



Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

November 29, 2022

**VIA E-FILING**

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

**RE: Haleemah Gross v. PECO Energy Company  
Docket No. F-2022-3036710**

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 that reads "Khadijah Scott".

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

Cc: Haleemah Gross (via email)



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>HALEEMAH GROSS</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3036710</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”), pursuant to 52 Pa. Code §5.101(a)(4), respectfully petitions this Honorable Commission to dismiss the instant Complaint as legally insufficient.

1. On November 9, 2022, PECO Energy Company ("PECO Energy") was served with a formal complaint filed by Haleemah Gross (hereafter “Complainant”) in the above captioned docket. A copy of the Complaint is attached hereto as Exhibit “1”.
2. On November 29, 2022, PECO Energy filed an Answer to the Complainant’s Complaint. A copy of the Answer is attached hereto as “Exhibit 2”.
3. In the Complaint, the Complainant requests that PECO credit her account for the months of July and August 2022 because a squatter moved into her home during that time period, without her authorization. See Exhibit “1”.
4. In essence, the Complainant is requesting that the Commission have PECO Energy intervene in a private party matter.
5. PECO Energy therefore files the instant Preliminary Objections.

6. 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).

7. Commission procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil procedure. Equitable Small Transportation Intervenor. v. Equitable Gas Co., 1994 Pa.PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994).

8. In deciding preliminary objections, the Public Utility Commission must determine, based on the factual pleadings of the petitioner, if relief or recovery is possible. Roc v. Flaherty, 527 A.2d 211 (Pa. Cmwlth 1985).

9. A complaint must be able to recover under the law to survive a preliminary objection. 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”).

10. All of the non-moving party’s averments must be taken as true for the sake of deciding the preliminary objection. County of Allegheny v. Commw. of Pa., 490 A.2d 402 (Pa. 1985).

11. The court does not, however, need to accept, “unwarranted inferences from facts, argumentative allegations, or expressions of opinions.” Feingold v. McNulty, 2009 Phila. Ct. Com. Pl LEXIS 167, \*3.

12. 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.

13. 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.Comm. Ct. 2003), petition for allowance of appeal denied, 836 A.2d 123 (Pa. 2003).

14. 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.

**I. Legal Insufficiency – PECO Energy does not involve itself in the private matters of its customers.**

1. The Complainant is requesting that PECO Energy hold a person who she avers moved into her property without authorization responsible for service charges that accrued in the Complainant's name during the time period of July and August 2022.

2. Pursuant to 52 Pa Code 56, a customer is defined as:

(i) A natural person at least 18 years of age in whose name a residential service account is listed and who is primarily responsible for payment of bills rendered for the service or an adult occupant whose name appears on the mortgage, deed or lease of the property for which the residential public utility service is requested.

3. In this matter, it is undisputed that the Complainant was PECO's customer of record up until the date that she disconnected services on August 15, 2022.

4. The Complainant's request to charge an unauthorized resident at her property for a portion of her bill because she was unaware that an unauthorized resident resided in her home is outside the jurisdiction of the Commission.

5. The issue that the Complainant raises involves a private matter outside of PECO's control.

6. Accordingly, the Complainant's formal complaint should be dismissed as it fails to set forth a violation by PECO Energy of either the Public Utility Code, the regulations of the PUC or PECO's Electric Service Tariff as required by 52 Pa. Code §5.22(a)(4).

**REQUEST FOR RELIEF**

WHEREFORE, for the reasons set forth above, PECO Energy Company respectfully requests that your Honorable Commission summarily dismiss the Complainant's formal complaint, and all issues which were raised in the Complaint.

Respectfully submitted,



---

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>HALEEMAH GROSS</b>	:	
<b>Complainant</b>	:	
	:	
<b>v.</b>	:	<b>DOCKET NO. F-2022-3036710</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

---

**VERIFICATION**

I, Khadijah Scott, hereby declare that I am counsel for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. §4904 pertaining to false statements to authorities.

Date: November 29, 2022



---

Khadijah Scott

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>HALEEMAH GROSS</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3036710</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 Objection in the above matter upon all interested parties by *E-mailing* a copy to:

HALEEMAH GROSS  
8208 GROVERS AVE  
APT C  
PHILADELPHIA PA 19153  
*Via email: HALEEMAH67@msn.com*

Dated: November 29, 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**

timely

BCS: 3859030

PECO ENERGY COMPANY

Must be returned by NOVEMBER 21, 2022

# PENNSYLVANIA PUBLIC UTILITY COMMISSION

## Formal Complaint

Public Utility Commission  
Formal Complaint  
Form No. 100-100  
Effective 10/1/2022

**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 Haleemah Gross

Street/P.O. Box 8208 Grovers Ave Apt # C

City Phila State PA Zip 19153

County USA

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

( ) \_\_\_\_\_ (home) (215) 688-8454 (mobile)

E-mail Address (required): Haleemah67@msn.com

Utility Account Number (from your bill) 7187496070

**If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.**

Name \_\_\_\_\_

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

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

### 2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

Peco (apc)

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).

It is a Squatter in my house since July I have a Police Report 22-12-047260 the cops told me make it uncomfortable for the person that's staying there so I cut the electric off and she got it cut back on with out a lease. I Don't know this lady

She shouldn't be here my electric is usually \$26.00  
due to me being on the Cap program I was never  
late paying my bill I travel for work a lot when  
I returned home that's when I noticed  
this unknown lady was living in my home.  
Peco told me it was nothing they could do.

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 will like this bill of my account since I was NOT the one living in the home and I have proof that I cut the electric off and they allowed some one name Tony Richardson to open an account under my address. When I ask for information I was treated unfairly and was told "its not my problem" and "If its not in your name I don't need to worry"

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.

9. **Verification and Signature**

**You must sign your complaint.** Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. **If you do not sign the Formal Complaint, the PUC will not accept it.**

**Verification:**

I Haleemah Gross, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Haleemah D  
(Signature of Complainant)

10/20/2022  
(Date)

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

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept it**.

10. **How to File Your Formal Complaint**

**Electronically.** You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

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

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

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

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

**Keep a copy of your Formal Complaint for your records.**

**Please know that your complaint form and the utility's answer will not be published to the PUC's website.** Once your complaint case moves to the Office of Administrative Law Judge, any filings you make **should be marked confidential if you do not want them published to the website.**

Haleemah Gross  
8208 Grovers Ave Apt C  
Phila, Pa 19153



Pennsylvania Public Utility Commission  
400 North Street, Commonwealth Keystone Building  
2nd floor

Harrisburg, PA 17120

## **EXHIBIT 2**



Direct Dial: 215.841.6841  
khadijah.scott@exeloncorp.com

November 29, 2022

**VIA E-MAIL**

Haleemah Gross  
8208 Grovers Ave  
Apt C  
Philadelphia Pa 19153

**Re: Haleemah Gross vs. PECO Energy Company  
PUC Docket No. F-2022-3036710**

Dear Ms. Gross:

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,

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

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
11/29/2022	2445551

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-2022-3036710  
**Case Description:** Answer to Formal Complaint  
**Transmission Date:** 11/29/2022 11:07 AM  
**Filed On:** 11/29/2022 11:07 AM  
**eFiling Confirmation Number:** 2445551

File Name	Document Type	Upload Date
Answer to Formal Complaint - Haleemah Gross.pdf	Answer to Formal Complaint	11/29/2022 11:07:05 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

November 28, 2022

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

**RE: Haleemah Gross vs. PECO Energy Company  
PUC Docket No. F-2022-3036710**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is the *Answer 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 that reads "Khadijah Scott".

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

Cc: Not Recommended for Call of the Docket

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>HALEEMAH GROSS</b>	:	
<b>Complainant</b>	:	
	:	
v.	:	<b>DOCKET NO. F-2022-3036710</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

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

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On November 29, 2022, PECO Energy Company ("PECO Energy") was served with a formal complaint filed by HALEEMAH GROSS (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 her formal complaint, the Complainant states that a squatter has been residing in her property as of July 2022. The Complainant avers that after she discontinued service in her name, the person connected service in their name at her residency. The Complainant requests that she not be held responsible for the electric service bill because she was not the only person living in the home.

PECO Energy's records reveal that the Complainant initiated electric service in March 2018 at 8208 Grovers Ave., Apt C, Philadelphia, PA 19153, under account number 71874-96070.

See Account Activity Statement, attached hereto as Exhibit “1”. On August 15, 2022, the Complainant disconnected service at her residence. A final balance of \$235.55 remained on the account. See, Exhibit “1”. On August 19, 2022, the Complainant contacted PECO Energy and advised that she disconnected her electric service because an unknown squatter resided at her property. The Complainant was advised that a new customer had placed service in their name as of August 16, 2022. The Complainant requested that the new customer’s service be disconnected. PECO Energy advised that it could not disconnect that customer’s service based on her request. The Complainant was also advised that an unauthorized squatter was a private matter outside of PECO Energy’s control.

On August 22, 2022, the Complainant filed an Informal Complaint with the Bureau of Consumer Services (“BCS”) under case number 003859030. On October 20, 2022, the BCS dismissed the complaint as follows:

DECISION E-MAILED TO HALEEMAH GROSS. COMPLAINT IS DISMISSED. HALEEMAH GROSS IS RESPONSIBLE FOR THE FINAL BALANCE OF 232.55 FOR THE SERVICE THAT WAS IN HER NAME AT 8208 GROVERS AVE APT C IN PHILADELPHIA, PA FROM MARCH 1, 2018- AUGUST 16, 2022. THERE IS NO RECORD MS. GROSS REQUESTED DISCONTINUANCE PRIOR TO AUGUST 15, 2022. THERE IS NO RECORD ANYONE ELSE ESTABLISHED SERVICE BETWEEN MARCH 2, 2018 AND AUGUST 15, 2022. PECO ENERGY IS NOT OBLIGATED TO DENY SERVICE TO ANY OTHER ADULT APPLICANT AND THE COMPANY IS NOT OBLIGATED TO HONOR THE REQUEST OF MS. GROSS TO DENY SERVICE TO ANY OTHER POTENTIAL APPLICANT.

See, BCS Decision #003859030, attached hereto as Exhibit “2”.

In this matter, PECO Energy avers that the company properly billed the Complainant for the time that service remained in her name. See, Exhibit “1”. Any matters relating to unauthorized

use by an unauthorized resident is a private matter to be resolved between the parties and is outside of the jurisdiction of the Public Utility Commission.

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>HALEEMAH GROSS</b>	:	
<b>Complainant</b>	:	
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v.	:	<b>DOCKET NO. F-2022-3036710</b>
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<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: November 29, 2022



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Khadijah Scott

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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v.	:	<b>DOCKET NO. F-2022-3036710</b>
	:	
<b>PECO ENERGY COMPANY</b>	:	
<b>Respondent</b>	:	

**CERTIFICATE OF SERVICE**

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

HALEEMAH GROSS  
8208 GROVERS AVE  
APT C  
PHILADELPHIA PA 19153  
*Via email: HALEEMAH 67@msn.com*

Dated: November 29, 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**

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S
1	<b>Account Number: 7187496070</b>			<b>Service Address:</b>			Current Bill: \$88.16			<b>Account Balance: \$232.55</b>									
2	<b>Account Name: HALEEMAH Z GROSS</b>			8208 GROVERS AV APT C			Billed Prior: \$144.39												
3	<b>Account Status: FINAL</b>			PHILADELPHIA, PA 19153			Balance Due: \$232.55												
4	<b>Meter Bill Group: 15</b>																		
5				<b>Mail To:</b>			Credit Amount: \$0.00			<b>Rates:</b>									
6				HALEEMAH Z GROSS			Deposit Requested: \$0.00			CAP FCO ELECTRIC RESIDENTIAL SERVICE									
7				529 HARRIS ST NW			Deposit On-Hand: \$0.00												
8				PHILADELPHIA, PA 19153			CAP Pre-program Arrears: \$0.00												
9							Payment Agreement Balance: \$0.00												
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11																			
12	Account Transaction Activity																		

	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
14	09/08/2020		PAYMENT								-\$50.35							
15	09/16/2020	ELECTRIC SERVICE		08/17/2020-09/16/2020	19105	ACTUAL	125648840	184	0		\$33.81	\$42.57	\$33.81	\$76.38	10/08/2020	\$76.38		\$0.00
16	10/13/2020		PAYMENT								-\$76.38							
17	10/15/2020	ELECTRIC SERVICE		09/16/2020-10/15/2020	19208	ACTUAL	125648840	103	0		\$23.33	\$0.00	\$23.33	\$23.33	11/06/2020	\$23.33	48	\$0.00
18	11/16/2020	ELECTRIC SERVICE		10/15/2020-11/16/2020	19449	ACTUAL	125648840	241	0		\$41.20	\$23.33	\$41.20	\$64.53	12/08/2020	\$64.53	284	\$0.00
19	12/07/2020		PAYMENT								-\$23.33							
20	12/17/2020	ELECTRIC SERVICE		11/16/2020-12/17/2020	19620	ACTUAL	125648840	171	0		\$32.21	\$41.20	\$32.21	\$73.41	01/08/2021	\$73.41	618	\$0.00
21	12/31/2020		PAYMENT								-\$73.41							
22	01/20/2021	ELECTRIC SERVICE		12/17/2020-01/20/2021	19712	ACTUAL	125648840	92	0		\$22.01	\$0.00	\$22.01	\$22.01	02/11/2021	\$22.01	926	\$0.00
23	02/04/2021		PAYMENT								-\$22.01							
24	02/18/2021	ELECTRIC SERVICE		01/20/2021-02/18/2021	19783	ACTUAL	125648840	71	0		\$19.28	\$0.00	\$19.28	\$19.28	03/12/2021	\$19.28	945	\$0.00
25	02/22/2021		PAYMENT								-\$19.28							
26	03/19/2021	ELECTRIC SERVICE		02/18/2021-03/19/2021	19921	ACTUAL	125648840	138	0		\$27.82	\$0.00	\$27.82	\$27.82	04/12/2021	\$27.82	708	\$0.00
27	04/14/2021		PAYMENT								-\$27.82							
28	04/19/2021	ELECTRIC SERVICE		03/19/2021-04/19/2021	20115	ACTUAL	125648840	194	0		\$35.14	\$0.00	\$35.14	\$35.14	05/11/2021	\$35.14	362	\$0.00
29	05/03/2021		PAYMENT								-\$35.14							
30	05/18/2021	ELECTRIC SERVICE		04/19/2021-05/18/2021	20308	ACTUAL	125648840	193	0		\$35.04	\$0.00	\$35.04	\$35.04	06/09/2021	\$35.04	151	\$0.00
31	06/08/2021		PAYMENT								-\$35.04							
32	06/17/2021	ELECTRIC SERVICE		05/18/2021-06/17/2021	20581	ACTUAL	125648840	273	0		\$45.41	\$0.00	\$45.41	\$45.41	07/09/2021	\$45.41		\$0.00
33	07/19/2021		PAYMENT								-\$45.41							
34	07/19/2021	ELECTRIC SERVICE		06/17/2021-07/19/2021	20961	ACTUAL	125648840	380	0		\$59.15	\$0.00	\$59.15	\$59.15	08/10/2021	\$59.15		\$0.00
35	08/17/2021	ELECTRIC SERVICE		07/19/2021-08/17/2021	21015	ACTUAL	125648840	54	0		\$17.07	\$59.15	\$17.07	\$76.22	09/08/2021	\$76.22		\$0.00
36	08/19/2021		PAYMENT								-\$76.22							
37	09/16/2021	ELECTRIC SERVICE		08/17/2021-09/16/2021	21255	ACTUAL	125648840	240	0		\$41.54	\$0.00	\$41.54	\$41.54	10/08/2021	\$41.54		\$0.00
38	09/24/2021		PAYMENT								-\$41.54							
39	10/15/2021	ELECTRIC SERVICE		09/16/2021-10/15/2021	21608	ACTUAL	125648840	353	0		\$56.49	\$0.00	\$56.49	\$56.49	11/08/2021	\$56.49		\$0.00
40	11/15/2021	ELECTRIC SERVICE		10/15/2021-11/15/2021	21879	ACTUAL	125648840	271	0		\$45.72	\$56.49	\$45.72	\$102.21	12/07/2021	\$102.21	287	\$0.00
41	12/15/2021		PAYMENT								-\$50.00							
42	12/16/2021	ELECTRIC SERVICE		11/15/2021-12/16/2021	21925	ACTUAL	125648840	46	0		\$16.36	\$52.21	\$16.36	\$68.57	01/07/2022	\$68.57	612	\$0.00
43	01/03/2022		PAYMENT								-\$52.21							
44	01/20/2022	ELECTRIC SERVICE		12/16/2021-01/20/2022	22231	ACTUAL	125648840	306	0		\$53.00	\$16.36	\$53.00	\$69.36	02/11/2022	\$69.36	885	\$0.00
45	02/17/2022		PAYMENT								-\$69.36							
46	02/18/2022	ELECTRIC SERVICE		01/20/2022-02/18/2022	22530	ACTUAL	125648840	299	0		\$53.62	\$0.00	\$53.62	\$53.62	03/15/2022	\$53.62	883	\$0.00
47	03/08/2022		PAYMENT								-\$53.62							
48	03/21/2022	ELECTRIC SERVICE		02/18/2022-03/21/2022	22684	ACTUAL	125648840	154	0		\$32.79	\$0.00	\$32.79	\$32.79	04/12/2022	\$32.79	581	\$0.00
49	04/07/2022		PAYMENT								-\$32.79							
50	04/19/2022	ELECTRIC SERVICE		03/21/2022-04/19/2022	22873	ACTUAL	125648840	189	0		\$37.80	\$0.00	\$37.80	\$37.80	05/11/2022	\$37.80	395	\$0.00
51	05/09/2022		PAYMENT								-\$37.80							

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13	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	
52	05/18/2022	ELECTRIC SERVICE		04/19/2022-05/18/2022	23380	ACTUAL	125648840	507	0		\$83.73	\$0.00	\$83.73	\$83.73	06/09/2022	\$83.73	168	\$0.00	
53	06/17/2022	ELECTRIC SERVICE		05/18/2022-06/17/2022	23728	ACTUAL	125648840	348	0		\$62.87	\$83.73	\$62.87	\$146.60	07/11/2022	\$146.60		\$0.00	
54	07/14/2022		PAYMENT								-\$84.00								
55	07/19/2022	ELECTRIC SERVICE		06/17/2022-07/19/2022	24198	ACTUAL	125648840	470	0		\$81.79	\$62.60	\$81.79	\$144.39	08/10/2022	\$144.39		\$0.00	
56	08/16/2022	ELECTRIC SERVICE		07/19/2022-08/16/2022	24710	ACTUAL	125648840	512	0		\$88.16	\$144.39	\$88.16	\$232.55	09/07/2022	\$232.55		\$0.00	
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13	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		
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## **EXHIBIT 2**



November 29, 2022

**BCS Decision Report**

**BCS Case #:** 003859030 **Open Date:** 2022-08-22  
**Customer Name:** HALEEMAH GROSS  
**Service Address:** 8208 GROVERS AVE  
APT C  
PHILADELPHIA, PA 19153  
**BCS Bill Account #:** 7187496070 **Previous Case #:**  
**Violation Type:** NO **Chapter Type:**  
**Decision Type:** W **Section / Rule:**  
**Investigator Name:** JULIE CARLIN  
  
**Decision Issued Date:** 2022-10-20  
**Case Closed Date:** 2022-10-20

**Letter Description:**

<b>Total Balance:</b>	\$232.55	<b>Balance Date:</b>	2022-09-06
<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:**

DECISION E-MAILED TO HALEEMAH GROSS. COMPLAINT IS DISMISSED. HALEEMAH GROSS IS RESPONSIBLE FOR THE FINAL BALANCE OF 232.55 FOR THE SERVICE THAT WAS IN HER NAME AT 8208 GROVERS AVE APT C IN PHILADELPHIA, PA FROM MARCH 1, 2018-AUGUST 16, 2022. THERE IS NO RECORD MS. GROSS REQUESTED DISCONTINUANCE PRIOR TO AUGUST 15, 2022. THERE IS NO RECORD ANYONE ELSE ESTABLISHED SERVICE BETWEEN MARCH 2, 2018 AND AUGUST 15, 2022. PECO ENERGY IS NOT OBLIGATED TO DENY SERVICE TO ANY OTHER ADULT APPLICANT AND THE COMPANY IS NOT OBLIGATED TO HONOR THE REQUEST OF MS. GROSS TO DENY SERVICE TO ANY OTHER POTENTIAL APPLICANT.