

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANDREW WIEGAND :
 :
 v. : Docket No. C-2025-3056409
 :
 PECO ENERGY COMPANY :

Plaintiff's Response to Answer of Peco Energy Company to the formal complaint of Andrew Wiegand (Filing 8/12/2025 2:07 PM) & Plaintiff's Acknowledgment to Interim Order (Filing 8/14/2025 2:41 PM)

1. No response required.
2. No response required.
3. No response required.
4. **Disagree**; the Complainant was actively communicating with Peco over the course of about a year at least 38 times regarding an open billing issue that was still actively being worked on or about 7/17/2025. Below is a sampling of the back-and-forth communication dates and times.

All the following dates/times are outbound attempts to reach Peco unless otherwise stating as inbound communication from Peco. *This most likely is not a complete list.*

7/9/2024 11:46pm eMail sent to joseph.mckee@peco-energy.com regarding billing issues
7/10/2024 12:34am eMail sent to joseph.mckee@peco.com regarding billing issues
7/10/2024 8:57am eMail sent to peco_webmail@exeloncorp.com regarding billing issues
7/24/2024 8:36am (800) 494-4000 11min 51sec (most likely to originally open the inquiry about billing issues)
7/25/2024 11:02am (267) 533-2133 (incoming) 11min 30sec (Brianna Colletti assigned to handle case)
8/6/2024 11:33am (267) 533-2133 (incoming) 52sec
10/30/2024 2:06pm (267) 533-2133 13min 33sec (Calling Brianna Colletti to check on status of case)
11/7/2024 9:46am (800) 494-4000 1min 5sec
11/7/2024 9:47am (800) 494-4000 22min 2sec
11/21/2024 12:53pm (800) 494-4000 47min 17sec
2/27/2025 12:03pm (800) 220-7326 4min 25sec
2/27/2025 1:05pm (833) 732-6334 8min 19sec
3/6/2025 10:18am (833) 732-6334 8min 11sec
3/6/2025 10:27am (800) 220-7326 1hr 9min 25sec
3/20/2025 5:52pm (800) 220-7326 11min 46sec
3/20/2025 5:37pm (800) 220-7326 14min 21sec
3/21/2025 1:25pm (267) 533-2133 (incoming) 4min 51sec
3/21/2025 1:33pm Inbound eMail from brianna.colletti@exeloncorp.com
3/21/2025 1:49pm eMail reply back to brianna.colletti@exeloncorp.com
4/14/2025 12:25pm (267) 533-0164 (incoming) 2min
4/14/2025 12:38pm Inbound eMail from Amoni.Roberts@exeloncorp.com
4/14/2025 2:00pm (267) 533-0164 30sec

4/14/2025 2:36pm (267) 533-0164 2sec
4/14/2025 2:37pm eMail reply back to Amoni.Roberts@exeloncorp.com (stating I attempted to call several times.)
4/14/2025 4:16pm (267) 533-0164 3sec
4/15/2025 10:23am (267) 533-0164 1sec
4/16/2025 9:56am (267) 533-0164 7sec
4/18/2025 1:25pm (267) 533-0164 (incoming) 3min 8sec
4/24/2025 10:27am (267) 533-0164 25sec
5/23/2025 Communication sent from Jessica Krupa (PUC) on behalf of plaintiff to Peco.
5/29/2025 Communication sent from Jessica Krupa (PUC) on behalf of plaintiff to Peco.
6/17/2025 Communication sent from Jessica Krupa (PUC) on behalf of plaintiff to Peco.
7/3/2025 Communication sent from Jessica Krupa (PUC) on behalf of plaintiff to Peco.
7/16/2025 Communication sent from Jessica Krupa (PUC) on behalf of plaintiff to Peco.
7/16/2025 9:02pm (800) 494-4000 1min 48sec
7/17/2025 8:07am (800) 494-4000 20min 22sec (Peco confirmed that my account still has an open billing dispute actively being worked on)
7/24/2025 9:09am Inbound eMail from Lisa.Crespo@exeloncorp.com
7/25/2025 10:52pm eMail reply back to Lisa.Crespo@exeloncorp.com

As further context I have been a loyal Peco Solar customer with net-metering since on or about 12/30/2011 billing statement with account #69824-63049 prior to transitioning to current location with account #6722999000.

I appreciate the review of the account and Peco has determined the current banked generation credit is 6,463 kWh. At a generation rate of \$0.1094, the total value of the credits is \$707.05. However, Peco has not stated if they have corrected the billing template issues as it relates to calculation of total kWh used within the Meter Information section and remaining banked distribution credits to ensure that this issue will not just arise again in the upcoming billing cycles.

5. While Plaintiff acknowledges that Respondent has stated it "completed its review of the usage discrepancies and the credits" and has provided a figure of 6,463 kWh in current banked generation credit, valued at \$707.05 at a generation rate of \$0.1094, Plaintiff disputes the sufficiency and accuracy of this conclusion for the following reasons:
 - Scope of Review Was Too Narrow – Respondent’s statement addresses only the current balance and fails to show a transparent, itemized, and auditable calculation of all transactions since the Spring 2024 billing template change. Plaintiff specifically requested a forensic review of the entire period to identify and correct any and all miscalculations in both distribution and generation/transmission credits, not merely a review resulting in a current balance.
 - Failure to Address Distribution Credit Errors – Plaintiff’s claims include the misapplication and/or improper addition/subtraction/pay out of banked distribution kWh, which Respondent has not addressed in their answer. Simply reporting a current generation credit balance does not resolve the separate and equally important distribution credit miscalculations.
 - No Assurance of Correct Methodology – Respondent has not demonstrated that the calculation of the 6,463 kWh credit uses a corrected formula that resolves the original defects introduced by the Spring 2024 billing template change. Without such assurance, there remains a risk that the current figure is itself the product of the flawed methodology. Based on Peco’s review calculated the credit at 10.94¢, based on an unknown duration; however, based on my contracts the rates are as follows:

12/5/2023-12/4/2024 9.65¢ per kWh
12/5/2024-12/6/2025 10.94¢ per kWh

- Ongoing Harm and Need for Safeguards – Even if the stated credit were correct, Respondent’s refusal to roll back or immediately correct the defective billing template means the systemic issue remains unresolved, risking further miscalculations for Plaintiff and all similarly situated solar customers.

Conclusion:

Plaintiff respectfully requests that the Commission requires Respondent to:

- Provide a full, itemized transaction history showing how the 6,463 kWh figure was derived.
- Conduct the comprehensive forensic review of all solar accounts since the Spring 2024 template change, as originally requested.
- Correct all distribution and generation/transmission miscalculations; and
- Implement safeguards to ensure no similar billing errors occur in the future.

Simply providing a present credit balance without a transparent, auditable reconciliation of all past transactions does not satisfy the Respondent’s obligations or address the scope of the relief requested.

6. No response required.

7.

- a. An informal complaint was filed with the PUC on or about 3/21/2025. Or on about 7/21/2025 I was advised by the PUC informal complaint representative that since they have still not received a response from Peco regarding the status of your investigation and bills, that I, Plaintiff, should consider filing a formal complaint.
- b. No response required.
- c. Plaintiff disputes Respondent’s denial and maintains that the record contains clear, dated, and verifiable proof of sustained efforts to communicate with PECO representatives, both directly and through the Pennsylvania Public Utility Commission (PUC), without resolution.
 - Extensive direct contact with PECO
Between July 9, 2024 and July 25, 2025, Plaintiff, engaged in a minimum of 33 documented communications with PECO, including emails, inbound and outbound calls, and replies to PECO staff. (Which were provided above in response #4) These contacts are not speculative; they are supported by specific dates, times, recipients, and in many cases, call durations. The log includes direct correspondence with named PECO representatives such as Joseph McKee, Breanna Colletti, Amoni Roberts, and Lisa Crespo, evidencing Plaintiff’s persistent and active engagement in seeking resolution.
 - Documented PUC involvement without resolution
In addition to Plaintiff’s direct outreach, PUC representative Jessica Krumpa sent formal communications to PECO on Plaintiff’s behalf on May 23, May 29, June 17, July 3, and July 16, 2025. Respondent failed to provide substantive responses to these inquiries, prolonging the dispute and leaving core billing issues unresolved.
 - Pattern of non-resolution
Throughout Fall and Winter 2024, Plaintiff was told by PECO that the matter was "still being worked on," yet the dispute remained open for more than a year. PECO’s handling

of the matter included instances where the case was closed and reopened without any substantive corrective action, indicating a failure to progress toward resolution.

- Evidence Meets "Strict Proof" Requirement
Respondent demands "strict proof" that Plaintiff attempted to communicate. The plaintiff will introduce at hearing the complete call log and email correspondence, already provided in part to the Commission above in statement #4, which demonstrates not only the frequency and persistence of these contacts, but also their content, showing that the subject matter was the billing dispute at issue in this proceeding.

Conclusion

Given the documented record of 38 separate contacts over a 12-month period, many involving named PECO representatives and supported by PUC intervention, the assertion that Plaintiff's claims are unsupported is without merit. The evidence shows a sustained and well-documented effort by Plaintiff to resolve the billing dispute, and an inadequate and unreasonably delayed response by PECO.

8. No response required.
9. No response required.
10. No response required.
11. No response required.

Plaintiff respectfully opposes Respondent's request to dismiss the Formal Complaint "with prejudice" or to deny it in its entirety. The record contains substantial, documented evidence supporting the allegations set forth in the Complaint, including but not limited to:

- Detailed logs of **38 separate communications** with PECO and PUC representatives over more than 12 months regarding the same unresolved billing dispute.
- Documentary proof that billing errors arose after PECO's Spring 2024 billing template change and have yet to be fully corrected.
- Evidence that Respondent has failed to provide a transparent, auditable reconciliation of all distribution and generation/transmission credits owed since the template change; and
- Proof that repeated inquiries — both directly to PECO and through the PUC — were met with unreasonable delays, partial responses, or no substantive resolution.

Regarding Mediation

Plaintiff acknowledges that Respondent has suggested mediation, believed to have been communicated via telephone. While mediation can be useful in certain disputes, it is not appropriate here. This matter involves **systemic billing methodology defects** impacting multiple solar customers and requires a formal adjudication to establish the facts, determine appropriate remedies, and ensure safeguards against future violations.

Statement Regarding Interim Order and Resolution Conference

Complainant acknowledges receipt of the Interim Order dated 8/14/2025 directing the parties to participate in a resolution conference. Complainant agrees to participate in the resolution conference in good faith and will coordinate with Respondent to schedule the conference by the deadline set forth in the Order. However, Complainant does not consent to mediation. If no full resolution is achieved through the resolution conference, Complainant respectfully demands that this matter proceed directly to a formal hearing before an Administrative Law Judge so that all facts, evidence, and applicable law may be fully considered.

Demand for Hearing

Pursuant to the Commission's rules and the above-cited statutory and regulatory provisions, **Plaintiff formally demands that this matter be set for a hearing before the Pennsylvania Public Utility Commission.** The plaintiff is prepared to present testimony, documentary exhibits, and potentially call witnesses to substantiate the claims, including but not limited to:

- Complete call and email records.
- Correspondence from PUC representative Jessica Krumpa.
- PECO's own statements and account records; and
- Technical evidence demonstrates calculation errors in the application of credits. Already outlined in part in an eMail dated 7/25/2025 10:52pm already filed with the PUC as a letter.

Dismissal at this stage would be premature and contrary to the substantial evidence already in the record. The plaintiff respectfully requests that the Commission deny Respondent's request for dismissal and schedule a hearing to adjudicate the matter in full; to ensure that this same billing issue will not just reoccur in future billing cycles without fixing the underlying issues.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANDREW WIEGAND	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3056409
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

VERIFICATION

I, Andrew Wiegand, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904.

8/14/2025

Date



Andrew Wiegand

Re: Docket No. C-2025-3056409
Andrew Wiegand v. PECO Energy
Plaintiff's Response to Defendant's Answer of Plaintiff's Complaint

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s) in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via eFiling System

<https://efiling.puc.pa.gov/>

Via Electronic Mail

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Dated: August 14, 2025



Andrew Wiegand