



Legal Department 2301
Market Street / S23-1
Philadelphia, PA 19103
Direct Dial: 267-533-1830

August 16, 2024

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: Christopher and Valerie Watson v PECO Energy Company
Docket No. C-2020-3021127

Dear Ms. Chiavetta:

PECO Status Report #22 is enclosed for filing. A Verification and a Certificate of Service precede PECO's filing.

Very truly yours,

/s/ Khadijah Scott

Khadijah Scott
Counsel for PECO Energy Company

Enclosure

cc: Administrative Law Judge F. Joseph Brady
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VALERIE AND CHRISTOPHER	:	
WATSON	:	
Complainants	:	
	:	
	:	
v.	:	DOCKET NO. C-2020-3021127
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

VERIFICATION

I, Khadijah Scott, hereby declare that I am counsel for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the attached Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. §4904 pertaining to false statements to authorities.

Dated: August 16, 2024

/s/ Khadijah Scott
Khadijah Scott

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VALERIE AND CHRISTOPHER	:	
WATSON	:	
Complainants	:	
	:	
	:	
v.	:	DOCKET NO. C-2020-3021127
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Khadijah Scott, hereby certify that today I served a copy of PECO Status Report #22, via email only, on:

Frank Kosir, Jr.
Meyer Unkovic Scott
Henry W. Oliver Building
535 Smithfield Street
Suite 1300 Pittsburgh
PA 15222
(412) 456-2825 fk@muslaw.com
Counsel for Complainants

Dated: August 16, 2024

/s/ Khadijah Scott

Khadijah Scott
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19103
(267) 533-1830
Khadjah.scott@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VALERIE AND CHRISTOPHER	:	
WATSON	:	
Complainants	:	
	:	
	:	
v.	:	DOCKET NO. C-2020-3021127
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

PECO STATUS REPORT #22

On November 10, 2020, Your Honor issued an Order Granting PECO’s Motion for Stay. In Ordering Paragraph 2, Your Honor directed “[t]hat the Respondent shall file a status report with the presiding officer and the opposing party, within sixty (60) days of the date of this Order, and every sixty (60) days thereafter, until the civil proceeding has concluded.” PECO filed its Status Report #1 on January 11, 2021. PECO filed its Status Report #2 on March 20, 2021. PECO filed its Status Report #3 on May 21, 2021. PECO filed its Status Report #4 on July 21, 2021. PECO filed its Status Report #5 on September 21, 2021. PECO filed its Status Report #6 on December 13, 2021, its Status Report #7 on February 14, 2022. PECO filed its Status Report #8 on April 8, 2022, its Status Report #9 on June 8, 2022, its Status Report #10 on August 11, 2022, its Status Report #11 on October 11, 2022, its Status Report #12 on December 13, 2022, its Status Report #13 on February 13, 2023, its Status Report #14 on April 11, 2023, its Status Report #15 on June 12, 2023, its Status Report #16 on August 14, 2023, its Status Report #17 on October 13, 2023, its Status Report #18 on December 14, 2023, its Status Report #19 on February 14, 2024, its Status Report #20 on April 12, 2024, and its Status Report #21 on June 17, 2024. This is PECO Status Report #22.

Prior Status Reports

In PECO Status Report #1, PECO reported that:

- On October 30, 2020, PECO filed a Complaint with the Court of Common Pleas of Montgomery County, in which it seeks a declaratory judgment that it has an irrevocable license or, in the alternative, a prescriptive easement, to operate, maintain, and update its poles, power lines, and equipment on the Watson property.
- On December 18, 2020, the Watsons filed their Answer, New Matter, and Counterclaims in which they deny the allegations of PECO's Complaint and seek a determination that PECO is trespassing and should be ejected from their property.
- On January 11, 2021, PECO filed its Answer to the Watson New Matter and Counterclaims.

In PECO Status Report #2, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #1.

In PECO Status Report #3, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #2.

In PECO Status Report #4, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #3.

In PECO Status Report #5, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #4.

In PECO Status Report #6, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #5.

In PECO Status Report #7, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #6.

In PECO Status Report #8, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #7.

In PECO Status Report #9, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #8.

In PECO Status Report #10, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #9.

In PECO Status Report #11, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #10.

In PECO Status Report #12, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #11.

In PECO Status Report #13, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #12.

In PECO Status Report #14, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #13.

In PECO Status Report #15, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #14.

In PECO Status Report #16, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #15.

In PECO Status Report #17, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #16.

In PECO Status Report #18, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #17.

In PECO Status Report #19, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #18.

In PECO Status Report #20, PECO reported that on February 29, 2024, the Montgomery County Court of Common Pleas issued a Notice of Intention to Terminate. On March 11, 2024, PECO filed a Statement of Intention to Proceed. On March 13, 2024, the Complainants' filed a Statement of Intention to Proceed.

In PECO Status Report #21, PECO reported that:

There have been no developments in the civil litigation since PECO Status Report #20.

PECO Status Report #22

There have been no developments in the civil litigation since PECO Status Report #21. The parties are engaged in discovery efforts.

Respectfully Submitted,

/s/ Khadijah Scott

Khadijah Scott
Assistant General Counsel
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
(267) 533-1830
Khadijah.scott@exeloncorp.com

Dated: August 16, 2024