

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

Direct Dial: 215.841.6841

February 4, 2016

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

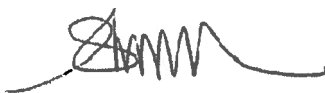
RE: Garrett House Apartments v. PECO Energy Company
PUC Docket No.: C-2015-2516861

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *Respondent, 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,



Shawane Lee
Counsel for PECO Energy Company

cc: Certificate of Service

SL/alb
Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GARRETT HOUSE APARTMENTS	:	
Complainant	:	
v.	:	DOCKET NO. C-2015-2516861
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.102(b), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion for Judgment on the Pleadings 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 Motion for Judgment on the 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:
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, February 4, 2016



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**

GARRETT HOUSE APARTMENTS	:	
Complainant	:	
v.	:	DOCKET NO. C-2015-2516861
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**RESPONDENT, PECO ENERGY COMPANY'S
MOTION FOR JUDGMENT ON THE PLEADINGS**

Respondent, PECO Energy Company (“PECO Energy”), pursuant to 52 Pa. Code § 5.102(a) respectfully petitions this Honorable Commission to dismiss the instant Complaint or in the alternative set a date certain for the Complainant to have counsel enter an appearance for the following reasons:

I. PROCEDURAL HISTORY:

1. On or about December 4, 2015, Complainant, Garrett House Apartments, filed a Formal Complaint with the Pennsylvania Public Utility Commission (“PUC”) against PECO Energy.
2. On December 8, 2015, the above-mentioned Formal Complaint was served on PECO Energy. A copy of Complainant’s Formal Complaint is attached hereto as (Exhibit 1).
3. On December 28, 2015, PECO Energy filed an Answer and New Matter to the Formal Complaint. A copy of PECO Energy’s Answer and New Matter is attached hereto as (Exhibit 2).

II. RELEVANT FACTS:

4. In their Complaint, the Complainant alleges that there are incorrect charges on their bill.

5. Complainant also alleges that PECO transferred charges that do not belong to Garrett House Apartments.

6. PECO Energy avers that the Complainant, Garrett House Apartments has an account for electric commercial service under account number 21680-36040.

7. Complainant, Garrett House Apartments, is a commercial customer operating an apartment complex at the service address 3420 Garrett Road, C-3, Drexel Hill, PA.

8. Complainant, Garrett House Apartments is a corporation (3420 Garrett Road LLC) incorporated in the State of New Jersey on September 6, 1996. See New Jersey State Corporation Search, attached hereto as (Exhibit 3).

III. LEGAL ARGUMENT

A. Standard of Review

9. 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.

10. 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.

11. 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).

12. 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).

B. The Complainant's Complaint should be dismissed because Garrett House Apartments is a commercial customer; and the Complainant is required to be represented by counsel.

13. The Complainant, Garrett House Apartments is a commercial customer operating an apartment complex at the service address at issue.

14. Garrett House Apartments is a corporation (3420 Garrett Road LLC) incorporated in the State of New Jersey on September 6, 1996. See New Jersey State Corporation Search, attached hereto as (Exhibit 3).

15. As a commercial customer and corporation, Complainant is required to be represented by counsel in adversarial proceedings before the Commission.

16. The proceedings become adversarial at the time when respondent files an Answer. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975).

17. On December 28, 2015, PECO Energy filed an Answer and New Matter to the Complainant's Complaint. See (Exhibit 2).

18. Once PECO Energy filed the Answer, the current PUC matter became adversarial. See 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc.

19. To date, the Complainant commercial customer corporation has not had counsel enter an appearance for this matter.

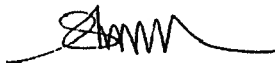
20. Accordingly, PECO Energy requests that the Commission dismiss the Complainant's Complaint for failure to be represented by counsel, or in the alternative, designate a date certain the Complainant must have counsel enter an appearance.

IV. CONCLUSION

21. The Complainant has had no attorney enter an appearance; and therefore, the Complaint against PECO Energy should be dismissed, or in the alternative, a date certain set for Complainant's counsel to enter an appearance.

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the Complainant's Complaint or set a date certain for Complainant's counsel to enter an appearance.

Respectfully Submitted,



Shawane L. Lee
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
(215) 841-6841
Fax: 215.568.3389

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GARRETT HOUSE APARTMENTS	:	
Complainant	:	
v.	:	DOCKET NO. C-2015-2516861
	:	
PECO ENERGY COMPANY	:	
		Respondent

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: February 4, 2016

Shawane L. Lee

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GARRETT HOUSE APARTMENTS :
 Complainant :
 v. :
 :
PECO ENERGY COMPANY :
 Respondent :

DOCKET NO. C-2015-2516861

CERTIFICATE OF SERVICE

I, Shawane L. Lee, hereby certify that I have this day served a copy of PECO Energy Company's Motion for Judgment on the Pleadings in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Garrett House Apartments
c/o 3240 Garrett Road, LLC
P.O. Box 1155 St. Georges Avenue
Rahway, NJ 07065

Administrative Law Judge Christopher P. Pell
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

Dated at Philadelphia, Pennsylvania, February 4, 2016



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

Botak, Amy:(PECO)

From: eServe@pa.gov
Sent: Tuesday, December 08, 2015 4:16 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-2015-2516861**.

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

*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 Garrett House Apartments
Street/P.O. Box 1155 St. Georges Avenue

City: Rahway State: NJ Zip Code: 07065
County: Upper Darby

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

(_732_) _381-6640_ (main office)

E-mail Address (optional): jessiep@rigapts.com

Utility Account Number (from your bill:) 21680-36040

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 Garrett House Apartments
Street/P.O. Box 3420 Garrett Road

City Drexel Hill State PA Zip 19026

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.

Garrett House Apartments

RECEIVED

DEC 4 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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). Peco transferred amount to one open bill and some of the charges do not belong to Garrett House

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.

WE have been trying to resolve this issue with Peco since 2014. When it started the bill was at \$162 not its \$412.

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.

We have emailed and called and never received the information we have requested.

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) _____

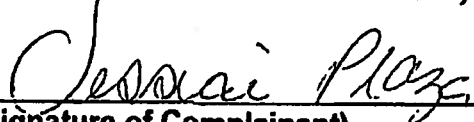
Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

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 Jessica Plaza, 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).



(Signature of Complainant) 12/4/15
(Date)

Accounts Payable

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.

Jessie Plaza

From: "Jessie Plaza" <jessiep@rigapts.com>
Date: Friday, December 04, 2015 9:57 AM
To: <pecobizservices@exelon.corp>
Subject: 21680-36040

Peco has ballooned this account to a ridiculous amount. We have been trying to work with Peco since 2014 to clear up this account. The only thing we see Peco doing is adding on connection charges and late fees and transferring amount from who knows where.

Again, what we need to know is where these balance where being transferred from and what time period. Peco created this issue not us. We have been doing our best to clear this up. From a bill which started close to \$162 now they have ballooned it to \$413. We are not going to pay for services that belong to tenants, not paying for late fees since Peco never got back to us and definitely not paying for any Connection Charges which they keep adding on to every bill.

If those electric charges are for C3 there is tenant who lives there that is their bill. I will also be reporting this issue to the Board of Utilities.

Jessica Plaza
Account Payable

12/4/2015

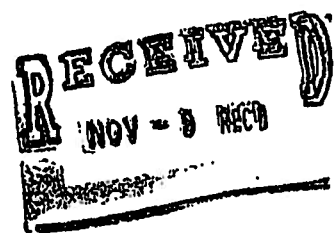


Emergency and Repairs: 1-800-841-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO Equipment. For all other business, call 1-800-194-4000.

Name: GARRETT HSE
 Account Number: 21680-36040
 Phone Number: 732-381-6640
 Service Address: 3420 GARRETT RD, C-3, DREXEL HILL

Billing Summary

Bill Date	11/03/2015
Connection charge - standard	\$6.00
Connection charge - standard	\$6.00
Connection charge - standard	\$6.00
Connection charge - standard	\$6.00
Connection charge - standard	\$6.00
Connection charge - standard	\$6.00
Connection charge - standard	\$6.00
Connection charge - standard	\$6.00
Charges from previous bill	\$3.67
Transfer service 3420 GARRETT RD DREXEL HILL	\$116.64
Late payment charge	\$174.03
Total Other Charges	\$50.66
	\$389.04



30

Current Period Charges

Electric	\$24.65
Total New Charges	\$24.65
Total Amount Due on 11/25/2015	\$413.69

General Information

Next scheduled meter reading: December 08, 2015
 PECO, 2301 Market Street, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date. Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de fecha de vencimiento.

Customer Self Service - Manage Your Account 24/7
www.peco.com/ebill - Go paperless: receive and pay your bill
www.peco.com/service - Start, stop and transfer your service
www.peco.com/SmartIdeas - Save energy and money
 Pay by phone with credit/debit card at 1-877-432-9384 (\$2.35 fee)

Message Center

From PECO:
 New charges contain estimated total state taxes of \$1.71, including \$1.45 for State Gross Receipts Tax.
 Your electric price to compare is \$0.0850 per kWh. This may change in March, June, September and December. For more information and supplier offers visit www.PAPowerSwitch.com and www.oca.state.pa.us.

When paying in person, please bring the entire bill. (continued on next page)



- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
- Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

0010685 01 MB 0.436 **AUTO T2 0 8762 07065-283155 -C01-81-P19714-1123 78



GARRETT HSE
 1155 SAINT GEORGES AVE
 RAHWAY, NJ 07065-2831



Account Number 21680-36040 Payment Receipt Stamp

Payment Amount

Please pay this amount by 11/25/2015 \$413.69

PECO - PAYMENT PROCESSING
 PO BOX 37629
 PHILADELPHIA PA 19101-0629



216803604000004136953290413698

related with
associated
Account's Ad



Emergency and Repairs: 1-800-841-4141. This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO Equipment. For all other business, call: 1-800-494-4000.

Name: **GARRETT HSE**
Account Number: **21680-36040**

Meter Information

Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
11/03	122190511	General Service	Tot kWh	7483 Actual	7602 Actual	119	1	119

Total kWh Used 119

Electric Residential Service - Current Period Detail

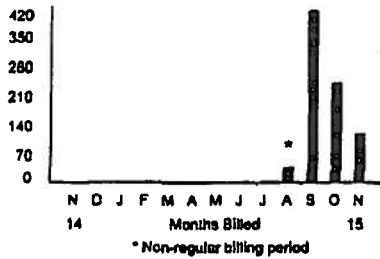
Service 10/05/2015 to 11/03/2015 - 29 days

Customer charge					\$7.12
Generation Charges	119 kWh	X	\$0.07990		9.51
Transmission Charges	119 kWh	X	0.00500		0.60
Distribution Charges	119 kWh	X	0.06270		7.46
State Tax Adjustment					-0.04

Total Current Charges

\$24.65

13-Month Usage (Total kWh)



Your Usage Profile

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	119	4.1	29	68
Last Month	241	7.5	32	71
Last Year	0	0.0	0	0

Avg kWh per Month	203
Total Annual kWh Usage	813

Shopping Information Box

When shopping for a competitive electric/natural gas supplier, please provide the following:

Account number: 21680-36040
Gas Rate:

Electric Rate: Electric Residential Service

If you are purchasing the energy you use from a competitive supplier, it is important to understand the terms of your contract and expiration date.



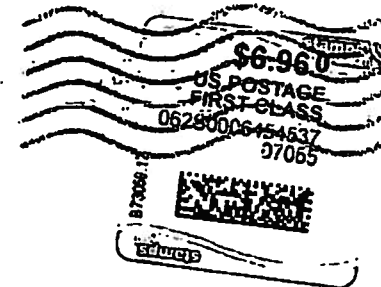
DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

REAL ESTATE INVESTMENT GROUP
1155 ST. GEORGE AVENUE,
RAHWAY, NEW JERSEY 07065



DVD P&DC
RAHWAY NJ 070
34 OCT 2015 PM 11 L

7015 0640 0006 0133 9007



RECEIVED

DEC 4 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

1712030079



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-2015-2516861
Description:	Garrett House Apartments - PECO Energy Company Answer to Formal Complaint
Transmission Date:	12/28/2015 9:59:29 AM
Filed On:	12/28/2015 9:59:29 AM
eFiling Confirmation Number:	1616573

Uploaded File List

File Name	Document Class	Document Type
Garrett House Apartments - Answer to Formal Complaint.pdf	Communication	Answer to Formal Complaint

PECO ENERGY
EXHIBIT **2**



An Exelon Company

Legal Department
2301 Market Street / S23-1
Philadelphia, PA 19101-8699

Direct Dial: 215-841-6841

December 28, 2015

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

RE: Garrett House Apartments v. PECO Energy Company
PUC Docket No.: C-2015-2516861

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy's Answer to the Formal Complaint*. At this time, PECO Energy Company is requesting that the above-referenced matter be scheduled for an in person hearing.

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
Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GARRETT HOUSE APARTMENTS	:	
Complainant	:	
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PECO ENERGY COMPANY	:	
Respondent	:	

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, December 28, 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**

GARRETT HOUSE APARTMENTS
Complainant

v.

PECO ENERGY COMPANY
Respondent

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:
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:
:
:
:

DOCKET NO. C-2015-2516861

ANSWER OF RESPONDENT,
PECO ENERGY COMPANY

On December 8, 2015, PECO Energy Company ("PECO Energy") was served with a formal complaint filed by Garrett House Apartments (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.

The Complainant alleges in their formal complaint that there are incorrect charges on their bill. The Complainant alleges that PECO transferred amount to an open bill and some of the charges do not belong to Garret House Apartments. PECO Energy specifically denies Complainant's allegations and states the charges are correct. Specifically, PECO Energy states the following:

Preliminarily, PECO Energy avers that the Complainant is a commercial customer operating a business at the premises. The Complainant is a corporation. As a commercial customer, Complainant is required to be represented by counsel in adversarial proceedings before the Commission.¹

The Complainant has an account at 3420 Garret Road, C-3, Drexel Hill, PA under account number 21680-36040. See Account Activity Statement, attached hereto as Exhibit "1". The Complainant entered into a Landlord Agreement with PECO Energy. The purpose of the Landlord Agreement is to ensure continuous service to landlords who do not want service physically disconnected between the occupancy of tenant apartment units. Garrett House Apartments' Landlord Agreement permitted them the flexibility of having the lights remain on when tenants moved out of apartments. This allowed them to have service at vacant units to prevent the pipes from freezing and to have the lights on in order to show vacant apartments. Under the agreement, instead of electric service being disconnected after a tenant vacated the premises, service was automatically transferred into Complainant's name. When a new tenant applied for electric service at the apartment unit, the service was removed from Complainant's name.

A separate process called "Internal Matching" impacted the Complainant's accounts. When a service account is closed and the final bill is not paid, PECO Energy's billing system automatically searches for an active account in the same customer's name. This process ensures that final bills follow their owners and increases the likelihood of payment.

¹ The proceedings become adversarial at the time when respondent files an Answer. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975). Accordingly, PECO request that the Commission establish a date certain by which Complainant is required to have an attorney enter an appearance in this matter.

In the case of Garrett House Apartments, these policies combined to create the transferred balances referenced in the Complainant's formal complaint. When a tenant vacated an apartment and requested a discontinuance of PECO Energy service, the account was automatically placed in Complainant's name and remained in its name until the next tenant called for service. If all or some of the bills were not paid when the account closed, the final balance was matched to another account which was active and on between tenants. Because these "on-between-tenants" accounts may be short-lived, the result is a large bill made up of many small transferred balances.

PECO is permitted to transfer the unpaid balance on a closed account to a customer's active account when the service is for the same rate class and customer. 52 Pa.Code §56.16 states in relevant part:

§56.16 A ratepayer who is about to vacate premises supplied with utility service or who wishes to have service discontinued shall give at least 7 days notice to the utility... In the absence of a notice, the ratepayer shall be responsible for services rendered.

Here, the Complainant disputes being billed for service when the tenant fails to timely request new service pursuant to the terms of his or her lease. If the Complainant does not request discontinuance, and the tenant does not request service in his or her name, the Complainant will be billed for the service. In order for the Complainant to be relieved of their responsibility for payment, they must request discontinuance or the tenant must apply for service. PECO Energy provides Landlord Agreements solely as a customer service option to landlords. If the Complainant does not wish to have that option, the Landlord Agreement can be removed and PECO Energy will terminate the service to each apartment unit when a tenant vacates.

Balances accrued on the accounts listed below were left unpaid and transferred to the Complainant's open active account number 21680-36040:

Account	Balance	Due Date	Transfer
43336-28036	\$162.02	05/13/14.	Final bill transferred to 52614-56021
52614-56021	\$215.65	08/26/14	Final bill transferred to 09300-18054
09300-18054	\$244.37	12/01/14	Final bill transferred to 43336-28063
43336-28063	\$223.70	01/20/15.	Final bill transferred to 37150-04204
37150-04204	\$238.79	03/04/15.	Final bill transferred to 21680-41041
21680-41041	\$287.40	07/29/15	Final bill transferred to 21680-36040

See Account Activity Statements, attached hereto as Exhibit "2".

The Complainant's balance is \$405.72. See Exhibit "1". Once the above accounts finalized, PECO Energy transferred the final balance to the open active account in the Complainant's name at account number 21680-36040 through the company's internal matching process. See Exhibit "1".

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.

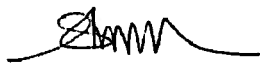
NEW MATTER OF RESPONDENT, PECO ENERGY COMPANY

PECO Energy, pursuant to 52 Pa. Code § 5.62(b), further responds to the Complaint and states:

1. Complainant is a commercial customer operating at the address at issue.
2. The Complainant is a corporation.
3. As a commercial customer, Complainant is required to be represented by counsel in adversarial proceedings before the Commission. The proceedings become adversarial at the time when respondent files its Answer.
4. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975).

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission issue a date certain for the Complainant to have counsel enter an appearance.

Respectfully Submitted,



Shawane L. Lee
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
(215) 841-6841
Fax: 215.568.3389

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GARRETT HOUSE APARTMENTS
Complainant

v.

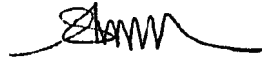
PECO ENERGY COMPANY
Respondent

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DOCKET NO. C-2015-2516861

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: December 28, 2015

Shawane L. Lee

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

GARRETT HOUSE APARTMENTS	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2015-2516861
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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:

**Garrett House Apartments
P.O. Box 1155 St. Georges Avenue
Rahway, NJ 07065**

Dated at Philadelphia, Pennsylvania, December 28, 2015.



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

EXHIBIT "1"

CUAR038

PECO Account Activity Statement

Date: 12/11/15
Page: 1 of 1

CUAR038

PECO Account Activity Statement

Date: 12/16/15
Page: 1 of 1

*** Account Information ***

Account Number: 21680-36040
 Account Status: Final
 Requested By: GARRETT HSE
 (732)381-6640 Extension:

Mail To:
 GARRETT HSE
 1155 SAINT GEORGES AVE
 RAHWAY NJ 07065

*** Current Account Status ***

Current Bill: \$0.00
 Billed Prior: \$405.72
 Balance Due: \$405.72
 Service Address:
 3420 GARRETT RD
 C-3
 DREXEL HILL PA 19026

Credit Amount: \$0.00
 Deposit Requested: \$0.00
 Deposit On-Hand: \$0.00

Meter Bill Grp: 06
 Rate: Electric Residential Service

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
08/06/15	ELECTRIC SERVICE	08/05/15 08/06/15	6930	122190511	\$6.16					
08/06/15	CONNECTION CHARGE - STANDARD				\$6.00					
08/06/15	Regular Bill						\$12.16		08/28	41
08/19/15	Transfer Debit from 21680-41041				\$270.37					
08/19/15	Payment					\$12.16				
09/02/15	Late Payment Charge									
09/03/15	ELECTRIC SERVICE	08/06/15 09/03/15	7242	122190511	\$0.09					
09/03/15	Regular Bill				\$67.84					
09/30/15	Late Payment Charge						\$338.30	\$270.46	09/25	412
10/05/15	ELECTRIC SERVICE	09/03/15 10/05/15	7483	122190511	\$3.73					
10/05/15	Regular Bill				\$42.64					
11/03/15	ELECTRIC SERVICE	10/05/15 11/03/15	7602	122190511	\$24.65		\$384.67	\$342.03	10/27	241
11/03/15	Late Payment Charge				\$4.37					
11/03/15	Regular Bill									
11/18/15	ELECTRIC SERVICE	11/03/15 11/18/15	7651	122190511	\$10.78		\$413.69	\$389.04	11/25	119
11/18/15	Regular Bill									
12/14/15	Transfer from 92808-37013						\$424.47	\$384.67	12/10	49
12/16/15	Late Payment Charge					\$0.02				
12/16/15	Transfer from 37150-04204					\$8.10				
						\$10.63				

A

EXHIBIT "2"

CUAR038

PECO Account Activity Statement

Date: 12/16/15
Page: 1 of 1

*** Account Information ***

Account Number: 37150-04204
 Account Status: Final
 Requested By: GARRETT HSE
 (732)381-6640 Extension:
 Mail To: GARRETT HSE
 1155 SAINT GEORGES AVE
 RAHWAY NJ 07065

*** Current Account Status ***

Current Bill: \$0.00
 Billed Prior: \$0.00
 Balance Due: \$0.00
 Service Address: 3420 GARRETT RD
 C-5
 DREXEL HILL PA 19026
 Credit Amount: \$0.00
 Deposit Requested: \$0.00
 Deposit On-Hand: \$0.00
 Meter Bill Grp: 06
 Rate: Electric Residential Service

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
01/12/15	CONNECTION CHARGE - STANDARD									
01/12/15	Regular Bill				\$6.00					
01/27/15	Transfer Debit from 43336-28063						\$6.00			
02/02/15	Payment				\$223.93				02/03	
02/06/15	ELECTRIC SERVICE					\$6.00				
02/06/15	Regular Bill	01/10/15 02/06/15	4446	122190510	\$11.65					
02/10/15	ELECTRIC SERVICE						\$235.58	\$223.93	03/02	30
02/10/15	Regular Bill	02/06/15 02/10/15	4461	122190510	\$3.21					
03/10/15	Late Payment Charge						\$238.79	\$6.00	03/04	15
03/11/15	Late Payment Charge				\$2.67					
04/13/15	Late Payment Charge				\$2.62					
05/12/15	Late Payment Charge				\$2.67					
05/14/15	Transfer to 21680-41041				\$2.67					
12/16/15	Late Payment Charge					\$249.42				
						\$10.63				

PECO ENERGY
 COMPANY


CUAR038

PECO Account Activity Statement

Date: 12/16/15
Page: 1 of 1

*** Account Information ***

Account Number:
21680-41041
Account Status: Final
Requested By:
GARRETT HSE
(732)381-6640 Extension:

Mail To:
GARRETT HSE
1155 SAINT GEORGES AVE
RAHWAY NJ 07065

DREXEL HILL PA 19026

*** Current Account Status ***

Current Bill: \$0.00
Billed Prior: \$0.00
Balance Due: \$0.00
Service Address:
3420 GARRETT RD
B-15
DREXEL HILL PA 19026

Credit Amount: \$5.60
Deposit Requested: \$0.00
Deposit On-Hand: \$0.00
Meter Bill Grp: 06
Rate: Supplier Electric Residential Service

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
05/07/15	ELECTRIC SERVICE	05/06/15 05/07/15	5242	123611452	\$0.96					
05/07/15	CONNECTION CHARGE - STANDARD				\$6.00					
05/07/15	Regular Bill									
05/14/15	Transfer Debit from 37150-04204									
05/18/15	Payment				\$249.42		\$6.96		05/29	5
06/03/15	Late Payment Charge					\$6.96				
06/05/15	ELECTRIC SERVICE	05/07/15 06/05/15	5299	123611452	\$0.01					
06/05/15	Regular Bill				\$15.34					
07/07/15	ELECTRIC SERVICE	06/05/15 07/02/15	5387	123611452	\$19.83		\$264.77	\$249.43	06/29	57
07/07/15	Late Payment Charge				\$2.80					
07/07/15	Regular Bill									
07/16/15	Payment						\$287.40	\$267.57	07/29	88
08/04/15	Late Payment Charge					\$19.83				
08/19/15	Transfer to 21680-41041				\$2.80					
12/16/15	Late Payment Charge					\$270.37				
						\$5.60				

CUAR038

PECO Account Activity Statement

Date: 12/11/15
Page: 1 of 1

*** Account Information ***

Account Number: 52614-56021
 Account Status: Final
 Requested By: GARRETT HSE
 (732)381-6640 Extension:
 Mail To: GARRETT HSE
 1155 SAINT GEORGES AVE
 RAHWAY NJ 07065

*** Current Account Status ***

Current Bill: \$0.00
 Billed Prior: \$0.00
 Balance Due: \$0.00
 Service Address: 3420 GARRETT RD
 C-16 DREXEL HILL PA 19026
 Credit Amount: \$0.00
 Deposit Requested: \$0.00
 Deposit On-Hand: \$0.00
 Meter Bill Grp: 06
 Rate: Electric Residential Service

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
04/09/14	ELECTRIC SERVICE	03/25/14 04/08/14	144	122191846	\$12.20					
04/09/14	CONNECTION CHARGE - STANDARD				\$6.00					
04/09/14	Regular Bill						\$18.20		05/01	60
04/28/14	Payment									
05/06/14	ELECTRIC SERVICE	04/08/14 05/06/14	167	122191846	\$10.51	\$18.20				
05/06/14	Regular Bill						\$10.51		05/28	23
05/19/14	Transfer Debit 43336-28036									
05/27/14	Payment				\$162.02					
06/03/14	Late Payment Charge					\$10.51				
06/05/14	ELECTRIC SERVICE	05/06/14 06/05/14	235	122191846	\$0.16					
06/05/14	Regular Bill				\$17.05					
07/02/14	Late Payment Charge						\$179.23	\$162.18	06/27	68
07/07/14	ELECTRIC SERVICE	06/05/14 07/07/14	287	122191846	\$1.99					
07/07/14	Regular Bill				\$14.71					
07/31/14	Payment						\$195.93	\$181.22	07/29	52
08/04/14	ELECTRIC SERVICE	07/07/14 08/02/14	474	122191846	\$34.43	\$14.71				
08/04/14	Regular Bill						\$215.65	\$181.22	08/26	187
08/05/14	Late Payment Charge									
09/03/14	Transfer to 09300-18054				\$2.00					
							\$217.65			

CUAR038

PECO Account Activity Statement

Date: 12/14/15
Page: 1 of 1

*** Account Information ***

Account Number: 09300-18054
 Account Status: Final
 Requested By: GARRETT HSE
 (732)381-6640 Extension:

Mail To: GARRETT HSE
 1155 SAINT GEORGES AVE
 RAHWAY NJ 07065

*** Current Account Status ***

Current Bill: \$0.00
 Billed Prior: \$0.00
 Balance Due: \$0.00
 Service Address: 3420 GARRETT RD
 A-4
 DREXEL HILL PA 19026

Credit Amount: \$0.00
 Deposit Requested: \$0.00
 Deposit On-Hand: \$0.00

Meter Bill Grp: 06
 Rate: Electric Residential Service

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
07/09/12	Transfer Debit 52614-56021									
09/02/14	CONNECTION CHARGE - STANDARD				\$217.65					
09/02/14	Regular Bill				\$6.00					
09/04/14	Transfer Debit						\$6.00		09/24	
09/04/14	ELECTRIC SERVICE	09/01/14 09/04/14	1930	123608974	\$13.27					
09/04/14	Regular Bill				\$1.56					
09/15/14	Transfer Debit						\$225.21	\$217.65	09/26	6
09/19/14	Payment				\$6.55					
10/01/14	Late Payment Charge					\$25.82				
10/03/14	ELECTRIC SERVICE	09/04/14 10/03/14	1976	123608974	\$2.24					
10/03/14	Regular Bill				\$13.68					
10/30/14	Payment						\$215.31	\$201.63	10/27	46
11/03/14	ELECTRIC SERVICE	10/03/14 11/03/14	2020	123608974	\$13.40	\$13.68				
11/03/14	Late Payment Charge									
11/03/14	Regular Bill				\$2.25					
11/06/14	ELECTRIC SERVICE	11/03/14 11/06/14	2066	123608974	\$7.27		\$237.10	\$223.70	11/25	44
11/06/14	Regular Bill									
11/21/14	Payment						\$244.37	\$201.63	12/01	46
12/08/14	Transfer to 43336-28063					\$20.67				
						\$223.70				

CUAR038

PECO Account Activity Statement

Date: 12/11/15
Page: 1 of 1

*** Account Information ***

Account Number: 43336-28063
 Account Status: Final
 Requested By: GARRETT HSE
 (732)381-6640 Extension:

Mail To:
 GARRETT HSE
 1155 SAINT GEORGES AVE
 RAHWAY NJ 07065

*** Current Account Status ***

Current Bill: \$0.00
 Billed Prior: \$0.00
 Balance Due: \$0.00
 Service Address:
 3420 GARRETT RD
 A-18
 DREXEL HILL PA 19026

Credit Amount: \$0.00
 Deposit Requested: \$0.00
 Deposit On-Hand: \$0.00

Meter Bill Grp: 06
 Rate: Electric Residential Service

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
11/03/14	ELECTRIC SERVICE	10/18/14 11/03/14	1058	122131254	\$8.93					
11/03/14	CONNECTION CHARGE - STANDARD				\$6.00					
11/03/14	Regular Bill									
12/08/14	Transfer Debit from 09300-18054						\$14.93		11/25	36
11/21/14	Payment				\$223.70					
12/04/14	ELECTRIC SERVICE	11/03/14 12/04/14	1111	122131254	\$15.12	\$8.93				
12/04/14	Regular Bill						\$21.12	\$6.00	12/26	53
12/29/14	Payment									
12/29/14	Regular Bill					\$21.12	\$223.70	\$223.70	01/20	
12/31/14	Late Payment Charge									
01/27/15	Transfer to 37150-04204				\$0.23					
						\$223.93				

EXHIBIT 3

Site Information**Folio Number: 16-12-00391-01**

Site Location:	Garrett Rd 3420-0000
Description:	2 Sty Bldg Apts 54 Units 153.32 X 286.14 Irr
Map Number:	16-22 -647:000
Municipality:	Upper Darby Township
Property Type:	Commercial
Use Code:	
2015 School Homestead Tax Reduction:	No
Current Assessment:	\$1,575,000 01/01/2001
Additional Info:	Court Order Decrease

Current Owner(s) Information

3420 Garrett Rd Llc
C/o Garrett House Apts
1155 St George Ave
Rahway , NJ 07065

Deed Book/Page	Deed Date	Purchase Price	Service Company
1567/0596	03/17/1997	\$1.00	0000 , No Mortg Code On Rec

Prior Owner(s) Information

Name	Deed Book/Page	Date	Purchase Price
Burkhoff Bernard & Ruth &	0330/1999	05/06/1986	\$1,300,000
Garrett Corp		01/13/1970	N/A

Additional Assessment Information**Prior Assessment Info.**

Value	Date	Description
\$1,907,300	01/01/2000	County Reassessment
\$54,870	01/01/1994	Court Order Decrease
\$63,700	01/01/1994	Bor No Change

EXHIBIT 3



Business Name Search

Required Fields [*]

Search Criteria

Business Name *

3420 Garrett Road

Use "%" as a wildcard

Search →

x Cancel

Show entries

Business Name	Entity Id	City	Type	Incorporated Date
3420 GARRETT ROAD, L.L.C.	0600030463	RAHWAY	LLC	9/6/1996

Showing 1 to 1 of 1 entries

« Previous Next »

Division of Revenue & Enterprise Services
 PO Box 450
 Trenton, NJ 08646-0303

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 Division of Revenue & Enterprise Services Web Site
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 Security Policy
 Legal Statements & Disclaimers

