

Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

January 26, 2022

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

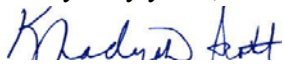
**RE: Yehuda Buckwold v. PECO Energy Company**  
**PUC Docket No. Docket No. C-2022-3030254**  
**PUC Docket No. Docket No. C-2022-3030255**  
**PUC Docket No. Docket No. C-2022-3030256**  
**PUC Docket No. Docket No. C-2022-3030257**  
**PUC Docket No. Docket No. C-2022-3030258**  
**PUC Docket No. Docket No. C-2022-3030259**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion to Consolidate*.

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,



Khadijah Scott, Esquire  
Assistant General Counsel, Exelon BSC  
Encl.

Cc: Yehuda Buckwold (via email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>COMPLAINANT</b>	:	
	:	
	:	<b>DOCKET NO. C-2022-3030254</b>
<b>vs.</b>	:	<b>DOCKET NO. C-2022-3030255</b>
	:	<b>DOCKET NO. C-2022-3030256</b>
	:	<b>DOCKET NO. C-2022-3030257</b>
<b>PECO ENERGY COMPANY</b>	:	<b>DOCKET NO. C-2022-3030258</b>
<b>RESPONDENT</b>	:	<b>DOCKET NO. C-2022-3030259</b>

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**NOTICE TO PLEAD**

Pursuant to 52 Pa. Code §§ 5.102, you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion to Consolidate of PECO Energy Company, within 20 days from service of this notice, a ruling may be entered against you. All pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Khadijah Scott, and where applicable, the Administrative Law Judge presiding over the issue.

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

With a copy to:  
Khadijah Scott, Esq.  
PECO Energy Company  
2301 Market Street, S-23  
Philadelphia, PA 19103  
Khadijah.scott@exeloncorp.com

Dated: January 26, 2022



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Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
Khadijah.scott@exeloncorp.com  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>COMPLAINANT</b>	:	
	:	
	:	<b>DOCKET NO. C-2022-3030254</b>
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<b>PECO ENERGY COMPANY</b>	:	<b>DOCKET NO. C-2022-3030258</b>
<b>RESPONDENT</b>	:	<b>DOCKET NO. C-2022-3030259</b>

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**PECO ENERGY COMPANY’S MOTION TO CONSOLIDATE**

Respondent, PECO Energy Company (“PECO”), pursuant to 52 Pa. Code § 5.81(a) respectfully petitions this Honorable Commission to consolidate the matters of Yehuda Buckwold v. PECO Energy in the above referenced dockets because the six (6) Complaints contain the same allegations and concern the same questions of fact and law. In support of this request, PECO avers:

1. On January 4, 2022, PECO Energy was served with six (6) Complaints filed by Complainant, Yehuda Buckwold, with the Pennsylvania Public Utility Commission (“PUC”) at Docket Numbers C-2022-3030254; C-2022-3030255; C-2022-3030256; C-2022-3030257; C-2022-3030258 and C-2022-3030259 . A copy of the respective Complaints are attached as Exhibit “1”.

2. In the Complainant’s formal complaints, he alleges that he requested that his Private Outdoor Lighting (POL) be repaired and he was informed that PECO was not responsible for his account.

3. The six (6) complaints are identical.

4. Pursuant to 52 Pa. Code §5.101(b), on January 24, 2022, PECO filed an Answer to the Complainant's six (6) Complaints. A copy of the answer is attached as Exhibit "2" .

5. PECO Energy avers that the Complaints make the same averments and contain the same allegations.

6. These Complaints should be consolidated pursuant to 52 Pa. Code §5.81 (a), which holds:

The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

7. All six (6) Complaints cover the same issue, actions and contain common questions of law and fact such that one hearing covering the six (6) Complaints will avoid unnecessary costs or delay to the Commission. Each Complaint relates to the same issues and facts, whether PECO Energy is responsible for repair of his Private Outdoor Lighting (POL).

8. Accordingly, the six (6) Complaints should be consolidated to save the time, resources and the expense of the parties and the Commission.

9. A hearing has not yet been scheduled in either matter. PECO requests that the six (6) dockets be heard at the same hearing.

**WHEREFORE**, PECO Energy Company respectfully requests that this Honorable Commission issue an Order consolidating the complaints at docket numbers C-2022-3030254; C-2022-3030255; C-2022-3030256; C-2022-3030257; C-2022-3030258 and C-2022-3030259. The Complaints are relief sought are identical.

Respectfully Submitted,



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Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
Khadijah.scott@exeloncorp.com  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>COMPLAINANT</b>	:	
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	:	<b>DOCKET NO. C-2022-3030254</b>
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<b>PECO ENERGY COMPANY</b>	:	<b>DOCKET NO. C-2022-3030258</b>
<b>RESPONDENT</b>	:	<b>DOCKET NO. C-2022-3030259</b>

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**VERIFICATION**

I, Khadijah Scott, hereby declare that I am an attorney representing 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: January 26, 2022

\_\_\_\_\_  
Khadijah Scott

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>COMPLAINANT</b>	:	
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	:	<b>DOCKET NO. C-2022-3030254</b>
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<b>PECO ENERGY COMPANY</b>	:	<b>DOCKET NO. C-2022-3030258</b>
<b>RESPONDENT</b>	:	<b>DOCKET NO. C-2022-3030259</b>

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of PECO Energy Company's Motion to Consolidate in the above matter upon all interested parties by E-mailing a copy thereof, properly to:

YEHUDA BUCKWOLD  
7801 LANGDON AVE.  
PHILADELPHIA PA 19111  
*Via Email: robert@woodlakemgt.com*

Dated: January 26, 2022



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Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
Khadijah.scott@exeloncorp.com  
(215) 841-6841  
Fax: 215.568.3389

# **EXHIBIT 1**

# 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 Yehuda Buckwold Woodlake Management

Street/P.O. Box \_\_\_\_\_ 7801 Algon Av \_\_\_\_\_ Apt # \_\_\_\_\_

City: Philadelphia State: PA Zip: 19111 \_\_\_\_\_

County \_\_\_\_\_

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

(\_\_\_\_) \_\_\_\_\_ (home) 248-662-7506 \_\_\_\_\_ (mobile)

E-mail Address (required): \_\_\_Robert@woodlakemgt.com\_\_\_\_\_

Utility Account Number (from your bill) 23132-00101

**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 \_\_\_\_\_

### 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\_\_\_\_\_

3. **Type of Utility Service**

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> STORM WATER  |
| <input type="checkbox"/> GAS                 | <input type="checkbox"/> WASTEWATER/SEWER                                     |
| <input type="checkbox"/> WATER               | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance)  |
| <input type="checkbox"/> STEAM HEAT          | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |

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.

**I have and have been paying for Private Outdoor Lighting Service for about 15 years. The way the service is set u is that I pay PRCO a monthly fee and they are responsible to make sure my outdoor lighting is working be it the power or the light bulbs. I have been attempting to reach the department that handles this account for about 7 months now I have been calling and leaving messages on the number I was provided (800-265-4189). Today I finally got thru to Luis and he advised me that they are not responsible for this account.**

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.

I want my broken lights fixed.

**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)/ Domestic Violence**

Has a court granted you a “Protection From Abuse” order or any other order which provides clear evidence of domestic violence against you 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 or any other 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.

They said they are not responsible for it

**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, (all required contact information). 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 \_\_\_\_\_

**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:**

I Yehuda Buckwold, 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).



\_\_\_\_\_  
(Signature of Complainant)

1/3/2022  
\_\_\_\_\_  
(Date)

\_\_\_\_\_  
Property Manager  
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. How 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>.

**Mail.** Mail the completed form with your original signature and any attachments, by certified mail, priority mail, or overnight delivery to this address and retain the tracking information as proof of submission:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

**If you are appealing a BCS decision:** follow the directions in the cover letter you received from the Secretary's Bureau with the formal complaint form. **ONLY** Formal complaints appealing a BCS decision can be filed by fax, email or overnight delivery to meet filing deadlines. **All other formal complaints MUST be efiled or mailed.**

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.

# PENNSYLVANIA PUBLIC UTILITY COMMISSION

## Formal Complaint

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**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 Yehuda Buckwold Woodlake Management

Street/P.O. Box \_\_\_\_\_ 7701 Bustleton Av \_\_\_\_\_ Apt # \_\_\_\_\_

City: Philadelphia State: PA Zip: 19152 \_\_\_\_\_

County \_\_\_\_\_

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

(\_\_\_\_) \_\_\_\_\_ (home) 248-662-7506 \_\_\_\_\_ (mobile)

E-mail Address (required): \_\_\_Robert@woodlakemgt.com\_\_\_\_\_

Utility Account Number (from your bill) 13775-00505

**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.**

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|--|---|
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Has a court granted a “Protection From Abuse” order or any other 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.

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If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, (all required contact information). 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 \_\_\_\_\_


**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.

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I Yehuda Buckwold, 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).

  
\_\_\_\_\_  
(Signature of Complainant) \_\_\_\_\_ 1/3/2022  
(Date)

\_\_\_\_\_  
Property Manager \_\_\_\_\_  
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**.

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Harrisburg, Pennsylvania 17120

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# PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Name Yehuda Buckwold Woodlake Management

Street/P.O. Box \_\_\_\_\_ 2121 Glendale Av \_\_\_\_\_ Apt # \_\_\_\_\_

City: Philadelphia State: PA Zip: 19152 \_\_\_\_\_

County \_\_\_\_\_

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

(\_\_\_\_) \_\_\_\_\_ (home) 248-662-7506 \_\_\_\_\_ (mobile)

E-mail Address (required): \_\_\_Robert@woodlakemgt.com\_\_\_\_\_

Utility Account Number (from your bill) 26226-00708

**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 \_\_\_\_\_

### 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\_\_\_\_\_

**3. Type of Utility Service**

**Check the box listing the type of utility service that is the subject of your complaint (check only one):**

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> STORM WATER  |
| <input type="checkbox"/> GAS                 | <input type="checkbox"/> WASTEWATER/SEWER                                     |
| <input type="checkbox"/> WATER               | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance)  |
| <input type="checkbox"/> STEAM HEAT          | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |

**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.

**I have and have been paying for Private Outdoor Lighting Service for about 15 years. The way the service is set u is that I pay PRCO a monthly fee and they are responsible to make sure my outdoor lighting is working be it the power or the light bulbs. I have been attempting to reach the department that handles this account for about 7 months now I have been calling and leaving messages on the number I was provided (800-265-4189). Today I finally got thru to Luis and he advised me that they are not responsible for this account.**

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.**

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**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.**

I want my broken lights fixed.

**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.**

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Has a court granted you a “Protection From Abuse” order or any other order which provides clear evidence of domestic violence against you 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 or any other 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.

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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, (all required contact information). 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 \_\_\_\_\_

**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:**

I Yehuda Buckwold, 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).



\_\_\_\_\_  
(Signature of Complainant)

1/3/2022  
(Date)

\_\_\_\_\_  
Property Manager  
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. How 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>.

**Mail.** Mail the completed form with your original signature and any attachments, by certified mail, priority mail, or overnight delivery to this address and retain the tracking information as proof of submission:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

**If you are appealing a BCS decision:** follow the directions in the cover letter you received from the Secretary's Bureau with the formal complaint form. **ONLY** Formal complaints appealing a BCS decision can be filed by fax, email or overnight delivery to meet filing deadlines. **All other formal complaints MUST be efiled or mailed.**

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.

# 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 Yehuda Buckwold Woodlake Management

Street/P.O. Box \_\_\_\_\_ 2100 Glendale Av \_\_\_\_\_ Apt # \_\_\_\_\_

City: Philadelphia State: PA Zip: 19152 \_\_\_\_\_

County \_\_\_\_\_

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

(\_\_\_\_) \_\_\_\_\_ (home) 248-662-7506 \_\_\_\_\_ (mobile)

E-mail Address (required): \_\_\_Robert@woodlakemgt.com\_\_\_\_\_

Utility Account Number (from your bill) 29320-00903

**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 \_\_\_\_\_

### 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\_\_\_\_\_

3. **Type of Utility Service**

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> STORM WATER  |
| <input type="checkbox"/> GAS                 | <input type="checkbox"/> WASTEWATER/SEWER                                     |
| <input type="checkbox"/> WATER               | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance)  |
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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.****

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**I have and have been paying for Private Outdoor Lighting Service for about 15 years. The way the service is set u is that I pay PRCO a monthly fee and they are responsible to make sure my outdoor lighting is working be it the power or the light bulbs. I have been attempting to reach the department that handles this account for about 7 months now I have been calling and leaving messages on the number I was provided (800-265-4189). Today I finally got thru to Luis and he advised me that they are not responsible for this account.**

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I want my broken lights fixed.

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Has a court granted you a “Protection From Abuse” order or any other order which provides clear evidence of domestic violence against you 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 or any other 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

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Lawyer's Name \_\_\_\_\_

Street/P.O. Box \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Area Code/Phone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_


**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.**

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**Verification:**

I Yehuda Buckwold, 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).

  
\_\_\_\_\_  
(Signature of Complainant) \_\_\_\_\_ 1/3/2022 \_\_\_\_\_  
(Date)

\_\_\_\_\_  
Property Manager \_\_\_\_\_  
Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

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# PENNSYLVANIA PUBLIC UTILITY COMMISSION

## Formal Complaint

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**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 Yehuda Buckwold Woodlake Management

Street/P.O. Box \_\_\_\_\_ 7801 Langdon st \_\_\_\_\_ Apt # \_\_\_\_\_

City: Philadelphia State: PA Zip: 19111 \_\_\_\_\_

County \_\_\_\_\_

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

(\_\_\_\_) \_\_\_\_\_ (home) 248-662-7506 \_\_\_\_\_ (mobile)

E-mail Address (required): \_\_\_Robert@woodlakemgt.com\_\_\_\_\_

Utility Account Number (from your bill) 20037-00808

**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 \_\_\_\_\_

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\_\_\_\_PECO\_\_\_\_\_

**3. Type of Utility Service**

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> STORM WATER  |
| <input type="checkbox"/> GAS                 | <input type="checkbox"/> WASTEWATER/SEWER                                     |
| <input type="checkbox"/> WATER               | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance)  |
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\_\_\_\_\_  
(Signature of Complainant)

1/3/2022

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
Property Manager \_\_\_\_\_  
Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

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# PENNSYLVANIA PUBLIC UTILITY COMMISSION

## Formal Complaint

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Name Yehuda Buckwold Woodlake Management

Street/P.O. Box \_\_\_\_\_ 7801 Bustleton \_\_\_\_\_ Apt # \_\_\_\_\_

City: Philadelphia State: PA Zip: 19152 \_\_\_\_\_

County \_\_\_\_\_

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

(\_\_\_\_) \_\_\_\_\_ (home) 248-662-7506 \_\_\_\_\_ (mobile)

E-mail Address (required): \_\_\_Robert@woodlakemgt.com\_\_\_\_\_

Utility Account Number (from your bill) 16870-00405 \_\_\_\_\_

**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 \_\_\_\_\_

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- 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.

**I have and have been paying for Private Outdoor Lighting Service for about 15 years. The way the service is set u is that I pay PRCO a monthly fee and they are responsible to make sure my outdoor lighting is working be it the power or the light bulbs. I have been attempting to reach the department that handles this account for about 7 months now I have been calling and leaving messages on the number I was provided (800-265-4189). Today I finally got thru to Luis and he advised me that they are not responsible for this account.**

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.**

I want my broken lights fixed.

**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)/ Domestic Violence**

Has a court granted you a “Protection From Abuse” order or any other order which provides clear evidence of domestic violence against you 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 or any other 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.

They said they are not responsible for it

**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, (all required contact information). 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 \_\_\_\_\_


**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:**

I Yehuda Buckwold, 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).

  
\_\_\_\_\_  
(Signature of Complainant) \_\_\_\_\_ 1/3/2022 \_\_\_\_\_  
(Date)

\_\_\_\_\_  
Property Manager \_\_\_\_\_  
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. How 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>.

**Mail.** Mail the completed form with your original signature and any attachments, by certified mail, priority mail, or overnight delivery to this address and retain the tracking information as proof of submission:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

**If you are appealing a BCS decision:** follow the directions in the cover letter you received from the Secretary's Bureau with the formal complaint form. **ONLY** Formal complaints appealing a BCS decision can be filed by fax, email or overnight delivery to meet filing deadlines. **All other formal complaints MUST be efiled or mailed.**

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.

## **EXHIBIT 2**



Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
Harrisburg, PA 17105-3265  
**EFILING - FILING DETAIL**

Date Created	Filing Number
1/24/2022	2365364

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.

**Docket Number:** C-2022-3030254

**Case Description:** YEHUDA BUCKWOLD - REFILED ANSWER TO COMPLAINT

**Transmission Date:** 1/24/2022 9:47 AM

**Filed On:** 1/24/2022 9:47 AM

**eFiling Confirmation Number:** 2365364

File Name	Document Type	Upload Date
Refiled_Answer.pdf	Answer to Formal Complaint	1/24/2022 9:47:43 AM

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 using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

January 24, 2022

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

**RE: Yehuda Buckwold v. PECO Energy Company**  
**PUC Docket No. C-2022-3030254**

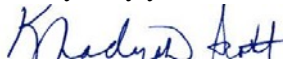
Dear Ms. Chiavetta:

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

The previous filed Answer contained an error in the docket.

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,



Khadijah Scott, Esquire  
Assistant General Counsel, Exelon BSC  
Encl.

Cc: Not Recommended for Call of Docket

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030254</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**ANSWER OF RESPONDENT,**  
**PECO ENERGY COMPANY**

---

On January 4, 2022, PECO Energy Company (“PECO”) was served with a formal complaint filed by YEHUDA BUCKWOLD (hereafter “Complainant”) in the above captioned docket. Pursuant to 52 Pa. Code §5.61, PECO responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.

4. Unless specifically admitted herein, PECO Energy denies all material allegations of fact and conclusions of law in the instant Complaint. In his formal Complaint, the Complainant alleges that he has paid for private outdoor lighting for fifteen (15) years. He has contacted PECO Energy over the past seven (7) months and has left messages on the telephone number that was provided by PECO, in an effort to get his lights repaired. The Complainant avers that he was recently informed by PECO that it not responsible for his account. The Complainant requests that his lights be repaired.

PECO Energy’s records reveal that the Complainant established service in the name of Woodlake Management at 7801 Algon Ave., Philadelphia PA 19111, under account number

ending in 00101. On January 3, 2022, the Complainant contacted PECO Energy regarding his lightbulbs that were blown out and he was informed that PECO was not responsible for its repair. He was informed to contact an electrician or contractor for repairs. Pursuant to PECO Energy's Tariff, Rate POL Private Outdoor Lighting, Terms and Conditions, lighting service shall be supplied from distribution and equipment installed, owned and maintained by the Company. See, PECO's Electric Tariff, Rate POL Private Outdoor Lighting Terms and Conditions.

However, the Complainant was instructed in error, on the Terms and Conditions for Rate SL-E Street Lighting Customer Owned Facilities, in which customers are responsible for maintaining their facilities. On January 6, 2022, after the error was recognized, the Complainant was contacted by a customer service representative and informed that the repairs would be maintained by PECO Energy. Pursuant to PECO's policy, the Complainant was also provided the telephone number to American Lighting and Signalization (ALS), (800) 871-1308. The Complainant's account was documented and his contact information was sent to the Large Customer Services department. The Complainant stated that he was satisfied.

The Complainant's lighting will be expedited for repair.

5. Admitted. See Response to Paragraph 4.
6. Admitted
7. Admitted.
8. Denied. PECO is without knowledge or information sufficient to form a belief as to whether the Complainant has or has not hired an attorney, 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,



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
Complainant	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030254</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
Respondent	:	

---

**VERIFICATION**

I, Khadijah Scott, 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: January 24, 2022



---

Khadijah Scott

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030254</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**CERTIFICATE OF SERVICE**

I, Khadijah Scott, 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 E-mailing a copy to:

YEHUDA BUCKWOLD  
7801 ALGON AVE.  
PHILADELPHIA PA 19111  
*Via Email: robert@woodlakemgt.com*

Dated: January 24, 2022



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389  
Khadijah.Scott@exeloncorp.com



Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
Harrisburg, PA 17105-3265  
**EFILING - FILING DETAIL**

Date Created	Filing Number
1/24/2022	2365358

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.

**Docket Number:** C-2022-3030255

**Case Description:** YEHUDA BUCKWOLD - ANSWER TO FORMAL COMPLAINT

**Transmission Date:** 1/24/2022 9:19 AM

**Filed On:** 1/24/2022 9:19 AM

**eFiling Confirmation Number:** 2365358

File Name	Document Type	Upload Date
Answer.pdf	Answer to Formal Complaint	1/24/2022 9:19:46 AM

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 using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

January 24, 2022

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

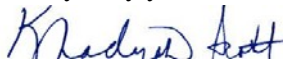
**RE: Yehuda Buckwold v. PECO Energy Company**  
**PUC Docket No. C-2022-3030255**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy's Answer with New Matter 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,



Khadijah Scott, Esquire  
Assistant General Counsel, Exelon BSC  
Encl.

Cc: Not Recommended for Call of Docket

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030255</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**ANSWER OF RESPONDENT,**  
**PECO ENERGY COMPANY**

---

On January 4, 2022, PECO Energy Company (“PECO”) was served with a formal complaint filed by YEHUDA BUCKWOLD (hereafter “Complainant”) in the above captioned docket. Pursuant to 52 Pa. Code §5.61, PECO responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.

4. Unless specifically admitted herein, PECO Energy denies all material allegations of fact and conclusions of law in the instant Complaint. In his formal Complaint, the Complainant alleges that he has paid for private outdoor lighting for fifteen (15) years. He has contacted PECO Energy over the past seven (7) months and has left messages on the telephone number that was provided by PECO, in an effort to get his lights repaired. The Complainant avers that he was recently informed by PECO that it not responsible for his account. The Complainant requests that his lights be repaired.

PECO Energy’s records reveal that the Complainant established service in the name of Woodlake Management at 7701 Bustleton Avenue, Philadelphia PA 19152, under account

number ending in 00505. On January 3, 2022, the Complainant contacted PECO Energy regarding his lightbulbs that were blown out and he was informed that PECO was not responsible for its repair. He was informed to contact an electrician or contractor for repairs. Pursuant to PECO Energy's Tariff, Rate POL Private Outdoor Lighting, Terms and Conditions, lighting service shall be supplied from distribution and equipment installed, owned and maintained by the Company.

See, PECO's Electric Tariff, Rate POL Private Outdoor Lighting Terms and Conditions.

However, the Complainant was instructed in error, on the Terms and Conditions for Rate SL-E Street Lighting Customer Owned Facilities, in which customers are responsible for maintaining their facilities. On January 6, 2022, after the error was recognized, the Complainant was contacted by a customer service representative and informed that the repairs would be maintained by PECO Energy. Pursuant to PECO's policy, the Complainant was also provided the telephone number to American Lighting and Signalization (ALS), (800) 871-1308. The Complainant's account was documented and his contact information was sent to the Large Customer Services department. The Complainant stated that he was satisfied.

The Complainant's lighting will be expedited for repair.

5. Admitted. See Response to Paragraph 4.

6. Admitted

7. Admitted.

8. Denied. PECO is without knowledge or information sufficient to form a belief as to whether the Complainant has or has not hired an attorney, 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,



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030255</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**VERIFICATION**

I, Khadijah Scott, 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: January 24, 2022



---

Khadijah Scott

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030255</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**CERTIFICATE OF SERVICE**

I, Khadijah Scott, 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 E-mailing a copy to:

YEHUDA BUCKWOLD  
7701 BUSTLETON AVENUE  
PHILADELPHIA PA 19152  
*Via Email: robert@woodlakemgt.com*

Dated: January 24, 2022



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389  
Khadijah.Scott@exeloncorp.com



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**  
Harrisburg, PA 17105-3265  
**EFILING - FILING DETAIL**

Date Created	Filing Number
1/24/2022	2365373

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.

**Docket Number:** C-2022-3030256  
**Case Description:** Yehuda Buckwold - Answer to Formal Complaint  
**Transmission Date:** 1/24/2022 10:14 AM  
**Filed On:** 1/24/2022 10:14 AM  
**eFiling Confirmation Number:** 2365373

File Name	Document Type	Upload Date
Answer.pdf	Answer to Formal Complaint	1/24/2022 10:14:30 AM

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 using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

January 24, 2022

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

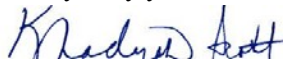
**RE: Yehuda Buckwold v. PECO Energy Company**  
**PUC Docket No. C-2022-3030256**

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,



Khadijah Scott, Esquire  
Assistant General Counsel, Exelon BSC  
Encl.

Cc: Not Recommended for Call of Docket

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030256</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**ANSWER OF RESPONDENT,**  
**PECO ENERGY COMPANY**

---

On January 4, 2022, PECO Energy Company (“PECO”) was served with a formal complaint filed by YEHUDA BUCKWOLD (hereafter “Complainant”) in the above captioned docket. Pursuant to 52 Pa. Code §5.61, PECO responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.

4. Unless specifically admitted herein, PECO Energy denies all material allegations of fact and conclusions of law in the instant Complaint. In his formal Complaint, the Complainant alleges that he has paid for private outdoor lighting for fifteen (15) years. He has contacted PECO Energy over the past seven (7) months and has left messages on the telephone number that was provided by PECO, in an effort to get his lights repaired. The Complainant avers that he was recently informed by PECO that it not responsible for his account. The Complainant requests that his lights be repaired.

PECO Energy’s records reveal that the Complainant established service in the name of Woodlake Management at 2121 Glendale Ave., Philadelphia PA 19152, under account number

ending in 00708. On January 3, 2022, the Complainant contacted PECO Energy regarding his lightbulbs that were blown out and he was informed that PECO was not responsible for its repair. He was informed to contact an electrician or contractor for repairs. Pursuant to PECO Energy's Tariff, Rate POL Private Outdoor Lighting, Terms and Conditions, lighting service shall be supplied from distribution and equipment installed, owned and maintained by the Company. See, PECO's Electric Tariff, Rate POL Private Outdoor Lighting Terms and Conditions.

However, the Complainant was instructed in error, on the Terms and Conditions for Rate SL-E Street Lighting Customer Owned Facilities, in which customers are responsible for maintaining their facilities. On January 6, 2022, after the error was recognized, the Complainant was contacted by a customer service representative and informed that the repairs would be maintained by PECO Energy. Pursuant to PECO's policy, the Complainant was also provided the telephone number to American Lighting and Signalization (ALS), (800) 871-1308. The Complainant's account was documented and his contact information was sent to the Large Customer Services department. The Complainant stated that he was satisfied.

The Complainant's lighting will be expedited for repair.

5. Admitted. See Response to Paragraph 4.
6. Admitted
7. Admitted.
8. Denied. PECO is without knowledge or information sufficient to form a belief as to whether the Complainant has or has not hired an attorney, 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,



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030256</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**VERIFICATION**

I, Khadijah Scott, 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: January 24, 2022



---

Khadijah Scott

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030256</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**CERTIFICATE OF SERVICE**

I, Khadijah Scott, 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 E-mailing a copy to:

YEHUDA BUCKWOLD  
2121 GLENDALE AVE  
PHILADELPHIA PA 19152  
*Via Email: robert@woodlakemgt.com*

Dated: January 24, 2022



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389  
Khadijah.Scott@exeloncorp.com



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**  
Harrisburg, PA 17105-3265  
**EFILING - FILING DETAIL**

Date Created	Filing Number
1/24/2022	2365379

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.

**Docket Number:** C-2022-3030257

**Case Description:** YEHUDA BUCKWOLD - ANSWER TO FORMAL COMPLAINT

**Transmission Date:** 1/24/2022 10:29 AM

**Filed On:** 1/24/2022 10:29 AM

**eFiling Confirmation Number:** 2365379

File Name	Document Type	Upload Date
Answer.pdf	Answer to Formal Complaint	1/24/2022 10:29:21 AM

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 using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

January 24, 2022

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

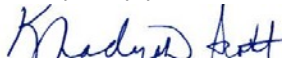
**RE: Yehuda Buckwold v. PECO Energy Company**  
**PUC Docket No. C-2022-3030257**

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,



Khadijah Scott, Esquire  
Assistant General Counsel, Exelon BSC  
Encl.

Cc: Not Recommended for Call of Docket

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030257</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**ANSWER OF RESPONDENT,**  
**PECO ENERGY COMPANY**

---

On January 4, 2022, PECO Energy Company (“PECO”) was served with a formal complaint filed by YEHUDA BUCKWOLD (hereafter “Complainant”) in the above captioned docket. Pursuant to 52 Pa. Code §5.61, PECO responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.

4. Unless specifically admitted herein, PECO Energy denies all material allegations of fact and conclusions of law in the instant Complaint. In his formal Complaint, the Complainant alleges that he has paid for private outdoor lighting for fifteen (15) years. He has contacted PECO Energy over the past seven (7) months and has left messages on the telephone number that was provided by PECO, in an effort to get his lights repaired. The Complainant avers that he was recently informed by PECO that it not responsible for his account. The Complainant requests that his lights be repaired.

PECO Energy’s records reveal that the Complainant established service in the name of Woodlake Management at 2100 Glendale Ave., Philadelphia PA 19152, under account number

ending in 00903. On January 3, 2022, the Complainant contacted PECO Energy regarding his lightbulbs that were blown out and he was informed that PECO was not responsible for its repair. He was informed to contact an electrician or contractor for repairs. Pursuant to PECO Energy's Tariff, Rate POL Private Outdoor Lighting, Terms and Conditions, lighting service shall be supplied from distribution and equipment installed, owned and maintained by the Company. See, PECO's Electric Tariff, Rate POL Private Outdoor Lighting Terms and Conditions.

However, the Complainant was instructed in error, on the Terms and Conditions for Rate SL-E Street Lighting Customer Owned Facilities, in which customers are responsible for maintaining their facilities. On January 6, 2022, after the error was recognized, the Complainant was contacted by a customer service representative and informed that the repairs would be maintained by PECO Energy. Pursuant to PECO's policy, the Complainant was also provided the telephone number to American Lighting and Signalization (ALS), (800) 871-1308. The Complainant's account was documented and his contact information was sent to the Large Customer Services department. The Complainant stated that he was satisfied.

The Complainant's lighting will be expedited for repair.

5. Admitted. See Response to Paragraph 4.
6. Admitted
7. Admitted.
8. Denied. PECO is without knowledge or information sufficient to form a belief as to whether the Complainant has or has not hired an attorney, 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,



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
v.	:	<b>DOCKET NO. C-2022-3030257</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**VERIFICATION**

I, Khadijah Scott, 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: January 24, 2022



---

Khadijah Scott

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030257</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**CERTIFICATE OF SERVICE**

I, Khadijah Scott, 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 E-mailing a copy to:

YEHUDA BUCKWOLD  
2100 GLENDALE AVE  
PHILADELPHIA PA 19152  
*Via Email: robert@woodlakemgt.com*

Dated: January 24, 2022



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389  
Khadijah.Scott@exeloncorp.com



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**  
Harrisburg, PA 17105-3265  
**EFILING - FILING DETAIL**

Date Created	Filing Number
1/24/2022	2365355

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.

**Docket Number:** C-2022-3030258  
**Case Description:** Yehuda Buckwold - Answer to Formal Complaint  
**Transmission Date:** 1/24/2022 9:04 AM  
**Filed On:** 1/24/2022 9:04 AM  
**eFiling Confirmation Number:** 2365355

File Name	Document Type	Upload Date
Answer - Yehuda Buckwold.pdf	Answer to Formal Complaint	1/24/2022 9:04:07 AM

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 using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

January 24, 2022

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

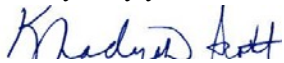
**RE: Yehuda Buckwold v. PECO Energy Company**  
**PUC Docket No. C-2022-3030258**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy's Answer with New Matter 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,



Khadijah Scott, Esquire  
Assistant General Counsel, Exelon BSC  
Encl.

Cc: Not Recommended for Call of Docket

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030258</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**ANSWER OF RESPONDENT,**  
**PECO ENERGY COMPANY**

---

On January 4, 2022, PECO Energy Company (“PECO”) was served with a formal complaint filed by YEHUDA BUCKWOLD (hereafter “Complainant”) in the above captioned docket. Pursuant to 52 Pa. Code §5.61, PECO responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.

4. Unless specifically admitted herein, PECO Energy denies all material allegations of fact and conclusions of law in the instant Complaint. In his formal Complaint, the Complainant alleges that he has paid for private outdoor lighting for fifteen (15) years. He has contacted PECO Energy over the past seven (7) months and has left messages on the telephone number that was provided by PECO, in an effort to get his lights repaired. The Complainant avers that he was recently informed by PECO that it not responsible for his account. The Complainant requests that his lights be repaired.

PECO Energy’s records reveal that the Complainant established service in the name of Woodlake Management at 7801 Langdon Ave Philadelphia PA 19111, under account number

ending in 00808. On January 3, 2022, the Complainant contacted PECO Energy regarding his lightbulbs that were blown out and he was informed that PECO was not responsible for its repair. He was informed to contact an electrician or contractor for repairs. Pursuant to PECO Energy's Tariff, Rate POL Private Outdoor Lighting, Terms and Conditions, lighting service shall be supplied from distribution and equipment installed, owned and maintained by the Company. See, PECO's Electric Tariff, Rate POL Private Outdoor Lighting Terms and Conditions.

However, the Complainant was instructed in error, on the Terms and Conditions for Rate SL-E Street Lighting Customer Owned Facilities, in which customers are responsible for maintaining their facilities. On January 6, 2022, after the error was recognized, the Complainant was contacted by a customer service representative and informed that the repairs would be maintained by PECO Energy. Pursuant to PECO's policy, the Complainant was also provided the telephone number to American Lighting and Signalization (ALS), (800) 871-1308. The Complainant's account was documented and his contact information was sent to the Large Customer Services department. The Complainant stated that he was satisfied.

The Complainant's lighting will be expedited for repair.

5. Admitted. See Response to Paragraph 4.
6. Admitted
7. Admitted.
8. Denied. PECO is without knowledge or information sufficient to form a belief as to whether the Complainant has or has not hired an attorney, 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,



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030258</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**VERIFICATION**

I, Khadijah Scott, 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: January 24, 2022



---

Khadijah Scott

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030258</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**CERTIFICATE OF SERVICE**

I, Khadijah Scott, 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 E-mailing a copy to:

YEHUDA BUCKWOLD  
7801 LANGDON AVE.  
PHILADELPHIA PA 19111  
*Via Email: robert@woodlakemgt.com*

Dated: January 24, 2022



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389  
Khadijah.Scott@exeloncorp.com



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**  
Harrisburg, PA 17105-3265  
**EFILING - FILING DETAIL**

Date Created	Filing Number
1/24/2022	2365370

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.

**Docket Number:** C-2022-3030259

**Case Description:** YEHUDA BUCKWOLD - ANSWER TO FORMAL COMPLAINT

**Transmission Date:** 1/24/2022 9:58 AM

**Filed On:** 1/24/2022 9:58 AM

**eFiling Confirmation Number:** 2365370

File Name	Document Type	Upload Date
Answer.pdf	Answer to Formal Complaint	1/24/2022 9:57:50 AM

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.

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Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

January 24, 2022

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

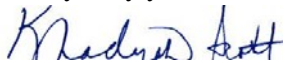
**RE: Yehuda Buckwold v. PECO Energy Company**  
**PUC Docket No. C-2022-3030259**

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,



Khadijah Scott, Esquire  
Assistant General Counsel, Exelon BSC  
Encl.

Cc: Not Recommended for Call of Docket

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030259</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**ANSWER OF RESPONDENT,**  
**PECO ENERGY COMPANY**

---

On January 4, 2022, PECO Energy Company (“PECO”) was served with a formal complaint filed by YEHUDA BUCKWOLD (hereafter “Complainant”) in the above captioned docket. Pursuant to 52 Pa. Code §5.61, PECO responds to the Complaint and states:

1. Admitted.
2. Admitted.
3. Admitted.

4. Unless specifically admitted herein, PECO Energy denies all material allegations of fact and conclusions of law in the instant Complaint. In his formal Complaint, the Complainant alleges that he has paid for private outdoor lighting for fifteen (15) years. He has contacted PECO Energy over the past seven (7) months and has left messages on the telephone number that was provided by PECO, in an effort to get his lights repaired. The Complainant avers that he was recently informed by PECO that it not responsible for his account. The Complainant requests that his lights be repaired.

PECO Energy’s records reveal that the Complainant established service in the name of Woodlake Management at 7801 Bustleton Avenue, Philadelphia PA 19152, under account

number ending in 00405. On January 3, 2022, the Complainant contacted PECO Energy regarding his lightbulbs that were blown out and he was informed that PECO was not responsible for its repair. He was informed to contact an electrician or contractor for repairs. Pursuant to PECO Energy's Tariff, Rate POL Private Outdoor Lighting, Terms and Conditions, lighting service shall be supplied from distribution and equipment installed, owned and maintained by the Company.

See, PECO's Electric Tariff, Rate POL Private Outdoor Lighting Terms and Conditions.

However, the Complainant was instructed in error, on the Terms and Conditions for Rate SL-E Street Lighting Customer Owned Facilities, in which customers are responsible for maintaining their facilities. On January 6, 2022, after the error was recognized, the Complainant was contacted by a customer service representative and informed that the repairs would be maintained by PECO Energy. Pursuant to PECO's policy, the Complainant was also provided the telephone number to American Lighting and Signalization (ALS), (800) 871-1308. The Complainant's account was documented and his contact information was sent to the Large Customer Services department. The Complainant stated that he was satisfied.

The Complainant's lighting will be expedited for repair.

5. Admitted. See Response to Paragraph 4.

6. Admitted

7. Admitted.

8. Denied. PECO is without knowledge or information sufficient to form a belief as to whether the Complainant has or has not hired an attorney, 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,



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030259</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**VERIFICATION**

I, Khadijah Scott, 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: January 24, 2022



---

Khadijah Scott

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>YEHUDA BUCKWOLD</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2022-3030259</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**CERTIFICATE OF SERVICE**

I, Khadijah Scott, 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 E-mailing a copy to:

YEHUDA BUCKWOLD  
7801 BUSTLETON AVENUE  
PHILADELPHIA PA 19152  
*Via Email: robert@woodlakemgt.com*

Dated: January 24, 2022



---

Khadijah Scott  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
(215) 841-6841  
Fax: 215.568.3389  
Khadijah.Scott@exeloncorp.com