



An Exelon Company

Legal Department
2301 Market Street / S23-1
Philadelphia, PA 19103

Direct Dial: 215-841-6841

July 28, 2015

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

RE: Ronald Bordone v. PECO Energy Company
PUC Docket No.: F-2015-2486774 and F-2015-2490538

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Motion to Consolidate the Formal Complaints* with regard to the matters 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

cc: Ronald Bordone

SL/lo

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RONALD BORDONE	:	
	:	
v.	:	DOCKET NO. F-2015-2486774
	:	DOCKET NO. F-2015-2490538
	:	
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 Motion to Consolidate 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, July 29, 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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RONALD BORDONE	:	
	:	
v.	:	DOCKET NO. F-2015-2486774
	:	DOCKET NO. F-2015-2490538
	:	
PECO ENERGY COMPANY	:	

PECO ENERGY COMPANY’S MOTION TO CONSOLIDATE

Respondent, PECO Energy Company (“PECO”), pursuant to 52 Pa. Code § 5.81(a) respectfully petitions this Honorable Commission to consolidate the matters of Ronald Bordone v. PECO Energy, the above referenced dockets because the two complaints are identical. In support of this request, PECO avers:

1. On or around June 10, 2015, PECO Energy was served with a Complaint filed by Complainant with the Pennsylvania Public Utility Commission (“PUC”) at Docket No. F-2015-2486774. A copy is attached as Exhibit “1”.
2. In the Complainant’s formal complaint, he alleged that PECO Energy was threatening to terminate or had already terminated his service. The Complainant states there are incorrect charges on his bill and that he is appealing the decision issued by the Bureau of Consumer Services.
3. Specifically, the Complainant ticked the box “The utility is threatening to shut off my service or has already shut off my service”. In an attachment, the Complainant averred that the Complainant is appealing Bureau of Consumer Services (“BCS”) Decision Report #003285833 that held him responsible for a foreign wiring balance transferred into his name as the landlord

for his property located at 1854 E Orleans Street, Philadelphia, PA 19134. The Complainant alleges that PECO never advised him there was foreign wiring at the premises. See Exhibit “1”.

4. On or about July 1, 2015, PECO was served with another Complaint from Complainant at Docket No. F-2015-2490538, which is identical to the complaint filed at Docket No. F-2015-2486774. A copy is attached as Exhibit “2”.

5. Pursuant to 52 Pa. Code § 5.101(b), PECO timely filed an Answer to Docket No. F-2015-2486774 on June 29, 2015 and also filed an answer to Docket No. F-2015-2490538 on July 17, 2015. A copy is attached as Exhibit “3”.

6. PECO Energy avers that the Complaints are identical and allege the same issues of service termination, incorrect billing and foreign wiring.

7. These Complaints should be consolidated pursuant to 52 Pa. Code § 5.81 (a), which holds:

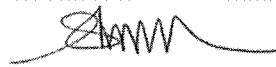
The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

8. Both Complaints cover the same customer, address, and contain common questions of law and fact such that one hearing covering both Complaints will avoid unnecessary costs or delay to the Commission. Each Complaint relates to the same issues and facts, whether the Complainant’s electric service should be terminated and whether the Complainant’s bill is accurate.

9. Accordingly, the two Complaints should be consolidated to save the time, resources and the expense of the parties and the Commission.

WHEREFORE, PECO Energy Company respectfully requests that this Honorable Commission issue an Order consolidating the complaints at docket numbers F-2015-2486774 and F-2015-2490538. Both complaints are identical and involve service termination and incorrect billing.

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**

RONALD BORDONE

v.

PECO ENERGY COMPANY

:
:
:
:
:
:
:

DOCKET NO. F-2015-2486774
DOCKET NO. F-2015-2490538

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: July 29, 2015

Shawane L. Lee

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

RONALD BORDONE	:	
	:	
v.	:	DOCKET NO. F-2015-2486774
	:	DOCKET NO. F-2015-2490538
	:	
PECO ENERGY COMPANY	:	

CERTIFICATE OF SERVICE

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

Ronald Bordone
3874 Frankford Ave
Philadelphia, PA 19124

Dated at Philadelphia, Pennsylvania, July 29, 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

EXHIBIT “1”

Botak, Amy:(PECO)

From: eServe@pa.gov
Sent: Wednesday, June 10, 2015 10:01 AM
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 Form** has been served in this proceeding. This document is docketed as **F-2015-2486774**. You may view this document at **Formal Complaint Form**

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

RECEIVED
2015 JUN -9 AM 10:53
PA. P.U.C.
SECRETARY'S BUREAU

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. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name RONALD BOZONNE

Street/P.O. Box 3874 FRANKFORD AVE Apt #

City PHILADELPHIA State PA Zip 19124

County PHILADELPHIA

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

(215) 749-1350 (home) (856) 534 9991 (mobile)

E-mail Address (optional) RON 3380@AOL.COM

Utility Account Number (from your bill) 9720100904

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 RONALD BOZONNE

Street/P.O. Box 1854 E ORLEANS ST 1RL / 2FL

City PHILADELPHIA State PA Zip 19134

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):

- | | |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> WASTEWATER/SEWER |
| <input type="checkbox"/> GAS | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance) |
| <input type="checkbox"/> WATER | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |
| <input type="checkbox"/> 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).

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.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

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.

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.

Ronald Bordone
3874 FRANKFORD AVE
PHILADELPHIA, PA 19124

FAX

To:
PUC
P.O. Box 3265
Harrisburg, PA 17105-3265

From:
Ronald Bordone

Date:
Number of Pages:
Phone: 215-744-1350
Cell : 856-534-9991

Remarks:

BCS NO :3285833

APPEALS DEPT:

I am appealing your decision because of reasons 4, 8, 9, 20 and 24 I was never notified of foreign wiring by PECO or the tenant . I never established residency at 1854 E. Orleans. When service was needed I made clear about that fact and PECO informed that taxes would be charged. I also supplied PECO with my mailing address of 3878 Frankford Ave every time service was needed. I have never received a call regarding 1854 E Orleans. I was notified that service was terminated by a new tenant in unit 1 they states they could not establish service because of a block on the address after termination. As you can see by the time line after finding out about the issue the matter was handled within weeks and that was only due to bad weather or the matter would have been resolved in days. Also please take into account the two units only have a total of 5 Electric heaters that draw 2.1 amps at 500 watts each a 30 gallon water heater and a electric stove in each unit. I am confused to think how they could compile those two bills over the time expresses. Please be fair in your decision because in an earlier conversation with someone in PECO she states should only be liable for the \$915.39 because I was never contacted by PECO about the bill transfer.

THANK YOU

RONALD BORDONE

WORK 215-744-1350

CELL 856-534-9991

BOEDONE

3874 FRANK POW AVE
PHILAD PA 19124

PHILADELPHIA PA 190

POST OFFICE BOX 5000



SECRETARY

COMMISSION

PENN PUBLIC UTILITY
400 NORTH STREET

17120

HARRISBURG, PA ~~17102~~

EXHIBIT “2”

Botak, Amy:(PECO)

From: eServe@pa.gov
Sent: Wednesday, July 01, 2015 10:01 AM
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 Form** has been served in this proceeding. This document is docketed as **F-2015-2490538**. You may view this document at **Formal Complaint Form**

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 2

timely

BCS: 3285833
PECO ENERGY

Must be returned by June 23, 2015

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.

I. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number: It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name RONALDO BOROONE

Street/P.O. Box 3874 FRANKFORD AVE Apt #

City PHILA State PA Zip 19124

County PHILA

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

215 244 1350 (home) 856 534-9991 (mobile)

E-mail Address (optional): RON3380@AOL.COM

Utility Account Number (from your bill) 972 0100904

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 RONALDO BOROONE

Street/P.O. Box 1854 E OCEANS ST 1+2

City PHILA State PA Zip 19134

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

RECEIVED
2015 JUN 19 AM 9:16
SECRETARY'S BUREAU
PA P.U.C.

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).

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.

ATTACHED
LETTER

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

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.

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.

9. Verification and Signature

You must sign your complaint. Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. If you do not sign the Formal Complaint, the PUC **will not accept** it.

Verification:

I, RONALD BIRDAK, 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).

Ronald Bir

(Signature of Complainant)

6-13-15

(Date)

owner

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept** it.

10. Two Ways to File Your Formal Complaint

Electronically. You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

Note: If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

Mail. Mail the completed form with your original signature and any attachments, by certified mail, first class mail, or overnight delivery to this address:

Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Note: Formal Complaints sent by fax or e-mail 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 Formal Complaint for your records.