

February 17, 2022

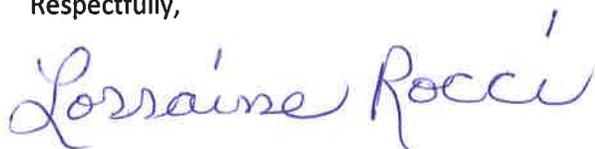
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: Lorraine Rocci v. PECO Energy Company
PUC Docket No. C-2021-3030224

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is Lorraine's Answer with New Matter to Formal Complaint. I am enclosing a copy of this document to the attorney, Khadijah Scott, Esq. Please consider this document my Answer to New Matter. Thank you for your time.

Respectfully,



Lorraine Rocci
1112 Foxmeadow Dr
Royersford, PA 19468
610-948-0613

Lorraine Rocci, Complainant v. PECO Energy Company, Respondent

Docket No. C-2021-3030224

Answer of Complainant, Lorraine Rocci

On September 7, 2021 (not 2020 as stated in the answer of Respondent), I filed a claim with PECO regarding the destruction of my refrigerator. It was not just damaged (I tried to have it repaired), it completely blew out as a direct result of a blown transformer. I was told by a neighbor that the same thing happened to her two years ago and PECO replaced her refrigerator. After this, I also saw neighbors that brought their story of power surges to Channel 10 News and were awarded damages. I therefore filed and faxed my claim. Even after repeated calls and emails from PECO, they refused to respond back to me. Only after contacting my state representative and state senator did I finally receive a response. That response was immediate denial before they even looked at the date of my loss. After contacting PECO, they said they would "look into it." I again did not receive a response and ended up calling Jeffrey Savage back, and it was denied again and he hung up on me.

On September 20, 2021 (again, not 2020 as stated in the letter), Jeffrey Savage tried to blame the loss of power on the storm, which happened days before. I would like to stress the outage and subsequent total loss of my refrigerator occurred on September 4, 2021. It was a hot and sunny Saturday with absolutely no wind at all. I was actually at the pool when the first transformer blew and the outage occurred, as we heard the sirens. There was no storm on September 4th. The outage did not occur as a result of inclement weather. He blamed the storm (which happened on September 1st) in causing the transformer to blow. He mentions in his letter (Exhibit 1) that Montgomery County suffered

downed trees, high winds, and tornadoes due to the storm, which happened before September 4th. While this may be true of parts of Montgomery County (Upper Dublin, for instance, which is nowhere near Royersford where I live) Limerick and Royersford did not experience a tornado or any of the damages he claimed (downed trees, etc.). We did not even experience a loss of electricity during this time. Furthermore, in completing my taxes, it was noted that we did not live in a disaster declared area.

This area is growing at a rapid speed with huge houses and other development being built rapidly. PECO is aware of this growth and aware that there is too much pressure on these old transformers and they cannot handle the power of all this construction. So while PECO claims that my loss was not caused by them, and that this was not within their control, they are incorrect. As they stated to me, they do not maintain their transformers (only when they break). This is evident in the fact that there were at least 4 transformers that blew in August (before the storm) and throughout the whole month of September, causing widespread losses.

PECO also states that there are no unreasonable service reliability issues at my premises. I do experience periodic outages that have not caused any lasting damage. In fact, the most recent outage that I experienced (along with my neighbors) was on Sunday, February 13, 2022 at 1:50 am.

If PECO was indeed aware of the damages caused by the storm, they took no action to check their equipment after the storm.

I know that as a result of these 4 transformers blowing, there were many neighbors that lost a lot of personal property. It is interesting to note that PECO has told everyone the same story—the damage was caused by a tree limb falling on a transformer. Everyone lived in a different area but the

false claim was the same for everyone. There is absolutely no evidence of this claim, and the results of the investigation (if any) were never released. These happened all different times of the month, but yet they still claim a tree limb was the cause. I have heard of many other stories from unsatisfied consumers that would like to file a complaint with the PUC pertaining to this false claim and there has been discussion of a class action lawsuit. I have evidence of all the damages that people have suffered from August to September that I will provide, should I have the opportunity of having my case heard.

PECO also states that they neither admit nor deny the allegations in paragraph 8 by this complainant, and is without knowledge or information sufficient to form a belief as to the truth and therefore, deny the allegation. However, I have sufficient and significant information as to the truth and would like an opportunity to bring forth the truth. I have facts pertaining to all the damages that residents have suffered as a result of these substandard transformers. If PECO does not have knowledge of information to this truth, my claim should not be automatically denied. My statements are not allegations (as they have stated) but factual truths. I will provide my evidence before the Administrative Law Judge. Thank you for your consideration on this matter.

Answer to the New Matter of Respondent, PECO Energy Company by

Complainant, Lorraine Rocci

1. My claim that has been stated numerous times before is that I suffered a total loss of my refrigerator that had absolutely nothing to do with any storm, as this happened on a hot and sunny Saturday, and entirely to do with PECO not maintaining their transformers causing the outages and complete loss of my refrigerator. Was it not for their negligence, I would not be filing my claim. I therefore have stated my claim upon which relief may be granted.
2. I agree—I am seeking damages caused not by an alleged blown transformer, but by a confirmed blown transformer.
3. My first step was to file my complaint with the PUC. While they might not be able to decide whether PECO should pay customers for loss or damages, they can decide whether PECO negligently failed to maintain their transformers, as evidenced by the fact that there were at least 4 transformers that blew from August (before the storm) and throughout the whole month of September. If relief is not granted, my full intention and next step is to file in civil court. My neighbors and I have even discussed the possibility of filing a class action lawsuit.
4. I am requesting the replacement of my refrigerator. I only request that I be made whole due to PECO's negligence in maintaining their transformers. The PUC does have the power to demand that PECO maintain their equipment and transformers, something that PECO has failed to do. I, as a long time PECO customer, am guaranteed a reliable and safe level of service. What I received from PECO not maintaining their transformers was poor and unsafe service, and this has created a liability issue. PECO states that the PUC does not have the power or jurisdiction to award monetary damages for the actions of a utility company. However, I asked and was told by Jeffrey Savage that the transformers are not checked regularly or maintained. I was told that

they fix them only when they break. But for these actions from PECO, I would not have suffered this hardship. Therefore, the PUC should hold PECO accountable for their negligent actions.

5. I fully disagree that my request be denied. PECO is responsible because they did not maintain and update their transformers. My claim and concerns are valid and should be heard and addressed. I am also requesting that PECO take responsibility for their transformers and maintain or replace them as is sufficient to reliable service. My loss and my safety concerns should not be denied.

Wherefore, I respectfully request that your Honorable Commission hear in full my formal complaint.

Respectfully,



Lorraine Rocci
1112 Foxmeadow Drive
Royersford, PA 19468

Answer to Exhibit 1

I am responding to the letter dated September 20, 2021 from Jeffrey Savage and PECO. My service was not interrupted at all as a result of Tropical Storm Ida, which occurred on Wednesday, September 1, 2021. While some of Pennsylvania and some areas in Bucks, Chester, and Montgomery Counties were affected by the storm, Limerick and Royersford did not experience the downed trees, heavy flooding, or a tornado that Jeffrey Savage refers to in his letter. In fact, we did not even experience a loss of electricity on that date. We were not in any way impacted by this storm on September 1st.

What occurred on September 4th was not beyond their control as they did not maintain their equipment and transformers and have done no upgrades to their transformers as a response to the rapid growth in this area. This is a safety issue and fails the standard of quality that we as PECO customers are entitled to. Since this was not beyond their control, the tariff should not apply.

Answer to Exhibit 2

This BCS Decision Report and Resolution Description was an informal complaint (the first step). PECO denied responsibility and therefore, the informal complaint was closed based solely on PECO's response without further action taken. As stated in the PUC's letter dated November 15, 2021, at the informal level, the Bureau of Consumer Services had limited authority to resolve my issue and that is the only reason why my case was closed. However, I do have the right to file a formal complaint which would be brought before an Administrative Law Judge, which would give me the opportunity to present my case and be heard on the facts of this matter. Therefore, the closing of my informal complaint should have no bearing on my formal complaint.