO Account Activity Statement

*** Account Information ***

Account Number: 31250-00306
 Account Status: Active
 Requested By: ROXANNE MCKINNON
 (215)755-2837 Extension:

Mail To:
 ROXANNE MCKINNON
 1417 S 19TH ST
 PHILADELPHIA PA 19146

Current Bill: \$99.54
 Billed Prior: \$2019.73
 Balance Due: \$2119.27
 Service Address: 1417 S 19TH ST
 PHILADELPHIA PA 19146

*** Current Account Status ***

Date: 06/04/15
 Page: 1 of 4

Meter Bill Grp: 10
 Rate: CAP Opt D Electric Residential Service

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
06/04/13	Payment	05/13/13 06/13/13			\$84.00	\$52.00	\$206.00	\$122.00	07/08	644
06/14/13	BUDGET BILLING				\$0.09		\$206.09			
06/14/13	Regular Bill				\$84.00		\$206.09		08/07	931
07/15/13	Late Payment Charge				\$52.00		\$271.52		09/05	1080
07/16/13	BUDGET BILLING				\$1.43		\$271.52			
07/16/13	Regular Bill	07/14/13 08/12/13			\$84.00		\$271.52			
07/17/13	Payment				\$84.00		\$271.52			
08/13/13	Payment				\$52.00		\$271.52			
08/13/13	Late Payment Charge				\$52.00		\$271.52			
08/14/13	BUDGET BILLING				\$1.43		\$271.52			
08/14/13	Regular Bill	08/12/13 09/11/13			\$84.00		\$271.52			
09/10/13	Late Payment Charge				\$3.89		\$271.52			
09/13/13	BUDGET BILLING				\$144.00		\$271.52			
09/13/13	Regular Bill	08/12/13 09/11/13			\$144.00		\$271.52			
09/17/13	Payment				\$144.00		\$271.52			
10/14/13	BUDGET BILLING				\$6.18		\$271.52			
10/14/13	Regular Bill	09/11/13 10/10/13			\$144.00		\$271.52			
10/14/13	Late Payment Charge				\$5.34		\$271.52			
11/12/13	Payment				\$52.00		\$271.52			
11/12/13	BUDGET BILLING				\$144.00		\$271.52			
11/12/13	Regular Bill	10/10/13 11/10/13			\$144.00		\$271.52			
11/12/13	Late Payment Charge				\$6.23		\$271.52			
12/09/13	Payment				\$6.23		\$271.52			
12/10/13	Late Payment Charge				\$50.00		\$271.52			
12/13/13	BUDGET BILLING				\$7.25		\$271.52			
12/13/13	Regular Bill	11/10/13 12/11/13			\$7.25		\$271.52			
01/13/14	Late Payment Charge				\$144.00		\$271.52			
					\$9.93		\$271.52			



PECO Account Activity Statement

Date: 06/04/15

Page: 3 of 4

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
09/11/14	BUDGET BILLING	08/13/14 09/10/14			\$246.00		\$246.00			
	** Budget Bill Detail **	Actual Bill Amount:			143.92		143.92			
						BB Deferred Amount:	188.02			
09/23/14	Regular Bill				\$1466.01	\$1752.63	\$1752.63	\$1486.63	10/03	942
09/23/14	Payment Agreement				\$286.62		\$286.62			
09/23/14	DEFERRED PAYMENT AGREEMENT				\$1466.01		\$1466.01			
10/03/14	Paid In Advance				\$1466.01		\$1466.01			
10/08/14	Late Payment Charge					\$286.62	\$286.62			
10/14/14	BUDGET BILLING	09/10/14 10/13/14			\$17.13		\$17.13			
	** Budget Bill Detail **	Actual Bill Amount:			114.15		114.15			
						BB Deferred Amount:	56.17			
10/14/14	Regular Bill				\$246.00		\$246.00			
10/24/14	Transfer To PPA					\$1729.14	\$1729.14	\$1196.52	11/05	675
11/06/14	PPA Adjustment				\$1729.14		\$1729.14			
11/06/14	Payment Agreement				\$1729.14		\$1729.14			
11/06/14	PPA Adjusted				\$1729.14		\$1729.14			
11/07/14	BUDGET BILLING	10/13/14 11/07/14			\$1729.14		\$1729.14			
	** Budget Bill Detail **	Actual Bill Amount:			23.39		23.39			
						BB Deferred Amount:	-33.44			
11/07/14	DEFERRED PAYMENT AGREEMENT				\$113.00		\$113.00			
11/07/14	Regular Bill				\$28.82		\$28.82			
11/12/14	Payment					\$141.82	\$141.82		12/01	487
12/10/14	BUDGET BILLING	11/07/14 12/10/14			\$113.00		\$113.00			
	** Budget Bill Detail **	Actual Bill Amount:			130.77		130.77			
						BB Deferred Amount:	-15.67			
12/10/14	DEFERRED PAYMENT AGREEMENT				\$28.82		\$28.82			
01/07/15	Regular Bill				\$1671.50		\$1671.50			
01/07/15	Bill Out DPA due to Default				\$1.89		\$1.89		01/02	1295
01/13/15	Late Payment Charge					\$141.82	\$141.82			
01/13/15	Payment Agreement				\$1.89		\$1.89			
01/13/15	BUDGET BILLING	12/10/14 01/13/15			\$113.00		\$113.00			
	** Budget Bill Detail **	Actual Bill Amount:			213.56		213.56			
						BB Deferred Amount:	84.89			
01/13/15	Regular Bill				\$1.70		\$1.70			
02/10/15	Late Payment Charge				\$113.00		\$113.00			
02/12/15	BUDGET BILLING	01/13/15 02/12/15			\$114.89		\$114.89	\$1.89	02/04	1839
	** Budget Bill Detail **	Actual Bill Amount:			141.37		141.37			
						BB Deferred Amount:	113.26			
02/12/15	DEFERRED PAYMENT AGREEMENT				\$28.82		\$28.82			
02/12/15	Regular Bill				\$258.41		\$258.41			
02/25/15	Payment				\$242.61		\$242.61			
03/13/15	BUDGET BILLING	02/12/15 03/13/15			\$28.82		\$28.82			
	** Budget Bill Detail **	Actual Bill Amount:			129.35		129.35			
						BB Deferred Amount:	0.00			
03/13/15	DEFERRED PAYMENT AGREEMENT				\$271.43		\$271.43			
03/13/15	Regular Bill				\$258.82		\$258.82		04/06	1312

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
04/13/15	Bill Out DPA due to Default									
04/13/15	ELECTRIC SERVICE	03/13/15 04/13/15	19337	122050268	\$1585.04					
04/13/15	DEFERRED PAYMENT AGREEMENT				\$130.37					
04/13/15	Late Payment Charge				\$28.82					
04/13/15	Regular Bill				\$4.07					
05/12/15	ELECTRIC SERVICE	04/13/15 05/12/15	20251	122050268	\$70.73		\$434.69	\$275.50	05/05	1319
05/12/15	Late Payment Charge				\$28.81					
05/12/15	Regular Bill						\$2119.27	\$2048.54	06/03	914

EXHIBIT 2

CAP RATE HISTORY

Customer: Roxann McKinnon
 Address: 1417 S 19th Street
 Philadelphia PA 19146

Account: 31250-00306

View CAP History for Account 31250-00306

Account Edit Help

Activity Date	CAP Activity	CAP Rate
10/24/14	PPA Changed	CAP Opt D Electric Residential Service
01/02/14	Sent CAP Application Packet	
05/07/13	Removed From Program	

View CAP History for Account 31250-00306

Account Edit Help

Activity Date	CAP Activity	CAP Rate
04/08/13	Re-Certification Letter Sent	
03/22/13	Re-Certification Letter Sent	
04/21/11	Re-Certification completed	CAP Opt D Electric Residential Service
12/31/10	CAP Rate Change	CAP Opt D1 Electric Residential Service
10/20/10	Enrolled	zCAP Opt D Electric Residential Service
11/13/09	Removed From Program	
09/16/09	Re-Certification Letter Sent	
09/01/09	Re-Certification Letter Sent	
10/01/07	Enrolled	zCAP Opt D Electric Residential Service
04/08/09	Sent CAP Application Packet	

CAP RATE HISTORY

Customer: Roxann McKinnon
 Address: 1417 S 19th Street
 Philadelphia PA 19146

Account: 31250-00306

CAP Program for Account 31250-00306

Account Edit Help

Status					
Date Taken	CAP Rate	FPL %	Recertification Date	End Date	CAP Status
10/24/14	D	59.00	10/24/16	/ /	Enrolled in Progra
10/01/07	D	74.00	04/21/13	05/07/13	Removed from Pr
06/14/03		1.14	04/02/04	04/14/06	Removed from Pr

View CAP Details for Account 31250-00306

Edit Help

Percent FPL	<input type="text" value="65"/>	Pre-program Arrears	<input type="text" value="0.00"/>
Suggested CAP Rate	<input type="text" value="D"/>	Social Security	<input type="text" value="***.***"/>
Current CAP Rate	<input type="text"/>	Recertification Date	<input type="text" value="04/02/04"/>
Start Date	<input type="text" value="06/14/03"/>	Status	<input type="text" value="Removed from Program"/>

Request Application

Current CAP Rate

New CAP Rate

Special CAP Rate Change
 Complete Recertification
 Reinstate CAP
 Potential Health Usage

 Refused to Drop Supplier
 Refused Budget Billing
 Customer Refused Program

Extenuating Circumstance

Remove/Refused Reason

CAP RATE HISTORY

Customer: Roxann McKinnon
 Address: 1417 S 19th Street
 Philadelphia PA 19146

Account: 31250-00306

CAP Program for Account 31250-00306						
Account Edit Help						
Status						
Date Taken	CAP Rate	FPL %	Recertification Date	End Date	CAP Status	
10/24/14	D	59.00	10/24/16	1/1	Enrolled in Progra	
10/01/07	D	74.00	04/21/13	05/07/13	Removed from Pr	
06/14/03		1.14	04/02/04	04/14/06	Removed from Pr	

View CAP Details for Account 31250-00306			
Edit Help			
Percent FPL	65	Pre-program Arrears	0.00
Suggested CAP Rate	D	Social Security	***.##.****
Current CAP Rate		Recertification Date	04/21/13
Start Date	10/01/07	Status	Removed from Program
Request Application	[Dropdown]		
Current CAP Rate	[Text Field]		
New CAP Rate	[Dropdown]		
<input type="checkbox"/> Special CAP Rate Change <input type="checkbox"/> Complete Recertification <input type="checkbox"/> Reinstated CAP <input type="checkbox"/> Potential Health Usage <input type="checkbox"/> Refused to Drop Supplier <input type="checkbox"/> Refused Budget Billing <input type="checkbox"/> Customer Refused Program			
Extenuating Circumstance	[Dropdown]		
Remove/Refused Reason	Income Verification Form Not Returned		

CAP RATE HISTORY

Customer: Roxann McKinnon
 Address: 1417 S 19th Street
 Philadelphia PA 19146

Account: 31250-00306

CAP PROGRAM FOR ACCOUNT 31250-00306
 Account Edit Help

Status					
Date Taken	CAP Rate	FPL %	Recertification Date	End Date	CAP Status
10/24/14	D	59.00	10/24/16	/ /	Enrolled in Program
10/01/07	D	74.00	04/21/13	05/07/13	Removed from Program
06/14/03		1.14	04/02/04	04/14/06	Removed from Program

View CAP Details for Account 31250-00306

Edit Help

Percent FPL	<input type="text" value="65"/>	Pre-program Arrears	<input type="text" value="0.00"/>
Suggested CAP Rate	<input type="text" value="D"/>	Social Security	<input type="text" value="***.***.***"/>
Current CAP Rate	<input type="text" value="D"/>	Recertification Date	<input type="text" value="10/24/16"/>
Start Date	<input type="text" value="10/24/14"/>	Status	<input type="text" value="Enrolled in Program"/>

Request Application	<input type="text" value=""/>
Current CAP Rate	<input type="text" value="CAP Opt D Electric Residential Service"/>
New CAP Rate	<input type="text" value=""/>

EXHIBIT 3



June 11, 2015

Case Details Report

BCS Case #: 003336597
Customer Name: ROXANN MCKINNON
Service Address: 1417 S 19TH STREET

BCS Bill Account #: 3125000306

Mailing Address: PHILADELPHIA, PA 19146

Home Phone: () -
Business Phone: () -
Business name: OMAR SHABAZZ SON AUTH
Alternate contact:

Date Case Opened: 2015-04-21
PAR Case: Y
Investigator Name: BCS CASE POOL
Investigator Phone: (717) 787-0000
Service class: R
Previous case #:

Date Cut Out: 2015-04-27
Universal Service: N
Contact Type: TELEPHONE
Amount in Arrears: \$0.00

Adults: 2
Children: 0
Children Ages:
Gross Income: \$1679.00
Miscellaneous Info:

Complaint Reason:
ON - PAR NEEDED (# 61)

Customer Problem Description:
STRAIGHT PARREQUEST A PAYMENT ARRANGEMENT

Company Position:
04/17/2015 PECO ENERGY WANTS HER TO PAY 300 TO KEEP SERVICES ON.

PECO ENERGY
EXHIBIT 3

EXHIBIT 4



June 11, 2015

BCS Decision Report

BCS Case #: 003336597 Open Date: 2015-04-21
Customer Name: ROXANN MCKINNON
Service Address: 1417 S 19TH STREET

PHILADELPHIA, PA 19146
BCS Bill Account #: 3125000306 Previous Case #:
Violation Type: NO Chapter Type:
Decision Type: W Section / Rule:
Investigator Name: BUREAU OF
CONSUMER SERVICE

Decision Issued Date: 2015-04-24
Case Closed Date: 2015-04-22

Letter Description:

Total Balance: \$0.00 Balance Date:
Amount to Restore Service: \$0.00 Amount to Continue Service: \$0.00
Date Payment Due: Regular Budget Amount: \$0.00
Special Budget Payment: \$0.00 Final Bill Monthly Payment: \$0.00
Plus Arrears Payment: \$0.00 End of Month Payment: \$0.00
Current Monthly Payment: \$0.00
Payment Terms:

PAR Description:

Resolution Description:
CASE CLOSED - DISMISSED PER 1405C - THE DATE OF COMPLAINT RESOLUTION
AND EXPIRATION OF THE STAY OF TERMINATION IS 4/29/2015

PESCO ENERGY
EXHIBIT **4**