



21. Denied.

Complainant further responds to the Affirmative Defenses as follows:

22. No response required.

23. Denied. Paragraph 23 states a conclusion of law to which no response is required.

24. No response required.

25. Denied. Paragraph 25 states a conclusion of law to which no response is required.

26. No response required.

27. Denied. Paragraph 27 states a conclusion of law to which no response is required.

28. No response required.

29. Denied. Paragraph 29 states a conclusion of law to which no response is required.

30. No response required.

31. Denied. Paragraph 31 states a conclusion of law to which no response is required.

**COMPLAINANT'S RESPONSE TO  
MOTION TO WITHDRAW ITS MOTION FOR CONSOLIDATION**

Complainant **opposes** PECO's motion to withdraw its motion for consolidation of the Formal Complaints filed by the Borough of Swarthmore and Swarthmore residents, and further supports that discovery is required from PECO before any adjudication of the Complaints.

Dated: February 24, 2023

/s/ Kirsten Myers

Kirsten Myers

/s/ Jonathan Myers

Jonathan Myers

## CERTIFICATE OF SERVICE

I, Kirsten Myers, hereby certify that on February 24, 2023, I caused a true and correct copy of the foregoing to be served via email upon counsel for Respondent, as follows:

Christopher A. Lewis  
BlankRome  
One Logan Square  
230 North 18<sup>th</sup> Street  
Philadelphia, PA 19103  
Email: [chris.lewis@blankrome.com](mailto:chris.lewis@blankrome.com)

/s/ Kirsten Myers  
Kirsten Myers