

October 13, 2019

PRIORITY MAIL

Shawane Lee, Esquire  
Exelon Business Services  
Legal Department  
2301 Market Street/S23-1  
Philadelphia, PA 19103-8699

RE: Eileen Walden v. PECO Energy Company  
PUC Docket No. F-2019-3011507  
Answer of Respondent

ORIGINAL

Dear Shawane Lee:

Herewith enclosed is Complainant's response concerning the referenced matter.

Thank you for your cooperation,



Eileen Walden  
Complainant  
1838 Cobden Road  
Laverock, PA 19038

cc: Admin Law Judge Marta Guhl, w/encl  
Griesing Law LLC – Edward Fisher, Angela Lorenz, w/encl  
Secretary, PA Public Utility Commission, w/encl

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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<b>EILEEN WALDEN</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2019-3011507</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	
	:	

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**COMPLAINANT RESPONDS**

Respondent remains steadfast in its refusal to address the critical issue in complaint. It has successfully forestalled answering the questions that would end debate for nearly two years and counting. Despite its expertise and sophisticated technology, Respondent uses a load test to evaluate the accuracy of its smart meter with which it communicates and which displays a calculated result without explaining or evidencing the tests validity. Respondent's Answer to Complainant's amended complaint evidences a continuation of the same approach of evasion and outright denial. Complainant herein addresses the mistated facts and denial of evidence on the record contained therein.

- 1) Respondent's blanket denial of "...all material allegations of fact...in the instant complaint" "unless admitted" contradicts by result its receipt of complainant's letter and the Notice of Formal Dispute cited in complaint at paragraphs 5 and 6 respectively.

The Feb 06, 2018 letter challenged PECO's Utility Report's finding issued on Jan 29 because it did not disclose the method by which the cited load test established the meter's accuracy of the electrical power used or how the load test conducted with a stopwatch and manually calculated validated the internal calculation of energy units necessary for kWh conversion. According to PECO's billing statement, a Meter Multiplier is a "value that is applied to energy units to convert data from the meter into actual energy usage (kWh/Ccf)." The meter displays the result of that calculation in kWhs. The question of whether PECO's security had been breached was also raised. The letter informed PECO of complainant's intent to submit a Formal Dispute because the sudden and unexplained spike in kWh readings was not resolved but ongoing. PECO neither responded nor made any attempt to address. See copy of Feb 06 letter attached as Exhibit A.

The Notice of Formal Dispute dated Mar 11, 2018 was sent by certified mail on Mar 14 and again by certified mail on Mar 29, 2018. It was also included in the filing of an informal complaint with the PUC's Bureau of Consumer Services, "BCS". The notice addressed the matters in contention as asserted in the Feb 06 letter and requested information regarding the meter's manufacturer, multiplier, and test methodology. Complainant contended that "[t]he amount by which the kWhs increased alone would require a significant increase in frequency of use in a single person household as well as changes in electrical connections by way of additions sufficient to sustain the levels reported. The fact that no such changes happened leaves the accuracy of the meter suspect." Respondent has not explained why or how its smart meter suddenly spiked in the instant case although it is responsible for knowing and obligated to address. PECO did not deny its receipt of the Formal Dispute before or during BCS's investigation. See copy of Formal Dispute attached as Exhibit B.

PECO's policy states in part that an expressed dissatisfaction or disagreement with the utility company's response becomes a dispute when the utility company is notified that "the matter is not resolved" "in writing or by phone."

"The Company must respond to your dispute within 30 days...and must provide...all the information necessary for you to make a decision on whether you need to proceed further with the matter...includ[ing] informing you of all related company rules (tariffs)", PECO's How To Contact Us Guide, Pg 22.

PECO did not respond in violation of its own stated policy.

2) Respondent's assertion that "...Complainant declined an appliance analysis..." is wrong by omission. Permission was given for the visual inspection requested and conducted. An appliance analysis is not an analysis per se but rather an inventory. That is, a visual inspection according to the PECO technician who conducted said inspection on Jan 23, 2018. The appliances, devices visually inspected verified to Respondent that complainant's only major consumer of power in use during the fall/winter season is a gas powered furnace, not electric. An account of that inspection is detailed in the Formal Dispute filed with PECO, Exhibit B, and was not then refuted or its receipt denied until now.

3) Respondent's Utility Reports are not customer friendly for lack of definition and explanation. Although the test is identified, what it is, what it does, how it does it are not disclosed. Critical to the matters in complaint is how a load test establishes the accuracy of a smart meter that communicated with Respondent's system and registers a calculated result. Respondent provides no evidence or explanation evidencing the result asserted obtained for either test except its word that it is accurate.

Regarding the Apr 13<sup>th</sup> visit, Respondent asserts that “[a]n additional meter reading was obtained, which verified the accuracy of the last billed meter reading.” Respondent’s Utility Report issued on July 2, 2018 does not so evidence. Respondent further asserts that “[t]he technician determined the Complainant has been properly billed for her usage.” The technician made no determination about billings according to Respondent’s Utility Report. See copy attached as Exhibit C.

Of note, the citing of complainant’s 1500 watt space heater by both Utility Reports without disclosing relevance provoked confusion for complainant because the space heater is not the complainant’s primary source of heat, has been used consistently for over a decade and, the kWh equivalent is minimal--1,494 watts equates to 1.5 kWhs and 1,080 watts equates to 1.08 kWh. Respondent’s technological capability includes communicating directly with its smart meter. That capability notwithstanding, Respondent chose to schedule field visits to conduct load tests to determine whether its smart meter with which it communicates is accurate.

4) Regarding Respondent’s assertion about BCS’s decision, Complainant considers that decision in favor of Respondent did not, does not, validate either the test results obtained or the method used to obtain them. Based on the recitation of facts presented in its decision, BCS accepted Respondent’s results without regard to its validity or verifiability because Respondent said the meter was accurate and did not exceed limitations proscribed under Title 52 Pa C.S.

@57.20(c). As such, the BCS decision did not settle or otherwise address:

Whether Respondent exercised due diligence in addressing Complainant’s multiple alerts of false readings?

Whether the tests conducted by Respondent accurately assessed the performance and output of its smart meter?

Whether a smart meter that displays widely divergent readings for the same electrical connections and their use, so divergent as to create an 'anomalous event', is credible?

Whether reality, the actual electrical connections and usage borne out by repetition over time overcomes a load test that conflicts?

5) Regarding Respondent's summation that "...Complainant's bills are correct,"

Complainant contends in the absence of any information /explanation providing otherwise, that Respondent's load tests are not sufficient to establish the accuracy of its billings in the instant case. Because Respondent's tests do not evidence investigation or examination of the calculation of energy units necessary for kWh conversion and Respondent does not contend otherwise, 'load testing' the accuracy of a smart meter whose reading depends on that calculation must be found incomplete without. There's been no discussion of Respondent's ability to send commands to its smart meter and whether any erroneous command or system glitch occurred that explains the false readings complainant's meter commenced to display in late Nov 2017.

Stunning is the allegation by result that a smart meter that registers widely divergent readings for the same electrical connections, same usage, same weather conditions is accurate. Respondent fails to explain how a smart meter that registers 737 kWhs in Feb 2016 can register 1500 kWhs in Feb 2017 for relatively the same usage, same electrical connections, same weather conditions can be accurate. This divergence was repeated for six consecutive billing cycles with no change in circumstance respecting electrical connections or their use to support. The surge began in Nov 2017 with a report of 1080 kWhs as compared to 592 in Nov 2016. The surge peaked in Jan 2018 with a report of 2614 kWhs as compared to 819 in Jan 2017. The smart meter reverted to near normal readings based on Respondent's billing statement for May 2018. See billing comparison chart attached as Exhibit D.

When Respondent was informed multiple times post the initial call on Jan 05, 2018 that the meter continued to inflate kWh usage even higher than before, PECO elected to do nothing even though it knew or had reason to know that a spike in usage occurred and it had the technical means, capability to sort out the accuracy issue of its smart meter to which its system is linked.

According to PECO's published announcement when it commenced upgrading its then digital meter in 2012, smart meters are "...digital meters that wirelessly provide secure, two-way communication between the meter and PECO and also provide you with more information about your energy usage", @PECO.com. Per that announcement, PECO's smart meter technology allows it to monitor a customer's usage and detect when a spike in usage occurs. PECO can identify/detect theft or meter tampering, connect/disconnect service. Most important is that two-way communication capability allows PECO's system to send commands directly to the individual smart meters of its customers.

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**EXHIBIT A**



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**EXHIBIT B**

2019 OCT 18 AM 9:47

PA PUC  
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March 11, 2018

PECO  
2301 Market Street  
Philadelphia, PA 19103

Re: Acct #91635-15016  
Verbal Communication of 01/05/2018 Re Dec 2017 kWh Billing  
Written Communications Dated Jan 08, Jan 18, and Feb 06, 2018  
Notice of Formal Dispute

Dear Sir/Madam:

As a followup to the communications referenced above, I submit that the billings PECO issued for the months of Nov, Dec 2017, Jan, and Feb 2018 are obviously discrepant. Preadvisement of the matter disputed as contained in the communication dated 02/06/2018 anticipated an earlier submission date. However, in noting that the unjustified escalation of kwhs continued thruout the month of February and continues to date, submission was delayed to include PECO's latest complete billing statement which arrived by mail on March 03, 2018.

The billing discrepancies at issue present a stark contrast to the billings that directly precede and lie in contradiction to the pattern of usage established over the last 10 years at least. There has been no change in electrical connections or in the frequency of use of those connections in this single person household to sustain and explain the huge level of kwhs reported on the billings at issue in my view. The amount by which the kwhs increased alone would require a significant increase in frequency of use in a single person household as well as changes in electrical connections by way of additions sufficient to sustain the levels reported. The fact that no such changes happened leaves the accuracy of the meter suspect.

The meter's inaccuracy is made obvious by comparison. Prior billings establish a consistent pattern of use of generally specific electrical connections that fall well below the kwhs reported in the billings found discrepant. As shown in Attachment A, comparable billing cycles definitively argue against the meter's accuracy because there has been no change in connection or use. Consider that from the year 2010 to 2016, the daily kwh usage reported does not exceed:

22.1 for Nov billings compared to 37.2 kwhs reported in Nov 2017

25.5 for Dec billings compared to 67.3 kwhs reported in Dec 2017

28.1 for Jan billings compared to 76.9 kwhs reported in Jan 2018

26.8 for Feb billings compared to 51.7 kwhs reported in Feb 2018

Additionally, the last three preceding years as shown in Attachment B evidence the same consistency of use month after month without exception.

Results of routine and daily meter monitoring efforts conducted in Jan and Feb 2018 are shown in Attachment C and D. The results reveal kwh fluctuations that are more extreme than the gradations evidenced in prior billings. The meter registered readings of up to 100 kwhs per day and most of the higher readings occurred at the beginning of the month. As this single person

Meter Discrepancy -- Acct...15016

March 11, 20018

Page Two

household uses a gas furnace, gas stove, gas dryer, gas water heater, existing electrical appliances/devices are insufficient in number and use to support a daily usage of even 30 kwhs as prior billings establish. The fifty-two minute power outage mentioned in my Jan 18 letter did not effect kwh usage as initially thought. The reduction in daily kwh was brief but then reoccurred in advance of PECO's scheduled visit on Jan 23. The total circuit breaker shut-offs referenced in Attachments C and D also depressed kwh increases. The most peculiar incident that directly provoked suspicion were the readings on Jan 26 when the meter reversed course: 31198 at 9:38am vs 31163 at 6:10pm.

#### PECO's Visit on Jan 23 and Utility Company Report issued Jan 29, 2018

A PECO technician checked the meter by, as he explained, timing the horizontal bars that appear beneath the digital readout on the meter's face with a stopwatch and calculating the results which were not disclosed for any test at any time. Turning the gas furnace on by what the technician called an emergency switch instead of the thermostat triggered a higher reading, perhaps due to a circuit breaker shut-off, he said. However, turning the gas furnace on via the thermostat yielded a normal reading, he said. The technician was advised that the furnace was routinely turned on/off via the thermostat and thereby could not be responsible for the increased kwhs reported; the gas furnace is routinely maintained, the latest was done in Oct of 2017 without incident.

The technician was permitted to visually check the gas furnace that is housed in the same room as the gas water heater, gas dryer, washer and microwave. The technician also visually checked the air conditioning unit and one of two 1500watt space heaters--only one is used at any time--that he said yielded normal readings. He was told of the 2 baseboard heaters in the basement that are rarely used. As the visual check did not include inspection or testing of any kind, I declined further visual checks due to the need for more information than such visual checks could provide.

The technician concluded his visit with the advisement that the meter was performing accurately according to his tests. Although he insisted the meter was correct in count, he acknowledged its inconsistency with the normal usage established by prior billings. He also advised that I could take up the matter with the PUC if I chose. Relevant unanswered questions remain: how calculated readings with a stopwatch serve to verify the accuracy of the meter and whether that verification method is PECO's standard policy.

PECO's Utility Company Report arrived on Feb 1<sup>st</sup>. I sent notice to PECO on Feb 6<sup>th</sup> that I could not accept an unsigned report prepared by an individual that was not the technician who performed the tests as authentic. That aside, the assertions it contained were troubling. Contrary to what was asserted, to my knowledge the meter was never "idled." No calculations were disclosed by the technician or included in the report and no appliance analysis was offered. Use of the space heaters has not changed over the five or more years they have been in use.

Meter Discrepancy – Acct...15016

March 11, 2018

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Yet, the Report asserts that the space heater was “clocked at 1494 watts out of 1500 watts” despite the technician’s “normal reading” advisement. That assertion suggests PECO decided the space heater is at fault for the high kwh usage by result. But the fact that a 1500 watt appliance takes one hour to register 1.5 kwhs argues against that assertion. What is meant by the assertion “We found no meter mix up or foreign wiring at the time of our visit”? What constitutes a “meter mixup” and how can “foreign wiring” attach to the meter?

While appreciative of the 1487 kwh reduction offset proposed for the Dec 2017 billing, the offset represents less than one third of the total 4,743 kwhs overcharged to date and thereby less than one third of the associated cost. This is unacceptable and more importantly the issue of inflated kwhs has yet to be solved.

The effect of the discrepant billings in terms of kwhs are:

1. The November 2017 bill charged 1,080 kwhs. The average usage during any prior November billing cycle in the last 10 years does not exceed 642kwh for a 29-day billing cycle. The average daily kwh use for the November billings over the last 7 years, excluding 2017, yields an overall average of about 19 kwh per day. Based on that daily average, the November bill inflated electricity usage by 529 kwh:  $1,080 \text{ minus } 551 (19 \times 29 = 551) = 529 \text{ kwh}$ .

2. The December 2017 bill charged 2,287 kwhs. The average usage during any prior December billing cycle in the last 10 years does not exceed 844kwh for a 33-day billing cycle. The average daily kwh use for the December billings over the last 7 years, excluding 2017, yields an overall average of about 21.5 kwh per day. Based on that daily average, the December bill inflated electricity usage by 1,556 kwh:  $2,287 \text{ minus } 731 (21.5 \times 34 = 731) = 1,556 \text{ kwh}$ .

3. The January 2018 bill charged 2,614 kwhs. The average usage during any prior January billing cycle in the last 10 years does not exceed 855kwh for a 34-day billing cycle. The average daily kwh use for the January billings over the last 8 years, excluding 2018, yields an overall average of about 22.4 kwh per day. Based on that daily average, the January bill inflated electricity usage by 1,854 kwh:  $2,614 \text{ minus } 760 (22.36 \times 34 = 760) = 1,854 \text{ kwh}$ .

4. The February 2018 bill charged 1,500 kwhs. The average usage during any prior February billing cycle in the last 10 years does not exceed 761 kwh for a 29-day billing cycle. The average daily kwh use for the February billings over the last 8 years, excluding 2018, yields an overall average of about 24 kwh per day. Based on that daily average, the February bill inflated electricity usage by 804 kwh:  $1,500 \text{ minus } 696 (24 \times 29 = 696) = 804 \text{ kwh}$ .

5. Total kwhs charged = 7,481. Total kwhs overcharged = 4,743

The effect of the discrepant billings in terms of costs are:

- 1a. The November 2017 bill charged \$157.34 for 1,080kwhs; 551 kwhs yields a cost of \$84.39 resulting in a cost overcharge = \$72.95.
- 2a. The December 2017 bill charged \$323.56 for 2,287kwhs; 731 kwhs yields a cost of \$109.15 resulting in a cost overcharge = \$214.41.
- 3a. The January 2018 bill charged \$364.70 for 2,614 kwhs; 760 yields a cost of \$112.01 resulting in a cost overcharge of \$252.69.
- 4a. The February 2018 bill charged \$223.68 for 1,500 kwhs; 696 yields a cost of \$108.31 resulting in a cost overcharge = \$115.37.
- 5a. Total cost charged = \$1,069.28. Total cost overcharged = \$655.42

See supporting details provided in Attachment A.

#### PECO's Smart Meter Multiplier

As indicated above, conditions that could explain the dramatic rise in the kwh usage experienced are either the electrical connections and their use, or the meter readings are inaccurate. I have addressed the former; the latter requires more information be provided by PECO such as among others: who manufacturers the meter, number of like incidents reported, reports of defective meter units. (The technician's finding, although contradicted by the Utility Report is not based on an objective analysis of the meter in my view.)

The information that is provided on PECO's billing statement establishes certain facts relevant to the meter's accuracy. Such as, the formula used to calculate kwh usage and system/program access. The meter displays a calculation result. Any element/part of the formula that is used in calculating kwh usage that is changed or corrupt, changes/corrupts the result. So that, the meter's data could be accurate but change or corruption of the value (or energy units) applied will change/corrupt the result. The formula referred to is PECO's Meter Multiplier that is defined as "A value that is applied to energy units to convert data from the meter into actual energy usage (kwh/ccf)," found on its billing statement. PECO routinely accesses its customer's meter each month via its automated meter reading system to retrieve the customer's kwh usage thus establishing its exclusivity of access and interface capability.

Meter Discrepancy – Acct...15016  
March 11, 2018  
Page Five


#### Resolution

In conclusion, it is understood that given the nature of this complaint, resolution cannot be achieved without PECO's cooperation and commitment to solve what continues to be a mystery.

In accord with PECO's policy governing the dispute process, I can expect PECO's response to the matters raised herein within the next thirty days. In the interim, while I'm given to understand that no payment is required until the matter in dispute is resolved, consistent with the estimated charges for electric services cited on Pages 3 and 4, I submit that overpayment has resulted for the billings in dispute when reconciled with the payments made as cited below; future payments will be timely made on the same basis until resolution is achieved.

<u>Bill Date</u>	<u>Charged</u>	<u>Paid</u>	<u>Actual Est Due</u>	<u>Balance (Overpaid) Due</u>
Nov 2017	\$157.34	\$157.34	\$84.39	( 72.95)
Dec 2017	\$323.56	\$323.56	\$109.15	(214.41)
Jan 2018	\$364.70	\$ -0-	\$112.01	\$112.01
Feb 2018	\$223.68	\$ -0-	\$108.31	\$108.31
Total:		\$480.90	\$413.86	( 67.04)

I will respond to any request for additional information should PECO find necessary.

  
\_\_\_\_\_  
Eileen Walden  
Customer Acct 91635-15016  
1838 Cobden Road  
Laverock, PA 19038-7220  
215-630-2835  
attms Communications dated Jan 08, 18, Feb 06, 2018  
Utility Report  
Attachments A, B, C, D

COMPARABLE BILLING STATEMENT COMPARISON

<u>YEAR</u>	<u>KWH</u>	<u>AV TEMP</u>	<u>AV DAILY USE</u>
<u>November:</u>			
2017	1080	54	37.2
2016	592	55	20.4
2015	510	57	18.2
2014	574	51	19.7
2013	570	51	19.5
2012	339	50	11.6
2011	679	50	21.9
2010	642	53	22.1
<u>December:</u>			
2017	2287	43	67.3
2016	792	42	24.0
2015	687	49	20.8
2014	721	41	21.8
2013	777	38	23.5
2012	463	45	14.9
2011	619	47	19.9
2010	844	38	25.5
<u>January:</u>			
2018	2614	31	76.9
2017	819	39	23.4
2016	716	40	20.5
2015	789	35	22.5
2014	889	33	24.6
2013	625	38	17.8
2012	592	39	16.9
2011	1014	35	28.1
2010	855	33	25.1
<u>February:</u>			
2018	1500	40	51.7
2017	737	40	25.4
2016	743	37	25.6
2015	733	27	25.2
2014	714	31	25.5
2013	583	34	18.8
2012	534	41	18.4
2011	753	35	26.8
2010	761	32	26.2

THREE YEAR BILLING STATEMENT COMPARISON

<u>YEAR</u>	<u>KWH</u>	<u>AV TEMP</u>	<u>AV DAILY USE</u>
<b>2018</b>			
February	1500	40	51.7
January	2614	31	76.9
<b>2017</b>			
December	2287	43	67.3
November	1080	54	37.2
October	330	70	11.4
September	349	70	12.0
August	625	77	20.2
July	546	79	20.2
June	387	70	11.9
May	486	62	15.7
April	541	55	18.7
March	672	43	23.2
February	737	40	25.4
January	819	39	23.4
<b>2016</b>			
December	792	42	24.0
November	592	55	20.4
October	366	64	12.8
September	527	77	18.2
August	948	82	29.6
July	528	78	17.6
June	312	72	9.8
May	500	58	17.2
April	548	53	18.9
March	616	48	21.2
February	743	37	25.6
January	716	40	20.5
<b>2015</b>			
December	687	49	20.8
November	510	57	18.2
October	449	62	15.5
September	379	76	12.6
August	660	80	21.2
July	467	78	15.5
June	302	75	10.4
May	374	65	12.0
April	430	53	14.3
March	706	36	24.3
February	733	27	25.2
January	789	35	22.5

METER READING RESULTS -- JANUARY 2018

<u>DAY</u>	<u>TIME</u>	<u>READING</u>	<u>KWH INCREASE</u>
04/05	4:39-3:23pm	29811/29893	82
06	4:30pm	29993	100
07	4:45pm	30090	97
08	2:15pm	30172	82
13/14	8:45-8:00am	30417/30471	54*
16/17	11:15-11:20am	30613/30674	61
18	11:20am	30748	74
19	11:25am	30817	69
20	11:45am	30886	69
21	11:30am	30926	40
22	11:20am	30967	41
23**	9:40am	30997	30
24	10:00am	31036	39
25	11:40am	<u>31091</u>	55
26	9:38am	31198	107
	6:10pm	<u>31163</u>	<u>72</u>
27	11:30am	31203	40
28	12:31pm	31240	37
29	1:14pm	31278	38
30	1:40pm	31327	49
31	1:00pm	31392	65

\*Power Outage -- 4:20am-5:12am, Feb 13

\*\*PECO = Actual 30989 Jan 23

Meter readings show regressive count that reduced daily total by 35.

METER READING RESULTS – FEBRUARY 2018

<u>DAY</u>	<u>TIME</u>	<u>READING</u>	<u>KWH INCREASE</u>
02/03	12:20-12:00pm	31516/31613	97
04	12:00pm	31686	73
04/05	6:25-5:25pm	31699/31757	58
06	5:27pm	31823	66
06/07	11:44-11:38am	31805/31869	64
07/08	5:48-6:02pm	31891/31960	69
08/09	12:05am -11:27pm	31981/32039	58
10	11:37pm	32091	52
10/11	5:05-5:00pm	32074/32109	35
11/12	9:20-9:33pm	32100/32133	33
12/13	11:54-11:48pm	32161/32221	60
13/14	7:18-7:16am	32172-32231	59
15	7:47am	32267	36*
16	8:25am	32289	22
18/19	11:48-11:41pm	32417/32457	40
20	10:57am-12:01pm	32434/32488	31
20/21**	6:17-5:30pm	32480/32499	19
22	6:14pm	32527	28
23	5:42pm	32576	49
23/24	11:37-11:32pm	32590/32625	35
25	10:52pm	32664	39
26	11:04pm	32702	38
27	11:33pm	32742	40
28	11:15pm	32775	33*
01 (March)	11:12pm	32801	26

\*Total Circuit Breaker Shut-off

\*\*Actual Read by PECO = 32489 Feb 21

Notes: Furnace heat off at night post Feb 03 except Feb 17 thru 19.  
Furnace heat off all day and night on Feb 20, 21, and 22.

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**EXHIBIT C**



**UTILITY COMPANY REPORT**  
**Reporte De La Compania Utilidades**

<b>Date:</b> 7/2/18	<b>Prepared By:</b> CHRISTOPHER K.
------------------------	---------------------------------------

<b>Name:</b> EILEEN WALDEN
<b>Service Address:</b> 1838 COBDEN RD LAVEROCK PA 19038
<b>Post Office:</b> LAVEROCK PA 19038
<b>Account Number:</b> 91635-15016

<b>Phone Home:</b> (215) 630-2835	<b>Phone Work:</b>
<b>Mailing Address:</b> 1838 COBDEN RD LAVEROCK PA 19038	

**Problem As You Described It**

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On 4/10/18 you initially contacted our office regarding your PECO bill.

**Our Response**

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On 4/13/18 our technician verified that your meter number and reading are correct. We successfully dropped the load and idled the meter. A passing load test verified the accuracy of your meter. We clocked your space heater at 1,080 watts out of 1,500 watts. We found no meter mix-up or foreign wiring. We tested your meter's accuracy. Your meter tested 99.98% accurate on the first test and 99.96% accurate on the second test. The results are within the accuracy guidelines of both PECO and the PUC. Our technician found no ground faults.

The balance on your account is \$716.87 as of 7/2/18. The amount due by 7/13/18 to avoid delinquency is \$716.87.

The investigation is being closed at this time. If you have any further questions, or need payment arrangements please call our Financial Care Center at 1-888-480-1533.

Cordially,  
Andrew L.  
High Bill Field

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**EXHIBIT D**

PER PECO ENERGY BILLING STATEMENTS

<u>BILL MO/YR</u>	<u>KWH</u>	<u>AVG TEMP</u>
NOV 2018	268	50
<b>2017</b>	<b>1080</b>	<b>54</b>
2016	592	55
DEC 2018	374	38
<b>2017</b>	<b>2287</b>	<b>43</b>
2016	792	42
JAN 2019	423	35
<b>2018</b>	<b>2614</b>	<b>31</b>
2017	819	39
2016	716	40
FEB 2019	406	35
<b>2018</b>	<b>1500</b>	<b>40</b>
2017	737	40
2016	743	37
MAR 2019	393	40
<b>2018</b>	<b>1398</b>	<b>40</b>
2017	672	43
2016	616	48
APR 2019	327	55
<b>2018</b>	<b>981</b>	<b>47</b>
2017	541	55
2016	548	53
MAY 2019	205	62
2018	336	62
2017	486	62
2016	500	58

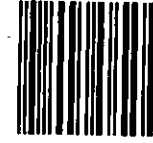
Billing cycles represented in bold are in dispute.

\*\*\*  
DUTY  
HONOR  
COURAGE  
COMMITMENT  
INTEGRITY  
COUNTRY  
SERVICE  
\*\*\*

Ms. Eileen Walden  
1838 Cobden Rd.  
Laverock, PA 19038-7220



1000



17120

U.S. POSTAGE PAID  
FCM LG ENV  
ELKINS PARK, PA  
18027  
OCT 18, 19

AMOUNT  
**\$1.60**  
R2305H128093-05

Found on control counter

Please stamp in for today

→ prep as reply to  
answer

*AW*

SECRETARY  
PA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, 2<sup>ND</sup> FLOOR  
HARRISBURG, PA 17120

