



An Exelon Company

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

Direct Dial: 215.841.6841

August 17, 2016

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

**RE: Twenty Thirty-Three Walnut Street Associates v. PECO Energy Company
PUC Docket No.: C-2016-2547145**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion for Continuance of Hearing Date* 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 horizontal flourish extending to the right.

Shawane Lee
Counsel for PECO Energy Company

SL/alb
Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TWENTY THIRTY-THREE WALNUT
STREET ASSOCIATES

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2016-2547145

MOTION FOR CONTINUANCE OF HEARING DATE

PECO Energy Company ("PECO"), pursuant to 52 Pa. Code § 1.15(b), hereby requests a continuance of the hearing date scheduled in this matter and states the following:

1. An in person hearing for this matter is currently scheduled to take place on Monday, August 22, 2016 at 10:00 a.m.
2. PECO is requesting a continuance of the August 22nd hearing date because of the unavailability of PECO witness, Senior Claims Case Manager, Paul Golden.
3. In the Complainant's formal complaint, the Complainant specifically alleges that Paul Golden was "rude, uncivil, impolite, short and abrupt in denying" the Complainant's personal property damage claim.
4. Mr. Golden has prescheduled vacation on August 22nd to take his daughter to her college campus that day.
5. Mr. Golden's testimony is critical to defend the Complainant's allegations; therefore, PECO respectfully requests that the hearing be continued to a further date on October 10, 11, 12, 14, 17, 18, 19, or 21.
6. The Prehearing Order in this matter states that requests for a continuance are only granted "in rare situations where good cause exists." (Prehearing Order, citing 52 Pa. Code § 1.15).

7. PECO avers that "good cause" exists to continue the scheduled hearing to another date because one of PECO's key witnesses is unavailable.

8. PECO reached out to counsel for the opposing party, Joseph R. Pozzuolo, Esquire to obtain his position on PECO's continuance request; however, the company has not yet received a response.

9. PECO therefore respectfully requests that the hearing be continued to a further date on October 10, 11, 12, 14, 17, 18, 19, or 21.

Respectfully Submitted,



Shawane L. Lee
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
Direct Dial: 215.841.6841
Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TWENTY THIRTY-THREE WALNUT
STREET ASSOCIATES

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2016-2547145

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.



Shawane L. Lee

Date: August 17, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TWENTY THIRTY-THREE WALNUT
STREET ASSOCIATES

v.

PECO ENERGY COMPANY

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DOCKET NO. C-2016-2547145

CERTIFICATE OF SERVICE

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

Joseph R. Pozzuolo, Esquire
Pozzuolo Rodden PC
2033 Walnut Street
Philadelphia, PA 19103
Via Facsimile – (215) 977-9663

Darlene D. Heep, Administrative Law Judge
Pa. Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
Via email



Shawane L. Lee
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
Shawane.Lee@exeloncorp.com

Dated at Philadelphia, Pennsylvania, August 17, 2016.

EXHIBIT 1

Top Priority Circuit – Line 2252
 Cycle 02 - 2015
 Analysis Completion Date – 08/29/2014
 Circuit Analyzed by – Kara Ogawa and Barney Adler

Overview & Recommendations:

Line 2252 is a 13/2.4 kV distribution circuit, fed from Penn Substation, with 5.25 miles of underground construction that feeds residential and commercial customers in Center City.

In 2014, Line 2252 has a SAIFI-to-date of 3.66. This value is a result of the following:

- On 1/12/2014, cable fault at Commerce & 22nd
- On 3/17/2014, Line 2263 bracket failure at Commerce & 22nd
- On 6/10/2014, Line 2263 cable fault at Commerce & 23rd

The table below is SAIFI and CAIDI values from 2011 through 2014.

Table 1: Line 2252 SAIFI and CAIDI 2011-2014

Year	SAIFI	CAIDI
2011	0.90	49
2012	1.77	115
2013	3.35	127
2014	3.66	84

Source: OMS Circuit Dashboard accessed 8/18/14

Both Line 2252 and Line 2263 share a feeder-breaker compartment at the Penn Substation. In the past 40 months, the following six failure events on Line 2263 that have interrupted Line 2252.

- 1) 05/19/11 - PUBL DAMAGE/DIG-IN
- 2) 07/07/12 - Main-stem cable fault
- 3) 03/30/13 - 1x2 concentric cable fault
- 4) 08/23/13 - Main-stem cable fault
- 5) 03/07/14 - 1x2 concentric cable fault
- 6) 06/10/14 - 1x2 concentric cable fault

Circuit Patrol Information: This circuit is 100% underground

Tree Trimming Information: This circuit is 100% underground

Completed W/O's Enhancing Reliability (since 1/1/2010):

07459815 - 5/7/12, REPLACED 20' STRETCH 3X250-KCM CU P&L, 22ND & WALNUT
 06969886 - 6/30/10, REPLACED 40' TRIPLEX 250 CABLE AT CHESTNUT & 19TH

Open W/O's Enhancing Reliability: None

W/R's Initiated to Enhance Reliability: None

Work to be completed on different circuit: None

S/R's Initiated to Enhance Reliability:

03176253 - REPLACE DOUBLE-WHEEL GAS SWITCH WITH AUTOMATIC TRANSFER SWITCH, 22ND & MARKET

03176260 – REFINE SETTING OF VACUUM FAULT INTERRUPTER (VFI) AT 22ND & COMMERCE (PRINCIPALLY FOR THE BENEFIT OF LINE-2263). (Because Line-2263 serves a large two-building HT customer on the southwest corner of 15th & Market, a similar VFI cannot be installed on Line-2263 for the benefit of Line-2252.)

Transformers with 8 or more interruptions is the last year: None

EXHIBIT 2

Philadelphia C & M
830 S. Schuylkill Avenue
Philadelphia, PA 19146

Service Reliability Report For
TWENTY-THIRTY THREE WALNUT ST ASSOC
2033 Walnut St. Philadelphia Pa, 19103
January 1, 2012 to June 6, 2016

Account Number: 56083-00404

T-Quad: 152F6B2H

SERVICE CHARACTERISTICS			
<input type="checkbox"/> Single HT	<input type="checkbox"/> Dual HT	<input type="checkbox"/> GS	<input checked="" type="checkbox"/> Residential
Supply 1:	Line - 2252	Source Substation:	Penn Substation
Circuit Miles Aerial:		Circuit Miles UG:	5.25
Additional Information: Both Line-2252 and Line-2263 are fed from the same circuit breaker at the Penn Substation. Therefore reliability enhancements on the main stems of both lines that were recently performed under the Top-Priority-Circuit- Program improve the performance of Line-2252 (the circuit that feeds the customer at 2033 Walnut Street).			

OUTAGE HISTORY for January 1, 2012 to June 6, 2016 (Only outages affecting this customer are listed)			
Date	Time of Inter.	Cause	Customer Interruption Duration
03/03/16	22:29	Planned Outage to replace C phase module & replace secondary leads at transformer – WO# 13910350 & WO# 13933201	6 hours 15 minutes
02/11/16	17:24	Primary Supply Cable burned during Manhole Fire @ 22 nd Walnut – WO# 13612260	2 hours 27 minutes
03/24/15	12:55	Cable Fault –WO #08302751 & WO# 08243167	1 hour 21 minutes
12/06/14	07:05	Circuit tripped, was sectionalized, systematically tried back and held. No cause found. (Technicians suspect working fault)	1 hour 25 minutes
10/26/14	12:16	Cable Fault WO#-08148520	1 hour 45 minutes
06/10/14	13:45	Cable Fault WO#-08031280	34 minutes
03/25/14	00:13	Planned Outage to repair damage splice and replace transformer- WO# 07974235	3 hours 19 minutes
03/21/14	06:22	Equipment Failure (Transformer) – WO# 07974235	4 hours 31 minutes
03/17/14	07:49	Equipment Failure (Bracket) –WO# 07970931	49 minutes
01/12/14	18:08	Cable Fault – WO# 07929721	1 hour 26 minutes
12/23/13	09:08	Cable Fault – WO#07916006	8 hours 14 minutes
12/16/13	22:30	Equipment Failure (Elbow) WO#-07911869	2 hours 10 minutes
08/23/13	19:46	Customers gear equipment failed (1500 Market St)	20 minutes
03/30/13	09:54	Cable Fault- WO# 07709137	48 minutes
02/14/13	20:38	Cable Fault (Partial Power) –WO# 07684183	17 hours 7 minutes

Philadelphia C & M
 830 S. Schuylkill Avenue
 Philadelphia, PA 19146

10/04/12	11:14	Cable Fault – WO #07589919	2 hours 51 minutes
07/07/12	03:41	Cable Fault –WO# 07514295	53 minutes

RELIABILITY ENHANCEMENTS	
When	Description
2016	Replacement of the Double Wheel Gas Switch with Automatic Transfer Switch (Work is still ongoing) WO#08185788
01/07/2015	Refined settings of Vacuum Fault Interrupter WO# 08141296
10/26/2014	Replaced 210 Ft. stretch of cable, 17 th Sansom - WO# 08148520
05/12/2014	Replaced B Phase Module, 17 th Moravian –WO# 08010951
03/30/2013	Replaced 140 Ft. stretch of cable , 15 th Walnut- WO#07709137
11/27/2012	Replaced B and C Phase 4-way modules- WO# 07533912
07/06/2012	Replaced A1 and B4 elbows- WO# 07513895
04/09/2012	Replaced 15 Ft. stretch of cable, 22 nd Walnut – WO# 07460089
05/07/2012	Replaced 20 Ft. stretch of cable, 22 nd Walnut – WO# 07459815
06/30/2010	Replaced 40 Ft. stretch of cable, 19 th Chestnut – WO# 06969886
05/31/2010	Replaced 40 Ft. stretch of cable, 20 th Ranstead – WO# 06746816
12/10/2009	Replaced 200 Ft. stretch of cable, 22 nd Walnut – WO#06819073

Prepared by: T.Mays

Date: June 6, 2016

EXHIBIT 3



An Exelon Company

William A. Marron
Manager of Claims

PECO
Claims Division
2301 Market Street, 516-1
Philadelphia, PA 19103

Telephone 215.841.4295
Fax 215.841.4919
www.peco.com
www.exeloncorp.com

Direct Dial 215-956-3361

February 19, 2016

Joseph R. Pozzuolo, Esquire
2033 Walnut Street
Philadelphia, PA 19103

Re: Your Claim No: 2016095185

Dear Mr. Pozzuolo,

This letter is in response to the service related issues your insured experienced on February 11, 2016. Thank you for giving us the opportunity to investigate this situation. We know how important reliable electric service is in the lives of our customers.

Our investigation shows the service to your property was affected as a result of a service related failure. Although PECO Energy compensates customers for certain costs incurred as a result of our negligent actions, we do not guarantee continuity of service, and cannot pay for damages resulting from this event and similar events. As a result, we are not able to compensate you for any damages that you may have suffered.

I've attached a copy of section 12.1 of the PECO Energy Electric Service Tariff for your review. If you have any questions, or would like to discuss this situation, please do not hesitate to contact me at 215-956-3361.

Very truly yours,

Paul J. Golden
Senior Claims Case Manager

Greg A. Lund

MAR 04 2016

POZZUOLO RODDEN, P.C.
COUNSELORS AT LAW

THE BYE-BENSON HOUSE
2833 WALNUT STREET
PHILADELPHIA, PA 19103-4403

PHONE: (215) 977-8200
FAX: (215) 977-9663

FIRM WEB SITE:

www.pozzuolo.com

DELAWARE COUNTY OFFICE
1216 LINDALE AVENUE
DREXEL HILL, PA 19026

NEW JERSEY OFFICE
1916 E. ROUTE 70
SUITE 6
CHERRY HILL, NJ 09003
(856) 489-7730

****PLEASE REPLY TO PHILADELPHIA ****

JOSEPH R. POZZUOLO
JUDITH P. RODDEN*
JEFFREY S. POZZUOLO*
KELLY A. BARSE*
MARY YURICK

PA& NJ BARS* FL BAR +

OF COUNSEL:
BERNARD D. BEITCH**

joe@pozzuolo.com
judy@pozzuolo.com
jeff@pozzuolo.com
kelly@pozzuolo.com
mary@pozzuolo.com

February 29, 2016

PERSONAL AND CONFIDENTIAL

Mr. Paul Golden
PECO: Senior Claims Case Manager
2301 Market Street, S16-1
Philadelphia, PA 19103

RE: Claim No.: 2016095185

Dear Mr. Golden:

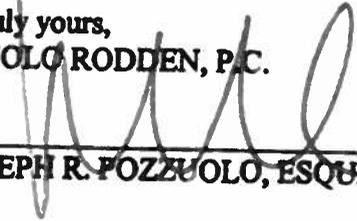
This letter is in response to your letter dated February 19, 2016. According to the attached copy of Section 12.1 of the PECO Energy Electric Service Tariff, the second paragraph is applicable to my initial claim: On 2-11-2016 the PECO underground electrical problem destroyed our telephone system's power supply. The cost to replace the power supply was \$510.00 plus the cost of our IT person for installation.

The underground electrical problem immediately destroyed and blew out the power supply to our telephone system which is expressly covered by the "...spike, surge, or variation in supply or voltage, transient voltage" language in your Section 12.1 tariff language. It occurred simultaneously with your underground outage problem on the 2100 block of Walnut Street.

Kindly reconsider your denial before I am forced to proceed legally. Kindly note that I am awaiting a bill from my IT person who is out of the country.

I will await your reply.

Very truly yours,
POZZUOLO RODDEN, P.C.

BY: 
JOSEPH R. POZZUOLO, ESQUIRE

JRP: cw

EXHIBIT 4



An Exelon Company

Golden

2016095185

PECO CLAIM REGISTRATION FORM

Claims Division
1-877-PECO-1111
RECEIVED
FEB 17 2016
Claims Division

Dear PECO Customer:

To officially register your claim, please complete and return this form in the enclosed return envelope, or fax the form to us at [redacted]

Our address is: PECO, Claims Division, 818-1, 2301 Market Street, Phila., PA 19103

Once this form is received in our office, you will be contacted by one of our Case Managers.

Pozzuolo Redden, PC
Joseph R. Pozzuolo, Esquire
Name

(215) 977-8200

Daytime Phone No.

2033 Walnut Street
Mailing Address

joe @ pozzuola.com

E-mail Address

Philadelphia Pa 19103
City, State, Zip

2/11/16

Date & Time of Loss or Damage

56083-00404
PECO Account No. (if applicable)

2033 Walnut St. Phila Pa 19103
Address of Loss Location

Please describe the details of the incident and list the item(s) damaged.

On 2-11-16 there was an underground fire which as a result left 400+ customers without power. 2033 Walnut Street was one of these customers. As a result, our phone system's power su was fried. To replace that part it cost \$510.00 Invoice is attached. Not to mention business lost & money paid to technician to repair phone s

[Signature]

2-15-16
Date

THIS FORM IS A REQUEST FOR INFORMATION ONLY AND DOES NOT CONSTITUTE ANY ADMISSION OF LIABILITY ON THE PART OF PECO ENERGY COMPANY.

APPLIED TELECOMMUNICATIONS, INC.
 2880 TURNPIKE DRIVE, P.O. BOX 813
 HATBORO
 (215) 443-8895

PA 19040

Invoice

Date: February 12, 2016
 Number: 44127
 Turned In On Receipt
 Account # 44127

RECEIVED

FEB 17 2016

Claims Division

Bill To:

POZZUOLO RODDEN, P.C.
 2033 WALNUT STREET
 PHILADELPHIA

PA 19103

Site Location:

MARTIN B
 POZZUOLO RODDEN, P.C.
 2033 WALNUT STREET
 PHILADELPHIA

PA 19103

Order#	Technician	PO Number	Tax Group
44127		MARTIN B.	PHILA

Services Performed:
 CHARGE FOR (1) BROODA KBU WITH PONA-A SUPPLY PICKED UP BY YOU ON 2-12-16
 MARTIN B. 484-211-7725

Qty	Item Number	Item Description	Unit Price	TOTAL
1	82000A	REFR/USED NEC 1241 KBU W/P8	\$472.22	\$472.22

Materials:	\$472.22
Labor:	\$0.00
Travel:	\$0.00
Other Charges:	\$0.00
Sales Tax:	\$37.78
Additional Tax:	\$0.00
Subtotal:	\$510.00
Deposit:	\$0.00
Total Amt Due:	\$510.00

COMMENTS:

Handwritten: Pack 591 \$510.00

EXHIBIT 5



August 15, 2016

BCS Decision Report

BCS Case #: 003417058 **Open Date:** 2016-03-15
Customer Name: JOSEPH POZZUOLO
Service Address: 2033 WALNUT STREET

PHILADELPHIA, PA 19103
BCS Bill Account #: 8888888888 **Previous Case #:**
Violation Type: NO **Chapter Type:**
Decision Type: W **Section / Rule:**
Investigator Name: FRANK WOLFE

Decision Issued Date: 2016-04-18
Case Closed Date: 2016-04-18

Letter Description:
SHORT BLANK LETTER

Total Balance:	\$612.92	Balance Date:	2016-04-05
Amount to Restore Service:	\$0.00	Amount to Continue Service:	\$0.00
Date Payment Due:		Regular Budget Amount:	\$850.00
Special Budget Payment:	\$0.00	Final Bill Monthly Payment:	\$0.00
Plus Arrears Payment:	\$0.00	End of Month Payment:	\$0.00
Current Monthly Payment:	\$0.00		
Payment Terms:			

PAR Description:

Resolution Description:
CASE DISMISSED: THE BUREAU OF CONSUMER SERVICES DOES NOT HAVE JURISDICTION OVER THE CUSTOMER???'S DAMAGE/SERVICE COMPLAINT.

EXHIBIT 6

**PA Public Utility Commission
Bureau of Consumer Services
Outbound Informal Report**

Case Number: 003417058 Opened On: 2016-03-15 Date Received: 2016-03-15
 Investigator: FRANK WOLFE Acct. Number: 5608300404 Utility Type: Electric Distributor
 Company Name: PECO Assessor Name / Number: FERRIER, TERESA ANNE
 Class of Service: C Case Writer Name / Number: ADOFF, KATHLEEN E

Customer Name And Service Address: Mailing Address: Rate: EM2
 JOSEPH POZZUOLO JOSEPH POZZUOLO Total Balance: 612.92
 2033 WALNUT ST
 PHILADELPHIA, PA 19103- , - Heating: N

Telephone: () - Alternate: (215) 977-8200
 Due Date: 2016-03-28 Budget: 850.00

Report Message Type	Date	Report Details
Informal Complaint		
Comp. Investigation Before BCS		
		<p>3/17/14 Company was notified of a power outage via the AMI (advanced metering infrastructure) system. A bracket failed which caused the circuit to trip, interrupting service. Switching was completed to restore load. Service was out for 49 minutes. 311 customers were affected.</p> <p>3/21/14 Company was notified of a power outage via the AMI (advanced metering infrastructure) system. A transformer failed which caused the interruption. The transformer was repaired and load was restored. Service was out for 4 hours and 31 minutes. 105 customers were affected.</p> <p>3/24/14 Customer contacted company at 8:58 am and reported a partial outage which caused him to have no heat. An electric emergency service request was initiated. Crew was dispatched and found the secondary needed repair.</p> <p>At 2:19 PM, the receptionist called back to notify the Company that field techs notified her that they were working on the secondary to restore service and that the partial outage should be corrected on 3/25/14. Records</p>

		<p>were updated with this information.</p> <p>3/25/14 At 8:46 AM, the customer called reporting that he still had partial power. An electric emergency service request was initiated.</p> <p>At 9:01 AM, the customer called reporting that he still had partial power. An electric emergency service request was initiated.</p> <p>3/25/14 Technicians repaired damaged spliced underground cable to restore service. Service was totally interrupted to safely make repairs for 3 hours and 19 minutes. Total interruption affected 104 customers.</p> <p>6/10/14 At 1:58 PM, the customer contacted company to report power outage. An electric emergency service request was initiated.</p> <p>6/10/14 Company technicians found breaker equipment failed causing circuit to trip. Technicians isolated the failure by switching load to restore service. Service was interrupted for 34 minutes. 316 customers were affected.</p> <p>10/26/14 Company was notified of a power outage via the AMI (advanced metering infrastructure) system. Company technicians found that breaker equipment had failed causing the circuit to trip. Technicians isolated the failure on line 225 and closed the breakdown to circuit Penn 151 to restore the load. Service was out for 1 hour and 45 minutes. 884 customers were affected by this outage.</p> <p>12/6/14 Company was notified of a power outage via the AMI (advanced metering infrastructure) system. Company technicians found a problem with an underground fault was the cause of the outage. Switching was completed to restore service. Service was interrupted for 1 hour and 25 minutes. 884 customers were affected.</p> <p>2/19/15 The customer at 2031 Walnut contacted the Company's IVR (interactive voice response) system and reported partial power. An electric emergency request was initiated. Company techs found a voltage issue that</p>
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needed to be escalated to the fault locate and repair crew. A work order was initiated to be completed with 6 weeks.

3/24/15 Company was notified of a power outage via the AMI (advanced metering infrastructure) system. Company technicians found the cause for the interruption was due to problem with an underground fault. Repairs were made to restore service and a work order was issued to check surrounding underground faults. Service was interrupted for 1 hour 21 minutes. 126 customers were affected.

3/26/15 Company fault locate and repair crew onsite and checked services for 2016, 2033 and 2031 Walnut Street. Crew found all properties had low voltage. Crew pumped and cleaned manhole # 35762 but found low voltage still coming off splice outside of the manhole. The crew indicated in notes that they would need to request a street dig and make arrangements with the customers because digging would need to take place in front of the building's entrance of the parking garage.

6/10/15 Company Fault Locate and Repair crew found the underground secondary fault. They repaired the fault and remade underground cable splice.

2/11/16 Service was interrupted because line 2252 tripped at 5:24 pm due to an underground manhole fire. Company crews were dispatched to 22nd and Walnut and found that the fire burned the primary supply cable and caused the circuit to trip resulting in a power outage. Crew restored the load on line 2252 by performing switching. Service was interrupted for 2 hours and 27 minutes. 215 customers were affected.

2/17/2016 - The PECO customer returned his claim form and indicated his phone system was damaged on 2/11/2016 as a result of a power outage

2/19/2016 - The assigned PECO Claims Case Manager (CCM) investigated the event and determined an underground cable failure interrupted this customer on 2/11/2016 for approximately two (2) hours. The assigned CCM properly sent the customer a denial letter along with a copy of section 12.1 of the PECO Energy

		<p>Electric Service Tariff</p> <p>2/25/2016 - The assigned CCM returned a call to the claimant's assistant and again explained the reason for the denial, and reaffirmed the denial.</p> <p>3/3/16 At 7:12 AM, the customer was notified through our interactive voice response (IVR) system that a planned interruption (for maintenance/ repairs) would occur starting on 3/3/16 at 10:00 PM and was scheduled to end on 3/4/16 at 4:00 AM. The service was interrupted as scheduled and restored.</p> <p>3/4/16 Due to an emergency at 1:22 PM, the customer was notified by company through (IVR) system that another planned outage is scheduled for 3/4/16 2:00 PM to 10 pm. Outage planned because crew needed to replace the secondary leads at the transformer. At 2:20 PM planned outage started and by 3:05 PM Service was restored.</p>
Last Contact With Customer		
	2016-03-04	A letter was received from Mr. Pozzuolo (see attached). It was referred to the Claims rep.
Comp. Investigation After BCS		
		<p>03/15/2016 Company received Informal Complaint filed by customer.</p> <p>03/16/2016 Company representative contacted customer to acknowledge receipt of PUC complaint. Customer was unavailable. Company representative left voicemail.</p> <p>03/17/2016 Company representative contacted customer to acknowledge receipt of PUC complaint. The customers secretary informed that the customer was on another call and the company representative was given the option to leave another voicemail or call him back. Company representative informed secretary she would try the customer again later.</p> <p>03/18/2016 Company representative contacted customer to acknowledge receipt of PUC complaint. Customer was unavailable. Company representative left 3rd voicemail.</p>

		<p>03/21/2016 Customer contacted company representative to discuss the PUC complaint. Company representative explained to the customer that the complaint about the outages in the area was investigated and a decision has been made to replace circuit switching equipment from manual to automatic and that this should reduce the amount of outages occurring and reduce restoration times. Company representative informed the customer that this work is scheduled to be completed by the end of May 2016 and that the circuit will be monitored to make sure that the equipment is functioning as it should be. Customer informed he was fine with this info but is still upset that the company has rejected a claim for a phone system that he believes was damaged because of the underground manhole fire that occurred in that area on 2/11/16. He informed that he was also upset that a claims representative was supposed to call him and never did. Company representative informed customer that she would contact claims and have someone reach out to him.</p> <p>3/24/2016 - The assigned CCM contacted the claimant and again reaffirmed the denial of the claim. Mr Pozzuolo was not happy with the information and became combative. He told the Claims rep he would see him in court.</p>
Final Position to BCS		
		<p>Unable to CURE.</p> <p>Records indicate that the customer experienced 9 interruptions since 03/17/2014. Eight interruptions were sustained and 1 was a partial power interruption. 6 of the interruptions occurred in 2014. 1 interruption occurred in 2015 and 2 interruptions (including the partial power interruption) occurred in 2016. All interruptions were due to equipment failure.</p> <p>All equipment that was involved with the customer's outages has been repaired or replaced. The company has also decided to replace the Manual Switch with an Automatic Control Switch. This upgrade should significantly reduce the customer's restoration times when there is a circuit tripping. Depending on where the fault occurs in the</p>

		<p>circuit, the Automatic Control Switch will isolate the customer from the fault and as a result the customer will not be affected. The company will continue to monitor the customer's circuit to ensure that the new equipment has improved the reliability of the service.</p> <p>The company has rejected the customer's claim that the underground manhole fire event that occurred on 2/11/16 caused the damage to the customer's phone system. The company will not be providing any reimbursement for this claim as per section 12.1 of our Tariff.</p>
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