

Docket No. : C-2023-3044046
Complainant : Hoi Cheung
Respondent : PECO Energy Company

Answer to Preliminary Objection

On November 3, 2023, PECO Energy Company ("PECO") was served with a formal complaint filed by HOI CHEUNG (hereafter "Complainant") in the above-captioned docket. Pursuant to 52 Pa. Code § 5.61, PECO Energy responds to the Complaint and states:

In respond to PECO denied on point number 4 on page 2:

PECO is unable to provide any document from their contractor's "investigation" nor able to prove that the damages were not caused by their construction on State Street Media, right outside of the property. The construction was contracted by the Media Borough and has nothing to do with my company's, Kenny Media, LLC's property nor me being their service subscriber.

When I filed on November 4th, 2023; I have submitted a letter from the engineer of the Media Borough stating that:

"water which does not appear to have existed prior to street work performed by PECO. The recent work performed by PECO and its contractors, appears to have disturbed the frontage of the physical cartway, and there is temporary paving in front of the walkway / sidewalk area. I was able to observe the site in rain weather conditions, and it appears to me that the current conditions of the cartway, with temporary street restoration have caused an adverse impact of rain water to become fugitive into the basement area of 110 West State."

I have also included an URL shared a video that shown the problem with their contractor's temporary paving, which have a hole underneath the drainpipe on the curb on State Street and causing the rain water leaking into my basement. Once again, the video is shared on the URL below:

https://pennstateoffice365-my.sharepoint.com/personal/hmc118_psu_edu/_layouts/15/stream.aspx?id=%2Fpersonal%2Fhmc118%5Fpsu%5Fedu%2FDocuments%2FKennyMedia%20Water%20Leak%20PECO%2F20230709%5F122015%2Emp4&ga=1&referrer=StreamWebApp%2EWeb&referrerScenario=AddressBarCopied%2Eview

I do not agree that PECO Energy Company can just deny their responsibility without providing anything and ignore all the evidence that I have submitted when I filed this case.

Hoi Michael Cheung

Kenny Media, LLC.

December 1st, 2023.