

GRIESING LAW LLC

Edward T. Fisher
Direct Dial: (215) 501-7846
efisher@griesinglaw.com

February 10, 2020

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

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

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is a *PECO Energy Company's Response to Complaint's Petition for Reconsideration* 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.

Sincerely Yours,



Edward T. Fisher

EF/

Cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JUDITH BENVENGER	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2018-3005286
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

**RESPONDENT PECO ENERGY COMPANY’S RESPONSE TO COMPLAINANT’S
PETITION FOR RECONSIDERATION**

In accordance with the Pennsylvania Public Utility Commission’s (“ PUC”) correspondence dated January 31, 2020, granting PECO Energy Company’s (“PECO”) Petition for Extension of Time to File Response to Complainant’s Petition for Reconsideration, PECO hereby files this response to Complainant’s Petition for Reconsideration. Complainant’s Petition for Reconsideration should be denied because she does not raise any new arguments or facts in the petition. To the contrary, when Complainant filed exceptions to the initial decision, she made some of the same arguments in various handwritten notes that she is making in the Petition for Reconsideration. The PUC noted this when it denied the exceptions, adopted the initial decision and dismissed the complaint with prejudice (in the PUC’s Opinion and Order dated December 19, 2019). The PUC actually stated: "Indeed, we are unable to discern what arguments are actually being asserted in her Exceptions." Just like the PUC stated, PECO is not able to discern what arguments Complainant is making in her Petition for Reconsideration, and she does not appear to raise any new arguments or facts. Because Complainant does not raise any issues in her Petition for Reconsideration that would warrant reopening the case, PECO respectfully requests that the Petition for Reconsideration be denied in its entirety.

WHEREFORE, PECO Energy Company respectfully requests that this Honorable Commission deny Complainant's Petition for Reconsideration in its entirety.

Respectfully Submitted,



Edward T Fisher, Esquire
Counsel for PECO Energy Company
Griesing Law, LLC
1880 JFK Blvd., Suite 1800
Philadelphia, PA 19103
215-618-3720
efisher@griesinglaw.com

DATED: February 10, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JUDITH BENVENGER	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2018-3005286
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

VERIFICATION

I, Edward T. Fisher, 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 Response 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.

Edward T. Fisher

Edward T. Fisher

Date: February 10, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JUDITH BENVENGER	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2018-3005286
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Edward T. Fisher, hereby certify that I have this day served a copy of Respondent PECO Energy Company's Response to Complainant's Petition for Reconsideration in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Judith Benvenger

Respectfully Submitted,



Edward T Fisher, Esquire
Counsel for PECO Energy Company
Griesing Law, LLC
1880 JFK Blvd., Suite 1800
Philadelphia, PA 19103
215-618-3720
efisher@griesinglaw.com

DATED: February 10, 2020