

WESLEY COLLIER

3807 Poplar Street

Philadelphia, PA 19104

Phone: 215-386-3864 Fax: 215-386-3864

Email: wesleycollier49@gmail.com

December 30, 2022

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

RCVD PUC SEC BUR
JAN 3 2023 AM 10:48

RE: Wesley Collier vs. PECO Energy Company

PUC Docket No. C-2022-3037194

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is my Letter of Opposition to PECO's request on December 21, 2022 to the Commission to dismiss my Formal Complaint.

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties.

In gratitude

A handwritten signature in cursive script that reads "Wesley Collier". The signature is written in black ink and is positioned above a horizontal line.

Wesley Collier, Propria Persona

Encl.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION

WESLEY COLLIER

Complainant

DOCKET NO. C-2022-3037194

PECO ENERGY COMPANY

Respondent

COMPLAINANT RESPONSE

IN OPPOSITION TO

RESPONDENT'S REQUEST

FOR DISMISSAL OF

COMPLAINANT'S ACTION

OF THIS INSTANT

RCVD PUC SEC BUR
JAN 3 2023 AM 10:48

And Now comes Complainant, Propria Persona, and represents on or about December 2, 2022, I Wesley Collier, filed a Complaint to the Pennsylvania Public Utility Commission against Respondent PECO Energy Company (henceforth "PECO Energy") indicting "PECO Energy" with Deceit, Dishonesty, Duplicity, and Defalcation, inter alia, as it relates to the return of my \$230 deposit with "PECO Energy" in the herein above captioned matter.

On 12-21 2022, "PECO Energy" in the process of providing some admission and denial answers to my Complaints requested that this August and Honorable Commission dismiss my Complaint, ergo: I am perforce to file my Response in Opposition to "PECO Energy" request for Dismissal of my Complaint.

1. No response is required

2. No response is required

3. No response is required

4. "PECO Energy" indicated in my telephonic contact in October 2022 that my \$230 Deposit with interest will be returned to me in November. And what is more, "PECO" Energy stated that this telephonic colloquy betwixt me and the PECO proxy was recorded. By way of further arguendo, "PECO Energy" sent me a "Notice of

Deposit Request” Letter dated August 20, 2021. This letter memorialized that my Deposit will be returned with interest, see paragraph 10 Residential Customers appended as Exhibit A. I detrimentally relied upon “PECO Energy’s” fraudulent inducement to return my deposit with interest after one year. It has been 1 year and a couple of months and PECO Energy has refused to return my Deposit, ergo my Complaint.

PECO Energy’s published reason for not returning my \$230 deposit after one year is that I have not completed on-time payments for 12 consecutive months sans providing any probative/dispositive evidence of when I received and/or a billing statement was delivered to me by the United States Postal Service which is PECO Energy’s methodology in notifying me that a payment is due. Given the adverse impact of the Covid Pandemic creating a pronounced staffing shortage in the United States Postal Service mail delivery in my area was unreasonably compromised and delayed and at times non-existent.

In its effort to glom more money from me, PECO Energy proffered Exhibit 1 which is titled "PECO Account Activity Statement" which is my soi-disant account with "PECO Energy". Of relevant and material importance this Statement is bereft of information when PECO Energy factually mailed the billing statements to me and equally important when the monthly billing statements were actually delivered to me. What "PECO Energy's" Exhibit 1 highlights, among other things, are notations that I was gratuitously charged two (2) late fees. One charge was appended on 12-15-2021 in the amount of \$1.05 and the other charge in the amount of \$1.79 was applied on 7-19-2022. For the actual person[s] who infused the data on the "PECO Account Activity Statement" please come forth in a written notarized document to demonstrate that they hand-delivered to me, in a timely fashion, the billing statements that are associated with "late fee(s)".

Moreover, "PECO Energy" never provided me with any advance notices of the exact date my next payments are due maugre having the opportunity to do so. As it relates to my interest payment, PECO refuses to return the money to me and without my

consent/approval; “PECO Energy” sua sponte, assigned my money to its pecuniary benefit thereby depriving me of the opportunity of exercising my money at my discretion!

To the extent that “PECO Energy” cannot determine when its Billing Statement can be delivered to me by the United States Postal Service and if I received its Billing Statements in a timely manner during the Pandemic, “PECO Energy” must not entertain or implement the execution of a late fee and/or refuse to return to me my \$230 Deposit. Forsooth, “PECO Energy” has, with a pernicious hand, upgraded its grip on my \$230 Deposit to a stranglehold and placed it into a black hole for which my deposit and interest cannot be returned to me without the intervention of The August and Honorable Pennsylvania Public Utility Commission.

5. “PECO Energy’s” proxy, in my telephonic contact on November 29, 2022, did proffer a plea to me that I do not contact The Public Utility Commission with the understanding that my \$230 Deposit could be returned to me in December. “PECO Energy” should have

an audio report on this colloquy and as of this juncture has not returned my \$230 Deposit.

6. PECO Energy admitted that I requested the telephone number and mailing address of the Department responsible for managing my Deposit. I was told that the information was not available. Yet PECO Energy published the address on its "NOTICE OF DEPOSIT REQUEST". The address is PECO, Deposit Verification Department n4-4, PO Box 8699, Philadelphia, PA 19101-8699, yet PECO Energy Admitted that the address was not available?, kindly and please see Exhibit A, Mahalo.

7. Existentially and factually speaking, as of this writing "PECO Energy", in a self-serving shuffle, has refused, resisted, and failed to return to me my \$230 Deposit. Even worse, "PECO Energy" provided untenable *raison d'être*s and exegeses for its abusive, and exploitive and oppressive deportment in this matter against me a United States Military Veteran who is an elderly citizen living on a fixed income and a member of a minority cadre, who promptly

paid his PECO Energy Bill when it was delivered to me by the United States Postal Service, see Exhibit B.

8. I have incontrovertible evidence that residential customers of “PECO Energy” who are members of the majority racial group receive preferential handling from “PECO Energy” than me, the Complainant and other people of color.

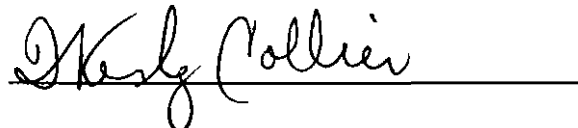
9. No response is required

10. No response is required

In substance and sum, I have a Complaint against “PECO Energy” that is inoculated with palmary merit that is warranted, and requires the sedulous consideration of a disinclined, disinterested, and unbiased tribune who will hear my Complaint, and render an equitable, fair and just verdict in this matter.

WHEREFORE, I forever pray this August and Honorable Pennsylvania Public Utility Commission rejects and dismisses with prejudice PECO Energy Company's requests for dismissal of my on the-spot-Complaint.

Respectfully Submitted 12/30/2022

A handwritten signature in cursive script, reading "Wesley Collier", is written over a solid horizontal line.

Wesley Collier, Propria Persona

3807 Poplar Street

Philadelphia, PA 19104

(215) 386-3864

wesleycollier49@gmail.com

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

WESLEY COLLIER

Complainant

v.

DOCKET NO. C-2022-3037194

PECO ENERGY COMPANY

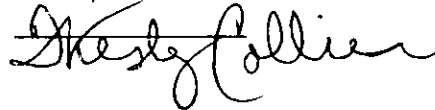
Respondent

VERIFICATION

I, Wesley Collier, Propria Persona hereby declare that I make this verification 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: December 30, 2022

Wesley Collier

A handwritten signature in black ink that reads "Wesley Collier". The signature is written in a cursive style with a large, stylized initial "W".

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

WESLEY COLLIER
Complainant

v.

DOCKET NO. C-2022-3037194

PECO ENERGY COMPANY
Respondent

CERTIFICATE OF SERVICE

I, Wesley Collier, hereby certify that I have this day served a copy my Response in Opposition for "PECO Energy" request for Dismissal of my Complaint in the above matter upon all interested parties via the United States Postal Service by First Class Mail.

Properly addressed to:

KHADIJAH SCOTT, Esquire
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, P A 19103
(215) 841-6841
Fax: 215.568.3389
Khadijah.Scott@exeloncorp.com

Dated: December 30, 2022

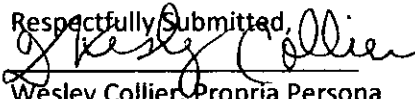
Respectfully Submitted,

Wesley Collier, Propria Persona
3807 Poplar Street
Philadelphia, PA 19104
(215) 386-3864
wesleycollier49@gmail.com

EXHIBIT A

RECEIVED

JAN 03 2023

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



An Exelon Company

0179

PECO
PO BOX 13778
Philadelphia, PA 19101

Account Number: 1002453000
August 20, 2021

0000535 01 AB 0.425 **AUTO T2 0 9264 19104-111307 -C02-P00535-I



WESLEY COLLIER
3807 POPLAR ST
PHILADELPHIA PA 19104-1113

For Service to:
3807 POPLAR ST
PHILADELPHIA, PA 19104



NOTICE OF DEPOSIT REQUEST

Dear Customer:

You recently applied for electric and/or natural gas service from PECO. In evaluating your application and based on information we received from the credit reporting agency below, PECO requires a deposit of \$230.00. Only PECO, and not the credit agency below, can tell you why the deposit is needed. The credit agency did not influence our decision other than providing us with your credit information.

If you do not pay the required deposit when due, your electric and/or natural gas service may be terminated.

Under the Fair Credit Reporting Act, you have the right to know the information provided to us. The information can be obtained by contacting:

Equifax
PO Box 740241
Atlanta, GA 30374-0241
1-888-259-2689

Reason(s) for adverse action concerning credit score:

- Incomplete credit history

Date score created: August 19, 2021

Equifax Advanced Risk Model Score: Not available, see reasons above.

Equifax Advanced Risk Model Score Range: 0-999

Residential Customers

The deposit is equal to two times the average monthly bill. You will be billed in three parts: 50 percent on the first bill and 25 percent on each of the next two bills. The deposit is in addition to your monthly energy usage charges. After the deposit is paid in full, and our records show 12 months of on-time payments, your deposit will be returned with interest.

Non-residential Customers

The deposit is equal to your two largest monthly bills combined in the last 12 months. After the deposit is paid in full, and your records show 24 months of on time payments, your deposit will be returned with interest. Once the deposit is billed, it cannot be waived. If you do not pay the deposit, your service may be shut off. If you stop or switch your service before your deposit is refunded, we will apply your deposit, plus interest, to your final balance.

If you would like more information about PECO's rules, please contact us at 1-800-494-4000, via mail at the address below. You may also visit our business office at 2301 Market Street in Philadelphia, Monday through Friday, 8:30 a.m. to 5:00 p.m.

PECO
Deposit Verification Department N4-4
PO Box 8699
Philadelphia, PA 19101-8699

Thank you,

PECO



*** Account Information ***

*** Current Account Status ***

Account Number: 10024-53000
 Account Status: Active
 Requested By: WESLEY COLLIER
 (215)386-3864 Extension:

Mail To: WESLEY COLLIER
 3807 POPLAR ST
 PHILADELPHIA PA 19104

Current Bill: \$0.00
 Billed Prior: \$0.00
 Balance Due: \$0.00
 Service Address: 3807 POPLAR ST
 PHILADELPHIA PA 19104

Credit Amount: \$8.90
 Deposit Requested: \$230.00
 Deposit On-Hand: \$230.00
 Meter Bill Grp: 18
 Rate: Electric Residential Service

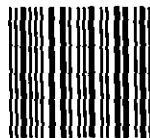
DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
08/19/21	DEPOSIT				\$115.00					
08/20/21	ELECTRIC SERVICE	08/19/21 08/20/21	52314	124725340	\$8.46					
08/20/21	CONNECTION CHARGE - STANDARD				\$6.00					
08/20/21	Regular Bill						\$129.46		09/13	63
09/13/21	Payment					\$129.46				
09/21/21	ELECTRIC SERVICE	08/20/21 09/21/21	53667	124725340	\$187.41					
09/21/21	DEPOSIT				\$57.50					
09/21/21	Regular Bill						\$244.91		10/13	1353
10/13/21	Payment					\$244.91				
10/20/21	ELECTRIC SERVICE	09/21/21 10/20/21	54324	124725340	\$96.42					
10/20/21	DEPOSIT				\$57.50					
10/20/21	Regular Bill						\$153.92		11/12	657
11/11/21	Payment					\$153.92				
11/18/21	ELECTRIC SERVICE	10/20/21 11/18/21	54778	124725340	\$69.76					
11/18/21	Regular Bill						\$69.76		12/10	454
12/15/21	Late Payment Charge				\$1.05					
12/21/21	ELECTRIC SERVICE	11/18/21 12/21/21	56311	124725340	\$217.68					
12/21/21	Regular Bill						\$288.49	\$70.81	01/12	1533
12/27/21	Payment					\$100.00				
01/11/22	Payment					\$200.00				
01/25/22	ELECTRIC SERVICE	12/21/21 01/25/22	58539	124725340	\$324.33					
01/25/22	Regular Bill						\$312.82		02/16	2228
02/16/22	Payment					\$313.00				
02/23/22	ELECTRIC SERVICE	01/25/22 02/23/22	59086	124725340	\$89.34					
02/23/22	Regular Bill						\$89.16		03/17	547
03/18/22	Payment					\$89.16				
03/24/22	ELECTRIC SERVICE	02/23/22 03/24/22	59495	124725340	\$69.65					
03/24/22	Regular Bill						\$69.65		04/18	409
04/19/22	Payment					\$70.00				
04/22/22	ELECTRIC SERVICE	03/24/22 04/22/22	59884	124725340	\$66.67					
04/22/22	Regular Bill						\$66.32		05/16	389
05/16/22	Payment					\$67.00				
05/23/22	ELECTRIC SERVICE	04/22/22 05/23/22	60323	124725340	\$73.89					
05/23/22	Regular Bill						\$73.21		06/14	439
06/16/22	Payment					\$74.00				
06/22/22	ELECTRIC SERVICE	05/23/22 06/22/22	61051	124725340	\$120.36					
06/22/22	Regular Bill						\$119.57		07/14	728

DATE	CHARGE TYPE	BILLING PERIOD	READ	METER #	CHARGE AMOUNT	CREDIT AMOUNT	TOTAL BILL	BALANCE FORWARD	DUE DATE	KWH
07/19/22	Late Payment Charge				\$1.79					
07/22/22	Payment					\$120.00				
07/22/22	ELECTRIC SERVICE	06/22/22 07/22/22	62181	124725340	\$181.89		\$183.25	\$1.36	08/15	1130
07/22/22	Regular Bill									
08/12/22	Payment					\$184.00				
08/22/22	ELECTRIC SERVICE	07/22/22 08/22/22	63750	124725340	\$248.47		\$247.72		09/13	1569
08/22/22	Regular Bill									
09/19/22	Payment					\$250.00				
09/21/22	ELECTRIC SERVICE	08/22/22 09/21/22	64424	124725340	\$118.60		\$116.32		10/13	674
09/21/22	Regular Bill									
10/13/22	Payment					\$117.00				
10/20/22	ELECTRIC SERVICE	09/21/22 10/20/22	64879	124725340	\$83.48		\$82.80		11/14	455
10/20/22	Regular Bill									
11/11/22	Deposit Interest					\$7.59				
11/11/22	Payment					\$100.00				
11/18/22	ELECTRIC SERVICE	10/20/22 11/18/22	65349	124725340	\$85.89		\$61.10		12/12	470
11/18/22	Regular Bill									
12/12/22	Payment					\$70.00				

Wesley Collier
3807 Poplar Street
Phila. PA 19104-1113



RDC 99



17120

U.S. POSTAGE PAID
FCM LG ENV
PHILADELPHIA, PA
19104
DEC 30, 22
AMOUNT

\$1.92

R2304M115268-09

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