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October 22, 2024

VIA E-FILING

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

**RE: Complaints Against PECO Energy Company's Reliability in Solebury Township
Docket Nos. C-2024-3050663, C-2024-3050779, C-2024-3050912, C-2024-3050923,
C-2024-3050949, C-2024-3050976, C-2024-3050975, C-2024-3050985,
C-2024-3050979, and C-2024-3051002**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is *PECO Energy Company's Motion to Consolidate*.

I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention in this matter.

Very truly yours,


Khadijah Scott, Esquire
Assistant General Counsel, PECO Energy Company

Encl.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re: Complaints Against PECO Energy :
Company's Reliability in Solebury :
Township :**

**: DOCKET NO. C-2024-3050663
: DOCKET NO. C-2024-3050779
: DOCKET NO. C-2024-3050912
: DOCKET NO. C-2024-3050923
: DOCKET NO. C-2024-3050949
: DOCKET NO. C-2024-3050976
: DOCKET NO. C-2024-3050975
: DOCKET NO. C-2024-3050985
: DOCKET NO. C-2024-3050979
: DOCKET NO. C-2024-3051002**

NOTICE TO PLEAD

Pursuant to 52 Pa. Code §5.102, you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion to Consolidate of PECO Energy Company, within 20 days from service of this notice, a ruling may be entered against you. All pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Khadijah Scott, and where applicable, the Administrative Law Judge presiding over the issue.

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

With a copy to:
Khadijah Scott, Esq.
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103
Khadijah.scott@exeloncorp.com

Dated: October 22, 2024



Khadijah Scott
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Philadelphia, PA 19103
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(267) 533-1830
Fax: 215.568.3389

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Complaints Against PECO Energy :
Company’s Reliability in Solebury :
Township :
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: **DOCKET NO. C-2024-3051002**

PECO ENERGY COMPANY’S MOTION TO CONSOLIDATE

Respondent, PECO Energy Company (“PECO”), pursuant to 52 Pa. Code §5.81 respectfully petitions this Honorable Commission to consolidate the matters in the above referenced dockets because the ten (10) Complaints contain similar allegations and concern the same questions of fact and law and a consolidated proceeding will provide for the efficient adjudication of these proceedings. In support of this request, PECO avers:

1. As of August 12, 2024, PECO has been served with the above referenced complaints (the “Complaints”) filed with the Pennsylvania Public Utility Commission (“PUC”) each relating to common questions of law and fact insofar as each complaint relates to the reliability and property damage experienced as a result of electrical surges involving the same circuit in Solebury Township.

2. The Complaints likewise request similar relief, including, *inter alia*, requests that PECO improve its reliability in their area, Solebury Township.

3. On August 12, 2024, PECO was served with its first complaint filed by Complainants, Timothy Guiner and Valerie Patterson, with the PUC at Docket Numbers C-2024-3050663.

4. On August 19, 2024, PECO was served a complaint filed by Complainant, Jesse Darlington, with the PUC at Docket Numbers C-2024-3050779.

5. On August 27, 2024, PECO was served a complaint filed by Complainant, Matthew Rooke, with the PUC at Docket Numbers C-2024-3050912.

6. On August 27, 2024, PECO was served a complaint filed by Complainant, Heather Sekiguchi with the PUC at Docket Numbers C-2024-3050923.

7. On August 29, 2024, PECO was served a complaint filed by Complainant, Marc Blucas with the PUC at Docket Numbers C-2024-3050949.

8. On September 3, 2024, PECO was served a complaint filed by Complainant, Charles Brickman with the PUC at Docket Numbers C-2024-3050976.

9. On September 3, 2024, PECO was served a complaint filed by Complainant, Kathleen Ronning with the PUC at Docket Numbers C-2024-3050975.

10. On September 3, 2024, PECO was served a complaint filed by Complainant, Carol Spiewak with the PUC at Docket Numbers C-2024-3050985.

11. On September 3, 2024, PECO was served a complaint filed by Complainant, Erin Durnin with the PUC at Docket Numbers C-2024-3050979.

12. On September 4, 2024, PECO was served a complaint filed by Complainant, Matthew and Elizabeth Kurteson with the PUC at Docket Numbers C-2024-3051002.

13. These Complaints should be consolidated pursuant to 52 Pa. Code §5.81(a), which holds:

The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or

presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

14. All ten (10) Complaints cover similar issues, *i.e.*, electrical surges within the same neighborhood on the same circuit, and contain common questions of law and fact such that one hearing covering the ten (10) Complaints will avoid unnecessary costs or delay to the Commission.

15. Each Complaint relates to similar issues of fact, the Complainants' request for improvement to their reliability.

16. Accordingly, the ten (10) Complaints should be consolidated to save the time, resources and the expense of the parties and the Commission.

17. A hearing has not yet been scheduled in these matters.

18. PECO requests that the ten (10) dockets be heard at the same hearing.

19. PECO requests that all remaining issues of fact, outside of the issue of consolidation, remain with the Mediation Unit prior to hearings being scheduled.

WHEREFORE, PECO Energy Company respectfully requests that this Honorable Commission issue an Order consolidating the complaints at docket numbers: C-2024-3050663; C-2024-3050779; C-2024-3050912; C-2024-3050923; C-2024-3050949; C-2024-3050976; C-2024-3050975; C-2024-3050985; C-2024-3050979 and C-2024-3051002.

Respectfully Submitted,



Khadijah Scott
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
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Khadijah.scott@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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VERIFICATION

I, Khadijah Scott, hereby declare that I am an attorney representing PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing 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.



Date: October 22, 2024

Khadijah Scott

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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: DOCKET NO. C-2024-3051002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of PECO Energy Company's Motion to Consolidate in the above matter upon all interested parties by *E-mailing* a copy thereof, properly to:

Timothy Guinher Valerie Patterson 6667 Phillips Mill Rd P.O. Box 98 Solebury, PA 18963 valpatterson@comcast.net	Jesse Darlington 6670 Phillips Mill Rd. P.O. Box 5 Solebury, PA 18963 jesse.darlington@foxroach.com
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Dated: October 22, 2024



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