

**PETER JOSEPH McHUGH, ESQUIRE**  
Attorney Identification Number: 80637  
47 Marchwood Road, Suite 1-H  
Exton, Pennsylvania 19341  
Telephone: 610.363.1440  
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Attorney for Complainant,  
John's Pizza and Pasta, Inc.

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOHN'S PIZZA & PASTA, INC. :  
:  
v. : DOCKET NO. C-2016-2554665  
:  
PECO ENERGY COMPANY :

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**COMPLAINANT'S ANSWER TO PECO ENERGY'S MOTION TO FILE  
ANSWER TO COMPLAINANT'S FORMAL COMPLAINT NUNC PRO TUNC**

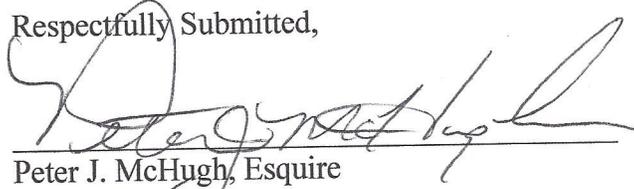
1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. To the contrary, respondent is not entitled to relief.
5. Denied as a legal conclusion. The code also speaks for itself.
6. Denied as a legal conclusion. The code also speaks for itself.
7. Denied as a legal conclusion. The decision also speaks for itself.
8. Admitted.
9. Denied. PECO's admits that the requested late filing is due solely to its own negligence, and no reasonable explanation is offered warranting relief.
10. Denied. See answer to No. 9 above. Further, PECO's negligence with requested relief has cost the complainant unwarranted expended time and fees in response, which

has been part of a pattern of untimeliness in the underlying subject matter for which it's also seeking relief.

11. Denied. PECO is not entitled to relief.

**WHEREFORE**, the complainant, John's Pizza and Pasta, Inc., respectfully requests that the motion be denied.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Peter J. McHugh", written over a horizontal line.

Peter J. McHugh, Esquire  
Counsel for Respondent,  
John's Pizza and Pasta, Inc.

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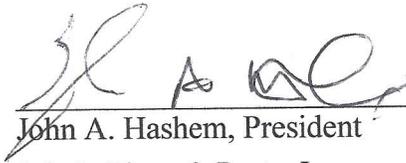
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**VERIFICATION**

I, John A. Hashem, hereby declare as President of John's Pizza & Pasta, Inc., 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 penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.

Date: August 5, 2016



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John A. Hashem, President

John's Pizza & Pasta, Inc.

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**CERTIFICATE OF SERVICE**

I, Peter J. McHugh, hereby certify that I have this day served a copy of Complainant's Answer to PECO Energy's Motion to File Answer to Complainant's Formal Complaint Nunc Pro Tunc in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Shawane L. Lee, Esq.  
PECO Energy Company  
2301 Market Street, S-23  
Philadelphia, PA 19103

Date: August 5, 2016

  
Peter J. McHugh, Esquire