

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

Direct Dial: 215-841-6841

January 9, 2019

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


RE: Sanskar Willow Grove, LLC v. PECO Energy Company
PUC Docket No.: C-2018-3005060

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *Respondent, PECO Energy Company's Motion for Judgment on the Pleadings* 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

cc: Certificate of Service

SL/ab

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SANSKAR WILLOW GROVE, LLC	:	
Complainant	:	
v.	:	DOCKET NO. C-2018-3005060
	:	
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 Motion for Judgment on the Pleadings of PECO Energy Company within 20 days from service of this notice, a decision may be rendered against you. All pleadings, such as a Reply to Motion for Judgment on the Pleadings, 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:
Rosemarie Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

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

Dated at Philadelphia, PA, January 9, 2018



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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SANSKAR WILLOW GROVE, LLC	:	
Complainant	:	
v.	:	DOCKET NO. C-2018-3005060
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**RESPONDENT, PECO ENERGY COMPANY’S
MOTION FOR JUDGMENT ON THE PLEADINGS**

Respondent, PECO Energy Company (“PECO”), pursuant to 52 Pa. Code § 5.102(a) respectfully petitions this Honorable Commission to dismiss the instant Complaint for failure of the Complainant to have counsel enter an appearance and states the following:

I. PROCEDURAL HISTORY:

1. On or about October 1, 2018, Complainant, Sanskar Willow Grove, LLC, filed a Formal Complaint with the Pennsylvania Public Utility Commission (“PUC”) against PECO.
2. On October 2, 2018, the above-mentioned Formal Complaint was served on PECO. A copy of Complainant’s Formal Complaint is attached hereto as (Exhibit 1).
3. On October 22, 2018, PECO filed an Answer and New Matter to the Formal Complaint. A copy of PECO’s Answer and New Matter is attached hereto as (Exhibit 2).
4. On December 5, 2018, Administrative Law Judge Angela T. Jones issued a Hearing Notice, which specifically states “if you are a partnership, limited liability company, corporation, trust, association, or governmental agency or subdivision, you must have an attorney licensed to practice law in the Commonwealth of Pennsylvania, or admitted *Pro Hac Vice*, represent you in this proceeding. Unless you are an attorney, you may not represent someone

else. Attorneys shall insure that their appearance is entered in accordance with the provisions of 52 Pa. Code § 1.24(b).”

5. The hearing for this matter is scheduled to take place on January 29, 2018.

II. RELEVANT FACTS:

6. The Complainant avers in the formal complaint that it has an account for electric commercial service under account number 04819-59013.

7. The Complainant states that it is operating a Great Clips located at 273 Main Street Exton, PA.

8. PECO avers that the Complainant is operating a commercial business at the address 273 Main Street, Exton, PA and has service with the company under the corporate name Sanskar Willow Grove, LLC.

9. PECO avers that the business operating at the premises is a limited liability corporation.

III. LEGAL ARGUMENT

A. Standard of Review

10. The Commission’s regulations at 52 Pa. Code §5.102(a) permits any party to move for summary judgment or judgment on the pleadings after the pleadings are closed, but within such time as to not delay a hearing.

11. Under 52 Pa. Code §5.102(d)(1), the presiding officer will grant the motion if the pleadings, depositions, answers to interrogatories, admissions and affidavits show that

there is no genuine issue as to a material fact and that the moving party is entitled to judgment as a matter of law.

12. The moving party bears the burden of showing that no genuine issue of material fact exists and that it is entitled to judgment as a matter of law. The Commission must view the record in the light most favorable to the non-moving party, giving that party the benefit of all reasonable inferences. First Mortgage Co. of Pennsylvania v. McCall, 459 A.2d 406 (Pa. Super. 1983).

13. The provision at 52 Pa. Code §5.102(c) serves judicial economy by avoiding a hearing where no factual dispute exists. If no factual issue pertinent to the resolution of the case exists, a hearing is unnecessary. Lehigh Valley Power Committee v. Pennsylvania Public Utility Commission, 563 A.2d. 557 (Pa. Cmwlt. 1989).

B. The Complainant's Complaint should be dismissed because Sanskar Willow Grove, LLC is a corporate commercial customer; and the Complainant is required to be represented by counsel.

14. The Complainant, Sanskar Willow Grove, LLC is a commercial customer operating a business at the service address at issue.

15. The Complainant is registered as a limited liability corporation in the State of New Jersey on May 31, 2009. A copy of the State of New Jersey Limited Liability Corporation registration is attached hereto as (Exhibit 3).

16. As a commercial customer and corporation, Complainant is required to be represented by counsel in adversarial proceedings before the Commission.

17. The proceedings become adversarial at the time when respondent files an Answer. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney

in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975).

18. On October 22, 2018, PECO filed an Answer and New Matter to the Complainant's Complaint. See (Exhibit 2).

19. Once PECO filed the Answer, the current PUC matter became adversarial. See 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc.

20. On December 5, 2018, Administrative Law Judge Angela T. Jones ("ALJ Jones") issued a Prehearing Order, specifically advising the Complainant that as a corporation, it needed to be represented by counsel and have counsel enter an appearance. The Prehearing Order states:

As stated in the above paragraph six (on page 2), a limited liability corporation or LLC is to be represented by an attorney license to practice law in the Commonwealth of Pennsylvania. The Complainant is a limited liability corporation. The Complainant must have an attorney to represent it in this proceeding. The Complainant is directed to obtain an attorney to represent it and to file a notice of appearance as evidence that it has an attorney licensed to practice law in the Commonwealth of Pennsylvania by ***no later than January 8, 2019***. Complainant should file a notice of appearance by an appropriate attorney consistent with 52 Pa. Code §§ 1.22 and 1.25. (emphasis added)

21. ALJ Jones warns that "failure to file a notice of appearance as evidence that the Complainant is indeed represented by an attorney may be detrimental to the Complainant."

22. To date, the Complainant corporate commercial customer has not had counsel enter an appearance for this matter.

23. Accordingly, PECO requests that the Commission dismiss the Complainant's Complaint for failure to be represented by counsel.

IV. CONCLUSION

24. The Complainant has had no attorney enter an appearance; and therefore, the Complaint against PECO should be dismissed.

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the Complainant's Complaint for Complainant's failure to have counsel enter an appearance.

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SANSKAR WILLOW GROVE, LLC	:	
Complainant	:	
v.	:	DOCKET NO. C-2018-3005060
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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: January 9, 2018

Shawane L. Lee

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SANSKAR WILLOW GROVE, LLC	:	
Complainant	:	
v.	:	DOCKET NO. C-2018-3005060
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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:

Sanskar Willow Grove, LLC
28 Lake Baldwin Drive
Pennington, NJ 08534

Administrative Law Judge Angela T. Jones
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
(via email & first class mail)

Dated at Philadelphia, Pennsylvania, January 9, 2018



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”

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 Sanskar Willow Grove LLC

Street/P.O. Box 28 Lake Baldwin Dr Apt # _____

City Pennington State NJ Zip 08534

County Mercer

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

(609) 558-5018 (home) (_____) _____
(mobile)

E-mail Address (optional): agrawalp@comcast.net

Utility Account Number (from your bill) 04819-59013

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 Sanskar Willow Grove LLC

Street/P.O. Box 273 Main Street, Suite E-4

City Exton State PA Zip 19341

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

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

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/them.

The Great Clips located at 273 Main Street at Exton (PECO Account# 04819-59013) is receiving electricity bills from PECO for \$877 for last 6 months. Our **historical bill over many years is \$320.**

We disputed the bills with PECO several times but nothing happened. Then from last month, we started getting **electric bills of \$1307 a month.** This has of course become unbearable and unreasonable since we don't use any heavy electric based equipment.

We have requested PECO to investigate the matter several times. **PECO never showed up.** They then stated that your "meter is very big", hence the bill. We have **1000 sq. feet of space** and we are a salon where we simply engage in haircutting with no heavy equipment of any kind. It is ridiculous to receive bills ranging from \$877-\$1307 a month. We had been paying

\$320 on budget plan for years and no change has occurred other than a new store opening near us.

We feel that either the meter is providing really bad reading or another store has been inadvertently connected to our circuit by PECO. We are unable to resolve the matter with PECO. We have paid \$877 for 6 months but now that the new bill is \$1307 as a "budget bill", we need to escalate this to you and if needed to courts.

We request urgent and immediate action in this matter. PECO is accumulating bills by thousands. They have accumulated our bill to \$2508.00 and counting.

A formal signed letter with copy of bills is attached.

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.

Need to address reason for the escalation of bill. Force PECO to do a thorough investigation and rectify any errors including faulty meter, connection to another store AND restore bills to reasonable levels of \$320 a month along with providing refund for sending \$877 bills a month which we have paid.

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.

Called and reached several times. No action was taken by PECO, instead the bill increased even further.

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 Pankaj Agrawal, 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).

Pankaj Agrawal _____ 10/1/2018
(Signature of Complainant) (Date)

President
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' Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.



PENNSYLVANIA PUBLIC UTILITY COMMISSION

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eFiling Successfully Transmitted

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Print this page for your records.



Docket Number:	C-2018-3005060
Description:	Sanskar Willow Grove, LLC - Answer to Formal Complaint
Transmission Date:	10/22/2018 1:04:19 PM
Filed On:	10/22/2018 1:04:19 PM
eFiling Confirmation Number:	1744307

Uploaded File List

Sanskar Willow Grove - Answer.pdf	Communication	Answer to Formal Complaint
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For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by clicking the My Filings link in the left navigation menu.

Customer Hotline 1-800-692-7380 | PUC Webmaster | Privacy Policy



An Exelon Company

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

Direct Dial: 215-841-6841

October 22, 2018

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

**RE: Sanskar Willow Grove, LLC v. PECO Energy Company
Docket No. C-2018-3005060**

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,

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

Scheduling Recommendation: Not Recommended for Call of the Docket

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SANSKAR WILLOW GROVE, LLC	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2018-3005060
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PECO ENERGY COMPANY	:	
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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 NEW MATTER of PECO Energy Company within 20 days from service of this notice, a decision may be rendered against you. All pleadings, such as a 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, Shawane L. Lee, and where applicable, the Administrative Law Judge presiding over the issue.

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

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

Dated at Philadelphia, PA, October 22, 2018



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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SANSKAR WILLOW GROVE, LLC	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2018-3005060
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

ANSWER OF RESPONDENT
PECO ENERGY COMPANY

On October 2, 2018, PECO Energy Company ("PECO") was served with a formal complaint filed by Sanskar Willow Grove, LLC (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 the Formal Complaint, the Complainant states that its bills are too high and unreasonable. The Complainant requests that PECO address the reason for the escalation of the bill.

Preliminarily, PECO avers that the Complainant is a commercial customer operating a business at the premises. The Complainant has a corporate name registered with the State of New Jersey Division of Revenue and Enterprise Services. See Complainant's corporate registration information, attached hereto as Exhibit "1". As a commercial customer,

Complainant is required to be represented by counsel in adversarial proceedings before the Commission.¹ PECO Energy's records reveal the following:

The Complainant established commercial electric service at 273 Main Street, #E-4, Exton, PA 19341 under account number 04819-59013. See Account Activity Statement, attached hereto as Exhibit "2".

The Complainant disputed high bills. Accordingly, on October 3, 2018, PECO sent a high bill field technician to the property to investigate. The technician shut of the main breaker and verified there is a meter mix up at the property. The Complainant should be billed on meter number 018035981 and rebilled for the usage under that meter.

On October 9, 2018, the Complainant filed an informal complaint with the Bureau of Consumer Services ("BCS") at case number 003658300, disputing the electric bills at the premises. See Case Details Report #003658300, attached hereto as Exhibit "3". On October 10, 2018, the BCS issued a Decision Report closing the case because the Complainant has an active Public Utility Commission case at the current docket. See BCS Decision Report #003658300, attached hereto as Exhibit "4".

The Complainant's current balance is \$2,508. See Account Activity Statement, attached hereto as Exhibit "2". PECO's billing department is currently reviewing the meter history to determine if the Complainant was overbilled or under-billed. In the event the Complainant has been over-billed, PECO will process a credit to adjust for the proper usage.

¹ The proceedings become adversarial at the time when respondent files an Answer. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975). Accordingly, PECO request that the Commission establish a date certain by which Complainant is required to have an attorney enter an appearance in this matter.

5. Denied.
6. Admitted.
7. Denied.
8. Denied. 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.


NEW MATTER OF RESPONDENT, PECO ENERGY COMPANY

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

1. The Complainant is a commercial customer operating a business at the address at issue and registered as a limited liability corporation on May 31, 2009. See attached hereto as Exhibit “1”.
2. As a commercial customer, the Complainant is required to be represented by counsel in adversarial proceedings before the Commission. The proceedings become adversarial at the time when respondent files its Answer.
3. A Complaint filed by a corporation will be dismissed for failure to be represented by an attorney in an adversarial proceeding. 52 Pa. Code §1.8; 1.21-§ 1.23; In Re: Checker Cab, 49 Pa. PUC 159, 160 (1975), Moore v. I. Berman and Cross, Inc., Pa. PUC 427, 428 (1975).

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission issue a date certain for the Complainant to have counsel enter an appearance.

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SANSKAR WILLOW GROVE, LLC
Complainant

v.

PECO ENERGY COMPANY
Respondent

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DOCKET NO. C-2018-3005060

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: October 22, 2018

Shawane L. Lee

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Complainant	:	
	:	
v.	:	DOCKET NO. C-2018-3005060
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PECO ENERGY COMPANY	:	
Respondent	:	

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:

Sanskar Willow Grove, LLC
28 Lake Baldwin Drive
Pennington, NJ 08534

Dated at Philadelphia, Pennsylvania, October 22, 2018



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EXHIBIT “3”

PECO
Exhibit # 3



MASSACHUSETTS
REGISTRY OF DEEDS AND CORPORATE SERVICES
BUSINESS NAME SEARCH

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Required Fields: [*]

Keywords (At least one required) *

Sanskar Willow

+ Add Another Keyword

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Business Name	Entity Id	City	Type	Incorporated Date
SANSKAR WILLOW GROVE LIMITED LIABILITY COMPANY	0400289598	HORSHAM	LLC	5/31/2009