



An Exelon Company

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

Direct Dial: 215-841-6841

December 4, 2017

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

RE: Paul Duca v. PECO Energy Company
PUC Docket No.: C-2017-2633943

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *Preliminary Objection of Respondent, PECO Energy Company* with regard to the matter referenced above.

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention on this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Shawane Lee", with a long horizontal flourish extending to the right.

Shawane Lee
Counsel for PECO Energy Company

SL/ab

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PAUL DUCA	:	
Complainant	:	
v.	:	DOCKET NO. C-2017-2633943
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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 Preliminary Objection within 20 days from service of this notice, a ruling may be entered against you. Your response must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Shawane L. Lee, and where applicable, the Administrative Law Judge presiding over the issue.

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

With a copy to:
Shawane L. Lee
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, December 4, 2017.



Shawane L. Lee
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103
(215) 841-6841
Shawane.Lee@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PAUL DUCA	:	
Complainant	:	
v.	:	DOCKET NO. C-2017-2633943
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PECO ENERGY COMPANY	:	
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**PRELIMINARY OBJECTION OF RESPONDENT,
PECO ENERGY COMPANY**

Respondent, PECO Energy Company (“PECO Energy”), pursuant to 52 Pa. Code § 5.101(a)(4) respectfully petitions this Honorable Commission to dismiss the instant Complaint as legally insufficient.

1. On November 16, 2017, PECO Energy was served with a formal complaint filed by Paul Duca (hereafter “Complainant”). A copy of the Complaint is attached hereto as Exhibit “1”.
2. In his Complaint, the Complainant states that PECO claims the basement at 1905 Fairview Avenue, Willow Grove, PA has foreign wiring.
3. The Complainant states the tenant knew of this and agreed to pay for the basement light and sump pump.
4. The Complainant states the tenant moved without notice and failed to pay the rent and the electric bill.
5. The Complainant states that the tenant complained of high bills to escape paying the utility bill.

6. The Complainant states that his tenant had an obligation to pay this bill.
7. The Complainant states that the PUC should order the tenant to pay the outstanding bill and relieve the landlord's obligation to pay the tenant's outstanding bill.
8. The Complainant states that no notice was given to the landlord that apparently the tenants did not pay their bill for over one year.
9. PECO Energy simultaneously filed an Answer and the instant Preliminary Objection.
10. Pursuant to 52 Pa. Code § 5.101, preliminary objections may be filed against a complaint and dismissed for legal insufficiency. 52 Pa. Code § 5.101(a)(4).
11. Commission procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil procedure.¹
12. In deciding preliminary objections, the Public Utility Commission must determine, based on the factual pleadings of the petitioner, if relief or recovery is possible.²
13. A complaint must be able to recover under the law to survive a preliminary objection.³
14. All of the non-moving party's averments must be taken as true for the sake of deciding the preliminary objection.⁴
15. The court does not, however, need to accept, "unwarranted inferences from facts, argumentative allegations, or expressions of opinions."⁵

¹ *Equitable Small Transportation Interveners v. Equitable Gas Co.*, 1994 Pa.PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994)

² 2006 Pa. PUC Lexis 111, *7.

³ *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. Ct. 1998) ("preliminary objection should be sustained only where it appears with certainty that, upon the facts averred, the law will not allow the plaintiff to recover").

⁴ *Id.* at 7-8.

⁵ *Feingold v. McNulty*, 2009 Phila. Ct. Com. Pl LEXIS 167, *3.

16. Section 703 of the Public Utility Code, 66 Pa. C.S.A. § 703(b) provides that the Commission may dismiss any complaint without a hearing of, in its opinion, a hearing is not necessary to the public interest.

17. A hearing is required only when there is a disputed question of fact, and is not required to resolve questions of law. Dee-Dee Cab, Inc. v. Pa. Pub. Util. Comm'n, 817 A.2nd 593 (Pa. Commw. Ct. 2003), petition for allowance of appeal denied, 836 A.2d 123 (Pa. 2003).

18. Here, there are no genuine issues of fact and PECO Energy is entitled to judgment as a matter of law with respect to all of the allegations in the Complaint.

19. The Commission has held that a landlord must pay the utility for any account balance, including arrearages, once a foreign load or wiring has been found. 66 Pa. C.S. §§ 1529.1(a), (c); and Ace Check Cashing Inc. v. Phila. Gas Works, Final Order, (May 21, 2010). See also Santos v. Metro. Edison Co., No. C-00967757 (Pa. P.U.C. Aug. 7, 1997).

20. The Complainant is the owner of the rental property at issue. See Exhibit "1".

21. The Complainant avers that he is being held responsible for his tenant's balance that was transferred to him. The Complainant disputes responsibility for the balance transferred to him arising from the foreign wiring condition. See Complaint at Exhibit "1".

22. As previously explained by the Legislature and this Commission, upon discovering the existence of a foreign load a public utility is required to list the account, including any arrearages, in the name of the landlord. 66 Pa. C.S. §§ 1529.1(a), (c). See also Santos v. Metro. Edison Co., No. C-00967757 (Pa. P.U.C. Aug. 7, 1997). The landlord is responsible for paying the utility bills until the foreign load is corrected. Santos at 16. Once the foreign load is corrected by the landlord and verified by the utility, the utility will place the account back in the name of the tenant and the arrearage, if any, will remain the landlord's

responsibility. Id. To the extent any dispute regarding the financial responsibility of the parties exists, that is a matter to be resolved in the Court of Common Pleas as it is outside the Commission's jurisdiction. Edmund v. Corazzini v. UGI Penn Natural Gas, Inc., No. F-2009-2101282, Opinion and Order adopted July 15, 2010 at 7.

23. The Complainant does not allege that the property is not a rental property or that he is not the owner of the property.

24. The Complainant does not allege that PECO Energy delayed investigating his tenant's foreign wiring concerns.

25. The Complainant does not allege that PECO Energy transferred an incorrect amount to his account.

26. The Complainant does not allege that PECO Energy delayed their field investigation to verify the foreign wiring had been corrected.

27. The Complainant's formal complaint simply alleges that foreign wiring was found at his property and he feels that he should not be held responsible for his tenant's balance arising from the foreign wiring because the tenant agreed to the additional electric usage. See e.g. ("tenant knew of this and agreed to pay for basement, light and sump pump.") See Complainant's Formal Complaint.

28. The law does not permit the Complainant to assign responsibility for the foreign wiring to his tenant through an agreement and circumvent 66 Pa. C.S. § 1529.1. See 1-A Realty v. PPL Electric Utilities Corp., Docket Nos. F-2010-2166554 and F-2010-2166976 (Order entered April 12, 2012).

29. The landlord shall be responsible for payment of utility services rendered to the rental property when a foreign load is found even if the landlord and tenant agree that the

tenant is responsible for the additional load. See George Kopf v. PECO Energy Company, Docket No. C-2012-2332993 (Initial Decision entered November 29, 2012).

30. In George Kopf, the Complainant argued that he should not be responsible for his tenant Ms. DelRaso's balance and requested that the PUC order PECO to transfer the tenant's balance back to the tenant.

31. Mr. Kopf argued in his formal complaint that his tenant, Ms. DelRaso agreed to pay for all utilities in the common areas pursuant to her lease agreement.

32. ALJ Salapa granted PECO Energy's Preliminary Objection and dismissed Mr. Kopf's formal complaint in a well-reasoned opinion wherein he stated:

The Public Utility Code at 66 Pa.C.S. § 1529.1, requires that a public utility "shall forthwith list the account for the premises in question in the name of the owner" when a residential building contains one or more dwelling units not individually metered. 66 Pa. Pa.C.S. § 1529.1(b); Ace Check Cashing, Inc. v. Philadelphia Gas Works, Docket No. C-2008-2056428 (Order entered May 21, 2010).

The Complainant apparently believes that the statute at 66 Pa.C.s. § 1529.1 does not apply to this case. The Complainant asserts that he has a lease with Ms. DelRaso that requires her to pay for the electricity used in the common areas and Ms. DelRaso has agreed to continue paying for the electricity used in the common areas. The Complainant argues that, since Ms. DelRaso agreed to pay for the electricity used in the common area, the Respondent improperly transferred her account to him and improperly refused to transfer the account back to Ms. Del Raso..... The Complainant is incorrect for two reasons.

First, the Public Utility Code does not authorize the Respondent to collect load charges from a tenant. In Santos the Commission held that "the utility must...place the account in the landlord's name upon discovery of the foreign load and collect unpaid bills only from the landlord." (emphasis added) Santos at 14.Second, the Complainant's lease with Ms. DelRaso, where she agreed to pay for the electricity used in the common areas, cannot supersede the provisions of 66 Pa.C.S. § 1529.1.

33. Mr. Kopf filed Exceptions to ALJ Salapa's Initial Decision. The Commission reviewed and adopted ALJ Salapa's Initial Decision based on the Commonwealth Court decision 1-A Realty v. PPL Electric Utilities Corp. The Commission determined that:

Under Section 1529.1 of the Code, the Commission's rulings related to it, and the Commonwealth Court's decision in *1-A Realty*, it is clear that tenants are not permitted to consent to having foreign load charges attributed to them. In this case, Ms. DelRaso could not accept utility service that was not exclusive to her rented apartment.

George Kopf v. PECO Energy Company, Docket Number C-2012 (Opinion and Order entered, June 13, 2013).

34. In the case at bar, as ALJ Salapa stated, and the Commission agreed in George Kopf, the Public Utility Code does not permit PECO to collect foreign load charges from the Complainant's tenant. 66 Pa.C.S.A. § 1529.1. When PECO finds foreign load, the company is required to transfer the tenant's account, including any arrearages, into the landlord's name. See 66 Pa.C.S.A. § 1529.1. The agreement where the tenant agrees to accept responsibility for the additional load for the basement, light and sump pump cannot supersede the provisions of 66 Pa.C.S.A. § 1529.1.

35. As stated above, the landlord shall be responsible for payment for the utility services rendered to the rental property when a foreign load is found.

36. PECO Energy properly transferred the tenant's utility account, including arrearages, to the Complainant's name.

37. PECO Energy's actions are consistent with Pennsylvania law.

38. The PUC is not the forum for the Complainant to raise what is essentially a dispute, regarding the foreign wiring balance that should be attributable to him as opposed to the amount attributable to his tenant.

39. As stated in Edmund v. Corazzini, supra that is a matter to be resolved in the Court of Common Pleas as it is outside the Commission's jurisdiction.

40. Because the Complaint relates to a dispute about the assignment of financial responsibility for a foreign load in a building he owns, this complaint should be dismissed as a matter of law.

41. Accordingly, PECO Energy requests that the Commission dismiss the Complaint for legal insufficiency.

REQUEST FOR RELIEF

WHEREFORE, for the reasons set forth above, PECO Energy Company respectfully requests that your Honorable Commission summarily dismiss the Complainant's Complaint.

Respectfully submitted,



Shawane L. Lee
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
Tel: (215) 841-6841
Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PAUL DUCA

Complainant

v.

PECO ENERGY COMPANY

Respondent

:
:
:
:
:
:

DOCKET NO. C-2017-2633943

VERIFICATION

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

Date: December 4, 2017



Shawane L. Lee

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PAUL DUCA	:	
Complainant	:	
v.	:	DOCKET NO. C-2017-2633943
	:	
PECO ENERGY COMPANY	:	
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CERTIFICATE OF SERVICE

I, Shawane L. Lee, 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, properly addressed and postage prepaid to:

Paul Duca
9134 Ayrdale Crescent
Philadelphia, PA 19128

Dated at Philadelphia, Pennsylvania, December 4, 2017



Shawane L. Lee
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
(215) 841-6841
Fax: 215.568.3389
Shawane.Lee@exeloncorp.com

EXHIBIT 1

Botak, Amy:(PECO)

From: eServe@pa.gov
Sent: Thursday, November 16, 2017 8:41 AM
To: Lee, Shawane L:(PECO)
Cc: Botak, Amy:(PECO)
Subject: [EXTERNAL] PA PUC eServe Notice

Importance: High

Dear Shawane L Lee,

A(n) Formal Complaint has been served in this proceeding. This document is docketed as **C-2017-2633943**. You may view this document at **Formal Complaint**

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,
Public Utility Commission
Commonwealth of Pennsylvania

** Please do not respond to this automatically generated email.*

PECO
Exhibit # 2

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

Filing this form begins a legal proceeding and you will be a party to the case.
If you do not wish to be a party to the case, consider filing an informal complaint.

To complete this form, please type or print legibly in ink.

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name PAUL J DUCA

Street/P.O. Box 9134 AYLALE CRESCENT Apt # _____

City PHILA State PA Zip 19128

County PHILA

Telephone Number(s) Where We Can Contact You During the Day:

(215) 483-9991 (home) () _____ (mobile)

E-mail Address (optional): PJDUCA@MSN.COM

Utility Account Number (from your bill) 67119-25036

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name PAUL J. DUCA

Street/P.O. Box 1905 FAIRVIEW AVE., 1ST FLOOR

City WILLOW GROVE State PA Zip 19090

2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

PECO

RECEIVED
2017 NOV -3 AM 10:20
PA PUC
SECRETARY'S BUREAU

3. Type of Utility Service

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- ELECTRIC
- GAS
- WATER
- STEAM HEAT
- WASTEWATER/SEWER
- TELEPHONE/TELECOMMUNICATIONS (local, long distance)
- MOTOR CARRIER (e.g. taxi, moving company, limousine)

4. Reason for Complaint

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. Your complaint may be dismissed without a hearing if you do not provide specific information.

- The utility is threatening to shut off my service or has already shut off my service.
- I would like a payment agreement.
- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it.
PECO CHARGES BASEMENT ELECTRIC IS FOREIGN WIRING. TENANT KNEW OF THIS AND AGREED TO PAY FOR BASEMENT LIGHT AND SUMP PUMPS. TENANT MOVED WITHIN NOTICE FAILED TO PAY RENT AND THEIR ELECTRIC BILL AND COMPLAINED OF WHICH BILL TO PAY. ESCAPE PAYING THEIR RENTAL BILL. TENANT HAS OBLIGATION TO PAY THIS BILL.
- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.
- Other (explain).

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

PUC SHOULD ORDER TENANT TO PAY OUTSTANDING BILL AND RELIEVE LANDLORD OF OBLIGATION TO PAY TENANTS' OUTSTANDING BILL. NO NOTICE WAS GIVEN LANDLORD AND APPARENTLY TENANT HAS NOT PAID THEIR BILL FOR OVER ONE YEAR.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

6. **Protection From Abuse (PFA)**

Has a court granted a "Protection From Abuse" order that is currently in effect for your personal safety or welfare? The PUC needs this information to properly process your complaint so that your identity is not made public.

Note: You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection From Abuse" order for your personal safety or welfare?

YES

NO

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

7. **Prior Utility Contact**

a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?

YES

NO

Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?

YES

NO

Note: You must contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.

c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why.

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.

8. Legal Representation

If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, if known. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name _____

Street/P.O. Box _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

E-mail Address (if known) _____


Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

9. **Verification and Signature**

You must sign your complaint. Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. If you do not sign the Formal Complaint, the PUC **will not accept** it.

Verification:

I PAUL J DUCA, 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).

 10 / 30 / 2017
(Signature of Complainant) (Date)

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept** it.

10. **Two Ways to File Your Formal Complaint**

Electronically. You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

Note: If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

Mail. Mail the completed form with your original signature and any attachments, by certified mail, first class mail, or overnight delivery to this address:

Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Note: Formal Complaints sent by fax or e-mail 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 Formal Complaint for your records.



An Exelon Company
Page 1 of 2

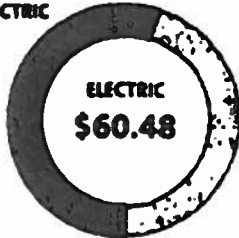
Name: PAUL J DUCA
Account Number: 67119-25036
Phone Number: 215-483-9991
Service Address: 1905 Fairview Av, 1st Fl, Willow Grove

Emergency and Repair

800-841-4141

This is the number to call to report power outages, gas leaks or odors, and safety hazards related to PECO Equipment.

PECO ELECTRIC DELIVERY



TAXES & FEES

PECO
2301 Market Street
Philadelphia, PA 19103
800-494-4000

Billing Summary

Bill Date	10/16/2017
Charges from previous bill	\$785.12
Connection charge - standard	\$6.00
Late payment charge	\$0.20
Total Other Charges	\$791.32

Current Period Charges

Electric	\$60.48
Total New Charges	\$60.48

Total Amount Due on 11/07/2017 \$851.80

PAID
10/21/17
DUCA
[Signature]

General Information

Next scheduled meter reading: 11/16/2017

1-800-494-4000

If you have any questions or concerns, please call 800-494-4000 before the due date. Si tiene alguna pregunta, favor de llamar al numero 1-800-494-4000 antes de la fecha de vencimiento.

peco.com/service

Customer Self Service - Manage Your Account 24/7
Start, stop and move your service

Online: peco.com

In Person: 2301 Market St., Philadelphia, PA 19103

By Phone: 1-800-494-4000

Return only this portion with your check made payable to PECO. Please write your account number on your check.



An Exelon Company
2301 Market Street
Philadelphia, PA 19103-1380

Pay Today!

peco.com/ebill

Go paperless: receive and pay your bill online.

- Enroll in Automatic Payment. Complete form on reverse side.
- Pledge a donation to MEAF. Complete form on reverse side.

Account # 67119-25036 877-432-9384

Pay by phone, a convenience fee will apply (\$2.95 fee)

Please pay this amount by 11/07/2017 \$851.80

Payment Amount \$

0022204 01 AS 0.400 **AUTO T7 0 8747 10128-10404 -002-01-P22228-11 34



PAUL J DUCA
9134 AYRDALE CRESCENT RD
PHILADELPHIA, PA 19128-1049



PECO - Payment Processing
PO Box 37629
Philadelphia, PA 19101-0629

671192503601008518073110851802

Mr. Paul J. Duro
9134 Ayrdale Crn
Philadelphia, PA 19128



SECRETARY
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET
HARRISBURG, PA 17120

1712080079 0000

