

Legal Department

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Business Services
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ORIGINAL

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October 11, 2005

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

RECEIVED

OCT 11 2005

**RE: Angela Kelly v. PECO Energy Company
PUC Docket No. C-20055348**

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU


Dear Mr. McNulty:

Enclosed for filing with the Commission are the following documents and copies in the matter referenced above.

- X Answer (original and 3 copies)
- Petition (original and 3 copies)
- Answer and Motion (original and 3 copies)
- Motion to Dismiss (original and 3 copies)
- Reply to Motion/Petition (original and 3 copies)
- Exceptions (original and 9 copies)
- Reply Exceptions (original and 9 copies)
- Brief (original and 9 copies)
- Reply Brief (original and 9 copies)

Also enclosed is an extra copy of this letter, which I request that you date stamp and return to me in the envelope provided as proof of filing. I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties.

Very truly yours,


Lisa A. Lutz
Counsel for PECO Energy Company

LAL/zr

Enc.

DOCUMENT
FOLDER

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA KELLY

v.

PECO ENERGY COMPANY

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DOCKET NO. C-20055348

ANSWER OF RESPONDENT PECO ENERGY COMPANY

PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code § 5.61, responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. PECO Energy admits notice was given to

Complainant that her electric service was scheduled for termination. PECO denies that the notice was improper due to the account delinquency.

By way of background, PECO avers that Complainant failed to respond and failed to properly complete the application for Customer Assistance Program ("CAP"). PECO denies that Complainant has been making regular monthly payments.. PECO Energy avers that Complainant's current account balance is \$662.68. Complainant's payment history includes many partial or missed payments. Complainant has many defaulted payment arrangements on her account.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE

DOCKETED
OCT 17 2005

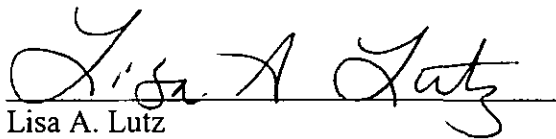
**DOCUMENT
FOLDER**

A decision by the Bureau of Consumer Services ("BCS") dated September 6, 2005 indicated Complainant's informal complaint was dismissed due to her failure to reply to the income verification letter. A copy of this decision is attached as Exhibit A.

5. This paragraph is a request for relief and no answer is required.
6. PECO Energy is without information to confirm or deny this statement.
7. Admitted.

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the instant Complaint.

Respectfully Submitted,



Lisa A. Lutz
Counsel for PECO Energy Company
2301 Market Street, S23-1, P.O. Box 8699
Philadelphia, PA 19101-8699
Direct Dial: 215.841.6841;
Fax: 215.568.3389
Lisa.Lutz@exeloncorp.com

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BEFORE THE
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VERIFICATION

I, Lisa A. Lutz, 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: October 11, 2005



Lisa A. Lutz

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Date: 9/28/05

PA. Public Utility Commission
Bureau Of Consumer Services
Inbound Closing Report

Case Number: 1905092
Customer Name: ANGELA KELLY
Address: 249 N HORTON S
PHILADELPHIA PA 19139-1119

Opened On: 5/20/05
Utility Type: Electric Distributor
Account Number: 250451101282
Company Name: PECO Energy

Prior Case: Total Balance: \$478.01 Balance Date:

Compliance Violation(Alleged, Actual, No): NO Chap 56/64/Other: Section/Rule:

Decision Issued: Y Oral Written:
Investigator: KWIATKOWSKI, JOSHUA PUC Decision Issued Dt: PUC Case Closed Dt: 9/6/05
Decision Recvd Dt: 9/6/05 06:25PM

Letter Description:

To Restore Service Pay: \$0.00 To Continue Service Pay: \$0.00 By:
Terms:
Special Budget Amount: \$0.00 Regular Budget Amount: \$0.00 Plus Arrears Payment: \$0.00
Final Bill Monthly Payment: \$0.00 Current Bill Monthly Payment: \$0.00
End Of Month Payment: \$0.00

Par Description:

Resolution:

CUSTOMER FAILED TO REPLY TO INCOME VERIFICATION LETTER - CASE CLOSED

Exhibit A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA KELLY

v.

PECO ENERGY COMPANY

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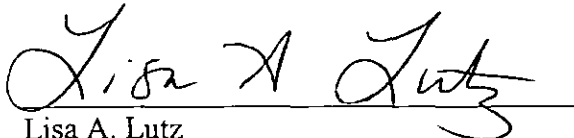
DOCKET NO. C-20055348

CERTIFICATE OF SERVICE

I, Lisa A. Lutz, 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:

ANGELA KELLY
249 N. Horton Street
Philadelphia, PA 19139

Dated at Philadelphia, Pennsylvania, October 11, 2005.



Lisa A. Lutz
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