

Legal Department
2301 Market Street / S23-1
Philadelphia, PA 19103

Direct Dial: 215-841-6841

October 31, 2018

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

Ret. to NOV. THIRD
2018 year
SATURDAY

RE: Judith Benvenger v. PECO Energy Company
Docket No. C-2018-3005286


WAS
INFORMAL

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is PECO Energy Company's Answer to Formal Complaint 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,


Shawane Lee
Counsel for PECO Energy Company

RECEIVED
NOV - 7 2018
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Rec'd
NOV. SECOND
2018
FRIDAY

Scheduling Recommendation: _____

Not Recommended for Call of the Docket

SL/ld

Investigated many months ago in the past

Gov. Tom Wolf - PA

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JUDITH BENVENGER

Complainant

v.

PECO ENERGY COMPANY

Respondent

:
:
:
:
:
:
:
:

DOCKET NO. C-2018-3005286

ANSWER OF RESPONDENT,
PECO ENERGY COMPANY

On October 11, 2018, PECO Energy Company ("PECO Energy") was served with a formal complaint filed by Judith Benvenger (hereafter "Complainant") in the above captioned docket. Pursuant to 52 Pa. Code § 5.61, PECO responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.

4. Unless specifically admitted herein, PECO Energy denies all material allegations of fact and conclusions of law in the instant Complaint. In her formal complaint, the Complainant disputes a threatened service termination and states that she has no past due payments. The Complainant disputes a \$4.15 charge to her bill and requests a refund.

The Complainant established service at [REDACTED] under account number 40309-74026 effective September 29, 2015. See Account Activity Statement, attached hereto as Exhibit "1". Since the Complainant has had service at this address,

in full

paid on time

she has incurred late payment charges practically every month for not paying her bill in full and on time.

On June 6, 2018, PECO credited \$40.00 in late payment charges to the account.

However, the Complainant continued to incur late payment charges and by August 2018, the Complainant had a balance forward in the amount of \$4.90 for unpaid previous usage and late payment charges.

On May 11, 2018, the Complainant filed an informal complaint with the Bureau of Consumer Services ("BCS") at case number 003613857, disputing overpayments. See Case Details Report #003613857, attached hereto as Exhibit "2". The Complainant stated that PECO had "fake payment locations." On June 13, 2018, the BCS issued a Decision Report, dismissing the complaint. The BCS noted the following:

DECISION ISSUED - LAST COMPANY CONTACT 9/7/2017 - THE CUSTOMER'S LETTER STATES PECO PAYMENT CENTERS IN PITTSBURGH AND CARLISLE ARE FRAUDULENT - PECO DOES NOT HAVE PAYMENT CENTERS IN THOSE CITIES - CUSTOMER MENTIONS AN OVERPAYMENT OF \$5.00 THAT WAS NOT POSTED ON HER NEXT BILL BUT DOES NOT INDICATE THE PAYMENT WHEN THIS HAPPENED - DISPUTE UNKNOWN - NO RESPONSE TO 2 CALLS OR 10 DAY LETTER - CUSTOMER ACKNOWLEDGED 10 DAY LETTER BY WRITING ON IT AND SENDING IT BACK TO THE PUC - THE COMPANY MADE CONTACT WITH THE CUSTOMER ON 6/4/2018 AND TRIED TO UNDERSTAND THIS DISPUTE BUT THE CUSTOMER TERMINATED THE CALL - COMPANY WAIVED \$8.64 IN LPCS - NO RESPONSE TO 2 CALLS - CUSTOMER WROTE ON THE 10 DAY LETTER AND MAILED IT BACK BUT IT DID NOT INCLUDE ANY CLARIFICATION TO THE DISPUTE.

*CHOSED
CARLISLE
&
Pittsburgh
PA
office*

See BCS Decision Report #003613857, attached hereto as Exhibit "3".

The Complainant's balance is \$44.69. The Complainant's balance is correct.

5. Denied.

2

6. Admitted

7. Admitted.

8. PECO Energy neither admits nor denies the allegations in paragraph 8. PECO is without knowledge or information sufficient to form a belief as to the truth of this averment and, therefore, such allegation is deemed denied.

9. Paragraph 9 is a Verification and Signature to which no response is required.

10. Paragraph 10 contains information regarding Filing, to which no response is required.

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

Respectfully Submitted,



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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUDITH BENVENGER
Complainant

v.

PECO ENERGY COMPANY
Respondent

DOCKET NO. C-2018-3005286

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.



October 31, 2018

Shawane L. Lee

① Money
ORDERS
ARE Cash
② Bank checks
ARE Cash

③ Credit
CARDS ARE
Cash
④ CASH Money
is Cash Money
⑤ Computer
Payments

No Computer

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JUDITH BENVENGER

Complainant

v.

PECO ENERGY COMPANY

Respondent

:
:
:
:
:
:
:

DOCKET NO. C-2018-3005286

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:

Judith Benvenger

Box # 905

Dated at Philadelphia, Pennsylvania, October 31, 2018

[Signature]

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

Do Not
Turn off
power after
4:15 AM on
when PECO
FRUAD
ADDRESSES
not in
Philadelphia PA

not in Philadelphia PA

⑥ OF COURSE NO CURSE
WORDS NO NO NO

Recalls

- 1) Telephone calls
2) Bad Connection
3) Do Not have any
idea what your
talking about

EXHIBIT "1"

- ④ Do Not TALK road
⑤ Do Not Shoat. Shoat



An Exelon Company

Legal Department
2301 Market Street / S23-1
Philadelphia, PA 19103

Direct Dial: 215-841-6841

October 31, 2018

Judith Benvenger
2700 Chestnut Street, Apt. 905
Chester, PA 19013

Rec'd
FRIDAY
November 2nd
Secord 2018 q fee

RE: Judith Benvenger v. PECO Energy Company
Docket No. : C-2018-3005286

Dear Ms. Benvenger:

UNFORMAL

Enclosed is a copy of PECO Energy Company's response to the formal complaint filed in the above-referenced docket. The law requires PECO Energy to file an answer to your Public Utility Commission complaint. Keep these papers for your records. This is not a decision on your complaint. PECO's response may include a New Matter, Motion or Preliminary Objection. Please note that if you do not respond to a New Matter, Motion, or Preliminary Objection an unfavorable decision may be rendered against you. Responses to New Matters and Motions must be filed within 20 days. Responses to Preliminary Objections must be filed within 10 days. If there is no New Matter, Motion or Preliminary Objection included, no response is required.

Soon, the Public Utility Commission will schedule either a settlement conference or a hearing on your complaint. The Commission will let you know by mail whether there will be a conference or a hearing and will include instructions on what to do next. If the matter is set for hearing, the notice will provide you with information about the date, time and place of the hearing. If we are unable to resolve your complaint and have to proceed with a hearing, a judge will be at the hearing and will decide your complaint. You must call the Public Utility Commission if you have any questions about the hearing or if you cannot attend the hearing.

Thank you for your time and attention on this matter.

Very truly yours,

Shawane Lee
Counsel for PECO Energy Company

SL/ld
Enclosure

what is PECO
Do, a, a

Returned to

Gov. Tom Wolf

FRCS, DONALD TRUMP

Exelon.

No 9/21/15 Amount unpaid
late
paid in full

October 31, 2018

BCS Decision Report

BCS Case #: 003613857 Open Date: 2018-05-11
Customer Name: JUDITH SHORTOFF BENVENGER
Service Address: [REDACTED]

Amount & Surcharges
4/15

BCS Bill Account #: 8888888888 Previous Case #:
Violation Type: NO Chapter Type:
Decision Type: W Section / Rule:
Investigator Name: ADAM KRICHMAR

Decision Issued Date: 2018-06-13
Case Closed Date: 2018-06-11

growing to
\$4.90 taxed

Letter Description:

Total Balance: \$5.15 Balance Date: 2018-06-11
Amount to Restore Service: \$0.00 Amount to Continue Service: \$0.00
Date Payment Due: Regular Budget Amount: \$42.00
Special Budget Payment: \$0.00 Final Bill Monthly Payment: \$0.00
Plus Arrears Payment: \$0.00 End of Month Payment: \$0.00
Current Monthly Payment: \$0.00
Payment Terms:

PAR Description:

Investigated also
PECO CARLISE, PA
Post office Box #

Resolution Description:

DECISION ISSUED - LAST COMPANY CONTACT 9/7/2017 - THE CUSTOMER'S LETTER STATES PECO PAYMENT CENTERS IN PITTSBURGH AND CARLISLE ARE FRAUDULENT - PECO DOES NOT HAVE PAYMENT CENTERS IN THOSE CITIES - CUSTOMER MENTIONS AN OVERPAYMENT OF \$5.00 THAT WAS NOT POSTED ON HER NEXT BILL BUT DOES NOT INDICATE THE PAYMENT WHEN THIS HAPPENED - DISPUTE UNKNOWN - NO RESPONSE TO 2 CALLS OR 10 DAY LETTER - CUSTOMER ACKNOWLEDGED 10 DAY LETTER BY WRITING ON IT AND SENDING IT BACK TO THE PUC - THE COMPANY MADE CONTACT WITH THE CUSTOMER ON 6/4/2018 AND TRIED TO UNDERSTAND THIS DISPUTE BUT THE CUSTOMER TERMINATED THE CALL - COMPANY WAIVED \$8.64 IN LPCS - NO RESPONSE TO 2 CALLS - CUSTOMER WROTE ON THE 10 DAY LETTER AND MAILED IT BACK BUT IT DID NOT INCLUDE ANY CLARIFICATION TO THE DISPUTE -

Not the usual standard PECO's envelopes for payments

PECO Pittsburgh, Pa Post Office Post
Investigated also

Copy

CHARLE, Pa

envelope

sent

11 ALL PAID But 71
Not in PECO Envelope

a Regular Brown
envelope

Nov. 3, 2018
year

PECO

overpayments to PECO'S
of ONE PENNY - One Penny
Should Be Posted on the
coming month as PAID

\$39.80 Paid

\$39.79 FOR

~~\$00.01~~ Penny Over
payment
to PECO'S
Ph. label Lisa Pa
office

11
Sept. Oct.
2018 year

EXHIBIT "2"

EVERY PENNY Counts
MATTERS AS
PAYMENT. PAID

October 31, 2018

Case Details Report

BCS Case #: 003613857 BCS Bill Account #: 8888888888
Customer Name: JUDITH SHORTOFF BENVENGER
Service Address: [REDACTED]

Mailing Address: [REDACTED]

Home Phone: 0-
Business Phone: 0-
Business name:
Alternate contact:

*Gov. Tom
Wolf
- PA -*

Date Case Opened: 2018-05-11 Date Cut Out: 9999-12-31
PAR Case: N
Investigator Name: ADAM KRICHMAR
Investigator Phone: (717) 772-8883
Service class: R
Previous case #:

Universal Service: N
Contact Type: LETTER
Amount in Arrears: \$0.00

Adults: 0
Children: 0
Children Ages:
Gross Income: \$0.00
Miscellaneous Info:

RECEIVED

NOV - 7 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Complaint Reason:
BILLING DISPUTES (# 18)

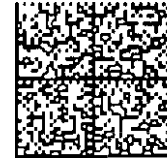
Customer Problem Description:

CUSTOMER'S DISPUTE IS THAT PECO'S OFFICES OF COLLECTIONS IN CARLISLE, PA AND PITTSBURGH, PA ARE FAKE PAYMENT LOCATIONS. CUSTOMER ALSO SAYS THAT OVERPAYMENTS OF BILLS TO PECO SHOULD BE DEDUCTED FROM THE NEXT MONTH'S BILL.

Company Position:



Exelon Business Services Company
Legal Department
2301 Market Street/S23-1
Philadelphia, PA 19103



U.S. POSTAGE PITNEY BOWES



ZIP 19103 \$ 001.63⁰
02 4W
0000335301 OCT 31 2018

PECO

~~Over 3/27
to Saturday~~

Friday
November 2nd 2018

Judith Benninger
2700 Chestnut Street, Apt. 905
Chester, PA 19013

Resident
2700 Chestnut Street
Apt. # 905
Chester, PA 19013



Rosemary Chiaavatta Secty.
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
HARRISBURG - PA 17120

Second Floor

Do Not Throw out -
HARRISBURG, PENNSA.

* A REFUND - OF MONEY - TO THIS
ACCOUNT CUSTOMER PECCO'S -
ADDRESS - IN NAME IN ENVELOPE.