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May 19, 2022

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

**RE: Ellen and Rami Sadiky v. PECO Energy Company**  
**PUC Docket No. F-2022-3032215**  
**PUC Docket No. F-2022-3032253**

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,

A handwritten signature in blue ink that reads "Khadijah Scott".

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



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>ELLEN SADIKY</b>	:	
<b>RAMI SADIKY</b>	:	
<b>Complainants</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3032215</b>
	:	<b>DOCKET NO. F-2022-3032253</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</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 Ellen and Rami Sadiky v. PECO Energy in the above referenced dockets because the two (2) Complaints contain the same allegations and concern the same questions of fact and law. In support of this request, PECO avers:

1. On April 28, 2022 and April 29, 2022, PECO Energy was served with two Complaints filed by Complainants, Ellen and Rami Sadiky, with the Pennsylvania Public Utility Commission (“PUC”) at Docket Numbers F-2022-3032215 and F-2022-3032253. A copy of the respective Complaints are attached hereto as Exhibit “1”.
2. In the Complainants’ formal complaints, they dispute the amount of their tenants’ balances that were transferred to their account after foreign wiring was identified.
3. The two (2) complaints are identical.
4. Pursuant to 52 Pa. Code §5.101(b), on May 19, 2022, PECO filed an Answer to the Complainant’s two (2) Complaints. A copy of the Answers are attached hereto 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. Both Complaints cover the same issue and actions and contain common questions of law and fact such that one hearing covering the two (2) Complaints will avoid unnecessary costs or delay to the Commission. Each Complaint relates to the same issues and facts, whether the tenants' transferred balances should be modified because they did not acquire their high bills as a result of the foreign wiring.

8. Accordingly, the two (2) 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 two (2) 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 F-2022-3032215 and F-2022-3032253. The Complaints and 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

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**Complainants**

v.

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**DOCKET NO. F-2022-3032215**

**DOCKET NO. F-2022-3032253**

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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: May 19, 2022

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Khadijah Scott

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**DOCKET NO. F-2022-3032215**

**DOCKET NO. F-2022-3032253**

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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:

ELLEN SADIKY  
RAMI SADIKY  
221 EMERALD DRIVE  
YARDLEY, PA 19067  
*Via email: momguinems@gmail.com*

Dated: May 19, 2022



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