

CAPTION SHEET

CASE MANAGEMENT SYSTEM

- 1. REPORT DATE: 00/00/00
- 2. BUREAU: ALJ
- 3. SECTION(S):
- 5. APPROVED BY: DIRECTOR:
- SUPERVISOR:
- 6. PERSON IN CHARGE:
- 8. DOCKET NO: C-20066071
- 4. PUBLIC MEETING DATE: 00/00/00
- 7. DATE FILED: 03/31/06
- 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: COOPER, COLLEEN

RESPONDENT/APPLICANT: PECO ENERGY COMPANY

COMP/APP COUNTY: DELAWARE

UTILITY CODE: 110550

ALLEGATION OR SUBJECT

COMPLAINANT STATES SHE WAS WRONGFULLY REMOVED FROM PAYMENT AGREEMENT AND WAS TOLD SERVICE MAY BE TERMINATED. SHE WOULD LIKE THE PUC TO HAVE PAYMENT AGREEMENT REINSTATED AND ACCOUNT CORRECTED TO SHOW ACTUAL AMOUNT OWED.

**DOCUMENT
FOLDER**

DOCKETED

APR 04 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

Please print or type.

1. CUSTOMER NAME (COMPLAINANT) C-70066071

Your name, mailing address, county, telephone number, utility account number and service address:

Name Colleen Cooper

Street/P.O. Box 1626 Niolet Ave. Apt # 5

City Phila, State Pa. Zip 19079

County Delaware

Area Code/HOME Phone (610) 583-8992

Area Code/WORK Phone

Utility Account Number (from your bill) 50-09-30-210553

if your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name

Street/P.O. Box N/A

City State Zip

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: Peco

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER

(taxi, moving company, limousine)

TELEPHONE

(local, long distance)

ORIGINAL

SECRETARY'S BUREAU
2005 MAR 31 AM 9:12
P.A.L.U.C.

4.

COMPLAINT (check one)

A. In general, what is your complaint?

I want to oppose the company's proposed rate increase.

There are incorrect charges on my bill.

There is a reliability, safety or quality problem with my utility service.

I received a notice that my utility service is being terminated.

I would like a payment agreement.

Other. I was wrongfully removed from my budget agreement (explain)

B. State the facts of your complaint.

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

Dear PUC
Peco claims that I did not pay my agreed - Budget in a timely manner therefore I was removed from that budget. However according to my records (attached) and a representative of Peco that was not the case at all. →
(Cont on next page)

5. RELIEF

What do you want the Public Utility Commission to do about your complaint? Use additional paper if you need more space.

Restore the budget of 113.00 per month, that I was unrightfully removed from, or a reduced amount so that it's a strain on my over-all income. (Income verification for attached)

note." The following conversation
was held prior to the month
in question. (March) all payments
up to March were not questionable.

ON 12/20/05 2:30 pm I called
Peco to see if it would be
okay for me to pay my bill
on a later day in the month
(approx. 5 days after the due date)
because of the scheduling dates
of my checks this year. At this
same time I spoke to a repres-
entative name "Rico" he was a
very nice man. He claimed that
there would be no problem with
that as long as I paid the bill
within the month. He also said
that I should pay my budget
which was \$113.00 and to add some-
thing extra so that it would pay
up any past due amount. The
reason that there was this past
due amount was because Peco
inadvertently according to them
credited my Gi-Stop allotment
twice to my account. (see
their letter attached). While they
admitted to this error they re-
fused to make any compromises
in correcting it. As a result

of this error they went ahead
and cancelled my budget without
notice, and also warned me
that they would proceed the
of shutting my services off if
I did not the past due amount.
My records bear witness that
I have been in compliance
with fees in regards to my
monthly budget payments (fees
documents attached) So there should
have been no reason for them to
take the actions that they did.
Furthermore this situation has
caused be a tremendous amount
of stress and aggravation, I
is well aware of my medical cond-
ition. Therefore it is my request
that this situation be remedied
without further ado.

All documents pertaining to
this claim is attached. If
further explanation is needed
please contact me at . . .
(610) 583-8992.

I thank you in advance -

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company AND your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES
(includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification: Colleen Cooper, 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).

Colleen Cooper
(Signature)

3/25/06
(Date)

9. **LEGAL REPRESENTATION (IF ANY)**

If you are represented by a lawyer in this matter you must provide your lawyer's name, address and telephone number.

Lawyer's Name Seeking Legal Aide

Street _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

10. **FILING**

Please return the completed form to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 nd Floor Harrisburg, Pennsylvania 17120
--	--

Facsimiles and/or electronic filings of the complaint form 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 complaint for your records.

12-7 9/10/05



COLLEEN CLARKSON
1626 NOBLET AV
SHARON HILL PA 19079-2515

December 14, 2005

2:35 PM
rep rec'd 12/25/05

\$113.00

RE 1626 NOBLET AV
SHARON HILL PA 19079-2515

Account Number: 095030210553

Dear PECO Customer,

Your recent LIHEAP Cash Grant payment was inadvertently applied twice to your account. This situation has been corrected and your accurate balance will be reflected on your next PECO bill.

We understand that this error may have caused confusion, and we apologize. If you have questions or need additional information please contact us at (800) 494-4000. Again, we thank you for your understanding.

Sincerely,

PUC 1888-782 3228

Peco, An Exelon Company

payment for past due cl. 1/9/05. p. 113

Call # 1800-774-7000

Note: Rec'd
Keep up with budget - plus extra
for past due amnt. of 179.74
\$113.4 + 2.2 + Rec'd \$135.00

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

Remove this copy at perforation and retain for your records.

LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM

NOTICE OF ELIGIBILITY

Date
10/31/05

Your application for LIHEAP CASH Benefits of 10/31/05 has been approved. A payment will be sent to PECO ENERGY COMPANY.

Payment
\$469.00

COLLEEN COOPER
1626 NOBLET AVENUE
SHARON HILL PA 19079

LIHEAP funds in your account with your fuel dealer and/or utility must be used by June 30 of the year after they are issued or they will be returned to the Department of Public Welfare.

ROBERT BAIR
SUPERV SCR
(610)-447-3248
DELAWARE C A O

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

Remove this copy at perforation and retain for your records.

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ROBERT BAIR
SUPERV SCR
(610)-447-3248
DELAWARE C A O

REQUEST FOR HEARING BY ADMINISTRATIVE LAW JUDGE
[Take or mail original and all copies to your local Social Security Office]

PRIVACY ACT NOTICE
ON REVERSE SIDE OF FORM.

1 CLAIMANT <u>Colleen Cooper</u>	2 WAGE EARNER, IF DIFFERENT	3 SOC SEC CLAIM NUMBER <u>208-44-3214</u>	4 SPOUSE'S CLAIM NUMBER
-------------------------------------	-----------------------------	--	-------------------------

5 I REQUEST A HEARING BEFORE AN ADMINISTRATIVE LAW JUDGE. I disagree with the determination made on my claim because:
I have suffered from mental disorder (bi-polar) for many years and am not able to work in any circumstance

An Administrative Law Judge of the Office of Hearings and Appeals will be appointed to conduct the hearing or other proceedings in your case. You will receive notice of the time and place of a hearing at least 20 days before the date set for a hearing.

6 If you have additional evidence to submit check the following block and complete the statement:
I have additional evidence to submit from (name and address of source)

7 Check one of the blocks:
 I wish to appear at a hearing
 I do not wish to appear and I request that a decision be made based on the evidence in my case. (Complete Waiver Form HA-4608)

(Please submit it to the Social Security Office within 10 days. Attach an additional sheet if you need more space.)

You have a right to be represented at the hearing. If you are not represented but would like to be, your Social Security Office will give you a list of legal referral and service organizations. (If you are represented and have not done so previously, complete and submit form SSA-1696 (Appointment of Representative).)

[You should complete No. 8 and your representative (if any) should complete No. 9. If you are represented and your representative is not available to complete this form, you should also print his or her name, address, etc. in No. 9.]

8 (CLAIMANT'S SIGNATURE) <u>X</u>	9 (REPRESENTATIVE'S SIGNATURE/NAME) <u>[Signature]</u>
ADDRESS <u>1626 Noblet Avenue</u>	(ADDRESS) <input checked="" type="checkbox"/> ATTORNEY; <input type="checkbox"/> NON-ATTORNEY <u>18 West Front Street</u>
CITY STATE ZIP CODE <u>Sharon Hill, Pa. 19079</u>	CITY STATE ZIP CODE <u>Media, Pa. 19063</u>
DATE AREA CODE AND TELEPHONE NUMBER <u>(610) 583-8992</u>	DATE AREA CODE AND TELEPHONE NUMBER <u>(610) 892-9654</u>

TO BE COMPLETED BY SOCIAL SECURITY ADMINISTRATION-ACKNOWLEDGMENT OF REQUEST FOR HEARING

10. Request for Hearing RECEIVED for the Social Security Administration on _____ by: _____

(TITLE)	ADDRESS
11 Was the request for hearing received within 65 days of the reconsidered determination? <input type="checkbox"/> YES <input type="checkbox"/> NO	If no is checked, attach claimant's explanation for delay; and attach copy of appointment notice, letter, or other pertinent material or information in the Social Security Office.
12. Claimant not represented - <input type="checkbox"/> list of legal referral and service organizations provided	13. Interpreter needed - <input type="checkbox"/> enter language (including sign language)
14. Check one: <input type="checkbox"/> Initial Entitlement Case <input type="checkbox"/> Disability Cessation Case <input type="checkbox"/> Other Postentitlement Case	15. Check claim type(s): <input type="checkbox"/> RSI only (RSI) <input type="checkbox"/> Title II Disability-worker or child (DIWC) <input type="checkbox"/> Title II Disability-Widow(er) only (DIWW) <input type="checkbox"/> SSI Aged only (SSIA) <input type="checkbox"/> SSI Blind only (SSIB) <input type="checkbox"/> SSI Disability only (SSID) <input type="checkbox"/> SSI Aged/Title II (SSAC) <input type="checkbox"/> SSI Blind/Title II (SSBC) <input type="checkbox"/> SSI Disability/Title II (SSDC) <input type="checkbox"/> HI Entitlement (HIE) <input type="checkbox"/> Other-Specify _____

CLAIMANT

COMMONWEALTH OF PENNSYLVANIA



DEPARTMENT OF PUBLIC WELFARE

DELAWARE COUNTY ASSISTANCE OFFICE

District 2
845 Main Street
Darby, Pennsylvania 19023

Tel (610) 461-3800
Fax (610) 461-3900

March 10, 2006

To Whom It May Concern:

This letter is to verify that Colleen Cooper is a recipient of Public Assistance.

Current benefits being received are:

- Cash Assistance \$ 316 monthly
- Food Stamps \$ 278 monthly
- Medical Assistance

Previous Period of Eligibility:

From	To
<u>11/10/05</u>	<u>present</u>
<u>11/10/05</u>	<u>present</u>
_____	_____

Case Record Number 0320588

Sincerely,

E. Jamison
Income Maintenance Caseworker

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: APRIL 4, 2006

COLLEEN COOPER
Complainant

v.

PECO ENERGY COMPANY
Respondent

Complaint Docket
No: C-20066071

DOCKETED

APR 04 2006

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: PECO ENERGY COMPANY

**DOCUMENT
FOLDER**

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

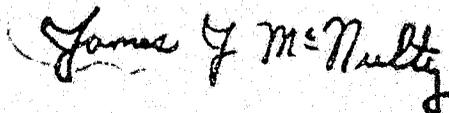
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if

you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

DATE SERVED: APRIL 4, 2006

C-20066071

PECO ENERGY COMPANY
C/O WARD L SMITH
ASSOCIATE GENERAL COUNSEL
PO BOX 8699
PHILADELPHIA PA 19101-8699

**DOCUMENT
FOLDER**

Dear Mr. Smith:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by COLLEEN COOPER. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

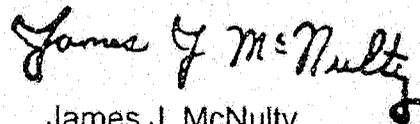
Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

APRIL 4, 2006

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,



James J. McNulty
Secretary

SS

Legal Department

Exelon Business Services Company
2301 Market Street/ 523-1
PG.Box 8699
Philadelphia, PA 19101-8699

Telephone 215 841 5544
Fax 215 568 3389
www.exeloncorp.com

ORIGINAL

Business Services
Company

Direct Dial: 215 841.6841

April 25, 2006

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

DOCUMENT FOLDER

RECEIVED

APR 25 2006

Re: Colleen Cooper v. PECO Energy Company
PUC Docket No. C-20066071

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

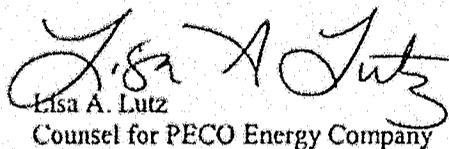
Dear Mr. McNulty:

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

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

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

Very truly yours,


Lisa A. Lutz
Counsel for PECO Energy Company

LAL/zr

Enc.

SCHEDULING RECOMMENDATION: X CALL OF THE DOCKET NON-CALL OF THE DOCKET

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

COLLEEN COOPER

v.

PECO ENERGY COMPANY

:
:
:
:
:

DOCKET NO. C-20066071

DOCUMENT
FOLDER

ANSWER AND NEW MATTER OF
RESPONDENT, PECO ENERGY COMPANY

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

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. PECO Energy admits the Complainant's

DOCKETED
MAY 03 2006

RECEIVED

APR 25 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE

account was removed from budget billing due to the account delinquency. PECO Energy further admits that a termination notice was issued on the account due to the delinquency; PECO Energy denies the notice was improper.

PECO Energy further denies that Complainant is unable to pay her gas and electric bill and strict proof thereof is hereby demanded at time of hearing. PECO Energy avers that Complainant's account balance is \$712.38. The Complainant's average monthly bill is currently \$115.00. The last payment made on this account was February 15, 2006 in the amount of \$115.00.

By way of further answer, PECO Energy's records indicate that on November 18, 2005, the Complainant's account was erroneously credited twice for a LIHEAP grant of \$469.00, leaving a credit balance of \$289.26 on the account. On November 28, 2005, PECO Energy corrected the error and debited the account for \$469.00, resulting in a balance due of \$179.74.

The Bureau of Consumer Services ("BCS") issued a decision on or about March 16, 2006, directed the case closed due to the Complainant already participating in the Customer Assistance Program ("CAP"). A copy of the decision is attached as Exhibit A.

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

NEW MATTER OF RESPONDENT, PECO ENERGY COMPANY

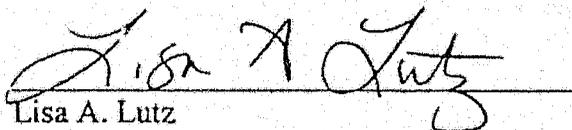
PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code § 5.62(b), further responds to the Complaint and states:

1. On June 13, 2001, the Complainant was approved and enrolled in the CAP Rate Program. The Complainant receives a 50% discount on the first 500 kilowatts of electric service and a 25% discount on the first 500 kilowatts of gas service each month.
2. PECO Energy avers that no further payment arrangements should be granted to Complainant. Section 1405(c) of the Public Utility Code 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."

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

Honorable Commission enter an Interim Order directing payment of current undisputed consumption charges, pursuant to 66 Pa. Code §1410(2).

Respectfully Submitted,

A handwritten signature in cursive script, reading "Lisa A. Lutz", is written over a horizontal line.

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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

COLLEEN COOPER

v.

PECO ENERGY COMPANY

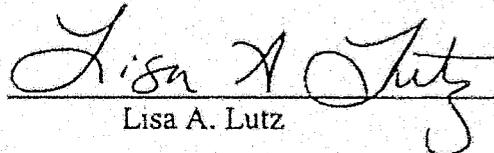
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DOCKET NO. C-20066071

VERIFICATION

I, Lisa A. Lutz, hereby declare that I am counsel for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. § 4904 pertaining to false statements to authorities.

Date: April 25, 2006



Lisa A. Lutz

Date 4/17/06

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

Case Number: 2042707
Customer Name: COLLEEN CLARKSON
Address: 1626 NOBLET AVE
SHARON HILL PA 19079-2515

Opened On: 3/8/06
Utility Type: Electric Distributor
Account Number: 500930210553
Company Name: PECO Energy

Prior Case: 2037357

Total Balance: \$431.74

Balance Date: 3/15/06

Compliance

Violation(Alleged, Actual, No): NO

Chap 56/64/Other:

Section/Rule:

Decision Issued: N

Oral Written: W

Investigator: MEURON, PAUL

PUC Decision Issued Dt: 3/16/06

PUC Case Closed Dt: 3/16/06

Decision Recvd Dt: 3/16/06 01:25PM

Letter Description: CHAPTER 14 EGW DISMISS/CONTACT COMP LETTER

To Restore Service Pay: \$0.00

To Continue Service Pay: \$0.00 By:

Terms:

Special Budget Amount: \$0.00

Regular Budget Amount: \$0.00 Plus Arrears Payment: \$0.00

Final Bill Monthly Payment: \$0.00

Current Bill Monthly Payment: \$0.00

End Of Month Payment: \$0.00

Par Description:

Resolution:

CASE CLOSE, NO DECISION. CU IS ON CAP. RECERT DUE 6/07. WILL SEND DISMISSAL LETTER

RECEIVED

APR 25 2006

PA PUBLIC UTILITY COMMISSION
ELECTRICITY BUREAU

Exhibit A

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

COLLEEN COOPER

v.

PECO ENERGY COMPANY

:
:
:
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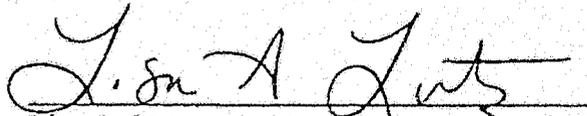
DOCKET NO. C-20066071

CERTIFICATE OF SERVICE

I, Lisa A. Lutz, hereby certify that I have this day served a copy of PECO Energy Company's Answer and New Matter in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Colleen Cooper
1626 Noblet Avenue
Sharon Hill, PA 19079

Dated at Philadelphia, Pennsylvania, April 25, 2006.



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

RECEIVED

APR 25 2006

PA PUBLIC UTILITY COMMISSION
1500 MARKET STREET

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

COLLEEN COOPER

v.

PECO ENERGY COMPANY

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DOCKET NO. C-20066071

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 Motion to Dismiss of PECO Energy Company, within 10 days from service of this notice, and if you do not file a written response denying or corrected the enclosed New Matter within 20 days from service of this notice, the facts set forth by PECO Energy Company in the New Matter may be deemed to be true, thereby requiring no other proof. All pleadings, such as a Reply to Motion to Dismiss and 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, Lisa A. Lutz, and where applicable, the Administrative Law Judge presiding over the issue.

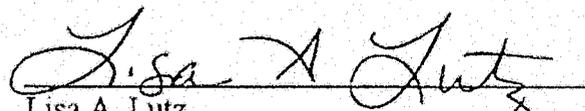
File with:

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

With a copy to:

Lisa A. Lutz, Esq.
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, April 25, 2006.


Lisa A. Lutz
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19101-8699
215-841-6841
lisa.lutz@exeloncorp.com

RECEIVED

APR 26 2006

PA PUBLIC UTILITY COMMISSION
REGULATORY BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
APR 27 2006
PA. PUBLIC UTILITY COMMISSION
HARRISBURG, PA.

COLLEEN COOPER

v.

PECO ENERGY COMPANY

DOCKET NO. C-20066071

DOCUMENT
FOLDER

PECO ENERGY COMPANY'S MOTION TO DISMISS COMPLAINT

Respondent, PECO Energy Company ("PECO"), pursuant to 52 Pa. Code § 5.101 respectfully petitions this Honorable Commission to dismiss the instant Complaint for the following reasons:

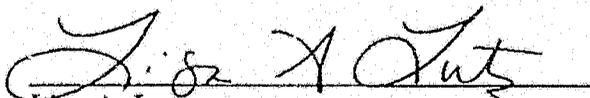
1. On or about March 25, 2006, Complainant filed a formal complaint with the Pennsylvania Public Utility Commission requesting the Commission to set or approve a new payment agreement on Complainant's utility account.
2. On or about April 4, 2006, PECO Energy was served the above-mentioned formal Complaint.
3. Pursuant to 52 Pa. Code § 5.101(b), PECO is filing an Answer and New Matter to the Complaint contemporaneously with this Motion.
4. Complainant currently participates in the residential utility discount Customer Assistance Program ("CAP") and receives a monthly discount on her utility charges.
5. Complainant is requesting further payment arrangements that the Commission cannot establish. Section 1405(c) of the Public Utility Code provides that customer assistance program rates shall be timely paid and shall not be the subject of payment agreements negotiated

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or approved by the Commission. 66 Pa. C.S. § 1405(c); Walton v. PECO Energy Company, Pa. PUC Docket Z-01593807, Initial Decision issued January 11, 2005.

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the Complaint because further payment agreements on Complainant's outstanding utility account is not properly before this Honorable Commission.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Lisa A. Lutz", written over a horizontal line.

Lisa A. Lutz
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
(215) 841-6841
lisa.lutz@exeloncorp.com

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

COLLEEN COOPER

v.

PECO ENERGY COMPANY

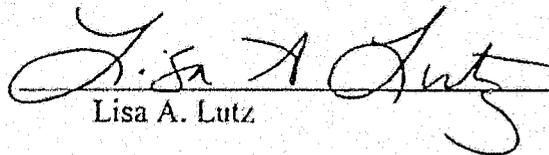
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DOCKET NO. C-20066071

VERIFICATION

I, Lisa A. Lutz, hereby declare that I am an attorney representing 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: April 25, 2006


Lisa A. Lutz

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

COLLEEN COOPER

v.

PECO ENERGY COMPANY

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DOCKET NO. C-20066071

CERTIFICATE OF SERVICE

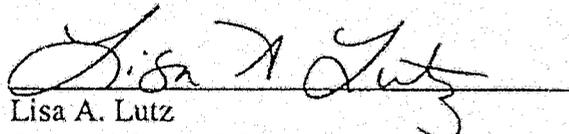
I hereby certify that I have this day served a copy of PECO Energy Company's Motion to Dismiss in the above matter upon all interested parties by mailing a copy thereof Certified mail, properly addressed and postage prepaid to:

COLLEEN COOPER
1626 Noblet Avenue
Sharon Hill, PA 19079-2515

Dated at Philadelphia, Pennsylvania, April 25, 2006.

APR 25 2006

PA PUBLIC UTILITY COMMISSION
PHILADELPHIA, PA



Lisa A. Lutz
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
(215) 841-6841
lisa.lutz@exeloncorp.com



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Administrative Law Judge
P.O. BOX 3265, HARRISBURG, PA 17105-3265
May 2, 2006

IN REPLY PLEASE
REFER TO OUR FILE

In Re: C-20066071

(See attached list)

Colleen Cooper v. PECO Energy Company

Motion Judge Assignment Notice

This is to inform you that a preliminary motion was filed on the above-captioned case. This motion is being assigned to Chief Administrative Law Judge Veronica A. Smith for ruling. The Commission rule of practice at 52 Pa. Code §5.101 specifies that the person who filed the complaint has ten (10) days from the date the motion was served on you to file an answer.

If you file any pleading or document relating to this motion with the Secretary of the Commission, please provide a duplicate copy to the judge.

Procedural questions or comments should be directed to the judge at:

(717) 783-5453

DOCUMENT
FOLDER

pc: MJ Amanda N. Rumsey
Susan Licon
Beth Plantz
Docket Section

DOCKETED
MAY 22 2006