

ORIGINAL

Legal Department

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January 31, 2002

DOCUMENT FOLDER

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

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JAN 31 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Janet Hayes v. PECO Energy Company
Docket No. C-20016658

Dear Mr. McNulty:

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

- ...X Answer (original and 3 copies)
- _____ Answer and Motion (original and 3 copies)
- _____ Petition (original and 3 copies)
- _____ Answer and New Matter (original and 3 copies)
- _____ Motion (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 documents were served on the interested parties.

Very truly yours,

Shari C. Gribbin
Assistant General Counsel
Exelon Business Services Company

SCG/zr

Enclosures

9/6

ORIGINAL

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JANET HAYES :
 :
 v. : DOCKET NO. C-20016658
 :
 PECO ENERGY COMPANY :

ANSWER 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. Denied. PECO Energy is, after reasonable investigation, without sufficient

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SECRETARY'S OFFICE

information to make a determination as to whether or not Complainant requested the property owner provide access. By way of further response, PECO Energy had a consistent problem accessing this property. Complainant's service was initiated at 5986 Norwood Street effective May 5, 1999. On August 6, 1999, Complainant contacted PECO Energy to request discontinuance of the service at 5986 Norwood Street effective August 9, 1999. On August 9, 1999, a PECO Energy representative visited the property to obtain a final reading and terminate service pursuant to the Complainant's request. The Complainant was unable to provide access to the meter. Thereafter, a PECO Energy representative visited the property on two other occasions, pursuant to scheduled appointments, and was unable to gain access to the meter on either occasion. The PECO Energy discontinuance and access policy was explained to Complainant on both occasions.

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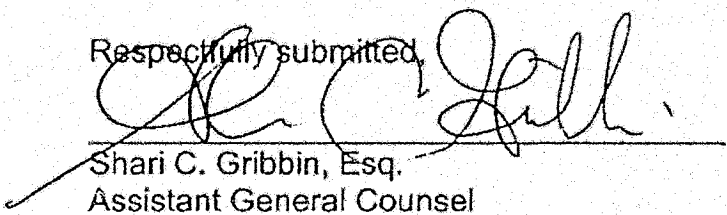
FEB 04 2002

Denied. It is denied that Complainant could not owe the amount billed. By way of further response, Complainant's final bill had to be estimated because Complainant repeatedly failed to provide access to the property. If a utility is denied access to a customer's property so that it cannot take an actual reading, §56.12 of the Pennsylvania Public Utility Regulations permits estimated billing. 52 Pa. Code § 56.12(4). The utility customer is responsible for assuring that the utility has access to the meter.

4. This paragraph is a claim for relief to which no answer is required.

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

Respectfully submitted,



Shari C. Gribbin, Esq.
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
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Philadelphia, PA 19101-8699
215-841-3606
shari.gribbin@exeloncorp.com

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JANET HAYES

v.

PECO ENERGY COMPANY

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DOCKET NO. C-20016658

VERIFICATION

I, Shari C. Gribbin, hereby declare that I am an attorney with 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: January 31, 2002



Shari C. Gribbin

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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JANET HAYES

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DOCKET NO. C-20016658

CERTIFICATE OF SERVICE

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

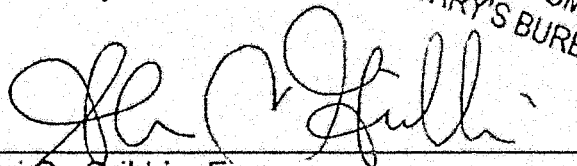
Janet Hayes
2025 Chestnut Street
Philadelphia, PA 19103

Dated at Philadelphia, Pennsylvania, January 31, 2002.

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