



TEMPLE UNIVERSITY  
A Commonwealth University

University Counsel  
(215) 787-6526

Philadelphia, Pennsylvania 19122

RECEIVED

DEC 9 1985

December 5, 1985

SECRETARY'S OFFICE  
Public Utility Commission

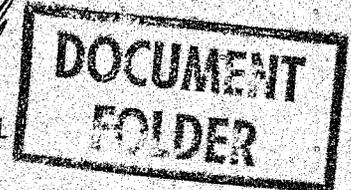
Secretary, Pennsylvania Public  
Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17120

Dear Sir:

Enclosed for filing please find the joint Complaint of Temple University, Bryn Mawr College, Gwynedd-Mercy College, Haverford College, Lincoln University, Medical College of Pennsylvania, Philadelphia College of Art, Philadelphia College of Pharmacy and Science, Philadelphia College of Textiles and Science, Rosemont College, St. Joseph's College, Swarthmore College, Villanova University and Widener University.

Sincerely,

Stephen Bosch  
Associate Counsel



SB/lrh  
Enc.

PENNSYLVANIA PUBLIC UTILITY COMMISSION

SECRETARY'S OFFICE  
Public Utility Commission

For Commission Use Only:  
**COMPLAINT DOCKET NO.** R-850152C011 **REF. #** \_\_\_\_\_ **UTILITY CODE** 110550  
TEMPLE UNIVERSITY, ET AL **VS.** PHILADELPHIA ELECTRIC COMPANY

**PLEASE PRINT:**

**1. YOUR NAME, ADDRESS AND TELEPHONE NUMBER.**

**Name** Temple University - Of The Commonwealth System Of Higher Education, jointly with all others on the attached list.

**Street** 450 Carnell Hall, Broad Street and Montgomery Avenue

**City** Philadelphia **State** Pennsylvania **Zip** 19122

**County** Philadelphia **Home Telephone-Area Code ( )** \_\_\_\_\_

**Work Telephone-Area Code (215)** 787-6526

**2. COMPANY YOU ARE COMPLAINING ABOUT.**

**Name** Philadelphia Electric Company

**DOCUMENT  
FOLDER**

**RECORDED  
DEC 10 1985**

**3. WHAT IS YOUR COMPLAINT (DESCRIBE PROBLEM).**

This joint complaint opposes Philadelphia Electric Company's rate filing of September 27, 1985, R-850152, as being unwarranted given PECO's failure to impliment appropriate cost and energy savings measures. Additionally, this estimated 30% increase will substantially deplete the resources needed by each school to meet its educational mission to its students. Since such a large increase cannot be completely absorbed by each school's budget, the excess will have to be passed on to our students in the form of tuition increases. That will surely result in the inability of many students to afford the cost of education, without which unemployment with its attendant

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For Commission Use Only:  
**DATE FILED** 12/09/85

**MONITOR** \_\_\_\_\_ **BUREAU** ALJ

Bryn Mawr College  
Bryn Mawr, PA 19010

Gwynedd-Mercy College  
Gwynedd Valley, PA 19437

Haverford College  
Haverford, PA 19041-1392

Lincoln University  
Lincoln University, PA 19352

Medical College of Pennsylvania  
3300 Henry Avenue  
Philadelphia, PA 19129

Philadelphia College of Art  
Broad and Pine Streets  
Philadelphia, PA 19102

Philadelphia College of Pharmacy and Science  
43rd Street and Woodland Avenue  
Philadelphia, PA 19104

Philadelphia College of Textiles and Science  
School House Lane and Henry Avenue  
Philadelphia, PA 19144

Rosemont College  
Rosemont, PA 19010

Saint Joseph's University  
5600 City Avenue  
Philadelphia, PA 19131

Swarthmore College  
Swarthmore, PA 19081

Villanova University  
Villanova, PA 19085

Widener University  
Chester, PA 19013

problems is certain rise. Additionally, the requested increase would divert money from educational service programs, thereby forcing schools to cut back and/or eliminate certain teaching and research functions which are critical to the provision of education.

(If You Need More Space Attach Paper)

4. WHAT DO YOU WANT US TO DO?

Deny all of the requested increase.

(If You Need More Space Attach Paper)

YOU MUST SIGN HERE

PUT TODAY'S DATE HERE

*Stephen Bosch*

Signature of complainant or attorney for corporate complainant

*December 5, 1985*

Today's Date

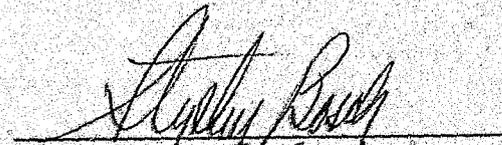
**YOU DO NOT NEED A LAWYER**

If you DO have a lawyer PLEASE PRINT the lawyer's name, address and telephone number below.

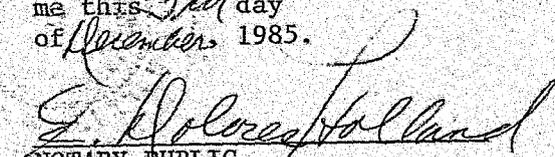
Lawyer's Name Stephen Bosch  
Street 450 Carnell Hall, Broad Street and Montgomery Avenue  
City Philadelphia State Pennsylvania Zip 19122  
Telephone Number-Area Code ( 215 ) 787-6526

AFFIDAVIT

Stephen Bosch, being duly sworn according to law, deposes and says that he is Associate University Counsel of Temple University - of the Commonwealth System of Higher Education; and he is authorized to and does make this affidavit for it and on behalf of and for the remaining joint-filers to this complaint; and that the facts set forth above are true and correct to the best of his knowledge, information and belief and that he expects that Temple University and all other joint-filers will be able to prove these facts at the hearing thereof.

  
Stephen Bosch

Sworn to and  
subscribed before  
me this 3rd day  
of December 1985.

  
NOTARY PUBLIC  
E. DOLORES HOLLAND  
Notary Public, Phila., Phila. Co.  
My Commission Expires Jan. 23, 1989



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P. O. BOX 3265, HARRISBURG, Pa. 17120

December 10, 1985

IN REPLY PLEASE  
REFER TO OUR FILE

R-850152C011

William E. Zeiter, Esquire  
Morgan, Lewis & Bockius  
One Logan Square  
Philadelphia, PA 19103



Dear Mr. Zeiter:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by Temple University, et al  
(the complaining party)

To defend yourself against the claims stated in the following pages, you must act within twenty (20) days, by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

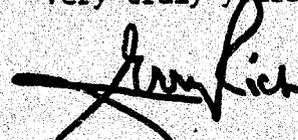
AN ADMINISTRATIVE LAW JUDGE MAY REVOKE OR SUSPEND ANY CERTIFICATE OR PERMIT HELD BY YOU, OR IMPOSE A FINE, OR ANY OTHER APPROPRIATE PENALTY OR REMEDY AUTHORIZED BY THE PUBLIC UTILITY CODE. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, Pennsylvania 17108  
(800) 692-7375

Very truly yours,

  
Jerry Rich  
Secretary

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION  
The Administrative Law Judge is not limited to the relief sought by the complainant in paragraph 1 of the attached complaint.

Temple University, et al

Complaint Docket

No. R-850152C011

Philadelphia Electric Company

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DEC 1 1985

Philadelphia Electric Company  
The Administrative Law Judge is not limited to the relief sought by the complainant in paragraph 1 of the attached complaint.

**FORMAL COMPLAINT**

**NOTICE TO RESPONDENT**

**TO ANSWER OR SATISFY**

DEC 1 1985

TO: Mr. William E. Zeiter  
This complaint is filed with the Pennsylvania Public Utility Commission. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 35.35 of the General Rules of Administrative Practice and Procedure, 1 Pa. Code §35.35, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant.

**TAKE NOTICE**

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. Cons. §702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 35.35 of the General Rules of Administrative Practice and Procedure, 1 Pa. Code §35.35, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant.

2. If you fail to either satisfy this complaint or to file an answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 35.35 of the General Rules of Administrative Practice and Procedure, 1 Pa. Code §35.35. In that event, an Administrative Law Judge of the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy

Return Receipt Requested  
Certified Mail

authorized by the Public Utility Code, 66 Pa.C.S. §101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Administrative Law Judge is not limited to the relief sought by the complainant in paragraph 4. of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint will be dismissed by an Administrative Law Judge in accordance with Section 703(a) of the Public Utility Code, 66 Pa.C.S. §703(a), unless the Judge determines that such dismissal would be contrary to the public interest, in which event he may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, an Administrative Law Judge will, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa.C.S. §101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Administrative Law Judge is not limited to the relief sought by the complainant in paragraph 4. of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in this complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa.C.S. §101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4. of the attached complaint.

12/10/85  
(SEAL)

*John R. Rich*  
Secretary

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