

Legal Department
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January 11, 2021

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

**RE: Christopher and Valerie Watson v PECO Energy Company
Docket No. C-2020-3021127**

Dear Ms. Chiavetta:

PECO Status Report #1 is enclosed for filing. A Verification and a Certificate of Service precede PECO's filing.

Very truly yours,

/s/ Ward Smith

Ward Smith
Counsel for PECO Energy Company

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VALERIE AND CHRISTOPHER	:	
WATSON	:	
Complainants	:	
	:	
v.	:	DOCKET NO. C-2020-3021127
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

VERIFICATION

I, Ward L. Smith, 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 attached 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 11, 2021

/s/ Ward L. Smith
Ward Smith

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Christopher and Valerie Watson	:	
	:	Docket No. C-2020-3021127
v.	:	
	:	
PECO Energy Company	:	

CERTIFICATE OF SERVICE

I, Ward L. Smith, hereby certify that today I served a copy of PECO Status Report #1, via email only, on:

Valerie and Christopher Watson
Valerie.levesque24@hotmail.com

Frank Kosir, Jr.
Meyer Unkovic Scott
Henry W. Oliver Building
535 Smithfield Street
Suite 1300 Pittsburgh
PA 15222
(412) 456-2825
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Counsel for Complainants

Dated January 11, 2021

/s/ Ward L. Smith
Ward L. Smith
Counsel for PECO Energy Company
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Philadelphia, PA 19101-8699
(267) 324-8426
ward.smith@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VALERIE AND CHRISTOPHER	:	
WATSON	:	
Complainants	:	
	:	
v.	:	DOCKET NO. C-2020-3021127
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

PECO STATUS REPORT #1

On November 10, 2020, Your Honor issued an Order Granting PECO’s Motion for Stay. In Ordering Paragraph 2, Your Honor directed “[t]hat the Respondent shall file a status report with the presiding officer and the opposing party, within sixty (60) days of the date of this Order, and every sixty (60) days thereafter, until the civil proceeding has concluded.” This is PECO Status Report #1.

On October 30, 2020, PECO filed a Complaint with the Court of Common Pleas of Montgomery County, in which it seeks a declaratory judgment that it has an irrevocable license or, in the alternative, a prescriptive easement, to operate, maintain, and update its poles, power lines, and equipment on the Watson property.

On December 18, 2020, the Watsons filed their Answer, New Matter, and Counterclaims in which they deny the allegations of PECO’s Complaint and seek a determination that PECO is trespassing and should be ejected from their property.

On January 11, 2021, PECO filed its Answer to the Watson New Matter and Counterclaims.

Respectfully Submitted,

Ward L. Smith
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January 11, 2021