

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DEREE J. NORMAN	:	
Complainant	:	DOCKET NO. C-2024-3048777
v.	:	
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

EXCEPTIONS OF COMPLAINANT DERE J. NORMAN

I. EXCEPTION TO INTRODUCTION

The Preliminary Objection of PECO Energy Company is sustained due to the legal insufficiency of the Complaint and because the Complainant cannot prevail even if the averments of the Complaint are read in the light most favorable to the Complainant

OBJECTION:

The Subject matter of the preliminary objections filed by PECO Energy Company (“PECO”) have no relevance to the Complaint before the Commission.

RESPONSE:

The acknowledgment and comprehension of the facts of a Complaint are the most crucial elements for a fact finder in the process of resolving a dispute between two parties. In the above captioned matter, the Commission must adhere to the Law as written, instead of solely relying on the misrepresentations of the responding party merely because they are a utility provider. Thus, the Commission erred by relying on PECO’s misapprehension of the subject matter of the Complaint considering the true subject matter was clearly explained in detail in the Complainant’s Response to PECO’s preliminary objections. Therefore, PECO’s preliminary objections are without merit and have no relevance to the Complaint before the Commission and the Complainant can prevail as a matter of law, regardless of who the Commission decides to shine a light most favorably upon.

II. EXCEPTIONS TO FINDING OF FACT

1. *The Complainant is Deree J. Norman, a PECO electric customer at 5367 Thomas Avenue, Philadelphia, Pennsylvania 19143 (service address).*

RESPONSE

Complainant concurs.

2. *The Respondent is PECO Energy Company.*

RESPONSE

Complainant concurs

3. *PECO issued termination notices to the Complainant on April 26, 2024, and May 20, 2024. Complainant's Answer to Preliminary Objection, Exhibits 1 and 2.*

OBJECTION

The Commission is exhibiting bias and prejudice and has committed an error of law.

RESPONSE

The Commissions acknowledgement of both termination notices dated April 26, 2024, and May 20, 2024, fails to properly acknowledge that one termination notice was served before the Formal Complaint had been filed, thereby prompting the need for a Formal Complaint, while the second termination notice was served two (2) weeks after the Formal Complaint had been filed and accepted by the Commission. Pursuant to Pennsylvania Code at Title 52 §56.92 “A public utility may not mail or deliver a notice of termination if a notice of initial inquiry, dispute, informal or formal complaint has been filed and is unresolved and if the subject matter of the dispute forms the grounds for the proposed termination.” Apparently, the dissemination of a termination notice after a Formal Complaint has been filed is acceptable to the Commission even though 1) Complainant has no outstanding balance and 2) Complainant has given PECO access to the **Smart Meter** at the service address in question.

4. *PECO issued termination notices to the Complainant because the Complainant refused PECO access to its meter at the service address. Id.*

OBJECTION

The Commission is exhibiting bias and prejudice.

RESPONSE

The Commission's misapprehension as to the access PECO has to its meter at the service address is highly prejudicial because it is solely reliant on the misrepresentation of facts presented to the Commission by PECO. Both PECO and this Commission have chosen to engage in willful ignorance and or willful blindness. Complainant has granted PECO access to its meter at the service address on multiple occasions for multiple purposes. Complainant's analog meter was previously replaced with a **Smart Meter** and Complainant's **Smart Meter** has been tested multiple times. As a result of the testing, PECO has consistently deemed Complainant's **Smart Meter** fully functional and in compliance with all required specifications. Moreover, the Commission has failed to establish and or specify if "access" is hourly, daily, weekly, monthly or annually. How often should PECO be granted unfettered access to the service address ("Complainant's residence").

5. *The Complainant is refusing PECO access to change his meter. Complainant's Answer to Preliminary Objection, Exhibit 3; Id. at pp. 7-8.*

OBJECTION

The Commission is exhibiting bias and prejudice

RESPONSE

The Commission's misapprehension as to the access PECO has to its meter and the current law regarding the Complainant's legal requirement to have an **Advanced Smart Meter** installed at the service address is highly prejudicial because it is solely reliant on the misrepresentations presented to the Commission by PECO. Furthermore, the Commission has failed to require

PECO to present an explanation as to why PECO insists on the installation of an **Advance Smart Meter** without a written request as required by Pennsylvania Code at Title 52 §57.255(a). Complainant has a **Smart Meter**, as required by the provisions established by Act 129 of 2008, which has been tested by PECO on multiple occasions and deemed to be fully functional. Moreover, The Commission has failed to acknowledge, comprehend and or address the provision of the Pennsylvania Code that prohibits the actions PECO is engaging in despite the twelve separate references to said provision made by Complainant. (See: Complainant's Response to Preliminary Objections (eight (8) separate references) and 2) Complainant's Response to New Matters (four (4) separate references)).

III. EXCEPTIONS TO DISCUSSION

Section 332(a) of the Code, 66 Pa. C.S. § 332(a), provides that the party seeking relief from the Commission has the burden of proof. PECO has filed Preliminary Objections seeking dismissal of this action.

OBJECTION

The Commission committed an error of law and an abuse of judicial discretion.

RESPONSE

A "burden of proof" is a party's duty to prove a disputed assertion or charge and includes the burden of production (providing evidence) and the burden of persuasion (standard of proof such as preponderance of the evidence). While, 52 Pa. Code § 5.101. states: Preliminary objections are available to parties and may be filed in response to a pleading Preliminary objections must state specifically the legal and **factual** grounds relied upon and be limited The rules of law become useless if the fact finder (a) fails to acknowledge or comprehend the facts presented by the proponent and (b) fails to acknowledge or comprehend that Preliminary Objection¹ not based in fact must be overruled.

1. PECO's Preliminary Objections have no factual relevance, and the Commission abused it's judicial decision to treat PECO's improperly filed affirmative defense as a motion for judgement on the pleadings which as a matter of law also fails.

*If it is determined that a moving party is entitled to a judgment as a matter of law, and there is no genuine issue of material fact, a motion for judgment on the pleadings or summary judgment will be granted. 52 Pa. Code § 5.102(d)(1). The Commission's Rules of Practice and Procedure at 52 Pa. Code § 5.102 govern motions for judgment on the pleadings. Generally, the moving party bears a heavy burden of showing that no genuine issue of material fact exists and that it is entitled to a judgment as a matter of law. The Commission must view the record in the light most favorable to the non-moving party, giving that party the benefit of all reasonable inferences. First Mortg. Co. of Pa. v. McCall, 459 A.2d 406 (Pa. Super. 1983); Mertz v. Lakatos, 381 A.2d 497 (Pa. Cmwlth. 1978). It must accept as true all well-pleaded statements of fact of the nonmoving party and consider only those facts that the non-moving party specifically admits. Weik v. Estate of Brown, 794 A.2d 907 (Pa. Super. 2002). All doubts as to the existence of a genuine issue of material fact must be resolved against the moving party. Thomson Coal Co. v. Pike Coal Co., 412 A.2d 466 (Pa. 1979). Only in a case where the moving party's right to prevail is so clear that a trial would be a fruitless exercise should judgment on the pleadings be granted. Williams v. Lewis, 466 A.2d 682 (Pa. Super. 1983); Service Emps. Int'l Union, Local 69, AFL-CIO v. The Peoples Nat. Gas Co., d/b/a Dominion Peoples, Docket No. C-20028539 (Opinion and Order entered December 19, 2003). Judgment on the pleadings should be entered only when the case is clear and free from doubt. Reuben v. O'Brien, 496 A.2d 913 (Pa. Super 1985). Finally, the Commission may dismiss any complaint without a hearing if, in its opinion, a hearing is not necessary in the public interest. 66 Pa.C.S. § 703. Commission Regulations provide that failure to file a timely reply to New Matter may be deemed in default, and relevant facts stated in the New Matter may be deemed to be admitted. 52 Pa. Code § 5.63(b); Jones v. Phila. Gas Works, Docket Number C-2019-3007984 (Order and Opinion entered July 16, 2020). While the Complainant does not directly state it in the Complaint here, it is clear in the Complainant's Reply to the New Matter and Response to the Preliminary Objection that the Complainant is seeking to prevent installation of a **smart meter** at the service address. Complainant's Reply to New*

*Matter at 2, 6; Complainant's Answer to Preliminary Objection at 7-8. PECO contends that the matter should be dismissed because: 1) under the doctrine of res judicata, the Complainant cannot relitigate previously litigated issues; and 2) the Complainant cannot opt out of a **smart meter** installation and therefore cannot prevail on his claims.*

OBJECTION

The Commission committed an error of law, an abuse of judicial discretion and an act of discrimination.

RESPONSE

As a matter of law, there is a genuine issue of material fact that the Commission has intentionally ignored. The Pennsylvania Code at Title 52 §57.255(a) requires a written request from both a customer and the EGS of that customer, to install a qualified **Advanced Smart Meter**. By treating PECO's preliminary objections as a motion for judgment on the pleadings, the Commission by and through Administrative Law Judge Heep, committed an error of Law. The Discussion submitted by Commission addresses sections of the Pennsylvania Code that have no relevance to the matter before the Commission while ignoring the singular matter that is relevant. The Commission's actions are therefore unlawful, unjust and discriminatory.

Res Judicata

The doctrine of res judicata bars the filing and relitigating of claims previously litigated before the Commission. See Hanley v. Penn Power Co., Docket No. C-2023-3041147 (Opinion and Order entered May 9, 2024). For the doctrine to prevail, four conditions must be met. They are: (1) Identity of issues; (2) Identity of causes of action; (3) Identity of persons and parties to the action; and (4) Identity of the quality and capacity of the parties suing or sued. Day v. Volkswagenwerk Aktiengesellschaft, 474 A.2d 1313 (Pa. Super. 1983). Here, PECO contends that the Complainant is seeking to litigate a claim challenging "algorithms" used by PECO in its metering system and that this was previously litigated by the Complainant in Norman v PECO Energy Co., C-20152472605 (Opinion and Order entered July 13, 2017). The

Complainant contends that he, in this matter, is not raising claims pertaining to “algorithms.” See Complainant Reply to New Matter at 2; Complainant Answer to Preliminary Objection at 8. When considering a motion for judgment on the pleadings, the Commission must accept as true all well-pleaded statements of fact of the non-moving party and consider only those facts that the non-moving party specifically admits. Weik v. Estate of Brown, 794 A.2d 907 (Pa. Super. 2002). The Complainant’s framing of his claims as not including the previously litigated issue of “algorithms” is accepted. Therefore, the res judicata conditions of identity of issues and identity of causes of action are not met. The doctrine of res judicata does not apply and cannot form the basis for dismissal.

OBJECTION

The doctrine of Res Judicata has no relevance to the matter before the Commission.

RESPONSE

The doctrine of res judicata bars the filing and relitigating of claims previously litigated before the Commission. In the matter before this Commission PECO is the party attempting to relitigate a previous matter. Complainant has unequivocally established that the matter before the Commission has never been raised by Complainant, yet the Commission improperly treated PECO’s affirmative res judicata defense as a means to convert non-factual preliminary objection as a motion for judgment on the pleadings.

Moreover, evidence submitted in one matter can be submitted in a subsequent matter where the same parties are involved and the evidence from the previously completed litigation is relevant to the current claim. (*See: Heart Care Consultants v. Albataineh, 239 A.3d 126, 131-32 (Pa. Super. 2020).*)

Smart Meter Opt Out

*Mr. Norman is seeking to prevent installation of a **Smart Meter** at the service address. See Complainant’s Response to New Matter, Request for Relief. The Commission has concluded*

that there is no provision in the Code or the Commission's Regulations or Orders that allows a customer to "opt out" of smart meter installation. See Povacz v. PECO Energy Co., Docket No. C-2012-2317176 (Opinion and Order entered Jan. 24, 2013). In Povacz v. Pennsylvania Public Utility Commission, 280 A.3d 975 (Pa. 2022) ("Povacz II"), the Pennsylvania Supreme Court affirmatively established that there is no "opt-out" provision for installation of a smart meter pursuant to Act 129 and that to raise a viable challenge to smart meter installation, a customer must satisfy the preponderance of evidence standard for a violation of Section 1501 of the Code. Povacz II at 983-984. To prevail on a Section 1501 claim, a Complainant challenging smart meter installation must establish that PECO installing a smart meter is unsafe or unreasonable. To meet that burden, a complainant may be required to present medical documentation and/or expert testimony in support. See Kreider v. PECO Energy Co., Docket. No. P2015-2495064 (Opinion and Order entered Jan. 28, 2016). In the instant Complaint and Response to New Matter, the Complainant has presented no basis upon which he can prevail in an evidentiary hearing. In fact, he unambiguously states that he "makes no assertions of possible harm from radio waves emitted by any type of meter." Complainant's Response to New Matter ¶14. The Complainant cannot prevent installation of a smart meter at the service address and therefore any claims seeking that remedy are dismissed. Povacz II at 999.

OBJECTION

The Commission is exhibiting bias, prejudice and committing errors of law.

RESPONSE

It is astonishing that this Commission, by and through ALJ Heep, would make such a defamatory statement insinuating that the Complainant is seeking to prevent the installation of a Smart Meter at the service address. Since PECO has previously installed a Smart Meter at the service address in question, it is nonsensical for the Commission to take such a position without expressing an extreme prejudice in favor of PECO and against Complainant. Moreover, the Commission reference to Act 129 in this section with a blatant disregard to Title 52 §57.255(a) establishes a malicious intent. Moreover, the Commission's reference to Povacz

v. Pennsylvania Public Utility Commission, 280 A.3d 975 (Pa. 2022) (“Povacz II”) is disingenuous because (a) the current matter is not a Section 1501 claim and (b) Povacz II is an unrelated, incomparable subject matter and unlike the matter currently before the Commission. In Povacz II, no law was ignored by the Commission as it is in this matter.

Termination Notice for Refusal to Allow PECO to Change the Meter

*PECO issued termination notices to the Complainant. Complaint ¶¶ 4-5, Response to New Matter at 2, Response to Preliminary Objections Exhibits 1 and 2. Both notices state that the Complainant did not provide access to PECO meters. Response to Preliminary Objections Exhibits 1 and 2. While the Complainant states that he has allowed PECO to read the meter, inspect the meter, or test the meter, he acknowledges that he has refused to allow PECO to change his meter. Response to New Matter at 7. Mr. Norman makes very clear in his response to the New Matter that he has not allowed PECO to change the meter at the service address. Id. at 3, 6. Termination of service for refusal to permit PECO to change a meter is allowed by the Commission. As the Commission has stated: electric distribution companies may commence termination proceedings due to the customer’s refusal to allow the utility access to their meter for purposes of replacement, consistent with the Pennsylvania Public Utility Code, Commission Regulations, Commission Orders and Commission-approved Tariff. Pennsylvania Public Utility Commission Order, **Smart Meter** Procurement and Installation, Docket No. M-2009-2092655 (Order entered Nov. 14, 2023). Also, PECO’s tariff states: employees shall have access to the premises of the customer at all reasonable times for the purpose of reading meters, and for installing, testing, inspecting, repairing, removing or changing any or all equipment belonging to the Company. PECO Energy Company Electric Tariff, 10.5 Right of Access. A public utility’s Commission-approved tariff is prima facie reasonable, has the full force of law, and is binding on the utility and the customer. 66 Pa.C.S. § 316; Kossman v. Pa. Pub. Util. Comm’n, 694 A.2d 1147 (Pa. Cmwlth. 1997); Stiteler v. Bell Tel. Co. of Pa., 379 A.2d 339 (Pa. Cmwlth. 1977). Additionally, the Public Utility Code and regulations provide that a utility company may notify a customer and terminate service where the customer does not permit access to the company’s meters for replacement. See 52 Pa. Code § 56.81(3) and 66 Pa. C.S. § 1406(a)(4).*

OBJECTION

The Commission is exhibiting bias, prejudice, judicial misconduct

RESPONSE

The Commission seemingly has no problem citing sections of Pennsylvania's Consolidate Statues at Title 66 as well as sections of Pennsylvania's Code at Title 52, while ignoring the section of the Pennsylvania Code found at Title 52 §57.255(a) that prohibits PECO from attempting to violate the law and Complainant's rights as a customer and United States citizen. Moreover, the Tariff's cited by the Commission do not supersede the law. Furthermore, as a result of PECO's termination notice sent two weeks after the Complaint was filed PECO's attempt to terminate Complainant's service must be deemed void as a matter of Law pursuant to Title 52 §56.92. This Commission's deliberate choices to cite irrelevant sections of the Pennsylvania Code while ignoring relevant sections of the Pennsylvania Code bares a semblance of Judicial Misconduct.

IV. EXCEPTION TO CONCLUSIONS OF LAW

1. *The Commission has jurisdiction over the subject matter and the parties to this proceeding. 66 Pa. C.S. § 701.*

RESPONSE

Complainant concurs

2. *The party seeking relief from the Commission has the burden of proof. 66 Pa. C.S. § 332(a).*

OBJECTION

The Commission exhibited extreme bias, abuse of judicial discretion and an error of law.

RESPONSE

The party seeking relief from the Commission has the **complete** burden of proof. 66 Pa. C.S. §332 et seq. It has been well established and uncontested by Complainant that the Commission must view the record in a light most favorable to the non-moving party. Thus, giving PECO the benefit of all reasonable inferences. However, the Commission has the responsibility to examine the documented evidence submitted and relevant law cited included and or attached to Complainant's Response to Preliminary Objections which unequivocally establishes that Complainant has a **Smart Meter** at the service address. The Commission does not have the legal authority to ignore relevant statutes, relevant codes and or relevant documented evidence.

3. *A preliminary objection will be granted only where relief is clearly warranted and free from doubt. Interstate Traveller Servs., Inc. v. Pa. Dep't of Env't Res., 406 A.2d 1020 (Pa. 1979).*

OBJECTION

The Commission exhibited extreme bias, abuse of judicial discretion and an error of law.

RESPONSE

The case cited by the Commission involves a failure to exercise or exhaust statutory remedies. In the matter before the Commission, Complainant has not failed to exercise or exhaust statutory remedies. In fact, the purpose of the Complaint is to achieve a statutory remedy that prevents PECO from harassing the Complainant any further.

For relief to be granted free from all doubt for a preliminary objection, the response to a preliminary objection must be acknowledged and understood by the fact finder. If the fact finder fails to acknowledge, comprehend and understand said response relief must not be granted because doubt exists.

4. *The Commission or presiding officer at any stage of an action or proceeding may disregard an error or defect of procedure which does not affect the substantive rights of the parties. 52 Pa. Code § 1.2(a).*

OBJECTION

The Commission exhibited extreme bias, abuse of judicial discretion and an error of law.

RESPONSE

The Commission reference to this section of the Pennsylvania Code is without merit as it does not include or establish what error or defect of procedure occurred. The Commission's choice to reference sections of the Pennsylvania Code that do not apply to the matter before the Commission undoubtedly affect the substantive rights of the Complainant. For example, ALJ Heep stated: "Commission Regulations provide that failure to file a timely reply to New Matter may be deemed in default, and relevant facts stated in the New Matter may be deemed to be admitted. 52 Pa. Code § 5.63(b); Jones v. Phila. Gas Works, Docket Number C-2019-3007984 (Order and Opinion entered July 16, 2020)." However, this reference is nonsensical and irrelevant to the matter before the Commission because Complainant filed a timely response to new matters and a timely response to preliminary objections.

5. *A motion for judgment on the pleadings will be rendered if the applicable pleadings show that there is no genuine issue as to a material fact and that the moving party is entitled to a judgment as a matter of law. 52 Pa. Code § 5.102*

OBJECTION

The Commission committed an error of law

RESPONSE

Neither party filed a Motion for Judgment on the Pleadings. In Pennsylvania, a motion for judgment on the pleadings can be filed after the relevant pleadings are closed. The court will enter judgment based on the pleadings if there is no genuine issue as to a material fact and the moving party is entitled to judgment as a matter of law. Judgment on the pleadings should be granted only in a case where the moving party's right to prevail is so clear that a trial would be a fruitless exercise (See *Nein v. UGI Utilities, Inc.*, PUC Docket No. C-2012-2298099 (Final Order entered November 9, 2012)). The Commission, by and through the unilateral decision of ALJ Heep to convert PECOs improperly raised affirmative defense as a preliminary objection

into a Motion for Judgment on the Pleadings is an abuse of judicial discretion. Moreover, the failure to allow Complainant to respond to a Motion is highly prejudicial and a clear violation of Complainant's Constitutional Rights.

6. *There is no provision in the Code or the Commission's Regulations or Orders that allows a customer to "opt out" of smart meter installation. Povacz v. Pa. Pub. Util. Comm'n, 280 A.3d 975 (Pa. 2022)*

OBJECTION

The Commission exhibited and or committed extreme bias, prejudice, abuse of judicial discretion and an error of law

RESPONSE

The Commission citation of this case is without merit as that the Complaint before the Commission makes no reference or suggestion to "opt out" of anything. Complainant responses to preliminary objections and new matters do however direct the Commission to Title 52 §57.255(a). The Commission's regurgitation of misinformation supplied to the Commission by PECO clearly establishes the bias the Commission has in favor of PECO and against Complainant. The Commission CANNOT produce a document or statement of any kind where the Complainant suggests, states or implies that opting out of or complying with the requirements of the smart meter procurement and installation implementation plan was ever at issue.

7. *PECO may commence termination proceedings due to the Complainant's refusal to allow the utility access to their meter for purposes of replacement, Pennsylvania Public Utility Commission Order, Smart Meter Procurement and Installation, Docket No. M-2009-2092655 (Order entered Nov. 14, 2023).*

OBJECTION

The Commission exercised extreme bias, prejudice, abuse of judicial discretion.

RESPONSE

Without due process the Commission's bias, prejudice, abuse of judicial discretion and errors of law will subject the Complainant to a grave injustice.

8. *Based on the Complainant's averments, recovery or relief is not possible for the Complainant, and he is not entitled to judgment as a matter of law. 52 Pa. Code § 5.102; Ridge v. State Emps.' Ret. Bd., 690 A.2d 1312 (Pa. Cmwlth. 1997).*

OBJECTION

The Commission exhibited and or committed extreme bias, prejudice, abuse of judicial discretion and an error of law

RESPONSE

Without due process the Commission's bias, prejudice, abuse of judicial discretion and errors of law will subject the Complainant to a grave injustice.

IV EXCEPTIONS TO ORDER

1. *That the Preliminary Objection of PECO in the matter of Deree J. Norman v. PECO Energy Company at Docket Number C-2024-3048777 is sustained.*

OBJECTION

The Commission exhibited and or committed extreme bias, prejudice, abuse of judicial discretion and an error of law.

RESPONSE

Non-factual preliminary objections and or a preliminary objection improperly filed as an affirmative defense should have never been treated as a motion for judgment on the pleadings by the Commission. Moreover, the Commission erred by sustaining preliminary objections which no longer existed after being treated as a motion for judgment on the pleadings. Thus,

under the rule of the law in Pennsylvania, motions for judgment on the pleadings and motions for summary judgment are in a different procedural posture from preliminary objections. Furthermore, pursuant to § 5.102(a) only a party may move for judgment on the pleadings.

2. *That the Formal Complaint of Deree J. Norman at Deree J. Norman v. PECO Energy Company at Docket Number C-2024-3048777 is dismissed*

OBJECTION

The Commission exhibited extreme bias, abuse of judicial discretion and an error of law.

RESPONSE

The Commission has effectively and unlawfully denied Complainant due process.

3. *That the matter at Deree J. Norman v. PECO Energy Company, Docket Number C-2024-3048777 be marked closed*

OBJECTION

The Commission exhibited extreme bias, abuse of judicial discretion and an error of law.

RESPONSE

The Commission has effectively and unlawfully denied Complainant of due process.

October 23, 2024,

Respectfully submitted



By: Deree J. Norman

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DEREE J. NORMAN :
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v. :
PECO ENERGY COMPANY :
Respondent :

CERTIFICATE OF SERVICE

I, Deree J. Norman, do hereby certify that on this 23rd day of October 2024 a true and correct copy of the foregoing Exceptions and accompanying papers, was served on the individuals listed below by electronic delivery.

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VERIFICATION

I, Deree J. Norman, hereby declare that the facts set forth in the foregoing Exceptions are true to the best of my knowledge, information, and belief. I make this verification subject to the penalties of 18 Pa. C.S. §4904 pertaining to false statements to authorities.

October 23, 2024,


Deree J. Norman