

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

Direct Dial: 215.841.6841

June 20, 2016

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

**RE: Stephanie Mobley v. PECO Energy Company**  
**PUC Docket No.: C-2016-2546866**

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

SL/alb  
Enclosure

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>STEPHANIE MOBLEY</b>	:	
<b>Complainants</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2016-2546866</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

**NOTICE TO PLEAD**

*To: Stephanie Mobley*

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: June 20, 2016



---

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**

<b>STEPHANIE MOBLEY</b>	:	
<b>Complainants</b>	:	
<b>v.</b>	:	<b>DOCKET NO. C-2016-2546866</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

**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 20, 2016, 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 May 23, 2016.
3. On March 31, 2016, 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 enrolled in its Customer Assistance Program (CAP) under Tier C on October 11, 2010. New Matter ¶1.
5. PECO averred that the Complainant recertified in the program on October 10, 2012. New Matter ¶2.

6. PECO averred that the Complainant's CAP Tier level changed to Tier B on October 8, 2014. New Matter ¶4.

7. PECO averred that the Complainant is scheduled to recertify in the program on October 8, 2016. New Matter ¶5.

8. PECO averred that the Complainant's entire balance is comprised of CAP arrears. New Matter ¶7.

9. PECO averred that the Complainant is actively enrolled in CAP. New Matter ¶8.

10. PECO averred that as the entire balance consists of CAP arrears, no agreement may be issued under 66 Pa.C.S. §1405(c). New Matter ¶¶9-10.

11. To date, 20 days has passed since PECO filed its New Matter.

12. 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).

13. 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."

14. 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.

15. 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).

16. 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).

17. 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.

18. 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,**



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**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**

<b>STEPHANIE MOBLEY</b>	:	
<b>Complainants</b>	:	
	:	
<b>v.</b>	:	<b>DOCKET NO. C-2016-2546866</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

**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  
Stephanie Mobley  
2131 Wakeling Street  
Philadelphia, PA 19124



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Shawane L. Lee

DATED: June 20, 2016

**EXHIBIT “1”**



**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 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) I need to pay \$460 in order to get on payment agreement and I just need a little more time do so I have been making payments as much as possible. The reason I fell behind is due to health reasons

**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.**

I just would like to have at least 30 days to get the money together that I need to get onto payment agreement. Thanks in advance for any help you can give me with this situation.

**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

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**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 Stephanie Mobley, 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).

Stephanie Mobley \_\_\_\_\_ 5/20/16 \_\_\_\_\_  
(Signature of Complainant) (Date)

\_\_\_\_\_  
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.

# **EXHIBIT “2”**



**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

CONSUMER INFO UTILITY & INDUSTRY FILING & RESOURCES ABOUT PUC CONTACT US

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- Technical Assistance
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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 ~~an~~ 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-2016-2546866
Description:	Stephanie Mobley - PECO Energy Company Answer with New Matter to Formal Complaint
Transmission Date:	5/31/2016 1:48:55 PM
Filed On:	5/31/2016 1:48:55 PM
eFiling Confirmation Number:	1635632

**Uploaded File List**

File Name	Document Class	Document Type
Stephanie Mobley - Answer to Formal Complaint.pdf	Communication	Answer to Formal Complaint

PECO ENERGY  
EXHIBIT

2

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

Direct Dial: 215-841-6841

May 31, 2016

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

**RE: Stephanie Mobley v. PECO Energy Company**  
**PUC Docket No.: C-2016-2546866**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy's Answer with New Matter to the Formal Complaint*.

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

SL/ab  
Enclosure

cc: *Scheduling Recommendation: Call of the Docket*

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**STEPHANIE MOBLEY**

**Complainants**

**v.**

**PECO ENERGY COMPANY**

**Respondent**

**DOCKET NO. C-2016-2546866**

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**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, May 31, 2016.**



---

**Shawane L. Lee  
Counsel for PECO Energy Company  
2301 Market Street S-23  
Philadelphia, PA 19101-8699  
215-841-6841  
Shawane.lee@exeloncorp.com**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**STEPHANIE MOBLEY**  
Complainants

v.

**PECO ENERGY COMPANY**  
Respondent

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**DOCKET NO. C-2016-2546866**

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**ANSWER OF RESPONDENT**  
**PECO ENERGY COMPANY**

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On May 23, 2016, PECO Energy Company ("PECO Energy") was served with a formal complaint filed by Stephanie Mobley (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 her formal Complaint, Complainant requests a payment agreement and states that she fell behind because of health reasons. PECO Energy requests dismissal pursuant to 66 Pa. C.S. §1405(c).

The Complainant established service at 2131 East Wakeling Street, Philadelphia, PA 19124. See Account Activity Statement, attached hereto as Exhibit "1". The Complainant was enrolled in PECO Energy's Customer Assistance Program ("CAP") on October 11, 2010 under Tier C. The Complaint re-certified in the program on October 10, 2012. The Complainant's

Tier level changed on September 24, 2013 to Tier D. The Complainant's CAP Tier level changed to Tier B on October 8, 2014. The Complainant is scheduled to recertify in the program on October 8, 2016. The Complainant's entire balance is comprised of CAP arrears. The Complainant is actively enrolled in CAP under Tier C.

On May 11, 2015, the Complainant filed a formal complaint at docket number C-2015-2481758, requesting a payment agreement. PECO filed a Motion for Judgment on the Pleadings averring that the Complainant's entire balance is comprised entirely of CAP arrears; and therefore, the Commission has no jurisdiction to grant the Complainant a payment agreement. On July 21, 2015, Administrative Law Judge Steven K. Haas ("ALJ Haas") issued an Initial Decision, which granted PECO's Motion for Judgment on the Pleadings and dismissed the case. The Complainant filed exceptions to ALJ Haas' Initial Decision, which was reviewed by the Commission. On November 5, 2015, the Commission adopted ALJ Haas' Initial Decision and dismissed the case in its entirety.

The Complainant's balance is \$4,044.18, 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 enrolled in PECO Energy's Customer Assistance Program ("CAP") on October 11, 2010 under Tier C.
2. The Complaint re-certified in the program on October 10, 2012.
3. On September 24, 2013, the Complainant's CAP Tier changed to Tier B.
4. The Complainant's CAP Tier level changed to Tier B on October 8, 2014.
5. The Complainant is scheduled to recertify in the program on October 8, 2016.
6. The Complainant's balance is \$4,044.18.
7. The Complainant's entire balance is comprised of CAP arrears.
8. The Complainant is actively enrolled in the CAP program.
9. 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."
10. Consequently, pursuant to 66 Pa.C.S. § 1405(c), the PUC has no jurisdiction to give the Complainant and Ms. Moore a payment agreement.

11. 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,



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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**

**STEPHANIE MOBLEY**  
Complainants

v.

**PECO ENERGY COMPANY**  
Respondent

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**DOCKET NO. C-2016-2546866**

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**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: May 31, 2016



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Shawane L. Lee

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

STEPHANIE MOBLEY  
Complainants

v.

PECO ENERGY COMPANY  
Respondent

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DOCKET NO. C-2016-2546866

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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:

Stephanie Mobley  
2131 Wakeling Street  
Philadelphia, PA 19124

Dated at Philadelphia, Pennsylvania, May 31, 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**

\*\*\* Account Information \*\*\*

Account Number: 50813-63016  
 Account Status: Active  
 Requested By: STEPHANIE R HODGLEY  
 STEPHANIE R HODGLEY  
 (215)966-1102 Extension:

\*\*\* Current Account Status \*\*\*

Current Bill: \$109.86  
 Billed Prior: \$324.32  
 Balance Due: \$4046.18  
 Service Address: 2131 E VALERIE ST PHILADELPHIA PA 19124  
 Meter Bill ID: 03  
 Meter: CAP Opt C Electric Residential Service

Mail To: STEPHANIE R HODGLEY  
 2131 VALERIE ST  
 PHILADELPHIA PA 19124

DATE	CHARGE TYPE	DATED PERIOD	READ	AMOUNT \$	GRADE	CREDIT	TOTAL	BALANCE	DUES	TERM	CCY	EX
10/02/12	EMDOST BILLING	08/30/12 10/01/12		\$82.00			\$82.00					
		** Budget Bill Detail ** Actual Bill Amount: 17.06										
10/02/12	Late Payment Charge			\$27.09			\$27.09					
10/02/12	Regular Bill			\$2082.86			\$2082.86	\$2000.86	10/24	647		
10/10/12	Payment Agreement			\$2082.86		\$140.06	\$2082.86					
10/31/12	PPA Forgiveness			\$68.00			\$68.00					
10/31/12	EMDOST BILLING	10/01/12 10/30/12		\$68.00			\$68.00					
		** Budget Bill Detail ** Actual Bill Amount: 60.29										
10/31/12	DEFERRED PAYMENT AGREEMENT			\$34.71			\$34.71					
10/31/12	Pre-Program Arrears			\$140.00			\$140.00					
12/03/12	Bill Out SWA due to Default	10/30/12 12/02/12		\$2013.44			\$2013.44	\$102.71	11/26	960		
		** Budget Bill Detail ** Actual Bill Amount: 95.42										
12/03/12	DEFERRED PAYMENT AGREEMENT			\$62.00			\$62.00					
12/03/12	Late Payment Charge			\$34.71			\$34.71					
01/02/12	Regular Bill			\$0.00			\$0.00					
01/04/12	EMDOST BILLING	12/02/12 01/03/12		\$39.69			\$39.69	\$199.82	12/26	1173		
		** Budget Bill Detail ** Actual Bill Amount: 51.93										
02/04/12	Late Payment Charge			\$62.00			\$62.00					
02/05/12	EMDOST BILLING	01/03/12 02/04/12		\$30.46			\$30.46	\$2304.95	01/26	944		
		** Budget Bill Detail ** Actual Bill Amount: 58.95										
02/05/12	Regular Bill			\$31.30			\$31.30	\$2397.41	02/27	971		
		** Budget Bill Detail ** Actual Bill Amount: 23.55										
03/06/12	Regular Bill			\$62.00			\$62.00					
04/02/12	Late Payment Charge	02/04/12 03/05/12		\$31.10			\$31.10	\$2490.71	03/20	753		
		** Budget Bill Detail ** Actual Bill Amount: 39.41										
04/04/12	EMDOST BILLING	03/05/12 04/03/12		\$62.00			\$62.00					
04/04/12	Regular Bill			\$31.35			\$31.35	\$2583.81	04/26	844		
		** Budget Bill Detail ** Actual Bill Amount: 53.26										
05/07/12	Payment Agreement	04/03/12 05/02/12		\$98.00			\$98.00					
05/23/12	LITMAG Payment			\$2713.16			\$2713.16	\$2015.16	05/28	765		
		** Budget Bill Detail ** Actual Bill Amount: 164.20										
05/28/12	Relcollineous			\$2343.16			\$2343.16					
05/28/12	Debit Transfer Payment			\$2713.16			\$2713.16					
05/28/12	Paid In Advance			\$2343.16			\$2343.16					
05/31/12	Payment Agreement			\$75.00			\$75.00					
05/31/12	LITMAG Payment			\$39.05			\$39.05					
05/31/12	EMDOST BILLING	05/02/12 05/31/12		\$75.00			\$75.00					
		** Budget Bill Detail ** Actual Bill Amount: 24.30										
05/31/12	DEFERRED PAYMENT AGREEMENT			\$39.05			\$39.05					
05/31/12	Regular Bill			\$2304.11			\$2304.11	\$-205.95	06/24	725		
06/03/12	Miscellaneous											

FBCO Account Activity Statement

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DATE	CUSTOM TYPE	BILLING PERIOD	TRND	AMOUNT \$	CUSTOM AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DOB	FIN	CCY	BY
06/03/13	Payment Agreement											
06/03/13	Public Transfer Payment											
07/01/13	PVA Forgiven											
07/01/13	EXPORT BILLING											
07/01/13	PERFORMED PAYMENT AGREEMENT	05/31/13	07/01/13									
07/01/13	Pre-Program Arrears											
07/01/13	Regular Bill											
07/29/13	Bill Out DPA due to Default											
07/30/13	Late Payment Charge											
07/31/13	EXPORT BILLING											
07/31/13	Regular Bill											
08/21/13	RECONSTRUCT FTR - CUT-OUT ROW-PAY											
08/27/13	Late Payment Charge											
08/29/13	EXPORT BILLING											
08/29/13	Regular Bill											
09/05/13	LINERAP Payment											
09/27/13	PVA Forgiven											
09/30/13	EXPORT BILLING											
09/30/13	Regular Bill											
10/29/13	EXPORT BILLING											
10/29/13	Regular Bill											
10/29/13	Late Payment Charge											
11/26/13	Regular Bill											
11/27/13	EXPORT BILLING											
11/27/13	Regular Bill											
12/30/13	Late Payment Charge											
01/02/14	EXPORT BILLING											
01/02/14	Regular Bill											
01/31/14	LINERAP Payment											
01/31/14	PVA Forgiven											
02/03/14	EXPORT BILLING											
02/03/14	Regular Bill											
02/03/14	EXPORT BILLING											
02/04/14	Regular Bill											
02/04/14	EXPORT BILLING											
03/04/14	Regular Bill											
04/02/14	EXPORT BILLING											
04/02/14	Regular Bill											
04/02/14	LINERAP Payment											
04/07/14	Payment Agreement											
05/01/14	PVA Forgiven											
05/01/14	EXPORT BILLING											
05/01/14	PERFORMED PAYMENT AGREEMENT	04/02/14	05/01/14									
05/01/14	Pre-Program Arrears											
05/01/14	Regular Bill											

FRAC Account Activity Statement

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DATE	CHANGE TYPE	BILLING PERIOD	ROW	AMOUNT \$	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DOB DATE	DOB	DOB	DOB	DOB	DOB
05/28/14	Bill Out DPA due to Default													
05/28/14	Late Payment Charge													
06/02/14	BUDGET BILLING	05/01/14 06/02/14												
	** Budget Bill Detail **	Actual Bill Amount: 64.44												
06/02/14	Regular Bill													
06/16/14	Payment													
06/16/14	Payment Agreement													
06/19/14	Returned Electronic Check													
07/01/14	PFA Forgiveness													
07/01/14	BUDGET BILLING	06/02/14 07/01/14												
	** Budget Bill Detail **	Actual Bill Amount: 136.30												
07/01/14	Late Payment Charge													
07/01/14	Pre-Program Arrears													
07/01/14	Regular Bill													
07/15/14	Payment													
07/15/14	Returned Electronic Check													
07/28/14	Bill Out PFA due to Default													
07/30/14	Late Payment Charge													
07/30/14	PFA Forgiveness													
07/30/14	PFA: PFA-PROGRAM ARREARS	07/01/14 07/31/14												
	** Budget Bill Detail **	Actual Bill Amount: 173.33												
08/05/14	Payment													
08/22/14	Payment Agreement													
08/27/14	Payment													
08/27/14	Miscellaneous													
08/27/14	Returned Electronic Check													
08/27/14	Late Payment Charge													
08/27/14	Reverse Pre-Program Arrears													
08/29/14	PFA Forgiveness													
08/29/14	BUDGET BILLING	07/31/14 08/29/14												
	** Budget Bill Detail **	Actual Bill Amount: 136.78												
08/29/14	PFA: PFA-PROGRAM ARREARS													
08/29/14	Regular Bill													
09/05/14	Payment													
09/10/14	Returned Electronic Check													
09/23/14	Bill Out DPA due to Default													
09/30/14	BUDGET BILLING	08/29/14 09/30/14												
	** Budget Bill Detail **	Actual Bill Amount: 142.47												
09/30/14	Late Payment Charge													
09/30/14	Regular Bill													
10/08/14	Payment Agreement													
10/08/14	Returned Electronic Check													
10/22/14	Returned Electronic Check													
10/20/14	Late Payment Charge													
10/29/14	BUDGET BILLING	09/30/14 10/29/14												
	** Budget Bill Detail **	Actual Bill Amount: 71.81												
10/29/14	Regular Bill													
11/06/14	Payment													
11/06/14	Payment Agreement													
11/10/14	Returned Electronic Check													
12/01/14	BUDGET BILLING	10/29/14 12/01/14												
	** Budget Bill Detail **	Actual Bill Amount: 101.82												
12/01/14	Returned Electronic Check													
12/01/14	Deferred Payment Agreement													
12/01/14	Regular Bill													

PC00 Account Activity Statement

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DATE	CURR STYS	STATUS	PERIOD	END	START	0	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	END DATE	END	CCY
12/29/14	Bill Due Due to Default						\$230.74		\$230.74				
12/30/14	Late Payment Charge						\$7.05		\$237.79				
01/02/15	Regular Bill		12/01/14	01/02/15			\$72.77		\$310.56				
02/02/15	Late Payment Charge						\$6.28		\$316.84				
02/03/15	Regular Bill		01/02/15	02/03/15			\$62.00		\$378.84				
03/03/15	Late Payment Charge						\$9.51		\$388.35				
03/04/15	Regular Bill		02/03/15	03/04/15			\$82.00		\$470.35				
04/02/15	Late Payment Charge						\$10.74		\$481.09				
04/02/15	Regular Bill		03/04/15	04/02/15			\$82.00		\$563.09				
05/01/15	Regular Bill		04/02/15	05/01/15			\$82.00		\$645.09				
05/01/15	Late Payment Charge						\$82.00		\$727.09				
05/02/15	Regular Bill		04/02/15	05/02/15			\$82.00		\$809.09				
06/02/15	Late Payment Charge						\$41.36		\$850.45				
06/02/15	Regular Bill		05/02/15	06/02/15			\$82.00		\$932.45				
07/01/15	Regular Bill		06/02/15	07/01/15			\$82.00		\$1014.45				
07/17/15	Payment						\$82.00		\$932.45				
07/20/15	Returned Electronic Check						\$107.93		\$1040.38				
07/21/15	Regular Bill		07/01/15	07/21/15			\$140.00		\$1180.38				
09/01/15	Regular Bill		07/21/15	09/01/15			\$82.00		\$1262.38				
09/01/15	Late Payment Charge						\$82.00		\$1344.38				
09/01/15	Regular Bill		07/21/15	09/01/15			\$82.00		\$1426.38				
09/20/15	Regular Bill		09/01/15	09/20/15			\$82.00		\$1508.38				
09/20/15	Late Payment Charge						\$82.00		\$1590.38				
09/30/15	Regular Bill		09/20/15	09/30/15			\$82.00		\$1672.38				
10/29/15	Regular Bill		09/30/15	10/29/15			\$82.00		\$1754.38				
11/28/15	Late Payment Charge						\$104.00		\$1858.38				
12/01/15	Regular Bill		10/29/15	12/01/15			\$49.41		\$1907.79				
12/01/15	Late Payment Charge						\$94.00		\$2001.79				
12/01/15	Regular Bill		12/01/15	12/01/15			\$82.00		\$2083.79				
01/04/16	Late Payment Charge						\$84.00		\$2167.79				
02/02/16	Regular Bill		01/04/16	02/02/16			\$52.00		\$2219.79				
02/02/16	Late Payment Charge						\$94.00		\$2313.79				
02/03/16	Regular Bill		01/04/16	02/03/16			\$51.13		\$2364.92				
02/11/16	Payment						\$95.00		\$2269.92				
03/01/16	Late Payment Charge						\$125.00		\$2144.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$2049.92				
03/03/16	Late Payment Charge						\$95.00		\$1954.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$1859.92				
03/03/16	Late Payment Charge						\$95.00		\$1764.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$1669.92				
03/03/16	Late Payment Charge						\$95.00		\$1574.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$1479.92				
03/03/16	Late Payment Charge						\$95.00		\$1384.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$1289.92				
03/03/16	Late Payment Charge						\$95.00		\$1194.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$1099.92				
03/03/16	Late Payment Charge						\$95.00		\$1004.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$909.92				
03/03/16	Late Payment Charge						\$95.00		\$814.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$719.92				
03/03/16	Late Payment Charge						\$95.00		\$624.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$529.92				
03/03/16	Late Payment Charge						\$95.00		\$434.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$339.92				
03/03/16	Late Payment Charge						\$95.00		\$244.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$149.92				
03/03/16	Late Payment Charge						\$95.00		\$54.92				
03/03/16	Regular Bill		02/03/16	03/03/16			\$95.00		\$-40.92				
03/03/16	Late Payment Charge						\$95.00		\$-135.92				

