

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Wesley Collier

Complainant

Vs.

DOCKET NO. C-2022-3037194

PECO ENERGY COMPANY

Respondent

**MOTION TO COMPEL PECO ENERGY
COMPANY TO RESPOND TO MY REQUEST
FOR DEPOSITIONS IN MY COMPLAINT 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 nine (9) months I have been engaged in conflicts with the PECO Energy Company (hereafter referenced as PECO).
- 2) 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, Fraudulent Concealment, Iniquity, Deceit, Dishonesty, Duplicity, Defalcation, and Bad Faith.

- 3) On December 21, 2022, PECO Motioned the Pennsylvania Public Utility Commission to Dismiss my Formal Complaint.
- 4) 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.

- 5) 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.
- 6) 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.
- 7) My Five Sets of Interrogatories were sent to PECO betwixt January 5, 2023 and February 4, 2023, and yet as of this writing PECO has never answered or responded to my Interrogatories.

8) Equally important, on January 22, 2023, I emailed PECO's Counsel in this matter requesting the Depositions of Michael A. Innocenzo who is the CEO of PECO, and on January 31, 2023 Maris E. Humphrey, who is the Senior Vice President, Chief Financial Officer and Treasurer of PECO. As of this instant, PECO has failed to respond to my Request for the Depositions. Confirmation of my Request for Depositions is provided by de facto copies of my emails to PECO's Counsel of Record, Khadijah Scott.

Deposition of Michael A. Innocenzo in the Matter of Wesley Collier v PECO Energy C-2022-3037194 - Formal Complaint Hearing



Wesley Collier <wesleycollier49@gmail.com>

Sun, Jan 22, 12:45 PM

to Khadijah:(PECO), anna.migliaccio

Good Day Attorney Khadijah Scott:

I would like to arrange to take the Deposition of Michael A. Innocenzo who is the de facto CEO of PECO in the matter of Wesley Collier v PECO Energy C-2022-3037194 {Formal Complaint Hearing}.

I am available from January 26, 2023, every day from 8:00 a.m. until 5:00 pm. As you would expect, I am very supple, and with that ability, I will work with Mr. Innocenzo's schedule as long as his deposition is taken 10 days prior to the Hearing that is intercalated for March 1, of the instant 10 am.

Mahalo for your anticipated cooperation in this matter.

Wesley Collier, In Propria Persona

***Deemed signed when electronically transmitted. Deposition of
Marissa E. Humphrey, Senior Vice President, Chief
Financial Officer and Treasurer of PECO***



Wesley Collier <wesleycollier49@gmail.com>

Tue, Jan 31, 10:56 PM

to Khadijah:(PECO)

Dear Attorney Khadijah Scott:

I would like to arrange to take the Deposition of Marissa E. Humphrey, Senior Vice President, Chief Financial Officer as well as Treasurer of PECO in the matter of Wesley Collier v PECO Energy C-2022-3037194 {Formal Complaint Hearing}.

I am available from February 2, 2023, every day from 8:00 a.m. until 5:00 pm. As you know, I am very reasonable, and with that attribute, I will work with Marissa E.

Humphrey's schedule as long as her deposition is taken 10 days prior to the Hearing that is intercalated for March 1, of the instant 10 am.

In gratitude for your sedulous attention, veridical consideration, and palmary cooperation in this critical and time-sensitive matter.

I remain,

Wesley Collier, In Propria Persona

Deemed signed when electronically transmitted.

9) Noteworthy, PECO filed a “Certificate of Satisfaction” to The PUC on February 27, 2023, prior to my scheduled Hearing on my Action before the Honorable and August Administrative Judge, Darlene Heep. However, I filed an Objection to the Certificate within the ten days to do so, howbeit, My Objection letter was deemed untimely and my case was closed on March 19, 2023. Then, circa March 23, 2023, I received a Secretarial Letter which provided me with an opportunity to File A Motion to Reopen my Action against PECO before 4:30 pm on March 27, 2023, which I accomplished. On May 18, 2023, during the process of a Public Hearing, the PUC issued an Opinion and Order Granting me Leave to Reopen my Action against PECO, citing, inter alia, “the Certificate filed by PECO on

February 27, 2023 appears to be deficient on its face” (see page 8, paragraph 3 and page 9, paragraph 1 in the PCU’s Opinion and Order of May 18, 2023, thank you).


- 10) Inasmuch as the Pennsylvania Public Utility Commission encourages the parties to attempt to Settle prior to a Formal Hearing, I must receive PECO’s answers to my 5 Sets of Interrogatories, and take the Depositions of four (4) PECO Executives in order to achieve a reasonable, and equitable resolution of my Formal Complaint against PECO who at the outset of our interaction has viewed me with an evil eye and an uneven hand maugre the fact that I do not owe PECO any money, nor did I do anything off beam to PECO unless requesting

accountability is unacceptable and unexpected and considered wrong by PECO!

11) **Wherefore;** In order to proscribe a Miscarriage of Justice, I, Wesley Collier, In Propria Persona, beseech the Administrative Judge, who has the vested plenipotentiary authority in this matter to Grant my Motion to Compel PECO to Respond to my Request for Depositions in my Formal Complaint against PECO, Docket Number C-2022-3037194.

With Gratitude and Appreciation,

Respectfully Submitted, July 13, 2023



Wesley Collier, In Propria Persona
3807 Poplar Street

Philadelphia, PA 19104
Phone # 215-386-3864
Email: wesleycollier49@gmail.

CERTIFICATE OF SERVICE

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

Properly addressed to:

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

Dated: July 13, 2023

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Wesley Collier", written over a horizontal line.

WESLEY COLLIER
3807 POPLAR ST
PHILADELPHIA P A 19104
emailwesleycollier49@gmail.com