

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Wesley Collier**

**Complainant**

**Vs.**

**DOCKET NO. C-2022-3037194**

**PECO ENERGY COMPANY**

**Respondent**

**MOTION TO REOPEN My current  
COMPLAINT ACTION at Docket Number C-  
2022-3037194**

Comes now the Complainant, Wesley Collier in Propria Persona and represents the following in seriatim and coda:

- 1) My name is Wesley Collier, and for the past five (6) months I have been engaged in conflicts with the PECO Energy Company (hereafter referenced as PECO).
- 2) One of the cardinal conflicts involves the return of my \$230 deposit held by PECO in excess of 12 months.

- 3) My deposit of \$230, at the behest of PECO, was required to convert my household PECO account from my wife's name to my name. The PECO's "Notice of Deposit Request" dated August 21, 2021, is on file with the PPUC under my Exhibits, notably, Exhibit A.
- 4) According to PECO's "Notice of Deposit Request", my \$230 Deposit will be returned to me after 12 months with interest.
- 5) My \$230 deposit was tender to PECO by October 2021 over 3 installment payments.
- 6) Circa September or October 2022, I telephonically contacted PECO's Customer Service Department anent the return of my \$230 deposit and associative interest. I was informed by the PECO proxy that I must wait until after October 2022 for the return of my \$230 deposit.

7) In November of 2022, I again telephonically contacted PECO's Customer Service Department seeking definite information regarding the return of my \$230 deposit.

8) At that time, during the process of our colloquy, the PECO proxy, (he identified himself as Ray), conveyed to me that my \$230 Deposit could be returned to me in December 2022.

Notabilia, my PECO Billing Invoice dated 11-18-2022, reflected that the \$7.59 "Deposit interest" was credited to my account without my knowledge, consent or imprimatur in lieu of being returned directly to me.

Factually speaking, the holding in **52 PA Code Section 56.307 Application of Interest** states "Interest shall be paid annually to the customer, or

at the option of either the utility or the customer, shall be applied to the service bill”.

PECO in a unilateral and self-serving motif assigned the interest payment to the service bill sans discussing the matter with me since I am the lawful owner of the money; see Exhibit B which is a copy of PECO Billing Invoice incorporating my Deposit interest entry of \$7.59 on my Exhibits filings in this matter.

- 9) Owing to the material fact that PECO had not returned my \$230 Deposit, and PECO transgressed **52 PA Code Section 56.307 Application of Interest**, on December 2, 2022, I was perforce to file a Complaint, (In Propria Persona), with the Pennsylvania Public Utility Commission in this matter which is docketed at PUC No. C-2022-

30377194. A copy of the Complaint is on file with the PPUC. In my Complaint and subsequent filings I indicted PECO with Subreption, Sophistry, Fraudulent Inducements, Deceit, Dishonesty, Duplicity, Defalcation, and Bad Faith.

- 10) On December 21, 2022, PECO Motioned the Pennsylvania Public Utility Commission to Dismiss my Formal Complaint.
- 11) I filed a Motion to the Pennsylvania Public Utility Commission on December 30, 2022, in Opposition to PECO's Motion to Dismiss my Complaint. The Pennsylvania Public Utility Commission set a date for March 1, 2023, to hear my Formal Complaint.
- 12) In the second week of January 2023, PECO offered to settle this matter by crediting my account with my \$230 Deposit rather than returning my money

directly to me. As you would expect, I categorically rejected PECO's offer on my Deposit money.

- 13) By way of email, on January 16, 2023, I relayed to Khadijah Scott, who is the Counsel of record for PECO, in order for me to noetically participate in any settlement discussions with PECO, I must have answers to my 5 Sets of Interrogatories and I must Depose 4 Administrators of PECO.
- 14) My 5 Sets of Interrogatories and dates and times for the Depositions were sent to PECO and the Honorable and August Rosemary Chiavetta, Secretary, for filing with the Pennsylvania Public Utility Commission.
- 15) The Interrogatories consisted of about 70 clear, concise, and succinct questions with 90% of the questions being liturgical in nature and the other

10% pedantic in scope. PECO never replied and/or responded to my Interrogatories and/or my request for Depositions.

- 16) Inasmuch as the Pennsylvania Public Utility Commission encourages the parties to attempt to Settle prior to a Formal Hearing, on February 27, 2023, I telephonically discuss my Complaint with two PECO representatives.
- 17) During our conversation, I propounded the exceedingly relevant fact that PECO's department, in this matter of refusing to return to me my \$230 Deposit and Interest, was wrongful, illegal, and without a doubt violated Pennsylvania's pandect of Laws governing my Deposit and Interest.
- 18) During the mandatory Settlement conference, PECO agreed to return my Deposit along with

several nugatory, and otiose concessions, but failed to address my issues enumerated in article Octothorpe 9 involving PECO's Subreption, Sophistry, Fraudulent Inducements, Deceit, Dishonesty, Duplicity, Defalcation, Bad Faith and perhaps Criminal Deportment against me in its furtive campaign to glom my money in this matter.

- 19) Maugre the omission of PECO's wrongful, improper, inappropriate and illegal deportment delineated in my Complaint, and PECO's failure to address same, PECO forwarded "A Certificate of Satisfaction to the PUC to inform it of the status of my complaint. PECO also advised me that unless I file a written objection to the PUC within ten (10) days, the Certificate of Satisfaction will sufficiently

confirm to PUC that the Complaint has been resolved and the file will be closed”.

- 20) Subsequent to revisiting, reconsidering, and applying a critical assessment to PECO’s soi-disant “A Certificate of Satisfaction” I had decided to exercise my prerogative to file a written objection to the PUC within the ten (10) days with the goal of seeking significant and substantial fines against PECO for its wrongful conduct in retaining my \$230 Deposit and Interest and forcing me to experience anxiety, insomnia, depression as well as expend my time, my energy, and my resources to recover my money and remedy the wrongful circumstances PECO created in this matter.
- 21) While it is a truth that PECO Energy agreed to return my deposit money and did, howbeit, other

relevant and material matters in my Formal Complaint dated 12/02/2022 to the PPUC remain open.

- 22) Videlicet, appoint a scrutator who will energetically indagate PECO for discrimination, bias, and disparate business practices against people of color, and/or low-income levels.
- 23) Compel PECO to comply with existing statutory Laws against Racial bias and discrimination in the Commonwealth of Pennsylvania.
- 24) Order PECO to institute Transparency and consistency in its Deposit Request Notice.
- 25) Enjoin PECO to return my \$250 immediately.  
(Noteworthy, the amount of my Deposit was \$230 not \$250).

- 26) Provide any succor the Pennsylvania Utility Commission deems necessary, proper, and appropriate in this matter including compensation for my time and cost for preparing this Action and my emotional distress created by PECO.
- 27) PECO's "A Certificate of Satisfaction" only addressed the issue denoted in article #25.
- 28) Upon protracted deliberation on PECO's "A Certificate of Satisfaction", in the interests of fairness, equity, and justice in this matter, I was perforce to file a Written Objection and did so on March 8, 2023.
- 29) However, due to a cavalcade of technical problems with my computer/printer device, I could not file it properly with the Secretary of the PPUC until I could print out my Written Objection. Factually

speaking as of this instant my printer is still inoperable.

30) When I finally had the purview to print out my Written Objection I faxed same presumably to the Office of the Secretary of the PPUC.

Parenthetically, on March 8, 2023, I did email my Written Objection to PECO Energy's Counsel of Record, Khadijah Scott, Esquire in this Matter. On March 8, 2023, I also Emailed my Written Objection to PECO Energy's "Certificate of Satisfaction" to Christy Krahel who is an assistant in the Office of PPUC and requested that she transmitted my Written Objection to the Secretary of the PPUC since I could not print out my Written Objection to mail it.

- 31) Christy Krahel replied automatically to my request and advised me to contact, via email, Deana Schlegel which I did do on March 9, 2023 at 3:38 am and I appealed to her to transmit my Written Objection to the Secretary of the PPUC.
- 32) Notwithstanding my good faith nix to timely file my Written Objections, on March 22, 2023, I received an email from the Honorable and August Rosemary Chiavetta, Esq., Secretary of the Pennsylvania Public Utility Commission expressing to me that my "Written Objections" to PECO's "A Certificate of Satisfaction" was procedurally unacceptable on two accounts namely: (1) faxed and emailed filings are impermissible, (2) the faxed filing is past the deadline for submission.

33) Owing to an eleemosynary disport, the PPUC provided me with a *Secretarial Letter* that bequeathed me with a discretionary option to file a Motion to Reopen my current complaint case at Docket Number C-2022-3037194, ergo; I present my instant Motion to Reopen my current complaint.

34) My Petition to Reopen my current Formal Complaint is grounded on the relevant and material facts that PECO, in its “A Certificate of Satisfaction” failed to attend to its wrongful and illegal acts of Subreption, Sophistry, Fraudulent Inducements, Deceit, Dishonesty, Duplicity, Defalcation, Bad Faith and perhaps Criminal Conduct against me in a surreptitious campaign to mulct my money into its massive financial vortex, even conservatively

measured, is enormous and requires the implementation of ***FINES AGAINST PECO FOR NOT FOLLOWING RULES*** and whatever else that is deemed proper and appropriate by a disinterested/impartial tribune (a defender of the people especially against injustice) who has the vested plenipotentiary authority to do so.

**Wherefore;** In order to preclude a Miscarriage of Justice, I, Wesley Collier, In Propria Persona, entreat the Pennsylvania Public Utility Commission to Grant my Motion to Reopen my current complaint case at Docket Number C-2022-3037194.

With Gratitude,

Respectfully Submitted, March 27, 2023

  
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Wesley Collier, In Propria Persona  
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v.

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CERTIFICATE OF SERVICE

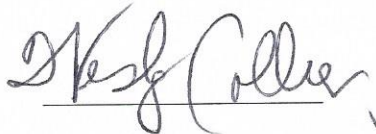
I, Wesley Collier, hereby certify that I have this day served a copy of my Motion to Reopen in the above matter upon all interested parties via email.

Properly addressed to:

KHADIJAH SCOTT  
Counsel for PECO Energy Company  
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Dated: March 27, 2023

Respectfully Submitted



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