



Direct Dial: 215.841.6841
khadijah.scott@exeloncorp.com

June 22, 2022

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

RE: Angela Owens v. PECO Energy Company
PUC Docket No. C-2022-3032158

Dear Ms. Chiavetta:

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

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.

Cc: Not Recommended for Call of Docket

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA OWENS	:	
Complainant	:	
v.	:	DOCKET NO. C-2022-3032158
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

NOTICE TO PLEAD

Pursuant to 52 Pa. Code §5.61, you are hereby notified that, if you wish to file a reply to PECO Energy Company's Motion to Stay Proceeding, as set forth below, you must file and serve that reply within 20 days (unless the presiding officer sets a different time for reply). If you do not file a reply, the Motion to Stay may be granted without further action by or notice to you. If you choose to file a reply, you must serve it on counsel for PECO Energy Company and file a copy with the Commission and the Administrative Law Judge.

File with:
Rosemarie 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

Dated: June 27, 2022



Khadijah Scott
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19103
215-841-6841
Fax: 215.568.3389
Khadijah.scott@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA OWENS	:	
Complainant	:	
v.	:	DOCKET NO. C-2022-3032158
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

PECO ENERGY COMPANY’S MOTION TO STAY THE PROCEEDINGS

Now come the Respondent, PECO Energy Company (“Respondent” or “PECO Energy”), by its attorney, Khadijah Scott, and moves the Administrative Law Judge (“ALJ”) and the Pennsylvania Public Utility Commission (“Commission”) to stay these proceedings pursuant to 52 Pa. Code §5.103, and in support thereof states:

1. On April 27, 2022, PECO Energy was served with a Formal Complaint filed by Angela Owens, hereafter (“Complainant”).
2. In the Complaint, the Complainant alleges that PECO Energy is threatening to shut off the utility services and is requesting a payment agreement.
3. In her request for relief, the Complainant also requests to be placed on PECO’s Customer Assistance Program (“CAP”), to have her bankruptcy deposit broken into smaller segments and to be told about her bankruptcy rights.
4. On May 25, 2022, PECO Energy filed an Answer to the Complainant’s Complaint, stating that the Complainant filed for Chapter 13 Bankruptcy in the Eastern District of Pennsylvania under docket number 21-13220- elf on December 6, 2021. As a result, the Complainant’s account is not eligible for a payment agreement and the deposit cannot be

broken down into smaller allotments. *See*, PECO Energy Answer Attached hereto as Exhibit “1”.

5. The Complainant has an active Chapter 13 Bankruptcy petition pending.

6. Accordingly, the Commission does not have jurisdiction over the Complainant’s request for a payment agreement.

7. Federal bankruptcy law provides that the filing of a bankruptcy petition . . . operates as a stay, applicable to all entities, of . . . the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title. 11 U.S.C. §362(a)(1).

8. The U.S. Bankruptcy courts have jurisdiction over the Complainant’s assets. All claims against a debtor, including claims arising subsequent to the filing of a petition, are to be adjusted and paid in accordance with the plan required by Chapter 13. Thus, the Complainant filing a petition for personal bankruptcy has pre-empted the Commission from establishing any payment schedule with respect to amounts owed by the Complainant to PECO Energy. *See, Michelle Chavous v. PECO Energy Company*, Docket No. F 2010-2215689 (Final Order entered Dec. 20, 2011).

9. The Commission has already ordered that proceedings such as the instant proceeding shall be stayed pursuant to federal law.

WHEREFORE, for the reasons set forth above, PECO Energy Company respectfully requests that your Honorable Commission stay this matter.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Khadijah Scott". The signature is written in a cursive style.

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA OWENS	:	
Complainant	:	
v.	:	DOCKET NO. C-2022-3032158
	:	
PECO ENERGY COMPANY	:	
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: June 27, 2022



Khadijah Scott

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA OWENS	:	
Complainant	:	
v.	:	DOCKET NO. C-2022-3032158
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

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

ANGELA OWENS
1012 ELSINORE PL
CHESTER PA 19013
Via Email: owens187@gmail.com

Dated: June 27, 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

EXHIBIT 1



Direct Dial: 215.841.6841
khadijah.scott@exeloncorp.com

May 17, 2022

VIA E-MAIL (owens187@gmail.com)

Angela Owens
1012 Elsinore Pl
Chester PA 19013

**RE: Angela Owens v. PECO Energy Company
PUC Docket No. C-2022-3032158**

Dear Ms. Owens:

Enclosed is a copy of PECO Energy Company's response to the formal complaint filed in the above-referenced docket. The law requires PECO Energy to file an answer to your Public Utility Commission complaint. Keep these papers for your records. This is not a decision on your complaint. PECO's response may include a New Matter, Motion or Preliminary Objection. Please note that if you do not respond to a New Matter, Motion, or Preliminary Objection an unfavorable decision may be rendered against you. Responses to New Matters and Motions must be filed within 20 days. Responses to Preliminary Objections must be filed within 10 days. If there is no New Matter, Motion or Preliminary Objection included, no response is required.

Soon, the Public Utility Commission will schedule either a settlement conference or a hearing on your complaint. The Commission will let you know by mail whether there will be a conference or a hearing and will include instructions on what to do next. If the matter is set for hearing, the notice will provide you with information about the date, time and place of the hearing. If we are unable to resolve your complaint and have to proceed with a hearing, a judge will be at the hearing and will decide your complaint. You must call the Public Utility Commission if you have any questions about the hearing or if you cannot attend the hearing.

Thank you for your time and attention on this matter.

Very truly yours,

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

#: 5168577



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

Date Created	Filing Number
5/17/2022	2386073

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-2022-3032158
Case Description: Answer to Formal Complaint
Transmission Date: 5/17/2022 2:46 PM
Filed On: 5/17/2022 2:46 PM
eFiling Confirmation Number: 2386073

File Name	Document Type	Upload Date
Answer to Formal Complaint - Angela Owens.pdf	Answer to Formal Complaint	5/17/2022 2:46:07 PM

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

May 17, 2022

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

RE: Angela Owens v. PECO Energy Company
PUC Docket No. C-2022-3032158

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company'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**

ANGELA OWENS	:	
Complainant	:	
v.	:	DOCKET NO. C-2022-3032158
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

NOTICE TO PLEAD

Pursuant to 52 Pa. Code §§5.101 and 5.62(c), you are hereby notified that, if you do not file a written response denying or correcting the enclosed NEW MATTER of PECO Energy Company within 20 days from service of this notice, a decision may be rendered against you. All pleadings, such as a Reply to NEW MATTER, 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:
Rosemarie 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

Dated: May 17, 2022



Khadijah Scott
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19103
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA OWENS	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2022-3032158
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

ANSWER WITH NEW MATTER OF RESPONDENT,
PECO ENERGY COMPANY

On April 27, 2022, PECO Energy Company (“PECO Energy”) was served with a formal complaint filed by ANGELA OWENS (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 the formal complaint, the Complainant states that PECO Energy is threatening to shut off the utility services and is requesting a payment agreement. She also requests to be placed on PECO’s Customer Assistance Program (“CAP”), to have her bankruptcy deposit broken into smaller segments and to be told about her bankruptcy rights.

PECO Energy's records reveal that the Complainant established electrical service with PECO Energy at 1012 Elsinore Pl., Chester, PA 19013, in August 2018, under account number 71236-23108. See Account Activity Statement, attached hereto as Exhibit "1".

The Complainant is currently in an active Chapter 13 bankruptcy. See, Bankruptcy docket number 21-13220-elf, attached hereto as Exhibit "2". As a result, the Complainant's account is not eligible for a payment agreement and the deposit cannot be broken down into smaller allotments. On February 22, 2022, the Complainant filed an Informal Complaint with the Bureau of Consumer Services ("BCS"), under case number 003821280. On March 25, 2022, the BCS rendered a decision with a verbal close advising the Complainant that she was not eligible for a payment agreement while in bankruptcy and that PECO Energy was authorized to charge a deposit. See, BCS Decision, attached hereto as Exhibit "3".

Notwithstanding the bankruptcy, the Complainant's current balance due is \$0.00, therefore, there is not a balance in which to place in a payment agreement. The Complainant can submit a CAP application to determine eligibility. PECO Energy is unable to provide legal advice regarding the Complainant's bankruptcy rights. The bills and balance are correct.

5. This paragraph is a request for relief to which no answer is required. To the extent this paragraph contains factual allegations, they are denied for the reasons set forth above. See, Response to Paragraph 4.

6. Admitted.

7. Denied as stated. This Complaint is a result of an appeal from the Bureau of Consumer Services.

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.

NEW MATTER OF RESPONDENT, PECO ENERGY COMPANY

PECO Energy Company ("PECO Energy"), pursuant to 52 Pa. Code §5.62(b), further responds to the Complaint and states:

1. On December 6, 2021, the Complainant filed for Chapter 13 Bankruptcy in the Eastern District of Pennsylvania under docket number 21-13220- elf. See, Exhibit “2.”
2. The Complainant has an active Chapter 13 Bankruptcy petition pending. Id.
3. Accordingly, the Commission does not have jurisdiction over the Complainant’s request for a payment agreement.
4. Federal bankruptcy law provides that the filing of a bankruptcy petition . . . operates as a stay, applicable to all entities, of . . . the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title. 11 U.S.C. §362(a)(1).

5. The U.S. Bankruptcy courts have jurisdiction over the Complainant's assets. All claims against a debtor, including claims arising subsequent to the filing of a petition, are to be adjusted and paid in accordance with the plan required by Chapter 13. Thus, the Complainant filing a petition for personal bankruptcy has pre-empted the Commission from establishing any payment schedule with respect to amounts owed by the Complainant to PECO Energy. See, *Michelle Chavous v. PECO Energy Company*, Docket No. F 2010-2215689 (Final Order entered Dec. 20, 2011).

6. The Complainant's payment agreement request should be dismissed for lack of subject matter jurisdiction.

7. The Complainant must seek relief from the bankruptcy courts.

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
khadijah.scott@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA OWENS	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2022-3032158
	:	
PECO ENERGY COMPANY	:	
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: May 17, 2022

Khadijah Scott

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANGELA OWENS	:	
Complainant	:	
v.	:	DOCKET NO. C-2022-3032158
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Khadijah Scott, hereby certify that I have this day served a copy of PECO Energy Company's Answer with New Matter in the above matter upon all interested parties by *E-mailing* a copy to:

ANGELA OWENS
1012 ELSINORE PL
CHESTER PA 19013
Via Email: owens187@gmail.com

Dated: May 17, 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

EXHIBIT 1

Account Number: 7123623108
Account Name: ANGELA OWENS
Account Status: ACTIVE
Meter Bill Group: 15

Service Address:
 1012 ELSINORE PL
 CHESTER, PA 19013

Mail To:
 ANGELA OWENS
 1012 ELSINORE PL
 CHESTER, PA 19013

Current Bill: \$205.65
Billed Prior: \$1,590.59
Balance Due: \$0.00

Rates:
 ELECTRIC RESIDENTIAL HEATING SERVICE

Credit Amount: \$0.00
Deposit Requested: \$0.00
Deposit On-Hand: \$655.00
CAP Pre-program Arrears: \$0.00
Payment Agreement Balance: \$0.00

Account Balance: \$0

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
Transaction Dt	Product Type	Credit Source	Billing Period	Read	Reading Type	Meter Equip Cd	KWH	KW	CCF	Transaction Amount	Balance Forward	Current Charges	Amt Due	Bill Due Dt	Total Balance	Heating Degree Days	Budget Bill Deferred Amt
13	INPA: IN PROGRAM																
14	ARREARAGE									\$1.34							
15	ELECTRIC SERVICE		04/17/2020-05/18/2020	97297	ACTUAL	119495769	2029	0		\$275.84	\$1,305.04	\$277.18	\$1,582.22	06/09/2020	\$1,582.22	322	\$0.00
16	ARREARAGE									\$1.34							
17	ELECTRIC SERVICE	PAYMENT AGREEMENT	05/18/2020-06/17/2020	98973	ACTUAL	119495769	1676	0		\$227.78	\$1,582.22	\$229.12	\$1,811.34	07/09/2020	\$1,811.34		\$0.00
18	ARREARAGE									-\$1,804.64							
19	ARREARAGE	PAYMENT								-\$811.34							
20	ARREARAGE	TRANSFER								-\$804.64							
21	ARREARAGE	INPA FORGIVEN - COMPANY								-\$6.70							
22	ARREARAGE	INPA FORGIVEN - RATE CASE								-\$6.70							
23	ARREARAGE									\$1.34							
24	SPECIAL PAYMENT AGREEMENT									\$75.19							
25	ELECTRIC SERVICE		06/17/2020-07/17/2020	101025	ACTUAL	119495769	2052	0		\$276.32	\$0.00	\$352.85	\$352.85	08/10/2020	\$352.85		\$0.00
26	ARREARAGE	PAYMENT								-\$352.85							
27	ARREARAGE	INPA FORGIVEN - RATE CASE								-\$1.34							
28	ARREARAGE	INPA FORGIVEN - COMPANY								-\$1.34							
29	ARREARAGE									\$1.34							
30	SPECIAL PAYMENT AGREEMENT									\$75.19							
31	ARREARAGE									\$1.34							
32	ARREARAGE	SPECIAL PAYMENT AGREEMENT								\$75.19							
33	ELECTRIC SERVICE		08/17/2020-09/16/2020	105711	ACTUAL	119495769	2145	0		\$287.54	\$416.32	\$364.07	\$780.39	10/09/2020	\$780.39		\$0.00
34	ARREARAGE									\$1.34							
35	ARREARAGE	SPECIAL PAYMENT AGREEMENT								\$75.19							
36	ELECTRIC SERVICE		09/16/2020-10/15/2020	107030	ACTUAL	119495769	1319	0		\$180.72	\$780.39	\$257.25	\$1,037.64	11/06/2020	\$1,037.64	48	\$0.00
37	ARREARAGE	PAYMENT								-\$1,037.64							

EXHIBIT 2

21-13220-elf Angela C. Owens
Case type: bk **Chapter:** 13 **Asset:** Yes **Vol:** v **Judge:** Eric L. Frank
Date filed: 12/06/2021 **Date of last filing:** 03/19/2022 **Plan confirmed:** 03/15/2022

Case Summary

Office: Philadelphia

Filed: 12/06/2021

County:

DELAWARE-PA

Fee: Paid

Origin: 0

Previous term:

Joint: n

Original chapter: 13

Current chapter: 13

Terminated:

Debtor discharged:

Reopened:

Converted:

Debtor dismissed:

Confirmation hearing:

Nature of debt: consumer

Pending status: Awaiting Discharge,Plan Confirmed

Trustee: United

States Trustee

City: Philadelphia

Phone: (215)597-4411

Fax: (215) 923-1293

Email:

USTPRRegion03.PH.ECF@usdoj.gov

Trustee: KENNETH

E. WEST

City: Philadelphia

Phone: 215-627-1377

Fax: 215-627-6299

Email: ecfemails@ph13trustee.com

Party 1: Owens, Angela C. (Debtor)

SSN / ITIN: xxx-xx-7003

Atty: ZACHARY

PERLICK

Represents party 1:

Debtor

Phone: (215) 569-2922

Email: Perlick@verizon.net

Location of case

files:

Volume: CS1

The case file may be available.

PACER Service Center			
Transaction Receipt			
05/16/2022 14:46:49			
PACER Login:	peco2022	Client Code:	
Description:	Case Summary	Search Criteria:	21-13220-elf
Billable Pages:	1	Cost:	0.10

EXHIBIT 3



May 17, 2022

BCS Decision Report

BCS Case #: 003821280 **Open Date:** 2022-02-22
Customer Name: ANGELA OWENS
Service Address: 1012 ELSINORE PL

CHESTER, PA 19013
BCS Bill Account #: 7123623108 **Previous Case #:**
Violation Type: NO **Chapter Type:**
Decision Type: O **Section / Rule:**
Investigator Name: NATHAN PROUGH

Decision Issued Date:
Case Closed Date: 2022-03-25

Letter Description:

Total Balance:	\$1254.84	Balance Date:	2022-03-23
Amount to Restore Service:	\$0.00	Amount to Continue Service:	\$0.00
Date Payment Due:		Regular Budget Amount:	\$0.00
Special Budget Payment:	\$0.00	Final Bill Monthly Payment:	\$0.00
Plus Arrears Payment:	\$0.00	End of Month Payment:	\$0.00
Current Monthly Payment:	\$0.00		
Payment Terms:			

PAR Description:

Resolution Description:

VERBAL CLOSE: CUSTOMER ANGELA OWENS RETURNED CALL. REVIEWED CASE AND COMPANY REPORT WITH CUSTOMER. INFORMED CUSTOMER THAT THE COMPANY HAS ATTEMPTED TO CONTACT HER SEVERAL TIMES SINCE THE PUC COMPLAINT WAS OPENED, BUT HAVE BEEN UNABLE TO REACH HER. CUSTOMER STATED SHE HAS NO RECORD OF THEM CALLING AND CAN PROVIDE A CALL REPORT FROM AT&T. INFORMED CUSTOMER THAT THE PUC DOES NOT INVESTIGATE PHONE CALLS AT THE INFORMAL LEVEL. INFORMED CUSTOMER THAT WHILE A BANKRUPTCY IS OPEN, SHE IS RESPONSIBLE FOR CURRENT CHARGES AND THE COMPANY CAN CHARGE A DEPOSIT. I REFERRED CUSTOMER TO THE FORMAL COMPLAINT PROCESS AS HER DISPUTE INVOLVES BANKRUPTCY AND HER LAWYER. CUSTOMER THANKED THE PUC FOR TRYING TO HELP. INFORMED CUSTOMER THAT THE CASE WILL BE CLOSED.