

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Shasta Patrice Brown

Complainant

v.

PECO Energy Company

Respondent

Docket No. C-2024-3050759

SUPPLEMENTAL FILING IN SUPPORT OF MOTION FOR SUBPOENA OF RECORDS

This filing supplements the previously submitted Motion for Subpoena of Records. The attached materials are directed to Anthony Costello, Regulatory Assessor at PECO Energy Company, as counsel for PECO has identified him as the appropriate party for receiving discovery and records-related requests.

SUBPOENA ADDENDUM DIRECTED TO:

Anthony Costello, Regulatory Assessor

PECO Energy Company

2301 Market Street

Philadelphia, PA 19103

anthony.costello@peco-energy.com

You are hereby required to produce the following documents and provide verification under oath:

1. Original hard copy contract or application for electric service, signed by Shasta Patrice Brown (wet ink or scanned original), for all accounts tied to her Social Security Number and Trust EIN.
2. Complete record of all PECO accounts ever established under:
 - Shasta Patrice Brown's Social Security Number (2 accounts)
 - Shasta Patrice Brown's Trust EIN (1 account)
3. Documentation related to any account mergers or closures, particularly the account that was closed and consolidated with another, including all internal memos, notices, and ledger adjustments.
4. All records related to IOLTA accounts, sub-accounts, nested accounts, escrow accounts, or internal ledgers tied to the above-referenced accounts.
5. Off-balance sheet journal entries, reserves, or transactions involving account-related charges, deposits, interest, or adjustments.
6. GAAP/FERC-compliant records showing how PECO classifies and books customer payments, deposits, and liabilities.
7. Detailed records showing how any partial payments were applied, including whether

they were allocated to interest, escrow, or securitized instruments.

8. SEC filings or internal documentation recognizing the customer as an investor or funding source for operational revenues.

9. All communications between PECO legal counsel and Mr. Costello related to this subpoena request.

10. Records evidencing credit reporting tied to any of the three accounts, especially for the closed account, and any submission to Experian, TransUnion, or Equifax.

All documents must be accompanied by a sworn Certificate of Accuracy and Completeness.

INTERROGATORIES AND REQUESTS FOR PRODUCTION

Directed to: PECO Energy Company, Attn: Anthony Costello

Interrogatories

1. State your full name, title, and professional duties at PECO Energy.
2. Describe your role in managing, overseeing, or accessing the customer records, ledgers, and account filings relevant to Shasta Patrice Brown.
3. Identify and describe the nature of the three accounts referenced, including the closed and merged account.
4. Identify all documents or records you reviewed in response to this subpoena and summarize their content.
5. Explain PECO's methodology under GAAP for accounting for customer liabilities, deposits, and interest.
6. Identify all personnel or departments that handle off-ledger accounting, escrow accounts, or trust-related customer instruments.
7. Confirm whether PECO classifies customers as investors under any internal or SEC standards.
8. Confirm whether PECO has submitted or continues to submit credit reports tied to any of the above-referenced accounts, and under what authority.

Document Requests

- All items listed in the subpoena addendum above.
- Internal correspondence or policies relating to account closures, account merges, and consumer credit reporting.
- Any documentation or agreements showing how PECO treats customer applications or account data as securitizable or pledgeable instruments.

VERIFICATION

I, Shasta Patrice Brown, verify that the facts contained in this filing are true and correct to the best of my knowledge and belief. I understand that false statements herein are made subject to penalties under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

I hereby certify that I have this day served a true and correct copy of the foregoing
Executing person(s) in accordance with the Commission's

Executed on: 15 May 25
Signature: Shasta Patrice Brown
Name: Shasta Patrice Brown

Khadija Scott
Counsel for PECO Energy Company
2301 Market Street S23-1
Philadelphia, PA 19103
Khadija.Scott@ecisioncorp.com

Anthony Costello
Regulatory Assessor, PECO Energy
anthony.costello@peco-energy.com

Executed on: 15 May 25
Signature: Shasta Patrice Brown
Name: Shasta Patrice Brown

Shasta Patrice Brown

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Supplemental Filing upon the following person(s) in accordance with the Commission's Rules:

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

Anthony Costello
Regulatory Assessor, PECO Energy
anthony.costello@peco-energy.com

Executed on: 15 May 25
Signature: Shasta Patrice Brown
Name: Shasta Patrice Brown

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