

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-20066009
- 4. PUBLIC MEETING DATE: 00/00/00
- 7. DATE FILED: 03/20/06
- 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: HAVER, LANCE

RESPONDENT/APPLICANT: PECO ENERGY COMPANY

COMP/APP COUNTY: PHILADELPHIA

UTILITY CODE: 110550

ALLEGATION OR SUBJECT

COMPLAINANT STATES SURCHARGES FOR PAYING BILLS WITH A CREDIT OR DEBIT CARD. HE WOULD LIKE THE PUC TO CONDUCT AN INVESTIGATION INTO THE VARIOUS SURCHARGES BEING COLLECTED.

**DOCUMENT
FOLDER**

DOCKETED
MAR 22 2006

MAYOR'S OFFICE



CONSUMER AFFAIRS

Room 116 - City Hall
Philadelphia, PA 19107
Phone: 215 686 7598

John F. Street, Mayor
Lance S. Haver, Director
Cell: 215 906 6230

Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

RECEIVED

MAR 20 2006

PA PUBLIC UTILITY COMMISSION
REGULATORY BUREAU

Dear Secretary,

Please accept the enclosed formal complaint. I believe the nature of the complaint requires an expedited hearing and decision. I look forward to a hearing date being set in Philadelphia as soon as possible.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Lance Haver", written over the typed name.

Lance Haver

ORIGINAL

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

RECEIVED

MAR 20 2006

Please print or type.

1. CUSTOMER NAME (COMPLAINANT) C-20066009

PA PUBLIC UTILITY COMMISSION

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

Name Lance Haver

Street/P.O. Box 6803 Lawnton Ave Apt #

City Philadelphia State PA Zip 19126

County Philadelphia

Area Code/HOME Phone 215 276 1077

Area Code/WORK Phone 215 686 7598

Utility Account Number 26-11-56-251251 (from your bill)

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

City State Zip

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PECO

3. TYPE OF UTILITY (check one)

- X ELECTRIC
[] GAS
[] WATER
[] TELEPHONE (local, long distance)
[] STEAM HEAT
[] WASTE WATER
[] MOTOR CARRIER (taxi, moving company, limousine)

ORIGINAL

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.

X PECO, as well as other utilities are surcharging for paying bills with a credit or debit card. These surcharges are not part of the tariff and have never been approved by the Public Utility Commission. It is counter intuitive for utilities to surcharge bills in a year where bills are harder than ever to pay.

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.

PECO on their web site states: "Each payment transaction will be assessed a convenience fee, by the service provider, as follows:

Credit Card or Debit Card convenience fee: 2.8%

PECO's and other utility's claim the charge is collected by a service provider, not collected by the utility is disingenuous at best. PECO and other utilities that use such service providers have the benefit of cost avoidance that adds to their profits and places their profits above the rate of return granted by the Public Utility Commission.

Furthermore, there is no evidence PECO, or any other utility, considered the price the consumer would have to pay, when they contracted for these services. As the cost to consumers is not uniform, it is impossible to believe it is cost based. And because it appears to vary so greatly from utility to utility, it creates the appearance that PECO failed in their due diligence to find the most cost effective service provider.

5. RELIEF

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

Conduct an investigation into the various surcharges utilities are collecting. Outlaw surcharges for paying in different methods or; force utilities to place such services out for bid and , estimate the cost avoidance to each utility that is captured through the use of these service providers and order the utilities in each case to lower their rates commensurate with the amount of costs avoided. No utility should be allowed this type of back door rate increase by shifting costs on to consumers.

Certainly no utility would be allowed to tell a consumer they must directly pay the worker in front of their home for doing repairs to the infrastructure and continue to bill at the same rate. Why then should a utility force a consumer to pay for the cost of billing and collections which has as a by-product a shifting of costs from the utility to the consumer, without a reduction in the rate base.

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 X

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 X
(includes appeals of BCS determinations)
NO

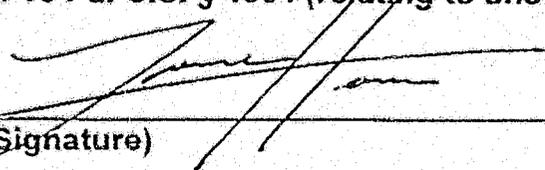
If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

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:

I, Lance Haver, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).


(Signature)

3/20/2006
(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 _____

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
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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.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: MARCH 22, 2006

LANCE HAVER

Complainant

v.

PECO ENERGY COMPANY

Respondent

Complaint Docket
No: C-20066009

DOCKETED
MAR 22 2006

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: PECO ENERGY COMPANY

TAKE NOTICE:

**DOCUMENT
FOLDER**

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).

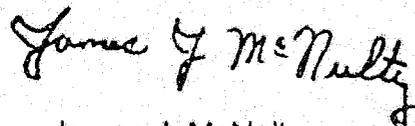
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. 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: MARCH 22, 2006

C-20066009

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 LANCE HAVER. 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.

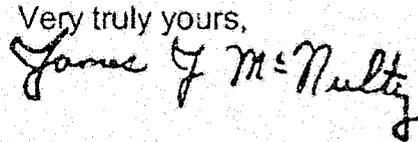
Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

MARCH 22, 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,

A handwritten signature in cursive script that reads "James J. McNulty". The signature is written in black ink and is positioned above the typed name and title.

James J. McNulty
Secretary

SS

Legal Department

Telephone 215 841 5544
www.exeloncorp.com

Business Services
Company

Exelon Business Services Company
2301 Market Street
PO Box 8699
Philadelphia, PA 19101

ORIGINAL

Direct Dial: 215 841 6841

April 14, 2006

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

RECEIVED

APR 14 2006

Re: Lance Haver v. PECO Energy Company
PUC Docket No. C-20066009

PA PUBLIC UTILITY COMMISSION
OFFICE OF GENERAL COUNSEL

Dear Mr. McNulty:

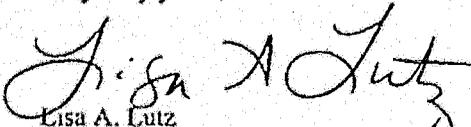
Enclosed for filing with the Commission are the following documents and copies in the matter referenced above.

- _____ Answer (original and 3 copies)
- _____ Petition (original and 3 copies)
- X Answer, New Matter and Motion to Dismiss (original and 3 copies)
- X Motion for a More Specific Pleading (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)

DOCUMENT FOLDER

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: xx MEDIATION

P231197

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APR 18 2006

RECEIVED BY THE COMMISSION

LANCE HAVER
COMPLAINANT

v.

PECO ENERGY COMPANY
RESPONDENT

DOCKET NO. C-20066009

DOCUMENT
FOLDER

ANSWER AND NEW MATTER OF RESPONDENT,
PECO ENERGY COMPANY

PECO Energy Company (PECO Energy or the Company), pursuant to 52 Pa.

Code §5.61, responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. PECO Energy specifically denies that it is surcharging customers

DOCKETED
APR 18 2006

for paying bills with a credit or debit card. By way of further answer, PECO Energy that this charge is levied by a third-party service provider, Speedpay, for its service in accepting and processing credit and debit card payments. PECO Energy admits that the Speedpay's convenience fee is explained on the Company's website. PECO Energy further avers that it does not receive any portion of the convenience fee charged by Speedpay.

PECO Energy further denies that the use of Speedpay to pay PECO bills is improper or that a third party is not permitted to charge a convenience fee. See Robert G. Newman v. UGI Utilities, PUC Docket No. C-00993003 (Initial Decision dated June,

15, 2000); Nick Samila, Jr. v. Columbia Gas of Pennsylvania, PUC Docket No. C-00981679 (Initial Decision dated February 10, 1999).

By way of further answer, PECO Energy avers that customers have other options available to pay their electric and gas bills. Customers can write a check and mail it to PECO Energy or pay in person at a walk-in payment center. Customers may choose to receive and pay their bills electronically using PECO's e-Bill or have their payment automatically deducted from a bank checking or savings account.

To the extent the Complainant raises issues relating to service providers used by other companies in the Commonwealth, PECO Energy is without sufficient information to admit or deny whether other utilities are surcharging their customers.

5. This paragraph is a request for relief and no answer is required.
6. No answer is required.
7. Denied. Based upon information and belief, there is no record that Complainant contacted PECO Energy to discuss the issue raised in this Complaint.

NEW MATTER

1. PECO Energy avers that Complainant lacks the requisite capacity to bring this complaint under 66 Pa.C.S. §701. PECO Energy further avers that Complainant has not paid his electric bill with a credit or debit card and has not been charged a convenience fee by Speedpay. Therefore, Complainant has no direct, immediate or substantial interest at issue. Furthermore, Complainant has no standing to represent any other PECO Energy customers. The sole parties with the requisite standing to bring complaints addressing customers' accounts are the customers of record themselves either

appearing on their own behalf or represented by counsel. Bensalem School District v. PECO Energy Company, PUC Docket No. C-00967727 (1996)(Unpublished).

2. PECO Energy avers that the Complainant fails to include indispensable parties to this proceeding. The Complaint contains allegations against all utilities whose customers can use a third party service provider who charges a convenience fee to make payments with credit or debit cards. Complainant, however, does not include other utilities in this proceeding.

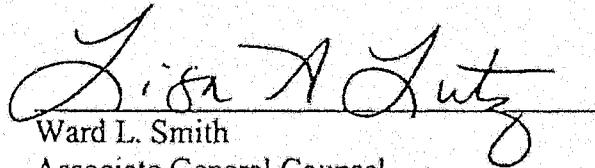
3. PECO Energy avers that Complainant fails to set forth any violation by PECO Energy of either the Public Utility Code, the regulations of the PUC or PECO Energy's Electric Service Tariff as required by 52 Pa. Code §5.22(a)(4) and accordingly, must be dismissed. West Penn Power Co. v. Pa. Public Utility Commission, 84 Pa. Cmwlth. Ct. 157, 478 A.2d 947 (1984).

4. The Commission has determined that a third party fee is not unreasonable service and is not a violation of Section 1501 of the Public Utility Code. See Robert G. Newman v. UGI Utilities, PUC Docket No. C-00993003 (Initial Decision dated June, 15, 2000); Nick Samila, Jr. v. Columbia Gas of Pennsylvania, PUC Docket No. C-00981679 (Initial Decision dated February 10, 1999).

5. Although Complainant is a customer of PECO Energy at the address listed on the Complaint, the transmittal letter accompanying the Complaint is on the Complainant's letterhead as the Director of City of Philadelphia Mayor's Office of Consumer Affairs. PECO Energy avers that it is unclear in what capacity Complainant brings this complaint.

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

Respectfully Submitted,



Ward L. Smith
Associate General Counsel
Exelon Business Services Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
215.841.6863
ward.smith@exeloncorp.com

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

LANCE HAVER

v.

PECO ENERGY COMPANY

DOCKET NO. C-20066009

RECEIVED

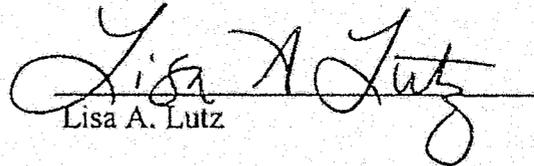
APR 14 2006

VERIFICATION

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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 14, 2006


Lisa A. Lutz

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LANCE HAVER

v.

PECO ENERGY COMPANY

DOCKET NO. C-20066009

APR 14 2006

PA PUBLIC UTILITY COMMISSION

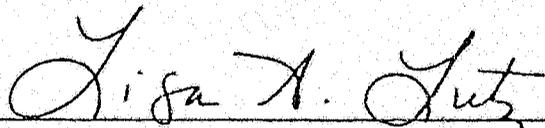
CERTIFICATE OF SERVICE

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:

Lance Haver
6803 Lawnton Avenue
Philadelphia, PA 19126

Dated at Philadelphia, Pennsylvania, April 14, 2006.

Respectfully Submitted,



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

APR 14 2006

LANCE HAVER

v.

PECO ENERGY COMPANY

DOCKET NO. C-20066009

NOTICE TO PLEAD

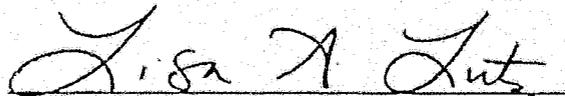
Pursuant to 52 Pa. Code §§ 5.101(a)(2), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion for a More Specific Pleading of PECO Energy Company, within 10 days from service of this notice, and if you do not file a written response denying or correcting the enclosed New Matter within 20 days from service of this notice, the facts set forth by PECO Energy Company in the New Matter and Motion to Strike may be deemed to be true, thereby requiring no other proof. All pleadings, such as a Reply to Motion for a More Specific Pleading, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company 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
Counsel for PECO Energy Company
2301 Market Street, S23-1; P.O. Box 8699
Philadelphia, PA 19101-8699
Dated at Philadelphia, PA, April 14, 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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LANCE HAVER

v.

PECO ENERGY COMPANY

DOCKET NO. C-20066009

**DOCUMENT
FOLDER**

PECO ENERGY COMPANY'S MOTION FOR A MORE SPECIFIC PLEADING

Respondent, PECO Energy Company ("PECO"), pursuant to 52 Pa. Code § 5.101(a)(2) respectfully petitions this Honorable Commission to strike the instant Complaint, or, in the alternative Order a More Specific Pleading, for the following reasons:

1. On or about March 20, 2006, Complainant filed a formal complaint with the Pennsylvania Public Utility Commission requesting certain relief and investigation into convenience fees charged by Speedpay when customers pay PECO bills through Speedpay.
2. On or about March 22, 2006, PECO Energy was served the above-mentioned formal Complaint.
3. PECO Energy is filing its Answer to the Complaint simultaneously with this Motion for a More Specific Pleading.
4. The instant Complaint was transmitted with a cover letter identifying the Complainant as Director of City of Philadelphia Mayor's Office of Consumer Affairs. The transmittal letter is attached as Exhibit A.
5. The instant Complaint is insufficient as to form because Complainant fails to clarify the capacity in which Complainant brings this Complaint.

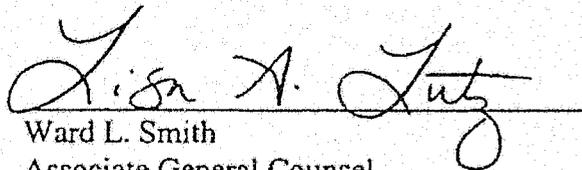
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APR 18 2006

6. If Complainant is filing the Complaint on behalf of a corporate entity, the pleading must be filed by an attorney in good standing to practice before a Court of record of the Commonwealth of Pennsylvania.

7. Since it is unclear in what capacity Complainant brings the Complaint, and whether it is on behalf of a corporate entity, the Complaint should be stricken as being insufficient as to form; or, in the alternative, direct the Complainant to file a more specific pleading. Macdade Terrace Apartments LP v. PECO Energy Company, Initial Decision of Administrative Law Judge Marlane R. Chestnut, at Pa. PUC Docket C-20054998, February 15, 2006, citing Moore v. J. Berman and Cross, Inc., 49 Pa. PUC 427, 428 (1975).

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the instant Complaint, or, in the alternative, direct the Complainant to file a more specific pleading.

Respectfully Submitted,



Ward L. Smith
Associate General Counsel
Exelon Business Services Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
215.841.6863
ward.smith@exeloncorp.com

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

LANCE HAVER

v.

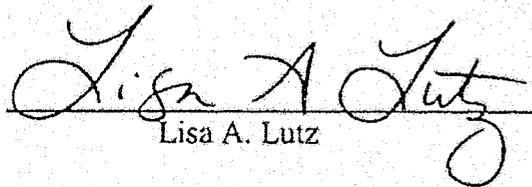
PECO ENERGY COMPANY

DOCKET NO. C-20066009

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 14, 2006


Lisa A. Lutz

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LANCE HAVER

v.

PECO ENERGY COMPANY

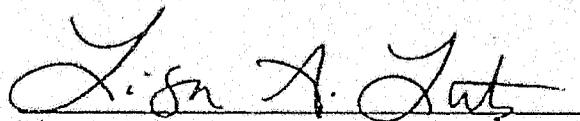
DOCKET NO. C-20066009

CERTIFICATE OF SERVICE

I 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 a copy thereof Certified mail, properly addressed and postage prepaid to:

Lance Haver
6803 Lawnton Avenue
Philadelphia, PA 19126

Dated at Philadelphia, Pennsylvania, April 14, 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

MAYOR'S OFFICE



CONSUMER AFFAIRS

Room 116 - City Hall
Philadelphia, PA 19107
Phone: 215 686 7598

John F. Street, Mayor
Lance S. Haver, Director
Cell: 215 906 6230

Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

RECEIVED

MAR 20 2006

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMMUNICATIONS SECTION

APR 11 2006

PA PUBLIC UTILITY COMMISSION
COMMUNICATIONS SECTION

Dear Secretary,

Please accept the enclosed formal complaint. I believe the nature of the complaint requires an expedited hearing and decision. I look forward to a hearing date being set in Philadelphia as soon as possible.

Sincerely Yours,

Lance Haver

COPY

Exh. b. + A

(3)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APR 14 2006

PA. PUB. UTILITY COM. (100)

LANCE HAVER

v.

PECO ENERGY COMPANY

DOCKET NO. C-20066009

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 correcting 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, and where applicable, the Administrative Law Judge presiding over the issue.

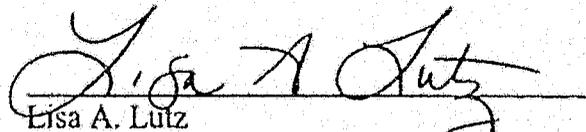
File with:

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, Esquire
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, April 14, 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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LANCE HAVER
COMPLAINANT

v.

PECO ENERGY COMPANY
RESPONDENT

DOCKET NO. C-20066009

PECO ENERGY COMPANY'S MOTION TO DISMISS COMPLAINT

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

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APR 18 2006

**DOCUMENT
FOLDER**

BACKGROUND

1. On or about March 20, 2006, Complainant filed a formal complaint with the Pennsylvania Public Utility Commission ("Commission") requesting the Commission "to conduct an investigation into the various surcharges utilities are collecting."
2. On or about March 22, 1006, PECO Energy was served the above-mentioned formal Complaint.
3. Pursuant to 52 Pa. Code §5.101(b), PECO Energy is filing an Answer and New Matter to the Complaint contemporaneously with this Motion.
4. Under 52 Pa. Code §5.101(a), a formal complaint may be dismissed where the complaint "does not indicate on its face the standing of the party to participate in the

proceeding,” and/or where the complaint has failed to join an indispensable party. 52 Pa.Code §5.101(a)(3).

MOTION TO DISMISS FOR LACK OF STANDING

5. Complainant is challenging a convenience fee charged by a third-party vendor, not PECO Energy, to customers who choose to pay their utility bill using a credit or debit card.

6. PECO Energy customers can choose to pay their bill with a credit or debit card through a third party, Speedpay. Speedpay charges a convenience fee to use a credit or debit card to pay bills.

7. Complainant, who is a PECO Energy customer, has not used a credit or debit card to pay his PECO utility bill and has not paid any convenience fee to Speedpay.

8. Complainant lacks the requisite standing to raise the issues set forth in the Complaint.

9. A Complainant has standing when he/she has a substantial, direct and immediate interest in the subject matter of the proceeding.

10. The Commission has “held that a party’s interest in the subject matter of a proceeding is substantial if the complainant has a discernible interest other than the common interest of all citizens, is direct if the matter complained up caused harm to the party’s interest, and is immediate if there is a close causal nexus between the action complaint and the injury to the party challenging it.” Leonard J. Searing v. Verizon Pennsylvania, Inc., (PUC Docket No. C-20043610, Initial Decision dated October 26, 2004)

8. Complainant fails to allege any immediate injury or nexus to the action of PECO Energy and Speedpay's convenience fee to use a credit or debit card.

Complainant has not used Speedpay to pay his bill, Complainant has not been charged a convenience fee and therefore has no direct, immediate or substantial interest in the matter.

MOTION TO DISMISS FOR FAILURE TO JOIN INDISPENSABLE PARTIES

9. Complainant alleges that other utilities "are surcharging for paying bills with a credit or debit card" and requests that the Commission prohibit all utilities from permitting third parties to charge convenience fees to customers.

10. Complainant does not specify the other utilities or include them as parties to this action.

11. In order for the Commission to decide the issue as it may relate to other utilities they are indispensable to this Complaint.

12. Complainant fails to join indispensable parties as required by 52 Pa. Code §5.101(a)(3).

MOTION TO DISMISS FOR FAILURE TO SET FORTH ANY VIOLATION OF THE PUBLIC UTILITY CODE, THE REGULATIONS OR PECO'S TARIFF

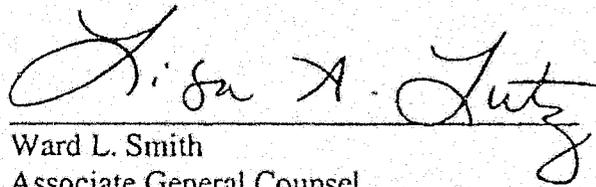
13. Complainant is challenging a convenience fee charged by a third-party vendor, not PECO Energy. Speedpay charges a convenience fee to use a credit or debit card to pay bills; the challenged fee is not charged by PECO Energy.

14. PECO Energy avers that Complainant fails to set forth any violation by PECO Energy of either the Public Utility Code, the regulations of the PUC or PECO Energy's Electric Service Tariff as required by 52 Pa. Code §5.22(a)(4) and accordingly,

must be dismissed. West Penn Power Co. v. Pa. Public Utility Commission, 84 Pa. Cmwlth. Ct. 157, 478 A.2d 947 (1984).

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the Complaint because Complainant lacks the requisite substantial, direct and immediate interest in the subject matter of the Complaint. Furthermore, the Complaint should be dismissed for failure to join indispensable parties, and for failure to state a violation of the Public Utility Code, the regulations of the PUC Public Utility Code, or PECO Energy's tariff.

Respectfully submitted,



Ward L. Smith
Associate General Counsel
Exelon Business Services Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
215.841.6863
ward.smith@exeloncorp.com

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

LANCE HAVER

v.

PECO ENERGY COMPANY

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DOCKET NO. C-20066009

VERIFICATION

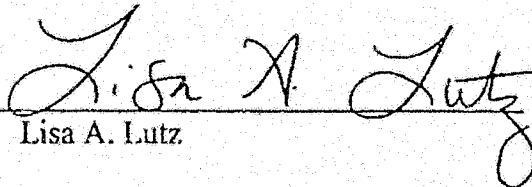
I, Lisa A. Lutz, hereby declare that I am an attorney representing PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification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

PECO ENERGY COMPANY

APR 14 2006

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Date: April 14, 2006



Lisa A. Lutz

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LANCE HAVER

v.

PECO ENERGY COMPANY

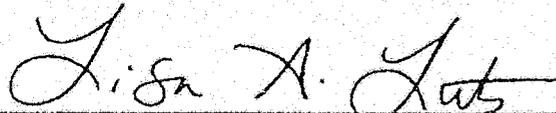
DOCKET NO. C-20066009

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:

LANCE HAVER
6803 Lawnton Ave.
Philadelphia, PA 19126

Dated at Philadelphia, Pennsylvania, April 14, 2006.

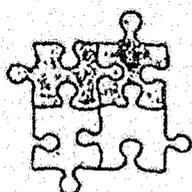


Lisa A. Lutz
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699
Direct Dial: 215.841.6841
Fax: 215.568.3389
Lisa.Lutz@exeloncorp.com

Risser, Gwen

From: Thomas, Val [VThomas@foxrothschild.com]
Sent: Tuesday, April 18, 2006 9:58 AM
To: grisser@state.pa.us
Subject: FW: Copy of Answer

Can you check again to see if the answer was filed in this case? Thanks again.



**Knowledge
Management
Services**

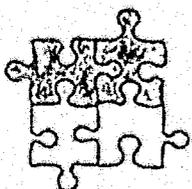
Research. Experience. Collaboration. Innovation.

Valencia Thomas
Research Analyst
Fox Rothschild LLP
2000 Market Street
Philadelphia, PA 19103-3291
(PH) 215-299-2108
(FX) 215 299-2150
vthomas@foxrothschild.com

From: Thomas, Val
Sent: Wednesday, April 12, 2006 1:30 PM
To: 'grisser@state.pa.us'
Subject: Copy of Answer

Hi Gwen,

I would like to see if an answer was filed in this case :
Haver v. PECO (C-20066009) - complaint was filed on 3/22/06.
Thanks for all your help.



**Knowledge
Management
Services**

Research. Experience. Collaboration. Innovation.

Valencia Thomas
Research Analyst
Fox Rothschild LLP
2000 Market Street
Philadelphia, PA 19103-3291
(PH) 215-299-2108
(FX) 215 299-2150
vthomas@foxrothschild.com

ATTENTION:

IRS CIRCULAR 230 DISCLOSURE:

Pursuant to Treasury Regulations, any tax advice contained in this communication (including any attachments intended or written to be used, and cannot be used or relied upon by you or any other person, for the purpose of avoiding penalties under the Internal Revenue Code, or (ii) promoting, marketing or recommending to another individual any tax advice addressed herein.

This e-mail contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the

APPL/RESPONDENT	DESCRIPTION	DISTRIBUTION
04/14/06 061 PECO ENERGY CO.	F-02005282 ORIG & 3 LETTER/SATISFACTION OF COMPLAINT VS BRIAN L. & FRANCINE T. LINCICOME	ALJ 4/17/06
04/14/06 062 PECO ENERGY CO.	F-02011947 ORIG & 3 LETTER/WITHDRAW OF COMPLAINT VS HEIDI UTLEY	ALJ 4/17/06
04/14/06 063 PECO ENERGY CO.	C-20065837 ORIG & 3 LETTER/SATISFACTION OF COMPLAINT VS MARK ALSTON	ALJ & OTS 4/17/06
04/14/06 064 PECO ENERGY CO.	C-20066009 ORIG & 3 ANSWER & NEW MATTER & MOTION TO DISMISS & MOTION FOR A MORE SPECIFIC PLEADING VS LANCE HAVER	ALJ & OTS 4/17/06

MORE RECORDS EXISTS ON DATA BASE, TRANSMIT FROM HOME
RCV [FORM] [LTAI] [Col 3]Row 1]Page 1]T1



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Administrative Law Judge
P.O. BOX 3265, HARRISBURG, PA 17105-3265
April 20, 2006

IN REPLY PLEASE
REFER TO OUR FILE

Re: C-20066009

(SEE ATTACHED LIST)

Lance Haver v. PECO Energy Company

Billing Dispute

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:

717-783-5452

DOCUMENT
FOLDER

pc: SA Rumsey
Cherie Pyle, Scheduling Officer
Beth Plantz
Docket Section

DOCKETED
APR 25 2006

MAYOR'S OFFICE



CONSUMER AFFAIRS

Room 116 - City Hall
Philadelphia, PA 19107
Phone: 215 686 7598

John F. Street, Mayor
Lance S. Haver, Director
Cell: 215 906 6230

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120
April 25, 2006

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APR 27 2006

ORIGINAL

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Mr. McNulty,

Enclosed please find three (3) filings in Lance Haver V PECO Energy Company, Docket No. C-20066009, a reply to PECO's motion to dismiss, a reply to PECO Energy's motion for a more specific Pleading and a response to PECO Energy's Answer and New Matter to be filed with the Commission.

For each filing I have enclosed a Cerifitice of Service showing that a copy of the Pleadings listed above was served on PECO Energy.

DOCUMENT
FOLDER

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Lance Haver".
Lance Haver
Pro Se

33

Before the
Pennsylvania Public Utility Commission

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APR 27 2006

Lance Haver
Complainant

:

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

V

:

Docket No. C-20066009

PECO Energy Company
Respondent

:

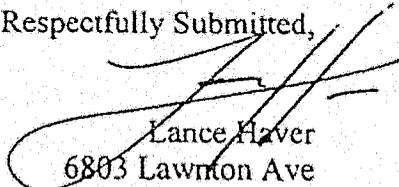
Certificate of Service

I, Lance Haver, hereby certify that I have this day served a copy of Lance Haver's response to PECO motion for a more specific pleading in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Lisa A Lutz, Esq
Counsel for PECO Energy
2301 Market St, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Dated at Philadelphia Pennsylvania, April 25, 2006

Respectfully Submitted,


Lance Haver
6803 Lawnton Ave
Philadelphia, PA, 19126

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APR 27 2006

Before the
Pennsylvania Public Utility Commission

PA PUBLIC UTILITY COMMISSION
REGULATORY BUREAU

Lance Haver :
Complainant :

V : Docket No. C-20066009

PECO Energy Company :
Respondent :

Response to PECO Energy's motion to dismiss complaint

Complainant, Lance Haver, pursuant to 52 PA code 5.101 respectfully petitions this Honorable Commission to dismiss PECO Energy's motion to dismiss.

1. Admitted
2. Accepted
3. Admitted
4. Admitted
5. Denied. Complainant is challenging the right of PECO energy to refuse to act in the complainant's interest by refusing to put the service out to bid; and refusing to share the savings, through lower bills with Complainant
6. Denied, Complainant has no knowledge of the financial arrangement between "Speedpay" and PECO energy and believes the lack of transparency in the arrangement violates basic rate making procedures.
7. Admitted
8. Denied
9. Admitted
10. Admitted

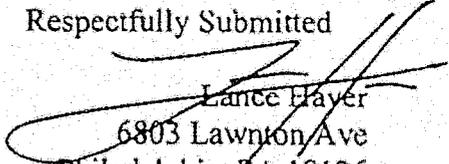
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8. Denied. Complainant avers that the cost savings should be shared with consumers and that PECO Energy's decision to not seek the lowest cost 3rd party to for such transactions adds to uncollectables, collection costs and raises the consumers bill
9. Admitted
10. Admitted
11. Admitted
12. Denied, Complainant only has standing to file complaints where Complaint has an interest
13. Denied. Complainant is challenging the division of the cost savings and the manner in which PECO energy selected "SpeedPay"
14. Denied

Wherefore, Complainant respectfully requests that your Honorable Commission dismiss PECO Energy's motion to dismiss.

Respectfully Submitted



Lance Hayer
6803 Lawnton Ave
Philadelphia, PA 19126

RECEIVED

Before the
Pennsylvania Public Utility Commission

APR 27 2006

Lance Haver
Complainant

:

PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE

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V

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Docket No. C-20066009

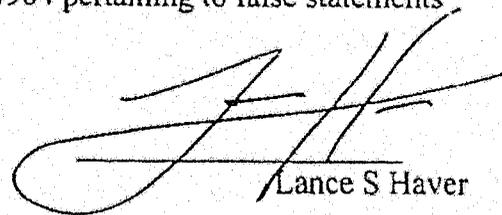
PECO Energy Company
Respondent

:

Verification

I, Lance S Haver, hereby declare 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.

April 25, 2006



Lance S Haver

Before the
Pennsylvania Public Utility Commission

RECEIVED

APR 27 2006

Lance Haver
Complainant

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V

Docket No. C-20066009

PECO Energy Company
Respondent

:

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

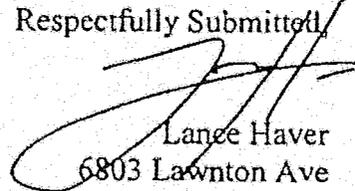
Certificate of Service

I, Lance Haver, hereby certify that I have this day served a copy of Lance Haver's response to PECO motion to dismiss in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Lisa A Lutz, Esq
Counsel for PECO Energy
2301 Market St, S23-1
P.O. Pox 8699
Philadelphia, PA 19101-8699

Dated at Philadelphia Pennsylvania, April 25, 2006

Respectfully Submitted,


Lance Haver
6803 Lawnton Ave
Philadelphia, PA, 19126

Before the
Pennsylvania Public Utility Commission

RECEIVED

APR 27 2006

Lance Haver
Complainant

:

PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE

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v

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Docket No. C-20066009

PECO Energy Company
Respondent

:

Response to PECO Energy's Motion for a more specific pleading

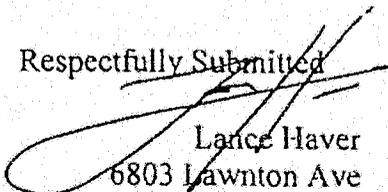
Complainant, Lance Haver, pursuant to 52 PA code 5.101 respectfully petitions this Honorable Commission to dismiss PECO Energy's Motion for a more specific pleading.

1. Admitted
2. Accepted
3. Admitted
4. Admitted. Complainant does not deny working for the City of Philadelphia in the Capacity of Director of Consumer Affairs and from time to time using his stationary.
5. Denied. The complaint is filed by the Complainant as an individual consumer of PECO energy
6. Accepted
7. Denied

Wherefore, Complainant respectfully requests that your Honorable Commission dismiss PECO Energy's motion for a more specific pleading.

DOCKETED
MAY 11 2006

Respectfully Submitted


Lance Haver
6803 Lawnton Ave
Philadelphia, PA 19126

DOCUMENT
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RECEIVED

APR 27 2006

Before the
Pennsylvania Public Utility Commission

PA PUBLIC UTILITY COMMISSION
SECRETARY'S OFFICE

Lance Haver
Complainant

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V

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Docket No. C-20066009

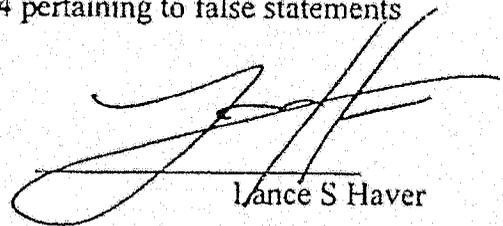
PECO Energy Company
Respondent

:

Verification

I, Lance S Haver, hereby declare 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.

April 25, 2006



Lance S Haver

Before the
Pennsylvania Public Utility Commission

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APR 27 2006

Lance Haver
Complainant

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

V

Docket No. C-20066009

PECO Energy Company
Respondent

DOCUMENT
FOLDER

Reply to New Matter of Respondent,
PECO Energy Company

Citizen Lance Haver pursuant to 52 PA code 5.61 responds to PECO's answer and New Matter and states:

1. Complainant is a consumer of PECO energy and therefore has requisite capacity to bring this complaint. Complainant avers that he is being overcharged as a result of PECO's decision to allow consumers paying with credit cards to be surcharged in the following ways:
 - a. To the extent that PECO has shed costs of collections, by outsourcing credit card payments and placed those costs on consumers who are using credit cards, the savings to the company are not being shared with Complainant.
 - b. To the extent that decision PECO has made to allow it consumers to be surcharged adds to collection costs and/or uncollectables, Complainant's bill has been and will be increased.
 - c. Complainant is representing his own interest in this instant case, filing individually and reserving the right to file a complaint in his official capacity.
2. Denied. Complainant does not have the requisite capacity to bring a complaint against utilities for which he is not a consumer
3. Denied. Complaint avers that the decision to outsource collections and place the cost of collections on consumers violates the rate of return set by the Commission
4. Admitted in part, denied in part. It is admitted that the Commission has determined a third party fee is not unreasonable. It is denied that the Commission

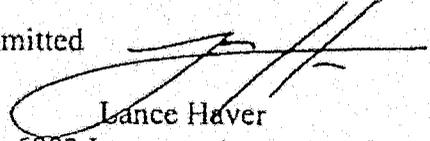
DOCKETED
MAY 11 2006

ruled on what is reasonable, what procedure a utility must use in contracting with a third party to surcharge; and to whom the savings from such programs belong.

5. Complainant is filing as an individual and admits that he is currently employed by the City of Philadelphia as the Director of Consumer Affairs and from time to time uses the his official letter head.

Wherefore, Lance Haver respectfully requests that your Honorable Commission dismiss PECO's motion for dismissal.

Respectfully Submitted



Lance Haver
6803 Lawnton Ave
Philadelphia, PA 19126

Before the
Pennsylvania Public Utility Commission

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APR 27 2006

Lance Haver
Complainant

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:

PA PUBLIC UTILITY COMMISSION
REG. TARIFF BUREAU

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Docket No. C-20066009

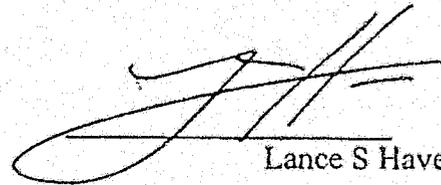
PECO Energy Company
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April 25, 2006



Lance S Haver

Before the
Pennsylvania Public Utility Commission

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APR 27 2006

Lance Haver
Complainant

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Docket No. C-20066009

PECO Energy Company
Respondent

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

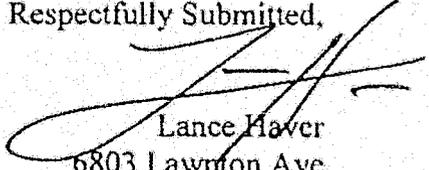
Certificate of Service

I, Lance Haver, hereby certify that I have this day served a copy of Lance Haver's response to PECO Energy's New Matter in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Lisa A Lutz, Esq
Counsel for PECO Energy
2301 Market St, S23-1
P.O. Pox 8699
Philadelphia, PA 19101-8699

Dated at Philadelphia Pennsylvania, April 25, 2006

Respectfully Submitted,


Lance Haver
6803 Lawnton Ave
Philadelphia, PA, 19126