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August 10, 2023

Via E-Mail: dheep@pa.gov
Administrative Law Judge Darlene Heep
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
801 Market Street
Philadelphia, PA 19107

Re: Wesley Collier v. PECO Energy Company
PUC Docket No. C-2022-3037194

Dear Judge Heep:

As requested, below please find PECO's response to Interrogatory Set I (Q12) and Set II (Q6).

Set I
(Q12)

PECO maintains its objection to Complainant's Interrogatory. PECO has over 1.6 million customers in its service territory. It assesses over 100,000 deposits in any given year. Itemizing the top ten (10) postal zip codes of customers who have rendered a deposit is overbroad, unduly burdensome and irrelevant as postal zip codes are not a factor of consideration when determining a new connection deposit or a credit risk deposit. This interrogatory seeks to discover information that is not relevant and not material to the subject matter and claims in this proceeding, and as such, are not reasonably calculated to lead to the discovery of admissible evidence.

Set II
(Q6)

PECO withdraws its objection to Interrogatory (Q6).

If Your Honor has any questions, please do not hesitate to contact me directly at (267) 533-1830.

Very truly yours,

Khadijah Scott

Khadijah Scott
Assistant General Counsel, PECO Energy

cc: Wesley Collier (*via email*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

WESLEY COLLIER	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2022-3037194
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, KHADIJAH SCOTT, hereby certify that I have this day served a copy of PECO Energy Company's Response to Interrogatory Set I (Q12) and Set II (Q6) in the above matter upon all interested parties by E-mailing a copy, properly addressed to:

WESLEY COLLIER
3807 POPLAR ST
PHILADELPHIA PA 19104
Via email: wesleycollier49@gmail.com

Dated: August 10, 2023



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