

Angela M. Lorenz, Esquire
Direct: 215-501-7847
alorenz@griesinglaw.com

December 2, 2019

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

**RE: Temple of Bethel v. PECO Energy Company
PUC Docket No. C-2019-3013389**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy's Company's Motion for Judgment on the Pleadings*. Kindly reject the previously filed Answer, as it had the wrong docket number on the cover letter.

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,



Angela Lorenz, Esq

Cc: Certificate Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TEMPLE OF BETHEL	:	
Complainant	:	
v.	:	DOCKET NO. C-2019-3013389
	:	
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, Angela M. Lorenz, 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:
Angela M. Lorenz, Esq.,
Griesing Law, LLC
1880 JFK Blvd.
Suite 1800
Philadelphia, PA 19103

Dated at Philadelphia, PA, December 2, 2019



Angela Lorenz, Esquire
Counsel for PECO Energy Company
Griesing Law, LLC
1880 JFK Blvd
Suite 1800
Philadelphia, PA 19103
215-618-3720
alorenz@griesinglaw.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TEMPLE OF BETHEL	:	
Complainant	:	
v.	:	DOCKET NO. C-2019-3013389
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

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

Respondent, PECO Energy Company (“PECO Energy”), pursuant to 52 Pa. Code § 5.102(a) respectfully petitions this Honorable Commission to dismiss the instant Complaint for the following reasons:

I. PROCEDURAL HISTORY:

1. On or about October 4, 2019, Complainant, Temple of Bethel, filed a Formal Complaint with the Pennsylvania Public Utility Commission (“PUC”) against PECO Energy.
2. On October 8, 2019, the above-mentioned Formal Complaint was served on PECO Energy. A copy of Complainant’s Formal Complaint is attached hereto as (Exhibit 1).
3. On October 28, 2019, PECO Energy filed an Answer to the Formal Complaint. A copy of PECO Energy’s Answer is attached hereto as (Exhibit 2).

II. RELEVANT FACTS:

4. In their Complaint, the Complainant alleges that PECO Energy failed to honor a prior payment agreement at service address 104 Hidden Creek Drive, Hatboro, PA.

5. PECO Energy avers that the Complainant has an account for electric service under account number 41236-63047. At the time of Answer, this account had a past due balance of \$9,558.37.

6. PECO Energy avers that the Complainant operates a business at the service address 1804 72nd Avenue, Philadelphia, PA.

8. PECO Energy avers that the Complainant is operating the business Temple of Bethel at the service address.

III. LEGAL ARGUMENT

A. Standard of Review

9. 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.

10. 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.

11. 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).

12. 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 Temple of Bethel is a business; and the Complainant is required to be represented by counsel.

13. The Complainant, Temple of Bethel is a customer operating a business at the service address at issue.

14. As a business, Complainant is required to be represented by counsel in adversarial proceedings before the Commission.

15. 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).

16. On October 28, 2019, PECO Energy filed an Answer to the Complainant's Complaint. See (Exhibit 2).

17. Once PECO Energy 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.

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

19. Accordingly, PECO Energy requests that the Commission dismiss the Complainant's Complaint for failure to be represented by counsel, or in the alternative, designate a date certain the Complainant must have counsel enter an appearance.

IV. CONCLUSION

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

WHEREFORE, PECO Energy Company respectfully requests that your Honorable Commission dismiss the Complainant's Complaint.

Respectfully Submitted,



Angela Lorenz, Esquire
Counsel for PECO Energy Company
Griesing Law, LLC
1880 JFK Blvd.
Suite 1800
Philadelphia, PA 19103
215-618-3720

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TEMPLE OF BETHEL	:	
Complainant	:	
v.	:	DOCKET NO. C-2019-3013389
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

VERIFICATION

I, Angela Lorenz, 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 2, 2019

Angela Lorenz

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TEMPLE OF BETHEL,	:	
Complainant	:	
v.	:	DOCKET NO. C-2019-3013389
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Angela Lorenz, hereby certify that I have this day served a copy of PECO Energy Company's Motion in the above matter upon all interested parties by e-mailing or e-serving a copy, properly addressed to:

Temple of Bethel
1804 72nd Avenue
Philadelphia, PA 19126
(via email only)

Honorable Darlene D. Heep, ALJ
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
(via email & regular mail)

Dated at Philadelphia, Pennsylvania, December 2, 2019



Angela Lorenz, Esquire
Counsel for PECO Energy Company
Griesing Law, LLC
1880 JFK Blvd.
Suite 1800
Philadelphia, PA 19103
215-618-3720
alorenz@griesinglaw.com

EXHIBIT 1

Botak, Amy:(PECO)

From: RA-PCESERVE@pa.gov
Sent: Tuesday, October 8, 2019 9:21 AM
To: Botak, Amy:(PECO)
Cc: Davis, Leslie:(PECO)
Subject: [EXTERNAL] PA PUC eServe Notice

Importance: High

Dear Amy Botak,

A(n) **Formal Complaint** has been served in this proceeding. This document is docketed as **C-2019-3013389**. 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.*

PUC has recently updated E-Service delivery E-Mail address to RA-PCESERVE@pa.gov. Please update your Address book and/or E-Mail rules accordingly.

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 TEMPLE OF BETHEL
Street/P.O. Box 1804 72nd Avenue Apt #
City PHILADELPHIA State PA Zip 19126
County

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

(215) 469-2205 (home) (215) 469-2205 (mobile)

E-mail Address (optional): templeofbethel@yahoo.com

Utility Account Number (from your bill) 4123663047

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
Street/P.O. Box
City State Zip
PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

RECEIVED

OCT - 4 2019

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/PHILADELPHIA ELECTRIC COMPANY, ORGANIZATION

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.
- 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.

A PAYMENT AGREEMENT WAS GIVEN TO TEMPLE OF BETHEL BUT NOT HONOR BY THE ELECTRIC COMPANY | 104 HIDDEN CREEK DRIVE, HATBORO, PA WAS THE ADDRESS WHERE THE PAYMENT AGREEMENT EXISTED, BUT WE HAD TO MOVE OUT OF THAT LOCATION | WE MOVED BACK TO 1804 72ND AVE, PHILA, PA 19126 THE BILL FOLLOWED BUT NOT THE PAYMENT AGREEMENT, SO OUR UTILITIES WERE SHUT-OFF |

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.

PECO SAID WE WEREN'T ELIGIBLE FOR ANYMORE MEDICAL AND SENT UP A CAP APPLICATION.

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:

TEMPLE OF BETHEL, 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).

QUEEN KHADYAH EL LAZAR

Queen Khadyah El Lazar
(Signature of Complainant)

September 30 2019
(Date)

MINISTER

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.

Queen Khalid L. El Sayid
1804 92nd Ave
Phila, PA 19126

PHILADELPHIA PA 190

02 OCT 2019 PM 5 L



Secretary
Pennsylvania Public Utility
400 North Street 2nd Floor
Harrisburg PA 17120

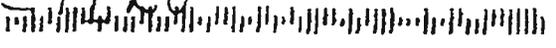
17120002110000 

EXHIBIT 2



PENNSYLVANIA

[INFO](#)

[&INDUSTRY](#)

[&RESOURCES](#)

[PUC](#)

[US](#)

[Log Off eFiling](#)

[Contact Us](#)

[Search](#)

- [➔ My Filings](#)
- [➔ New Filing](#)
- [➔ Modify Account](#)
- [➔ POR Search](#)
- [➔ eService Directory](#)
- [➔ Subscriptions](#)
- [➔ Technical Assistance](#)
- [➔ eFiling FAQs](#)
- [➔ Log Off](#)

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-2019-3013389
Description:	Temple of Bethel - Answer to Formal Complaint
Transmission Date:	10/28/2019 1:50:57 PM
Filed On:	10/28/2019 1:50:57 PM
eFiling Confirmation Number:	1826987

Uploaded File List

Temple of Bethel -Answer.pdf	Communication	Answer to Formal Complaint
------------------------------	---------------	----------------------------

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, 400 North Street, Harrisburg, PA 17120 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

GPIESING LAW

Angela M. Lorenz, Esquire
Direct: 215-501-7847
alorenz@griesinglaw.com

October 28, 2019

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

**RE: Temple of Bethel v. PECO Energy Company
PUC Docket No. C-2019-3013389**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy's Answer to Formal Complaint*.

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,



Angela Lorenz, Esq

Cc: Not Recommended for Call of the Docket

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TEMPLE OF BETHEL,	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2019-3013389
	:	
PECO ENERGY COMPANY,	:	
Respondent	:	
	:	

ANSWER OF RESPONDENT,
PECO ENERGY COMPANY

On October 8, 2019, PECO Energy Company (“PECO”) was served with a formal complaint filed by Temple of Bethel (hereafter “Complainant”) in the above captioned docket. Pursuant to 52 Pa. Code § 5.61, PECO responds to the Complaint and states:

1. Admitted. PECO answers further that in addition to the account number listed in the Complainant’s formal Complaint, the Complaint refers, in part, to an account balance transferred from Account No. 60908-76034 for service established at 104 Hidden Creek Drive, Hatboro, PA 19040.

2. Admitted.

3. Admitted.

4. Unless specifically admitted herein, PECO denies all material allegations of fact and conclusions of law in the instant Complaint.

In its Complaint, the Complainant states that PECO is threatening to terminate its service. The Complainant states that it was placed on a payment agreement that was not honored by PECO.

PECO’s records indicate that Complainant had electric service at 104 Hidden Creek Drive, Hatboro, PA 19040 under account number 60908-76034 (the “Hidden Creek Drive

Account”). See Account Activity Statement, attached hereto as Exhibit “1”. On May 17, 2018, the Complainant established service to 1804 72nd Avenue under account number 41236-63047 (the “72nd Avenue Account”). Shortly thereafter, on June 11, 2018, Complainant was placed on a PUC deferred payment arrangement related to the outstanding balance of \$3,418.26 on the Hidden Creek Drive Account, which required 60 monthly installments of \$57.03. On August 6, 2018, service was discontinued at the 104 Hidden Creek Drive address and on September 7, 2018, the final balance of \$4,006.70 on the Hidden Creek Drive Account was transferred to the 72nd Avenue Account.

In addition, PECO attempted to investigate the Complainant’s concern that its bills were high on January 30, 2019. PECO visited the property at issue for a scheduled visit but there was no answer at the property. The PECO field technician verified the accuracy of the last billed reading at that time by checking the meter.

On January 24, 2019, The Complainant stated that it wanted the entire balance placed on a payment agreement (even though no down payments could be made at that time). The Complainant has not made any payments since. PECO avers that the Complainant is responsible for the balance on both the Hidden Creek Drive Account and the 72nd Avenue Account.

Pursuant to 52 Pa. Code § 56.35- Payment of Outstanding Balance.

(a) A public utility may require, as a condition of the furnishing of residential service to an applicant, the payment of any outstanding residential account with the public utility which accrued within the past 4 years for which the applicant is legally responsible and for which the applicant was billed properly.

Furthermore, on January 16, 2019, Complainant filed an informal complaint with the Bureau of Consumer Services (“BCS”) established under #003675399. On July 12, 2019, the

BCS issued a decision dismissing the Complainant's case, stating the following:

THE CUSTOMER DEFAULTED ON PUC PAR BCS# 3621671,
ISSUED ON 01/30/17, PRIOR TO MOVING TO THIS
ADDRESS.CASE DISMISSED.

See BCS Decision, attached hereto as Exhibit "2".

The Complainant's current balance is \$9,558.37. See Exhibit "1." PECO avers that the Complainant's balance is correct and that it is currently ineligible for a payment agreement and a medical certificate.

5. Denied.

6. PECO neither admits nor denies the allegations in Paragraph 6. 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.

7. Denied. Complainant filed an informal complaint with the BCS established under #003675399 on January 16, 2019.

8. PECO 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,



Angela M. Lorenz
Counsel for PECO Energy Company
Griesing Law, LLC
1880 JFK Blvd.
Suite 1800
Philadelphia, PA 19103
215-618-3720
alorenz@griesinglaw.com

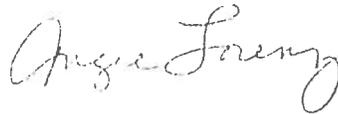
Dated: October 28, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TEMPLE OF BETHEL,	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2019-3013389
	:	
PECO ENERGY COMPANY,	:	
Respondent	:	
	:	

VERIFICATION

I, Angela M. Lorenz, 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 28, 2019

Angela M. Lorenz

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

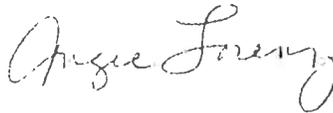
TEMPLE OF BETHEL,	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2019-3013389
	:	
PECO ENERGY COMPANY,	:	
Respondent	:	
	:	

CERTIFICATE OF SERVICE

I, Angela M. Lorenz, 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:

Temple of Bethel
1804 72nd Avenue
Philadelphia, PA 19126

Dated at Philadelphia, Pennsylvania, October 28, 2019.



Angela M. Lorenz
Counsel for PECO Energy Company
Griesing Law, LLC
1880 JFK Blvd.
Suite 1800
Philadelphia, PA 19103
215-618-3720
alorenz@griesinglaw.com

EXHIBIT 1

Account Number 6090876034
 Account Name TEMPLE OF BETH EL
 Account Status FINAL
 Meter Bill Group 6

Service Address:
 104 HIDDEN CREEK DR
 HATBORO, PA 19040

Current Bill \$335.20
 Billed Prior \$3,630.14
 Balance Due \$0.00

Account Balance: \$0.00

Mail To:
 TEMPLE OF BETH EL
 45 E CITY AVE STE 351
 BALA CYNWYD, PA 19004
 (267) 905 9361 Ext:

Credit Amount \$0.00
 Deposit Requested \$0.00
 Deposit On-Hand \$0.00
 CAP Pre-program Arrears \$0.00
 Payment Agreement Balance \$0.00

Rates:
 SUPPLIER ELECTRIC RESIDENTIAL SERVICE
 SUPPLIER GAS RESIDENTIAL HEATING SERVICE

Account Transaction Activity

Transaction Dt	Product Type	Credit Source	Billing Period	Read	Reading Type	Meter Equip Cd	KWH	KW	CCF	Transaction Amount	Balance Forward	Current Charges	Amt Due	Bill Due Dt	Total Balance	Heating Degree Days	Budget Bill Deferred Amt
02/10/2017	CONNECTION CHARGE									\$6.00							
02/10/2017	STANDARD																
02/10/2017	GAS SERVICE		01/30/2017 - 02/10/2017	8588	ACTUAL	16446639			85	\$69.15	\$0.00	\$120.88	\$120.88	03/06/2017	\$120.88	285	\$0.00
02/10/2017	ELECTRIC SERVICE		01/30/2017 - 02/10/2017	34754	ESTIMATE	122726540	281	0		\$45.73	\$0.00	\$120.88	\$120.88	03/06/2017	\$120.88	285	\$0.00
02/27/2017		PAYMENT								\$120.88							
03/08/2017	GAS SERVICE		02/10/2017 - 03/08/2017	8786	ACTUAL	16446639			198	\$168.70	\$0.00	\$292.33	\$292.33	03/30/2017	\$292.33	535	\$0.00
03/08/2017	ELECTRIC SERVICE		02/10/2017 - 03/08/2017	35530	ACTUAL	122726540	776	0		\$123.63	\$0.00	\$292.33	\$292.33	03/30/2017	\$292.33	535	\$0.00
04/03/2017		PAYMENT								\$292.33							
04/06/2017	GAS SERVICE		03/08/2017 - 04/06/2017	9010	ACTUAL	16446639			224	\$204.11	\$0.00	\$349.03	\$349.03	04/28/2017	\$349.03	609	\$0.00
04/06/2017	ELECTRIC SERVICE		03/08/2017 - 04/06/2017	36451	ACTUAL	122726540	921	0		\$144.92	\$0.00	\$349.03	\$349.03	04/28/2017	\$349.03	609	\$0.00
04/27/2017		PAYMENT								\$349.03							
05/02/2017	ELECTRIC SERVICE		04/06/2017 - 05/02/2017	37279	ACTUAL	122726540	828	0		\$130.44	\$0.00	\$130.44	\$130.44	05/24/2017	\$130.44	118	\$0.00
05/02/2017	ELECTRIC SERVICE		05/07/2017 - 05/04/2017	37319	ACTUAL	122726540	40	0		\$130.44	\$0.00	\$130.44	\$130.44	05/24/2017	\$130.44		\$0.00
05/07/2017	ELECTRIC SERVICE		05/04/2017 - 05/09/2017	37508	ACTUAL	122726540	189	0		\$130.44	\$0.00	\$130.44	\$130.44	05/24/2017	\$130.44	41	\$0.00
05/09/2017	ELECTRIC SERVICE		04/06/2017 - 05/02/2017	37279	ACTUAL	122726540	828	0		\$3.43	\$0.00	\$136.87	\$136.87	05/31/2017	\$136.87	118	\$0.00
05/09/2017	ELECTRIC SERVICE		05/02/2017 - 05/04/2017	37319	ACTUAL	122726540	40	0		\$3.43	\$0.00	\$136.87	\$136.87	05/31/2017	\$136.87		\$0.00
05/09/2017	ELECTRIC SERVICE		05/04/2017 - 05/09/2017	37508	ACTUAL	122726540	189	0		\$3.43	\$0.00	\$136.87	\$136.87	05/31/2017	\$136.87	41	\$0.00
05/09/2017	ALTERNATE ELEC SERVICE									\$3.00							
05/12/2017	GAS SERVICE		04/06/2017 - 05/09/2017	9119	ACTUAL	16446639			109	\$105.69	\$130.44	\$141.47	\$271.91	06/05/2017	\$271.91	154	\$0.00
05/12/2017	ELECTRIC SERVICE		04/06/2017 - 05/02/2017	37279	ACTUAL	122726540	828	0		\$14.82	\$130.44	\$141.47	\$271.91	06/05/2017	\$271.91	118	\$0.00
05/12/2017	ELECTRIC SERVICE		05/07/2017 - 05/04/2017	37319	ACTUAL	122726540	40	0		\$14.82	\$130.44	\$141.47	\$271.91	06/05/2017	\$271.91		\$0.00
05/12/2017	ELECTRIC SERVICE		05/04/2017 - 05/09/2017	37508	ACTUAL	122726540	189	0		\$14.82	\$130.44	\$141.47	\$271.91	06/05/2017	\$271.91	41	\$0.00
05/12/2017	ALTERNATE ELEC SERVICE									\$14.53							
05/30/2017		PAYMENT								\$250.00							
06/08/2017	GAS SERVICE		05/09/2017 - 06/06/2017	9158	ACTUAL	16446639			39	\$28.95	\$21.91	\$199.74	\$221.65	06/30/2017	\$221.65	3	\$0.00
06/08/2017	ALTERNATE GAS SERVICE									\$23.36							
06/08/2017	ELECTRIC SERVICE		05/09/2017 - 06/06/2017	38448	ACTUAL	122726540	940	0		\$75.14	\$21.91	\$199.74	\$221.65	06/30/2017	\$221.65	3	\$0.00
06/08/2017	ALTERNATE ELEC SERVICE									\$72.29							
06/12/2017	LATE PAYMENT CHARGE									\$0.33							
06/14/2017	TRANSFER DEBIT									\$661.25							
06/28/2017		PAYMENT								\$110.82							
07/06/2017	LATE PAYMENT CHARGE									\$2.99							
07/10/2017	ELECTRIC SERVICE		06/06/2017 - 07/05/2017	39967	ESTIMATE	122726540	1519	0		\$115.39	\$852.71	\$0.00	\$852.71	08/01/2017	\$1,084.91		\$232.20
07/10/2017	ELECTRIC SERVICE		07/05/2017 - 07/10/2017	40213	ACTUAL	122726540	246	0		\$115.39	\$852.71	\$0.00	\$852.71	08/01/2017	\$1,084.91		\$232.20
07/10/2017	ALTERNATE ELEC SERVICE									\$116.81							
07/13/2017	BUDGET BILLING									\$272.00							
07/13/2017	GAS SERVICE		06/06/2017 - 07/10/2017	9184	ACTUAL	16446639			76	\$22.44	\$199.74	\$924.97	\$1,124.71	08/04/2017	\$1,160.15		\$35.44
07/13/2017	ALTERNATE GAS SERVICE									\$15.57							
07/13/2017	ELECTRIC SERVICE		06/06/2017 - 07/05/2017	39967	ESTIMATE	122726540	1519	0		\$37.23	\$199.74	\$924.97	\$1,124.71	08/04/2017	\$1,160.15		\$35.44
07/13/2017	ELECTRIC SERVICE		07/05/2017 - 07/10/2017	40213	ACTUAL	122726540	246	0		\$37.23	\$199.74	\$924.97	\$1,124.71	08/04/2017	\$1,160.15		\$35.44
07/19/2017	ELECTRIC SERVICE		07/10/2017 - 07/19/2017	40741	ACTUAL	122726540	528	0		\$79.39	\$852.71	\$272.00	\$1,124.71	08/10/2017	\$1,239.54		\$114.83
07/19/2017	ELECTRIC SERVICE		07/19/2017 - 08/08/2017	41788	ACTUAL	122726540	1047	0		\$79.39	\$852.71	\$272.00	\$1,124.71	08/10/2017	\$1,239.54		\$114.83
07/24/2017		PAYMENT								\$200.00							
08/09/2017	LATE PAYMENT CHARGE									\$8.60							
08/10/2017	BUDGET BILLING									\$272.00							
08/10/2017	GAS SERVICE		07/10/2017 - 08/08/2017	9202	ACTUAL	16446639			18	\$27.81	\$933.31	\$272.00	\$1,205.31	09/01/2017	\$1,236.71		\$31.40
08/10/2017	ELECTRIC SERVICE		07/10/2017 - 07/19/2017	40741	ACTUAL	122726540	528	0		\$79.20	\$933.31	\$272.00	\$1,205.31	09/01/2017	\$1,236.71		\$31.40
08/10/2017	ELECTRIC SERVICE		07/19/2017 - 08/08/2017	41788	ACTUAL	122726540	1047	0		\$79.20	\$933.31	\$272.00	\$1,205.31	09/01/2017	\$1,236.71		\$31.40
08/10/2017	ALTERNATE ELEC SERVICE									\$81.56							
08/15/2017	LATE PAYMENT CHARGE									\$4.08							
08/22/2017		PAYMENT								\$924.71							
09/05/2017	BUDGET BILLING									\$272.00							
09/05/2017	GAS SERVICE		08/08/2017 - 09/02/2017	9217	ACTUAL	16446639			15	\$16.12	\$284.68	\$272.00	\$556.68	09/27/2017	\$534.31		\$22.37
09/05/2017	ALTERNATE GAS SERVICE									\$8.54							

PECO
 Exhibit # _____

Transaction Dt	Product Type	Credit Source	Billing Period	Read	Reading Type	Meter Equip Cd	KWH	KW	CCF	Transaction Amount	Balance Forward	Current Charges	Amt Due	Bill Due Dt	Total Balance	Heating Degree Days	Budget Bill Deferred Amt
09/05/2017	ELECTRIC SERVICE		08/08/2017 - 09/02/2017	43047	ACTUAL	122726540	1259	0		\$95.49	\$284.68	\$272.00	\$556.68	09/27/2017	\$534.31		-\$22.37
09/05/2017	ALTERNATE ELEC SERVICE									\$98.08							
09/06/2017	LATE PAYMENT CHARGE									\$3.74							
10/03/2017	LATE PAYMENT CHARGE									\$7.82							
10/05/2017	BUDGET BILLING									\$272.00							
10/05/2017	GAS SERVICE		09/02/2017 - 10/03/2017	9240	ACTUAL	16446639			23	\$20.06	\$568.24	\$272.00	\$840.24	10/27/2017	\$758.38		-\$81.86
10/05/2017	ALTERNATE GAS SERVICE									\$13.09							
10/05/2017	ELECTRIC SERVICE		09/02/2017 - 10/03/2017	44235	ACTUAL	122726540	1188	0		\$86.81	\$568.24	\$272.00	\$840.24	10/27/2017	\$758.38		-\$81.86
10/05/2017	ALTERNATE ELEC SERVICE									\$92.55							
10/17/2017		PAYMENT								-\$494.82							
10/18/2017		TRANSFER								-\$20.00							
10/18/2017	RECONNECT FEE - CUT									\$20.00							
10/19/2017	OUT NON-PAY									\$494.82							
10/19/2017	RETURNED CHECK									\$40.00							
10/19/2017	RETURNED ITEM CHARGE									\$250.00							
10/26/2017		PAYMENT								\$7.69							
11/01/2017	LATE PAYMENT CHARGE									\$272.00							
11/08/2017	BUDGET BILLING									\$272.00							
11/08/2017	GAS SERVICE		10/03/2017 - 11/04/2017	9297	ACTUAL	16446639			57	\$32.44	\$617.93	\$292.00	\$909.93	11/30/2017	\$791.09	43	-\$118.84
11/08/2017	ALTERNATE GAS SERVICE									\$32.43							
11/08/2017	ELECTRIC SERVICE		10/03/2017 - 11/04/2017	45359	ACTUAL	122726540	1124	0		\$82.59	\$617.93	\$292.00	\$909.93	11/30/2017	\$791.09	43	-\$118.84
11/08/2017	ALTERNATE ELEC SERVICE									\$87.56							
12/05/2017	LATE PAYMENT CHARGE									\$11.52							
12/06/2017	BUDGET BILLING									\$272.00							
12/06/2017	GAS SERVICE		11/04/2017 - 12/04/2017	9506	ACTUAL	16446639			209	\$87.22	\$921.45	\$272.00	\$1,193.45	12/28/2017	\$1,151.83	560	\$41.62
12/06/2017	ALTERNATE GAS SERVICE									\$118.92							
12/06/2017	ELECTRIC SERVICE		11/04/2017 - 12/04/2017	46295	ACTUAL	122726540	936	0		\$70.17	\$921.45	\$272.00	\$1,193.45	12/28/2017	\$1,151.83	560	-\$41.62
12/06/2017	ALTERNATE ELEC SERVICE									\$72.91							
01/03/2018	LATE PAYMENT CHARGE									\$16.76							
01/09/2018	BUDGET BILLING									\$272.00							
01/09/2018	GAS SERVICE		12/04/2017 - 01/05/2018	9881	ACTUAL	16446639			377	\$141.00	\$1,210.21	\$272.00	\$1,482.21	01/31/2018	\$1,686.34	1,014	\$204.13
01/09/2018	ALTERNATE GAS SERVICE									\$214.51							
01/09/2018	ELECTRIC SERVICE		12/04/2017 - 01/05/2018	47367	ACTUAL	122726540	1072	0		\$78.73	\$1,210.21	\$272.00	\$1,482.21	01/31/2018	\$1,686.34	1,014	\$204.13
01/09/2018	ALTERNATE ELEC SERVICE									\$83.51							
02/06/2018	LATE PAYMENT CHARGE									\$21.46							
02/08/2018	BUDGET BILLING									\$272.00							
02/08/2018	GAS SERVICE		01/05/2018 - 02/06/2018	245	ACTUAL	16446639			362	\$135.87	\$1,503.67	\$272.00	\$1,775.67	03/02/2018	\$2,175.81	976	\$400.14
02/08/2018	ALTERNATE GAS SERVICE									\$205.98							
02/08/2018	ELECTRIC SERVICE		01/05/2018 - 02/06/2018	48199	ACTUAL	122726540	832	0		\$61.35	\$1,503.67	\$272.00	\$1,775.67	03/02/2018	\$2,175.81	976	\$400.14
02/08/2018	ALTERNATE ELEC SERVICE									\$64.81							
03/07/2018	LATE PAYMENT CHARGE									\$25.54							
03/09/2018	BUDGET BILLING									\$272.00							
03/09/2018	GAS SERVICE		02/06/2018 - 03/07/2018	512	ACTUAL	16446639			267	\$103.28	\$1,801.21	\$272.00	\$2,073.21	04/02/2018	\$2,569.97	630	\$496.76
03/09/2018	ALTERNATE GAS SERVICE									\$151.92							
03/09/2018	ELECTRIC SERVICE		02/06/2018 - 03/07/2018	48941	ACTUAL	122726540	742	0		\$55.62	\$1,801.21	\$272.00	\$2,073.21	04/02/2018	\$2,569.97	630	\$496.76
03/09/2018	ALTERNATE ELEC SERVICE									\$57.80							
04/09/2018	BUDGET BILLING									\$355.00							
04/09/2018	LATE PAYMENT CHARGE									\$29.62							
04/09/2018	GAS SERVICE		03/07/2018 - 04/05/2018	778	ACTUAL	16446639			266	\$102.94	\$2,102.83	\$355.00	\$2,457.83	05/01/2018	\$2,965.05	715	\$507.22
04/09/2018	ALTERNATE GAS SERVICE									\$151.35							
04/09/2018	ELECTRIC SERVICE		03/07/2018 - 04/05/2018	49665	ACTUAL	122726540	724	0		\$54.77	\$2,102.83	\$355.00	\$2,457.83	05/01/2018	\$2,965.05	715	\$507.22
04/09/2018	ALTERNATE ELEC SERVICE									\$56.40							
04/30/2018	ELECTRIC SERVICE		04/05/2018 - 04/25/2018	50126	ACTUAL	122726540	461	0		\$35.14	\$2,073.21	\$384.62	\$2,457.83	05/22/2018	\$3,036.10	317	\$578.27
04/30/2018	ELECTRIC SERVICE		04/25/2018 - 05/08/2018	50380	ACTUAL	122726540	254	0		\$35.14	\$2,073.21	\$384.62	\$2,457.83	05/22/2018	\$3,036.10	22	\$578.27
04/30/2018	ALTERNATE ELEC SERVICE									\$35.91							
05/10/2018	BUDGET BILLING									\$355.00							
05/10/2018	GAS SERVICE		04/05/2018 - 05/08/2018	923	ACTUAL	16446639			145	\$61.42	\$2,457.83	\$355.00	\$2,812.83	06/01/2018	\$3,216.97	339	\$404.14
05/10/2018	ALTERNATE GAS SERVICE									\$82.51							
05/10/2018	ELECTRIC SERVICE		04/05/2018 - 04/25/2018	50126	ACTUAL	122726540	461	0		\$19.92	\$2,457.83	\$355.00	\$2,812.83	06/01/2018	\$3,216.97	317	\$404.14
05/10/2018	ELECTRIC SERVICE		04/25/2018 - 05/08/2018	50380	ACTUAL	122726540	254	0		\$19.92	\$2,457.83	\$355.00	\$2,812.83	06/01/2018	\$3,216.97	22	\$404.14
05/10/2018	ALTERNATE ELEC SERVICE									\$17.02							
05/30/2018	LATE PAYMENT CHARGE									\$34.95							
06/06/2018	BUDGET BILLING									\$355.00							
06/06/2018	GAS SERVICE		05/08/2018 - 06/05/2018	952	ACTUAL	16446639			29	\$21.63	\$2,847.78	\$355.00	\$3,202.78	06/28/2018	\$3,418.26		\$215.48
06/06/2018	ALTERNATE GAS SERVICE									\$10.73							
06/06/2018	ELECTRIC SERVICE		05/08/2018 - 06/05/2018	51336	ACTUAL	122726540	956	0		\$69.93	\$2,847.78	\$355.00	\$3,202.78	06/28/2018	\$3,418.26		\$215.48

Transaction Dt	Product Type	Credit Source	Billing Period	Read	Reading Type	Meter Equip Cd	KWH	KW	CCF	Transaction Amount	Balance Forward	Current Charges	Amt Due	Bill Due Dt	Total Balance	Heating Degree Days	Budget Bill Deferred Amt
06/06/2018	ALTERNATE ELEC SERVICE									\$64.05							
06/11/2018		PAYMENT AGREEMENT															
07/06/2018	BUDGET BILLING									-\$3,418.26							
07/06/2018	PUC AGREEMENT									\$311.00							
07/06/2018	GAS SERVICE		06/05/2018 - 07/05/2018	973	ACTUAL	16446639			71	\$19.72	\$0.00	\$367.97	\$367.97	07/30/2018	\$280.30		\$87.67
07/06/2018	ALTERNATE GAS SERVICE									\$7.77							
07/06/2018	ELECTRIC SERVICE		06/05/2018 - 07/05/2018	52750	ACTUAL	122726540	1414	0		\$101.10	\$0.00	\$367.97	\$367.97	07/30/2018	\$280.30		-\$87.67
08/06/2018	BILL OUT DPA									\$94.74							
08/06/2018	BUDGET BILLING									\$3,304.32							
08/06/2018	LATE PAYMENT CHARGE									\$311.00							
08/06/2018	PUC AGREEMENT									\$4.20							
08/06/2018	GAS SERVICE		07/05/2018 - 08/03/2018	996	ACTUAL	16446639			73	\$19.90	\$372.17	\$367.97	\$740.14	08/28/2018	\$607.72		-\$132.42
08/06/2018	ALTERNATE GAS SERVICE									\$8.51							
08/06/2018	ELECTRIC SERVICE		07/05/2018 - 08/03/2018	54481	ACTUAL	122726540	1731	0		\$121.86	\$372.17	\$367.97	\$740.14	08/28/2018	\$607.72		-\$132.42
08/06/2018	ALTERNATE ELEC SERVICE									\$115.98							
08/08/2018		EXCESS CREDIT BUDGET BILL SETTLEMENT								-\$99.12							
08/08/2018	GAS SERVICE		08/03/2018 - 08/06/2018	998	ACTUAL	16446639			2	\$1.89	\$3,630.14	\$315.70	\$3,945.34	08/30/2018	\$3,945.34		\$0.00
08/08/2018	ALTERNATE GAS SERVICE									\$0.74							
08/08/2018	ELECTRIC SERVICE		08/03/2018 - 08/06/2018	54706	ACTUAL	122726540	225	0		\$15.59	\$3,630.14	\$315.70	\$3,945.34	08/30/2018	\$3,945.34		\$0.00
08/08/2018	ALTERNATE ELEC SERVICE									\$15.08							
09/05/2018	LATE PAYMENT CHARGE									\$56.69							
09/06/2018	LATE PAYMENT CHARGE									\$4.67							
09/07/2018		TRANSFER								-\$4,006.70							

EXHIBIT 2

October 28, 2019

BCS Decision Report

BCS Case #: 003675399 Open Date: 2019-01-16
Customer Name: TEMPLE OF BETHEL
Service Address: 1804 72ND AVENUE

PHILADELPHIA, PA 19126
BCS Bill Account #: 4123663047 Previous Case #:
Violation Type: NO Chapter Type:
Decision Type: W Section / Rule:
Investigator Name: AVIS CHISHOLM

Decision Issued Date: 2019-07-12
Case Closed Date: 2019-07-09

Letter Description:

Total Balance:	\$6940.66	Balance Date:	2019-02-04
Amount to Restore Service:	\$0.00	Amount to Continue Service:	\$0.00
Date Payment Due:		Regular Budget Amount:	\$0.00
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:

Resolution Description:

DECISION ISSUED: THE CUSTOMER DEFAULTED ON PUC PAR BCS# 3621671, ISSUED ON 01/30/17, PRIOR TO MOVING TO THIS ADDRESS.CASE DISMISSED.

PECO
Exhibit # 2