



Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

July 27, 2022

**VIA E-FILING**

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

**RE: Stephanie Lane v. PECO Energy Company  
Docket No. F-2022-3033589**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is the *Preliminary Objection of Respondent, PECO Energy Company*.

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, appearing to read "Khadijah Scott".

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

Cc: Stephanie Lane (via email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>STEPHANIE LANE</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3033589</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**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 Preliminary Objection within 20 days from service of this notice, a ruling may be entered against you. Your response 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  
PECO Energy Company  
2301 Market Street, S-23  
Philadelphia, PA 19103

Dated: July 27, 2022



---

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>STEPHANIE LANE</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3033589</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**PRELIMINARY OBJECTION OF RESPONDENT,  
PECO ENERGY COMPANY**

Respondent, PECO Energy Company (“PECO Energy”), pursuant to 52 Pa. Code §5.101(a)(4) respectfully petitions this Honorable Commission to dismiss the instant Complaint as legally insufficient.

1. On July 7, 2022, PECO Energy Company (“PECO Energy”) was served with a formal complaint filed by Stephanie Lane (hereafter “Complainant”). See, Complainant’s Complaint attached hereto as Exhibit “1”.
2. On July 27, 2022, PECO Energy filed an Answer to the Complainant’s Complaint. See, PECO Energy’s Answer to the Complainant’s Complaint attached hereto as Exhibit “2”.
3. In her Complaint, the Complainant states that PECO Energy inspected the property and identified foreign wiring on the front first apartment of the property.
4. The Complainant states that when she became aware that there was a foreign wiring issue, she hired an electrician to come out and correct the issue as soon as possible.
5. The Complainant states that PECO Energy had the tenant’s electric service transferred into her name after the foreign wiring was identified.

6. The Complainant requests that PECO Energy only hold her responsible for a feasible amount of \$300.00.

7. PECO Energy files the instant Preliminary Objection.

8. Pursuant to 52 Pa. Code §5.101, preliminary objections may be filed against a complaint and dismissed for legal insufficiency. 52 Pa. Code § 5.101(a)(4).

9. In deciding preliminary objections, the Public Utility Commission must determine, based on the factual pleadings of the petitioner, if relief or recovery is possible.<sup>1</sup>

10. A complaint must be able to recover under the law to survive a preliminary objection.<sup>2</sup>

11. All of the non-moving party's averments must be taken as true for the sake of deciding the preliminary objection.<sup>3</sup>

12. The court does not, however, need to accept, "unwarranted inferences from facts, argumentative allegations, or expressions of opinions."<sup>4</sup>

13. Section 703 of the Public Utility Code, 66 Pa. C.S.A. § 703(b) provides that the Commission may dismiss any complaint without a hearing if, in its opinion, a hearing is not necessary to the public interest.

14. A hearing is required only when there is a disputed question of fact, and is not required to resolve questions of law. Dee-Dee Cab, Inc. v. Pa.Pub. Util. Comm'n, 817 A.2<sup>nd</sup> 593 (Pa.Commw. Ct. 2003), petition for allowance of appeal denied, 836 A.2d 123 (Pa. 2003).

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<sup>1</sup> 2006 Pa. PUC Lexis 111, \*7.

<sup>2</sup> *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. Ct. 1998) ("preliminary objection should be sustained only where it appears with certainty that, upon the facts averred, the law will not allow the plaintiff to recover").

<sup>3</sup> *Id.* at 7-8.

<sup>4</sup> *Feingold v. McNulty*, 2009 Phila. Ct. Com. Pl LEXIS 167, \*3.

15. Here, there are no genuine issues of fact and PECO Energy is entitled to judgment as a matter of law with respect to all of the allegations in the Complaint.

16. The Commission has held that a landlord must pay the utility for any account balance, including arrearages, once a foreign load or wiring has been found. 66 Pa. C.S. §§ 1529.1(a), (c); and Ace Check Cashing Inc. v. Phila. Gas Works, Final Order, (May 21, 2010). See also, Santos v. Metro. Edison Co., No. C-00967757 (Pa. P.U.C. Aug. 7, 1997).

17. It is undisputed that the Complainant is the owner of the rental property at issue. See, Exhibit “1”.

18. The Complainant avers that she is being held responsible for her tenant’s balance that was transferred to their account. The Complainant disputes responsibility for the entire balance transferred to her arising from the foreign wiring condition because she asserts that the foreign wiring would not have created such a high bill. See, Exhibit “1”.

19. As previously explained by the Legislature and this Commission, upon discovering the existence of a foreign load a public utility is required to list the account, including any arrearages, in the name of the landlord. 66 Pa. C.S. §§ 1529.1(a), (c). See also Santos v. Metro. Edison Co., No. C-00967757 (Pa. P.U.C. Aug. 7, 1997). The landlord is responsible for paying the utility bills until the foreign load is corrected. Santos at 16. Once the foreign load is corrected by the landlord and verified by the utility, the utility will place the account back in the name of the tenant and the arrearage, if any, will remain the landlord’s responsibility. Id.

20. There is no *de minimus* exception. Any dispute between the landlord and tenant regarding the financial responsibilities of the parties is a matter to be resolved in the Court of

Common Pleas and is outside this Commission's jurisdiction. Edmund v. Corazzini v. UGI Penn Natural Gas, Inc., No. F-2009-2101282, Opinion and Order adopted July 15, 2010 at 7.

21. The Complainant does not allege that the property is not a rental property or that she is not responsible for the property.

22. The Complainant does not allege that PECO Energy incorrectly determined a foreign wiring condition at the property.

23. The Complainant does not allege that PECO Energy delayed investigating the tenant's foreign wiring concerns.

24. The Complainant does not disagree that foreign wiring was found. Indeed the Complainant admitted that she corrected the foreign wiring condition.

25. The Complainant's formal Complaint simply alleges that foreign wiring was found at the property and she feels that she should not be held responsible for the entire tenant's balances arising from the foreign wiring condition and that PECO Energy should determine the tenant's share of the bill.

26. Indeed, consistent with Ace Check Cashing, Inc. vs. Philadelphia Gas Works, Docket No. C-2008-2056428, the Commission cannot consider what the Complainant proposes (*i.e.*, to determine the portion of the foreign wiring that is attributable to the specific light bulbs and hold the tenants responsible for the remaining balance).

27. The Commission reached the same result in the matter Vito Satiro v. PECO Energy Company, Docket No. F-2015-2510660 (Opinion and Order entered, June 9, 2016). In that case, Mr. Satiro argued that the hallway light attached to his tenant's meter was *de minimis* and that he should not be responsible for his tenant's \$1,439.98 balance. Mr. Satiro averred that his

tenant had vacated the apartment without paying rent. Administrative Law Judge Joel H. Cheskis granted PECO Energy's Preliminary Objection and dismissed Mr. Satiro's formal complaint in a well-reasoned opinion wherein he determined that PECO acted reasonably by transferring the entire amount of the tenant's arrearage to Mr. Satiro regardless of whether the amount of foreign load was *de minimis*. Id. at 9.

28. The Commission upheld ALJ Cheskis' Initial Decision and stated:

We explained our foreign load policy in detail in *Ace Check Cashing*. Specifically, we concluded that upon discovering foreign load, the utility must list the account, including any arrearages, in the landlord's name and the landlord must assume the responsibility of paying the utility bills at the service address until the foreign load is corrected. After the foreign load is corrected by the landlord and verified by the utility, the utility is to place the account back into the tenant's name. Id. At 7. However, the landlord remains responsible for any arrearages on the tenant's account. Id. At 7-8. This rule applies even if the amount of usage attributable to foreign load is considered *de minimis*.

See Vito Satiro, *supra*.

29. As stated above, the landlord shall be responsible for payment for the utility services rendered to the rental property.

30. PECO Energy properly transferred the tenant's utility account, including arrearages, to the Complainant's name.

31. PECO Energy's actions are consistent with Pennsylvania law.

32. Accordingly, PECO Energy requests that the Commission dismiss the Complaint for legal insufficiency.

**REQUEST FOR RELIEF**

WHEREFORE, for the reasons set forth above, PECO Energy Company respectfully requests that your Honorable Commission summarily dismiss the Complainant's Complaint.

Respectfully submitted,



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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**

<b>STEPHANIE LANE</b>	:	
<b>Complainant</b>	:	
	:	
<b>v.</b>	:	<b>DOCKET NO. F-2022-3033589</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**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: July 27, 2022



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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>STEPHANIE LANE</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3033589</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 Preliminary Objections in the above matter upon all interested parties by *E-mailing* a copy to:

STEPHANIE LANE  
1800 ASHBOURNE RD.  
APT 8893  
ELKINS PARK, PA 19027  
*Via email: smlane20@gmail.com*

Dated: July 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**

## Botak, Amy:(PECO)

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**From:** RA-PCESERVE@pa.gov  
**Sent:** Thursday, July 7, 2022 4:41 PM  
**To:** Scott, Khadijah:(PECO)  
**Cc:** Botak, Amy:(PECO)  
**Subject:** [EXTERNAL]PA PUC eServe Notice

**Importance:** High

**EXTERNAL MAIL. Do not click links or open attachments from unknown senders or unexpected Email.**

Dear Khadijah Scott,

A(n) **Formal Complaint Form** has been served in this proceeding. This document is docketed as **F-2022-3033589**. You may view this document at

[Formal Complaint Form - Lane](#)

You are receiving this email because you are a(n) **Respondent** for this case and have agreed to be served electronically. By selecting electronic service (eService), you have agreed that this notification constitutes valid service. Electronic service of any and all documents will be in place of paper service.

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*

*PUC has recently updated E-Service delivery E-Mail address to RA-PCESERVE@pa.gov. Please update your Address book and/or E-Mail rules accordingly.*

BCS: 3839659  
PECO ENERGY

Must be returned by AUGUST 1, 2022

## 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 Stephanie LaneStreet/P.O. Box 1800 Ashbourne Road Apt # 8893City Elkins Park State PA Zip 19027County Montgomery

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

( ) \_\_\_\_\_ (home) (267) 327-0420 (mobile)

E-mail Address (required): smlane200@gmail.comUtility Account Number (from your bill) 876-822019

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 Mariam Conteh-PalmerStreet/P.O. Box 332 Sharon Ave (FL 1 Front-Unit A)City Sharon Hill State PA Zip 190792. 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.

Other (explain). Tenants should be responsible for their own utilities. The amount issued to pay does not equal to a few common lights used at night. The original bill was about \$300 and now it is about \$3,000.00. I should not be penalized for a tenant not paying their bill. Once I was notified

of the issue, it was immediately resolved. There is a law to protect tenants, where is the law to protect new landlords purchasing properties with these unknown issues?

**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 do not feel obligated to pay for a tenant's bill. A lesser amount would be feasible like \$300 for a few lights not \$3,000. Either the electric heat is very expensive or there was a back bill which should not be my responsibility.

**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.

**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.



## **EXHIBIT 2**



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

Date Created	Filing Number
7/27/2022	2427620

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:** F-2022-3033589  
**Case Description:** Answer to Formal Complaint  
**Transmission Date:** 7/27/2022 10:07 AM  
**Filed On:** 7/27/2022 10:07 AM  
**eFiling Confirmation Number:** 2427620

File Name	Document Type	Upload Date
Answer to Formal Complaint - Stephanie Lane.pdf	Answer to Formal Complaint	7/27/2022 10:07:14 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

July 27, 2022

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

**RE: Stephanie Lane v. PECO Energy Company**  
**PUC Docket No. F-2022-3033589**

Dear Ms. Chiavetta:

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

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**

<b>STEPHANIE LANE</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3033589</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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

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On July 7, 2022, PECO Energy Company (“PECO Energy”) was served with a formal complaint filed by Stephanie Lane (hereafter “Complainant”) in the above captioned docket. Pursuant to 52 Pa. Code §5.61, PECO Energy 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 disputes the balance transfer of her first floor front tenant that occurred as a result of foreign wiring that was identified at her rental property. She acknowledges that foreign wiring existed at the property, but contend that the tenant’s outstanding balance did not accumulate to that level as a result of the foreign wiring and should, therefore, be transferred back to the tenant. The Complainant requests that she be held responsible for no more than \$300.00 of her tenant’s outstanding balance.

PECO Energy's records reveal that the Complainant's tenant, Mariam Conteh-Palmer, had service at 332 Sharon Avenue, Front First, Sharon Hill, PA 19079 under account number 68021-13128. In January 2022, tenant, Mariam Conteh-Palmer, contacted PECO Energy with foreign wiring concerns. On January 28, 2022, a PECO high bill field technician investigated the property for foreign wiring. The technician found foreign load or wiring on the Front First apartment. The hallway lights and socket in the basement were connected to the first-floor unit. See, High Bill Field Report dated January 28, 2022, attached hereto as Exhibit "1".

On January 31, 2022, a letter was sent to the Complainant advising of the foreign wiring. See, Letter dated January 31, 2022 attached hereto as Exhibit "2". On January 28, 2022, PECO Energy established service in the Complainant's name at 332 Sharon Avenue, Front First, Sharon Hill, PA 19079, under account number 68021-13137. PECO Energy transferred \$1,593.20 from first floor tenant, Mariam Conteh-Palmer, for charges accrued at the property to the Complainant's new account number.

On April 6, 2022, a high bill field technician went to the property for inspection and confirmed that the foreign wiring had been corrected for the Front First apartment. See, High Bill Field Report dated April 6, 2022, attached hereto as Exhibit "3". On April 6, 2022, the First Front apartment was placed back into the name of the tenant and the Complainant's account was finalized. However, foreign wiring was identified at the property for apartment C. Id. On April 6, 2022, PECO Energy established service in the Complainant's name at 332 Sharon Avenue, Apt C, Sharon Hill, PA 19079, under account number 64929-10108. See, account activity statement attached hereto as Exhibit "4". PECO Energy transferred \$7.76 from apartment C for charges accrued at the property, to the Complainant's new account number. The outstanding balance from

the Front First apartment's finalized account was transferred to the Complainant's new account number. Id.

On April 27, 2022, a high bill field technician went to the property for inspection and confirmed that the foreign wiring at apartment C had been corrected. See, Utility Report dated May 12, 2022, attached hereto as Exhibit "5". On April 27, 2022, apartment C was placed back into the name of the tenant and the Complainant's account was finalized. The outstanding balance for apartment C, which already included the outstanding balance for the Front First apartment, were transferred to the Complainant's active account at 1803 72nd Ave., Philadelphia, PA 19126 under account number 87618-22019. See, Account Activity Statement attached hereto as Exhibit "6". The Complainant's outstanding balance is \$2,930.66 The bills and balances are correct.

On May 19, 2022, the Complainant filed an informal complaint with the Bureau of Consumer Services ("BCS") at case number 003839659 disputing the foreign wiring balances. On June 1, 2022, the BCS issued a Decision Report, dismissing the cases as follows:

THE COMPANY IS WITHIN THEIR RIGHTS TO TRANSFER THE TENANT'S ACCOUNT BALANCE UNDER YOUR ACCOUNT WHEN THEY DISCOVER FOREIGN WIRING.2. YOU ARE RESPONSIBLE FOR THE TRANSFERRED BALANCE TOTALING \$2,973.50.

See BCS Decision Report #003839659, attached hereto as Exhibit "7".

In this matter, PECO Energy avers that the company properly determined that there was a foreign load condition at the Complainant's rental property and transferred the service and charges into the Complainant's name consistent with 66 Pa. C.S. §§ 1529.1(a), (c); and Ace Check Cashing Inc. v. Phila. Gas Works, Final Order, (May 21, 2010). Upon discovering the existence of a foreign load a public utility is required to list the account, including any arrearages, in the name of the

landlord. 66 Pa. C.S. §1529.1(a), (c). See also, Santos v. Metro. Edison Co., No. C-00967757 (Pa. P.U.C. Aug. 7, 1997). The landlord is responsible for paying the utility bills until the foreign load is corrected. Santos at 16. There is no *de minimus* exception. Once the foreign load is corrected by the landlord and verified by the utility, the utility will place the account back in the name of the tenant and the arrearage, if any, will remain the landlord's responsibility. Id.

To the extent any dispute regarding the financial responsibility of the parties exists, that is a matter to be resolved in the Court of Common Pleas as it is outside the Commission's jurisdiction. Edmund v. Corazzini v. UGI Penn Natural Gas, Inc., No. F-2009-2101282, Opinion and Order adopted July 15, 2010 at 7.

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. Admitted.

8. PECO Energy neither admits nor denies the allegations in paragraph 8. PECO is without knowledge or information sufficient to form a belief as to the truth of this averment and, 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  
Khadijah.Scott@exeloncorp.com

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>STEPHANIE LANE</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3033589</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**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: July 27, 2022

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>STEPHANIE LANE</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3033589</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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**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:

STEPHANIE LANE  
1800 ASHBOURNE RD.  
APT 8893  
ELKINS PARK, PA 19027  
*Via email: smlane20@gmail.com*

Dated: July 27, 2022



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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**



# High Bill Investigation Report

## High Bill Electric

Fielded By 132476-ANDREW LEAKE	Date Completed 2022-01-28T00:00:00.000-06:00	Customer Name MARIAM CONTEH PALMER	Customer Address 332 SHARON AVE FRNT 1ST, SHARON HIL, PA, 19079
Date Disputed 2022-01-19T00:00:00.000-06:00	Account No 6802113128	Reason for Order Possible Foreign Wiring	

◊ OR/WRUR Provided   ◊ OR/WRUR Needed   ◊ Billing Work Needed

### Check All that Apply:

- ◊ General High Bill
- ◊ Rate Change.
- ◊ Meter Mix Up.
- ◊ No Issues Found
- ◊ Foreign Wiring
- ◊ Foreign Wiring Corrected
- ◊ Cost Estimate Performed
- ◊ Meter Tested

Meter No. 1 114463886	Meter No. 2 115021848	Meter No. 3
Meter Reading 1	Meter Reading 2	Meter Reading 3
Daily Average KWH Usage		

Expected Meter Constant 1	Last Bill Reading Verified?
Meter Constant Match?	Found Meter Constant
Changed Landlord/Tenant Code to Landlord YES	

Dropped Load & Idled Meter	Of	Test Pass/Fail
Appliance Used		Kwh
Clocked		Watts
		No. Of Seconds

**Rate Change**

Change To

Change Reason (if applicable)

**Foreign Wiring**

**Check All that Apply:**

- Transfer Service/Balance into Owner's Name.
- Transfer Account into Tenant's Name.
- Leave in Owner's name until new tenant applies.
- Remove Landlord/Tenant Code – Foreign Wiring Corrected.
- Refer to Legal.

<?end if?

**High Bill Gas**

Date Disputed  
2022-01-19T00:00:  
00.000-06:00

Account No  
6802113128

Reason for Order  
Possible Foreign  
Wiring

- OR/WRUR Provided     OR/WRUR Needed     Billing Work Needed

**Check All that Apply:**

- General High Bill
- Rate Change.
- Meter Mix Up.
- No Issues Found
- Foreign Piping
- Foreign Piping Corrected
- Cost Estimate Performed

Meter No. 1  
114463886

Meter No. 2  
115021848

Meter No. 3

Module No. 1

Module No. 2

Module No. 3

Meter Reading 1

Meter Reading 2

Meter Reading 3

Daily Average KWH  
Usage

**Meter Multiplier**

|  |
|--|
| Expected Meter Constant                  |
| 1  |
| Meter Constant Match?                    |
|  |
| Changed Landlord/Tenant Code to Landlord |
|  |

|                               |
|-------------------------------|
| Last Billed Reading Verified? |
|                               |
| Found Meter Constant          |
|                               |
| Fitting Marked Correct?       |
|                               |

**Passing Load Test Performed**

|                             |
|-----------------------------|
| Dropped Load & Idled Meter? |
|                             |
| Appliance Used              |
|                             |
| Clocked                     |
|                             |

Of

|         |
|---------|
| FT Dial |
|         |
| BTUs    |
|         |

|                  |
|------------------|
| Test Pass/Fail ? |
|                  |
| No. Of Seconds   |
|                  |

**Rate Change**

|                |  |                                    |
|----------------|--|------------------------------------|
| Rate Change To |  | Rate Change Reason (if applicable) |
|                |  |                                    |

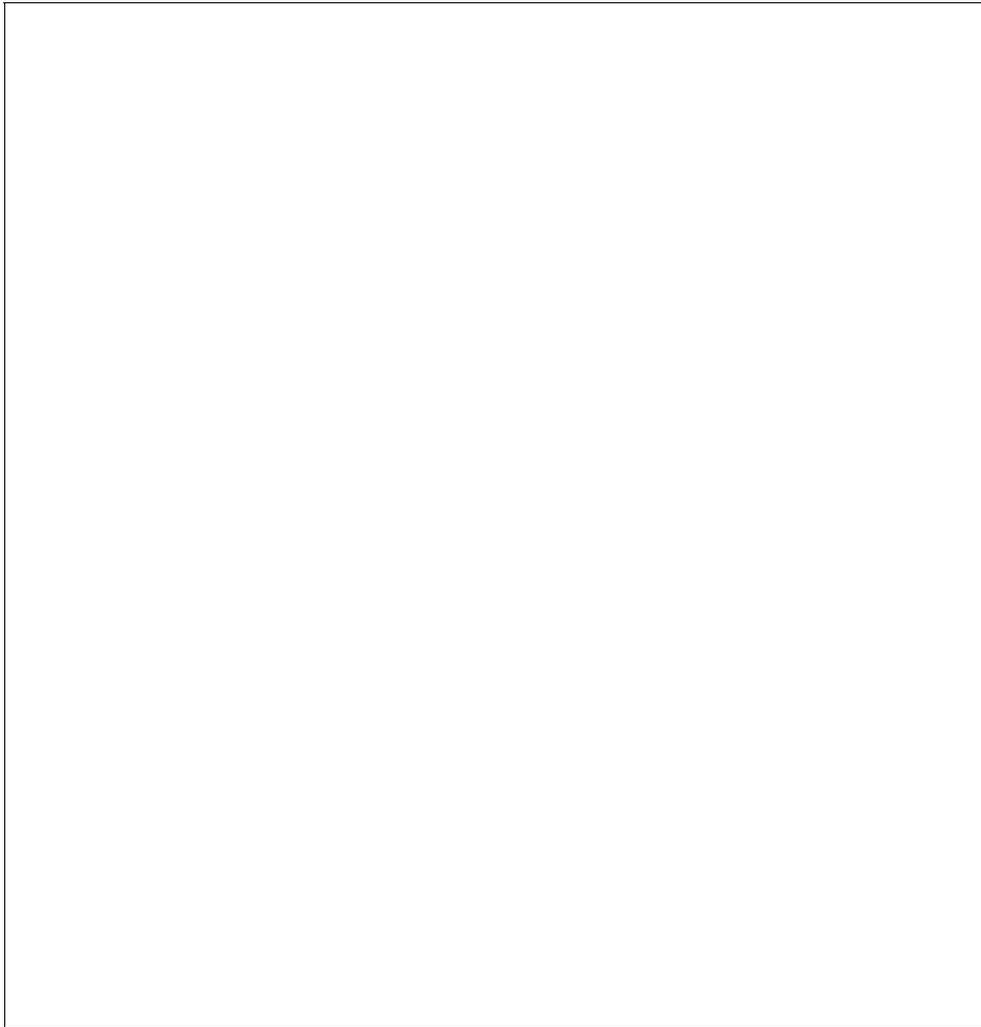
**Foreign Wiring**

**Check All that Apply:**

- ◊ Transfer Service/Balance into Owner's Name.
- ◊ Transfer Account into Tenant's Name.
- ◊ Leave in Owner's name until new tenant applies.
- ◊ Remove Landlord/Tenant Code – Foreign Wiring Corrected.
- ◊ Refer to Legal.

**Meter Mixup**

| Found Meter Number | Found Reading Device/Module Number | Reading | Incorrect Service Address (As Listed) | Correct Service Address (Should Be) |
|--------------------|------------------------------------|---------|---------------------------------------|-------------------------------------|
|                    |                                    |         |                                       |                                     |
|                    |                                    |         |                                       |                                     |
|                    |                                    |         |                                       |                                     |



**Cost Estimate**

| Refrigerator Type | No Of. | Avg Kwh | Act KWH |
|-------------------|--------|---------|---------|
|                   |        |         |         |
|                   |        |         |         |
|                   |        |         |         |
|                   |        |         |         |

| Freezer Type | No Of. | Avg Kwh | Act KWH |
|--------------|--------|---------|---------|
|              |        |         |         |
|              |        |         |         |

| Cooking - Elect | No Of. | Avg Kwh | Act KWH |
|-----------------|--------|---------|---------|
|                 |        |         |         |
|                 |        |         |         |
|                 |        |         |         |
|                 |        |         |         |

| Other Kitchen Appliances | No Of. | Avg Kwh | Act KWH |
|--------------------------|--------|---------|---------|
|                          |        |         |         |
|                          |        |         |         |
|                          |        |         |         |

| Laundry Service | No Of. | Avg Kwh | Act KWH |
|-----------------|--------|---------|---------|
|                 |        |         |         |
|                 |        |         |         |

| Home Entertainment | No Of. | Avg Kwh | Act KWH |
|--------------------|--------|---------|---------|
|                    |        |         |         |
|                    |        |         |         |
|                    |        |         |         |
|                    |        |         |         |
|                    |        |         |         |
|                    |        |         |         |

| Lighting Average | No Of. | Avg Kwh | Act KWH |
|------------------|--------|---------|---------|
|                  |        |         |         |
|                  |        |         |         |

| Electric Water Heater | No Of. | Avg Kwh | Act KWH |
|-----------------------|--------|---------|---------|
|                       |        |         |         |

| Heating Electric | No Of. | Avg Kwh | Act KWH |
|------------------|--------|---------|---------|
|                  |        |         |         |
|                  |        |         |         |

| Heating Gas / Oil / Propane | No Of. | Avg Kwh | Act KWH |
|-----------------------------|--------|---------|---------|
|                             |        |         |         |
|                             |        |         |         |

| Air Condition | Btu's | Watts | Act KWH |
|---------------|-------|-------|---------|
|               |       |       |         |
|               |       |       |         |



**Completion Form**

| Action        | Reason           | Subreason | Details |
|---------------|------------------|-----------|---------|
| COMP-Complete | ALL-All Complete | -         | -       |

| Type of Lock | Meter Protection |
|--------------|------------------|
|              |                  |

| Completion Remarks: |
|---------------------|
| OTHER-OTHER         |

| Contact |
|---------|
| S       |

| Remarks:  |
|---|
| MET W/ TENANT/ GAVE ACCESS TO<br>PROP & MTRS/ DROPPED LOAD AT<br>BREAKER VERF FW FND/ FW =<br>HALLWAY LIGHTS & SOCKET IN<br>BASEMENT WIRED TO FNRT 1ST<br>UNIT/ EXPLD FW POLICY/ CUST U/S |

## **EXHIBIT 2**



2301 Market Street  
N2-3  
Philadelphia PA 19103

www.peco.com

An Exelon Company

January 31, 2022

Stephanie M. Lane  
1803 72<sup>nd</sup> Ave  
Philadelphia, Pa 19126

Regarding: 332 Sharon Ave  
Front 1<sup>st</sup>  
Sharon Hill, Pa 19079

Dear Ms. Lane:

On 1-28-2022 a PECO field technician visited the above referenced property in response to a high bill complaint. The technician found hallway lights and socket in the basement wired to Front 1<sup>st</sup> Unit. This is known as foreign wiring. Please have your electrician check for any additional foreign wiring that may not have been detected at the time of the field visit.

When PECO identifies foreign wiring. Pennsylvania State Law requires the electric service to be transferred into the name of the landlord, until the wiring is properly corrected. (Per Section 1529.1(b) of the Pennsylvania Public Utility Code, 66 Pa. C.S. 1529.1)

Please be advised that the electric service for the accounts in question will be transferred into your name effective immediately. If any of the current tenant's balance due is attributable to the found foreign wiring the entire balance will be transferred into your name as well. The service can only go back into your tenants name if you have your electrician correct the wiring for each apartment.

If you have completed the repairs, or have any questions regarding this matter, please telephone 844-542-6164.

Cordially,

Andrew L.  
Customer Field Operations

## **EXHIBIT 3**



# High Bill Investigation Report

## High Bill Electric

|  |   |   |  |
|--|---|---|--|
| Fielded By<br>032771-DUANE VARGAS              | Date Completed<br>2022-04-06T00:00:00.000-05:00 | Customer Name<br>STEPHANIE LANE             | Customer Address<br>332 SHARON AVE<br>FRNT 1ST, SHARON<br>HIL, PA, 19079 |
| Date Disputed<br>2022-04-17T00:00:00.000-05:00 | Account No<br>6802113137                        | Reason for Order<br>Possible Foreign Wiring |  |

OR/WRUR Provided     OR/WRUR Needed     Billing Work Needed

### Check All that Apply:

- General High Bill
- Rate Change.
- Meter Mix Up.
- No Issues Found
- Foreign Wiring
- Foreign Wiring Corrected
- Cost Estimate Performed
- Meter Tested

|  |                 |                 |
|--|-----------------|-----------------|
| Meter No. 1<br>114463886                             | Meter No. 2     | Meter No. 3     |
| Meter Reading 1<br>117281<br>Daily Average KWH Usage | Meter Reading 2 | Meter Reading 3 |

## Meter Constant

|  |                             |
|--|-----------------------------|
| Expected Meter Constant<br>1             | Last Bill Reading Verified? |
| Meter Constant Match?                    | Found Meter Constant        |
| Changed Landlord/Tenant Code to Landlord |                             |

## Passing Load Test Performed

|                            |       |                |
|----------------------------|-------|----------------|
| Dropped Load & Idled Meter |       | Test Pass/Fail |
| Appliance Used             | Kwh   | No. Of Seconds |
| Clocked                    | Watts |                |
|                            | Of    |                |

**Rate Change**

Change To

Change Reason (if applicable)

**Foreign Wiring**

**Check All that Apply:**

- Transfer Service/Balance into Owner's Name.
- Transfer Account into Tenant's Name.
- Leave in Owner's name until new tenant applies.
- Remove Landlord/Tenant Code – Foreign Wiring Corrected.
- Refer to Legal.

<?end if?

**High Bill Gas**

Date Disputed  
2022-04-17T00:00:  
00.000-05:00

Account No  
6802113137

Reason for Order  
Possible Foreign  
Wiring

- OR/WRUR Provided
- OR/WRUR Needed
- Billing Work Needed

**Check All that Apply:**

- General High Bill
- Foreign Piping
- Rate Change.
- Foreign Piping Corrected
- Meter Mix Up.
- No Issues Found
- Cost Estimate Performed

Meter No. 1  
114463886

Meter No. 2

Meter No. 3

Module No. 1

Module No. 2

Module No. 3

Meter Reading 1

Meter Reading 2

Meter Reading 3

Daily Average KWH  
Usage

**Meter Multiplier**

|  |
|--|
| Expected Meter Constant                  |
| Meter Constant Match?                    |
| Changed Landlord/Tenant Code to Landlord |

|                               |
|-------------------------------|
| Last Billed Reading Verified? |
| Found Meter Constant          |
| Fitting Marked Correct?       |

**Passing Load Test Performed**

|                             |
|-----------------------------|
| Dropped Load & Idled Meter? |
| Appliance Used              |
| Clocked                     |

Of

|         |
|---------|
| FT Dial |
| BTUs    |

|                  |
|------------------|
| Test Pass/Fail ? |
| No. Of Seconds   |

**Rate Change**

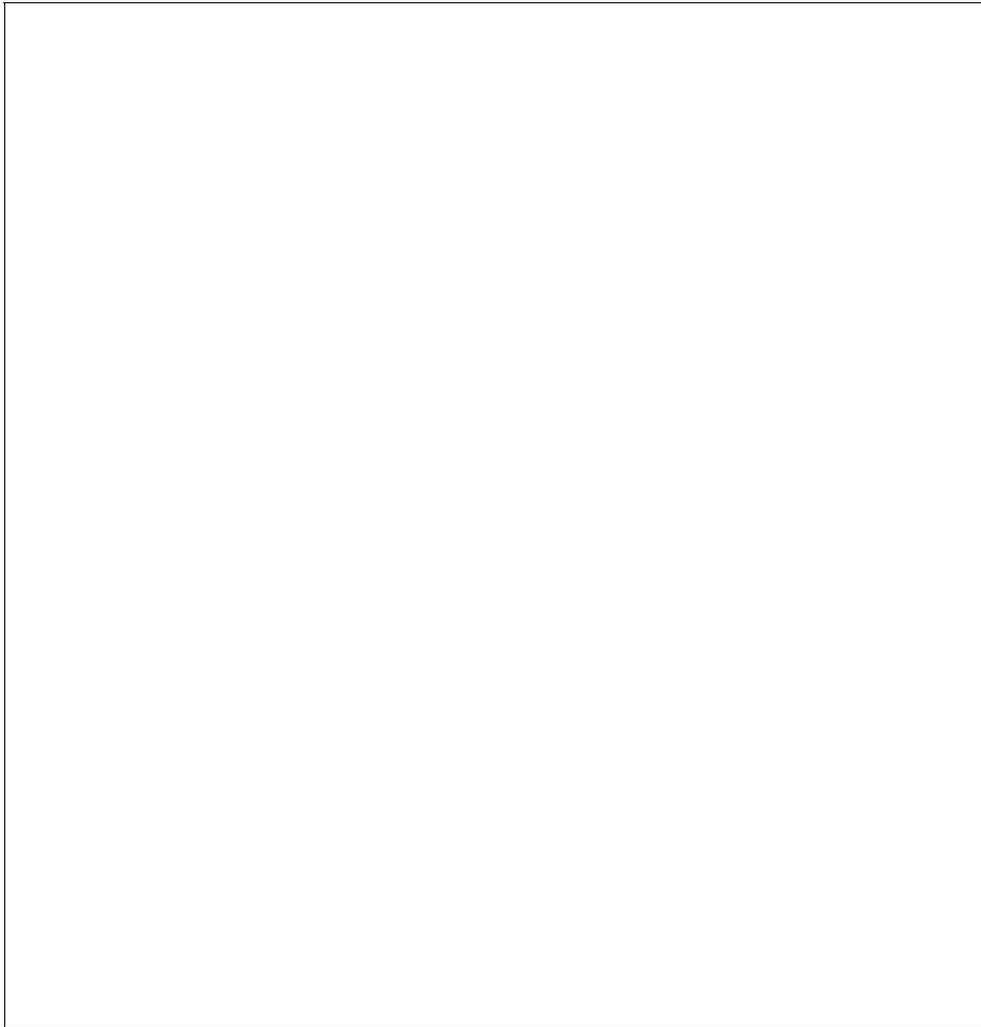
|                |  |                                    |
|----------------|--|------------------------------------|
| Rate Change To |  | Rate Change Reason (if applicable) |
|----------------|--|------------------------------------|

**Foreign Wiring****Check All that Apply:**

- ◊ Transfer Service/Balance into Owner's Name.
- ◊ Transfer Account into Tenant's Name.
- ◊ Leave in Owner's name until new tenant applies.
- ◊ Remove Landlord/Tenant Code – Foreign Wiring Corrected.
- ◊ Refer to Legal.

Meter Mixup

| Found Meter Number | Found Reading Device/Module Number | Reading | Incorrect Service Address (As Listed) | Correct Service Address (Should Be) |
|--------------------|------------------------------------|---------|---------------------------------------|-------------------------------------|
|                    |                                    |         |                                       |                                     |
|                    |                                    |         |                                       |                                     |
|                    |                                    |         |                                       |                                     |



**Cost Estimate**

| Refrigerator Type | No Of. | Avg Kwh | Act KWH |
|-------------------|--------|---------|---------|
|                   |        |         |         |
|                   |        |         |         |
|                   |        |         |         |
|                   |        |         |         |

| Freezer Type | No Of. | Avg Kwh | Act KWH |
|--------------|--------|---------|---------|
|              |        |         |         |
|              |        |         |         |

| Cooking - Elect | No Of. | Avg Kwh | Act KWH |
|-----------------|--------|---------|---------|
|                 |        |         |         |
|                 |        |         |         |
|                 |        |         |         |
|                 |        |         |         |

| Other Kitchen Appliances | No Of. | Avg Kwh | Act KWH |
|--------------------------|--------|---------|---------|
|                          |        |         |         |
|                          |        |         |         |

| Laundry Service | No Of. | Avg Kwh | Act KWH |
|-----------------|--------|---------|---------|
|                 |        |         |         |
|                 |        |         |         |

| Home Entertainment | No Of. | Avg Kwh | Act KWH |
|--------------------|--------|---------|---------|
|                    |        |         |         |
|                    |        |         |         |
|                    |        |         |         |
|                    |        |         |         |
|                    |        |         |         |

| Lighting Average | No Of. | Avg Kwh | Act KWH |
|------------------|--------|---------|---------|
|                  |        |         |         |
|                  |        |         |         |

| Electric Water Heater | No Of. | Avg Kwh | Act KWH |
|-----------------------|--------|---------|---------|
|                       |        |         |         |

| Heating Electric | No Of. | Avg Kwh | Act KWH |
|------------------|--------|---------|---------|
|                  |        |         |         |
|                  |        |         |         |

| Heating Gas / Oil / Propane | No Of. | Avg Kwh | Act KWH |
|-----------------------------|--------|---------|---------|
|                             |        |         |         |
|                             |        |         |         |

| Air Condition | Btu's | Watts | Act KWH |
|---------------|-------|-------|---------|
|               |       |       |         |
|               |       |       |         |



**Completion Form**

| Action        | Reason           | Subreason | Details |
|---------------|------------------|-----------|---------|
| COMP-Complete | ALL-All Complete | -         | -       |

| Type of Lock | Meter Protection |
|--------------|------------------|
|              |                  |

| Completion Remarks:                |
|------------------------------------|
| FFLOW-FOUND FOREIGN LOAD OR WIRING |

| Contact |
|---------|
| S       |

| Remarks:   |
|--|
| BWN-MET W/ STEPHANIE/GVE ACCSS TO PROOP/ODMA/DRPPD LOAD/VER NO FW ON FRNT 1ST MTR/FW MOVED TO APT C/FW=COMMON OUTSIDE, HALLWAY, & BSMT LTGS & OUTLETS ON APT C MTR/EXPL OK TO PLACE ELEC APT FRNT 1ST BCK 2 PRIOR TENT ACCT # 68021-13128/OK PLACE APT C ELEC SERV IN LL NAME RDG 66810/EXPL FW POLICY |

# **EXHIBIT 4**

\*\*\* Account Information \*\*\*

\*\*\* Current Account Status \*\*\*

|                          |                       |                      |        |                    |                                      |
|--------------------------|-----------------------|----------------------|--------|--------------------|--------------------------------------|
| Account Number:          | Mail To:              | Current Bill:        | \$0.00 | Credit Amount:     | \$0.00                               |
| 64929-10108              | STEPHANIE LANE        | Billed Prior:        | \$0.00 | Deposit Requested: | \$0.00                               |
| Account Status: Final    | 1803 72ND AVE         | Balance Due:         | \$0.00 | Deposit On-Hand:   | \$0.00                               |
| Requested By:            | PHILADELPHIA PA 19126 | Service Address:     |        | Meter Bill Grp:    | 09                                   |
| STEPHANIE LANE           |                       | APT C                |        | Rate:              | Gas Residential Service              |
| (267)322-0420 Extension: |                       | 332 SHARON AVE       |        |                    | Electric Residential Heating Service |
|                          |                       | SHARON HILL PA 19079 |        |                    | Gas Residential Heating Service      |

| DATE     | CHARGE TYPE                  | BILLING PERIOD    | READ  | METER #   | CHARGE AMOUNT | CREDIT AMOUNT | TOTAL BILL | BALANCE FORWARD | DUE DATE | KWH |
|----------|------------------------------|-------------------|-------|-----------|---------------|---------------|------------|-----------------|----------|-----|
| 02/10/22 | Transfer Debit               |                   |       |           | \$292.89      |               |            |                 |          |     |
| 02/10/22 | Transfer Debit               |                   |       |           | \$6.00        |               |            |                 |          |     |
| 02/15/22 | Transfer Debit               |                   |       |           | \$1593.20     |               |            |                 |          |     |
| 03/11/22 | Transfer Debit               |                   |       |           | \$587.03      |               |            |                 |          |     |
| 04/08/22 | Transfer Debit               |                   |       |           | \$457.28      |               |            |                 |          |     |
| 04/11/22 | Transfer Debit               |                   |       |           | \$37.10       |               |            |                 |          |     |
| 04/11/22 | ELECTRIC SERVICE             | 04/06/22 04/11/22 | 66810 | 114463884 | \$1.76        |               |            |                 |          |     |
| 04/11/22 | CONNECTION CHARGE - STANDARD |                   |       |           | \$6.00        |               |            |                 |          |     |
| 04/11/22 | Regular Bill                 |                   |       |           |               |               | \$7.76     |                 | 05/03    |     |
| 05/06/22 | ELECTRIC SERVICE             | 04/11/22 05/06/22 | 66810 | 114463884 | \$8.74        |               |            |                 |          |     |
| 05/06/22 | Regular Bill                 |                   |       |           |               |               | \$2990.00  | \$2981.26       | 05/31    |     |
| 05/19/22 | Payment                      |                   |       |           |               | \$7.76        |            |                 |          |     |
| 06/06/22 | Transfer                     |                   |       |           |               | \$2982.24     |            |                 |          |     |

# **EXHIBIT 5**



**UTILITY COMPANY REPORT**  
**Reporte De La Compania Utilidades**

|                         |                                   |
|-------------------------|-----------------------------------|
| <b>Date:</b><br>5/12/22 | <b>Prepared By:</b><br>LATISHA S. |
|-------------------------|-----------------------------------|

|   |
|---|
| <b>Name:</b><br>STEPHANIE LANE                                    |
| <b>Mailing Address:</b><br>1803 72ND AVE<br>PHILADELPHIA PA 19126 |
| <b>Account Number:</b><br>64929-10108                             |

|  |                         |
|--|-------------------------|
| <b>Primary Phone:</b><br>(267) 322-0420                                  | <b>Alternate Phone:</b> |
| <b>Service Address:</b><br>332 SHARON AVE *APT C<br>SHARON HILL PA 19079 |                         |

**Problem As You Described It**

---

On 04/15/22 you contacted our office stating that the foreign wiring has been corrected at the property.

**Our Response**

---

On 04/27/22 a PECO field technician visited the above property in response to a high bill complaint. The technician found that the foreign wiring has been corrected associated with 332 SHARON AVE \*APT C SHARON HILL PA 19079, meter # 114463884.

When PECO identifies that foreign wiring has been corrected, Pennsylvania State Law requires the electric service be transferred back into the name of the tenant. (Per Section 1529.1(b) of the Pennsylvania Public Utility Code, 66 Pa. C.S. 1529.1). Please be advised that the electric for the account in question was transferred back into your tenant's name effective 04/27/22.

The balance on your account is \$2,990.00 as of 7/27/22. The amount due by 05/31/22 to avoid delinquency is \$2,990.00.

The investigation is being closed at this time. If you have questions regarding the High Bill Investigation, please contact our High Bill Back Office at 1-844-542-6164. Or if you need payment arrangements, please contact our Financial Care Center at 1-888-480-1533.

Cordially,  
Damon G.  
High Bill Field



## **UTILITY COMPANY REPORT**

### **To file a Complaint**

If you do not agree with this report you may file a Complaint with the Public Utility Commission (PUC). You may file a complaint by calling the PUC at 1-800-692-7380 or by writing to the following address:

Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg PA 17105-3265  
Attention: Service Termination Mediation Unit

To protect your rights your complaint should be filed within 10 days of the date on this report and should include the following information:

1. Your name.
2. Your address.
3. The address where this service is being used.
4. Your account number.
5. Our name, PECO Energy Company.
6. A brief statement of the problem.
7. Whether a Complaint about this problem was filed with the PUC before.
8. Whether the problem was investigated and reported by us on or before the shut-off date, if any.
9. How you would like the problem to be solved.

If you file a complaint and do the things the PUC tells you to do, we will not shut off your service while they are handling your complaint.

### **PECO ENERGY COMPANY**

If you need to talk to us, please call 1-800-494-4000, between 7:00 a.m. and 7:00 p.m., Monday through Friday.

PECO Energy Company's Business Office hours are Monday through Friday, from 8:30 a.m. to 5:00 p.m. Our Business Office is located at:

2301 Market Street, Philadelphia, PA 19101

# **EXHIBIT 6**

PECO Account Activity Statement

Date: 07/18/22

Page: 1 of 2

\*\*\* Account Information \*\*\*

\*\*\* Current Account Status \*\*\*

|                          |                       |                       |           |   |         |
|--------------------------|-----------------------|-----------------------|-----------|---|---------|
| Account Number:          | Mail To:              | Current Bill:         | \$45.15   | Credit Amount:                              | \$0.00  |
| 87618-22019              | STEPHANIE LANE        | Billed Prior:         | \$2930.66 | Deposit Requested:                          | \$65.00 |
| Account Status: Active   | 1803 72ND AVE         | Balance Due:          | \$2975.81 | Deposit On-Hand:                            | \$0.00  |
| Requested By:            | PHILADELPHIA PA 19126 | Service Address:      |           |   |         |
| STEPHANIE LANE           |                       | 1803 72ND AV          |           | Meter Bill Grp: 07                          |         |
| (267)322-0420 Extension: |                       | PHILADELPHIA PA 19126 |           | Rate: Supplier Electric Residential Service |         |

| DATE     | CHARGE TYPE                | BILLING PERIOD    | READ  | METER #   | CHARGE AMOUNT | CREDIT AMOUNT | TOTAL BILL | BALANCE FORWARD | DUE DATE | KWH |
|----------|----------------------------|-------------------|-------|-----------|---------------|---------------|------------|-----------------|----------|-----|
| 07/28/20 | Payment                    |                   |       |           |               | \$50.70       |            |                 |          |     |
| 08/07/20 | ELECTRIC SERVICE           | 07/07/20 08/05/20 | 13908 | 114312585 | \$30.69       |               |            |                 |          |     |
| 08/07/20 | ELE-Direct Energy Services |                   |       |           | \$39.50       |               |            |                 |          |     |
| 08/07/20 | Regular Bill               |                   |       |           |               |               | \$70.19    |                 | 08/31    | 315 |
| 08/25/20 | Payment                    |                   |       |           |               | \$70.19       |            |                 |          |     |
| 09/08/20 | ELECTRIC SERVICE           | 08/05/20 09/03/20 | 14153 | 114312585 | \$26.10       |               |            |                 |          |     |
| 09/08/20 | ELE-Direct Energy Services |                   |       |           | \$30.58       |               |            |                 |          |     |
| 09/08/20 | Regular Bill               |                   |       |           |               |               | \$56.68    |                 | 09/30    | 245 |
| 09/22/20 | Payment                    |                   |       |           |               | \$56.68       |            |                 |          |     |
| 10/07/20 | ELECTRIC SERVICE           | 09/03/20 10/05/20 | 14304 | 114312585 | \$19.93       |               |            |                 |          |     |
| 10/07/20 | ELE-Direct Energy Services |                   |       |           | \$18.10       |               |            |                 |          |     |
| 10/07/20 | Regular Bill               |                   |       |           |               |               | \$38.03    |                 | 10/29    | 151 |
| 10/16/20 | Payment                    |                   |       |           |               | \$38.03       |            |                 |          |     |

| DATE     | CHARGE TYPE                | BILLING PERIOD    | READ  | METER #   | CHARGE AMOUNT | CREDIT AMOUNT | TOTAL BILL | BALANCE FORWARD | DUE DATE | KWH |
|----------|----------------------------|-------------------|-------|-----------|---------------|---------------|------------|-----------------|----------|-----|
| CCF      | KW                         |                   |       |           |               |               |            |                 |          |     |
| 11/06/20 | ELECTRIC SERVICE           | 10/05/20 11/04/20 | 14422 | 114312585 | \$17.76       |               |            |                 |          |     |
| 11/06/20 | ELE-Direct Energy Services |                   |       |           | \$14.15       |               |            |                 |          |     |
| 11/06/20 | Regular Bill               |                   |       |           |               |               | \$31.91    |                 | 11/30    | 118 |
| 12/01/20 | Payment                    |                   |       |           |               | \$31.91       |            |                 |          |     |
| 12/09/20 | ELECTRIC SERVICE           | 11/04/20 12/07/20 | 14567 | 114312585 | \$19.53       |               |            |                 |          |     |
| 12/09/20 | ELE-Direct Energy Services |                   |       |           | \$17.39       |               |            |                 |          |     |
| 12/09/20 | Regular Bill               |                   |       |           |               |               | \$36.92    |                 | 12/31    | 145 |
| 12/31/20 | Payment                    |                   |       |           |               | \$36.92       |            |                 |          |     |
| 01/12/21 | ELECTRIC SERVICE           | 12/07/20 01/08/21 | 14717 | 114312585 | \$19.88       |               |            |                 |          |     |
| 01/12/21 | ELE-Direct Energy Services |                   |       |           | \$17.99       |               |            |                 |          |     |
| 01/12/21 | Regular Bill               |                   |       |           |               |               | \$37.87    |                 | 02/03    | 150 |
| 01/25/21 | Payment                    |                   |       |           |               | \$40.00       |            |                 |          |     |
| 01/26/21 | Payment                    |                   |       |           |               | \$4.00        |            |                 |          |     |
| 02/10/21 | ELECTRIC SERVICE           | 01/08/21 02/08/21 | 14838 | 114312585 | \$18.04       |               |            |                 |          |     |
| 02/10/21 | ELE-Direct Energy Services |                   |       |           | \$14.51       |               |            |                 |          |     |
| 02/10/21 | Regular Bill               |                   |       |           |               |               | \$26.42    |                 | 03/04    | 121 |
| 02/22/21 | Payment                    |                   |       |           |               | \$26.42       |            |                 |          |     |
| 03/11/21 | ELECTRIC SERVICE           | 02/08/21 03/09/21 | 14953 | 114312585 | \$17.64       |               |            |                 |          |     |
| 03/11/21 | ELE-Direct Energy Services |                   |       |           | \$13.97       |               |            |                 |          |     |
| 03/11/21 | Regular Bill               |                   |       |           |               |               | \$31.61    |                 | 04/05    | 115 |
| 03/23/21 | Payment                    |                   |       |           |               | \$31.64       |            |                 |          |     |
| 04/09/21 | ELECTRIC SERVICE           | 03/09/21 04/07/21 | 15067 | 114312585 | \$17.65       |               |            |                 |          |     |
| 04/09/21 | ELE-Direct Energy Services |                   |       |           | \$14.24       |               |            |                 |          |     |
| 04/09/21 | Regular Bill               |                   |       |           |               |               | \$31.86    |                 | 05/03    | 114 |

| DATE     | CHARGE TYPE                | BILLING PERIOD    | READ  | METER #   | CHARGE AMOUNT | CREDIT AMOUNT | TOTAL BILL | BALANCE FORWARD | DUE DATE | KWH |
|----------|----------------------------|-------------------|-------|-----------|---------------|---------------|------------|-----------------|----------|-----|
| CCF      | KW                         |                   |       |           |               |               |            |                 |          |     |
| 04/30/21 | Payment                    |                   |       |           |               | \$31.86       |            |                 |          |     |
| 05/10/21 | ELECTRIC SERVICE           | 04/07/21 05/06/21 | 15184 | 114312585 | \$17.88       |               |            |                 |          |     |
| 05/10/21 | ELE-Direct Energy Services |                   |       |           | \$14.61       |               |            |                 |          |     |
| 05/10/21 | Regular Bill               |                   |       |           |               |               | \$32.49    |                 | 06/01    | 117 |
| 06/02/21 | Payment                    |                   |       |           |               | \$32.49       |            |                 |          |     |
| 06/09/21 | ELECTRIC SERVICE           | 05/06/21 06/07/21 | 15314 | 114312585 | \$18.70       |               |            |                 |          |     |
| 06/09/21 | ELE-Direct Energy Services |                   |       |           | \$16.24       |               |            |                 |          |     |
| 06/09/21 | Regular Bill               |                   |       |           |               |               | \$34.94    |                 | 07/01    | 130 |
| 06/29/21 | Payment                    |                   |       |           |               | \$34.76       |            |                 |          |     |
| 07/09/21 | ELECTRIC SERVICE           | 06/07/21 07/07/21 | 15539 | 114312585 | \$24.74       |               |            |                 |          |     |
| 07/09/21 | ELE-Direct Energy Services |                   |       |           | \$28.10       |               |            |                 |          |     |
| 07/09/21 | Regular Bill               |                   |       |           |               |               | \$53.02    | \$0.18          | 08/02    | 225 |
| 07/26/21 | Payment                    |                   |       |           |               | \$53.02       |            |                 |          |     |
| 08/09/21 | ELECTRIC SERVICE           | 07/07/21 08/05/21 | 15797 | 114312585 | \$26.88       |               |            |                 |          |     |
| 08/09/21 | ELE-Direct Energy Services |                   |       |           | \$32.22       |               |            |                 |          |     |
| 08/09/21 | Regular Bill               |                   |       |           |               |               | \$59.10    |                 | 08/31    | 258 |
| 08/24/21 | Payment                    |                   |       |           |               | \$59.10       |            |                 |          |     |
| 09/07/21 | ELECTRIC SERVICE           | 08/05/21 09/03/21 | 16034 | 114312585 | \$25.52       |               |            |                 |          |     |
| 09/07/21 | ELE-Direct Energy Services |                   |       |           | \$29.60       |               |            |                 |          |     |
| 09/07/21 | Regular Bill               |                   |       |           |               |               | \$55.12    |                 | 09/29    | 237 |
| 10/01/21 | Payment                    |                   |       |           |               | \$55.12       |            |                 |          |     |
| 10/07/21 | ELECTRIC SERVICE           | 09/03/21 10/05/21 | 16203 | 114312585 | \$21.19       |               |            |                 |          |     |
| 10/07/21 | ELE-Direct Energy Services |                   |       |           | \$21.11       |               |            |                 |          |     |

| DATE     | CHARGE TYPE                | BILLING PERIOD    | READ  | METER #   | CHARGE AMOUNT | CREDIT AMOUNT | TOTAL BILL | BALANCE FORWARD | DUE DATE | KWH |
|----------|----------------------------|-------------------|-------|-----------|---------------|---------------|------------|-----------------|----------|-----|
| CCF      | KW                         |                   |       |           |               |               |            |                 |          |     |
| 10/07/21 | Regular Bill               |                   |       |           |               |               | \$42.30    |                 | 10/29    | 169 |
| 10/15/21 | Payment                    |                   |       |           |               | \$42.30       |            |                 |          |     |
| 11/05/21 | ELECTRIC SERVICE           | 10/05/21 11/03/21 | 16322 | 114312585 | \$17.92       |               |            |                 |          |     |
| 11/05/21 | ELE-Direct Energy Services |                   |       |           | \$14.86       |               |            |                 |          |     |
| 11/05/21 | Regular Bill               |                   |       |           |               |               | \$32.78    |                 | 11/29    | 119 |
| 11/15/21 | Payment                    |                   |       |           |               | \$32.78       |            |                 |          |     |
| 12/08/21 | ELECTRIC SERVICE           | 11/03/21 12/06/21 | 16676 | 114312585 | \$33.27       |               |            |                 |          |     |
| 12/08/21 | ELE-Direct Energy Services |                   |       |           | \$44.21       |               |            |                 |          |     |
| 12/08/21 | Regular Bill               |                   |       |           |               |               | \$77.48    |                 | 12/30    | 354 |
| 12/28/21 | Payment                    |                   |       |           |               | \$77.48       |            |                 |          |     |
| 01/11/22 | Payment                    |                   |       |           |               | \$60.00       |            |                 |          |     |
| 01/11/22 | ELECTRIC SERVICE           | 12/06/21 01/07/22 | 16973 | 114312585 | \$29.70       |               |            |                 |          |     |
| 01/11/22 | ELE-Direct Energy Services |                   |       |           | \$37.10       |               |            |                 |          |     |
| 01/11/22 | Regular Bill               |                   |       |           |               |               | \$6.80     |                 | 02/02    | 297 |
| 02/08/22 | Payment                    |                   |       |           |               | \$6.80        |            |                 |          |     |
| 02/10/22 | Transfer Debit             |                   |       |           | \$292.89      |               |            |                 |          |     |
| 02/10/22 | Transfer Debit             |                   |       |           | \$6.00        |               |            |                 |          |     |
| 02/10/22 | ELECTRIC SERVICE           | 01/07/22 02/08/22 | 17199 | 114312585 | \$27.23       |               |            |                 |          |     |
| 02/10/22 | ELE-Direct Energy Services |                   |       |           | \$28.23       |               |            |                 |          |     |
| 02/10/22 | Regular Bill               |                   |       |           |               |               | \$55.46    |                 | 03/04    | 226 |
| 02/15/22 | Transfer Debit             |                   |       |           | \$1593.20     |               |            |                 |          |     |
| 03/09/22 | Late Payment Charge        |                   |       |           | \$0.83        |               |            |                 |          |     |
| 03/11/22 | Transfer Debit             |                   |       |           | \$587.03      |               |            |                 |          |     |
| 03/11/22 | ELECTRIC SERVICE           | 02/08/22 03/09/22 | 17348 | 114312585 | \$21.54       |               |            |                 |          |     |

| DATE     | CHARGE TYPE                | BILLING PERIOD    | READ  | METER #   | CHARGE AMOUNT | CREDIT AMOUNT | TOTAL BILL | BALANCE FORWARD | DUE DATE | KWH |
|----------|----------------------------|-------------------|-------|-----------|---------------|---------------|------------|-----------------|----------|-----|
| CCF      | KW                         |                   |       |           |               |               |            |                 |          |     |
| 03/11/22 | ELE-Direct Energy Services |                   |       |           | \$18.61       |               |            |                 |          |     |
| 03/11/22 | Regular Bill               |                   |       |           |               |               | \$96.44    | \$56.29         | 04/04    | 149 |
| 03/18/22 | Payment                    |                   |       |           |               | \$96.44       |            |                 |          |     |
| 04/08/22 | Transfer Debit             |                   |       |           | \$457.28      |               |            |                 |          |     |
| 04/11/22 | Transfer Debit             |                   |       |           | \$37.10       |               |            |                 |          |     |
| 04/11/22 | ELECTRIC SERVICE           | 03/09/22 04/07/22 | 17490 | 114312585 | \$20.99       |               |            |                 |          |     |
| 04/11/22 | ELE-Direct Energy Services |                   |       |           | \$17.74       |               |            |                 |          |     |
| 04/11/22 | Regular Bill               |                   |       |           |               |               | \$38.73    |                 | 05/03    | 142 |
| 04/15/22 | Payment                    |                   |       |           |               | \$90.00       |            |                 |          |     |
| 05/06/22 | Transfer Debit             |                   |       |           | \$8.74        |               |            |                 |          |     |
| 05/10/22 | ELECTRIC SERVICE           | 04/07/22 05/06/22 | 17635 | 114312585 | \$21.19       |               |            |                 |          |     |
| 05/10/22 | ELE-Direct Energy Services |                   |       |           | \$18.11       |               |            |                 |          |     |
| 05/10/22 | Regular Bill               |                   |       |           |               |               |            | \$-11.97        | 06/01    | 145 |
| 05/13/22 | Payment                    |                   |       |           |               | \$38.73       |            |                 |          |     |
| 06/09/22 | ELECTRIC SERVICE           | 05/06/22 06/07/22 | 17804 | 114312585 | \$23.01       |               |            |                 |          |     |
| 06/09/22 | ELE-Direct Energy Services |                   |       |           | \$21.11       |               |            |                 |          |     |
| 06/09/22 | Regular Bill               |                   |       |           |               |               | \$2975.66  | \$2931.54       | 07/01    | 169 |
| 06/15/22 | Payment                    |                   |       |           |               | \$40.00       |            |                 |          |     |
| 06/24/22 | Payment                    |                   |       |           |               | \$5.00        |            |                 |          |     |
| 07/11/22 | ELECTRIC SERVICE           | 06/07/22 07/07/22 | 17977 | 114312585 | \$23.54       |               |            |                 |          |     |
| 07/11/22 | ELE-Direct Energy Services |                   |       |           | \$21.61       |               |            |                 |          |     |
| 07/11/22 | Regular Bill               |                   |       |           |               |               | \$2975.81  | \$2930.66       | 08/02    | 173 |

# **EXHIBIT 7**



July 27, 2022

**BCS Decision Report**

**BCS Case #:** 003839659 **Open Date:** 2022-05-19  
**Customer Name:** STEPHANIE LANE  
**Service Address:** 332 SHARON AVE  
APT C  
SHARON HILLS, PA 19079  
**BCS Bill Account #:** 6492910108 **Previous Case #:**  
**Violation Type:** NO **Chapter Type:**  
**Decision Type:** W **Section / Rule:**  
**Investigator Name:** FLORENCE BLAMO  
  
**Decision Issued Date:** 2022-07-01  
**Case Closed Date:** 2022-07-01

**Letter Description:**

|                                   |           |                                    |            |
|-----------------------------------|-----------|------------------------------------|------------|
| <b>Total Balance:</b>             | \$2982.24 | <b>Balance Date:</b>               | 2022-07-01 |
| <b>Amount to Restore Service:</b> | \$0.00    | <b>Amount to Continue Service:</b> | \$0.00     |
| <b>Date Payment Due:</b>          |           | <b>Regular Budget Amount:</b>      | \$0.00     |
| <b>Special Budget Payment:</b>    | \$0.00    | <b>Final Bill Monthly Payment:</b> | \$0.00     |
| <b>Plus Arrears Payment:</b>      | \$0.00    | <b>End of Month Payment:</b>       | \$0.00     |
| <b>Current Monthly Payment:</b>   | \$0.00    |                                    |            |
| <b>Payment Terms:</b>             |           |                                    |            |

**PAR Description:**

**Resolution Description:**

1. THE COMPANY IS WITHIN THEIR RIGHTS TO TRANSFER THE TENANT???'S ACCOUNT BALANCE UNDER YOUR ACCOUNT WHEN THEY DISCOVER FOREIGN WIRING.2. YOU ARE RESPONSIBLE FOR THE TRANSFERRED BALANCE TOTALING \$2,973.50.