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August 21, 2025

**Via Electronic Filing**

Matthew Homsher, Esquire  
Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Docket No. C-2025-3056641  
Michael Hanford v. PECO Energy Company, et al.  
Answer to Amended Complaint**

Dear Secretary Homsher:

Attached for filing is the Answer of PECO Energy Company (Respondent) to the Amended Complaint of Michael Hanford (Complainant) in the above-referenced proceeding.

A copy of the enclosed Answer has been served on the relevant parties in the manner indicated on the attached Certificate of Service.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/co  
Enclosures

cc: Khadijah Scott, Esquire, PECO Energy Company [w/o encls.]  
Colleen Kartychack, Constellation NewEnergy, Inc. [w/encls.]  
Michael Hanford [w/encls.]

**Re: Docket No. C-2025-3056641  
Michael Hanford v. PECO Energy Company, et al.  
Answer to Amended Complaint**

**CERTIFICATE OF SERVICE**

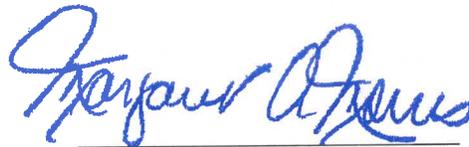
I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s) in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**Via Electronic Mail**

Michael Hanford  
[mikeh55@comcast.net](mailto:mikeh55@comcast.net)

Colleen Kartychak  
Constellation NewEnergy, Inc.  
[choicecompliance@constellation.com](mailto:choicecompliance@constellation.com)

Dated: August 21, 2025



Margaret A. Morris, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MICHAEL HANFORD	:	
	:	
v.	:	Docket No. C-2025-3056641
	:	
PECO ENERGY COMPANY	:	

**ANSWER OF PECO ENERGY COMPANY  
TO THE AMENDED FORMAL COMPLAINT OF MICHAEL HANFORD**

PECO Energy Company (PECO or Respondent), by and through its attorneys, Reger Rizzo & Darnall LLP, pursuant to 52 Pa. Code § 5.61, hereby submits its Answer to the Amended Formal Complaint filed by Michael Hanford (Complainant). In response thereto, the Respondent avers and represents as follows:

1. Admitted that service is in the name of Judith Hanford (Customer). The Complainant is listed as an authorized user.
  
2. Admitted that the responding utility is PECO Energy Company.
  
3. Admitted that Respondent provides residential electric service in the Customer's name to 20 Southridge Drive, Kennett Square, Pennsylvania, 19348 (Service Address) under Account No. 5269299000 (Account).
  
4. Denied that PECO is providing unreasonable customer service. The Respondent specifically avers that at all times relevant to this proceeding, its actions have been reasonable

and performed in accordance with all applicable laws, as well as PECO's Commission-approved tariff, the Pennsylvania Public Utility Code (Code), Commission regulations and orders.

In the Amended Formal Complaint, the Complainant alleges that he made three unidentified unsuccessful attempts to reach PECO *via* its Customer Call Center and his wait times were as follows: 25 minutes, 45 minutes and 55 minutes. He contends that “*PECO must provide realistic response times to its customers; especially where the PUC requires prior discussion.*”

The Complainant does not identify when he attempted the calls or the subject matter. Upon information and belief, PECO's business records reflects that the outage that the Service Address experienced on July 22, 2025 was reported to PECO using its automated system. Three follow up automated calls to the number on file for the Service Address regarding the potential cause and the duration of the outage were made. Section 1501 of the Code,<sup>1</sup> mandates that the Respondent provide reasonable and adequate service, not perfect service. *Elkin v. Bell Telephone Company*, 372 A.2d 1203 (Pa.Super. 1977). In determining whether Respondent has violated the provisions of 66 Pa.C.S. § 1501, it must be understood that what is required is adequate, efficient, safe, and reasonable service and facilities, not “perfect service.” *Manuel A. Biason v. Metropolitan Edison Company*, PUC Docket No. C-00004450 (Opinion and Order entered December 19, 2001). Likewise, service must only be *reasonably* continuous and without *unreasonable* interruptions or delay. The Code does not mandate perfect service nor must a public utility provide the best possible service. Most certainly, a public utility is not a guarantor of either perfect service or the best possible service. *Re Metropolitan Edison*

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<sup>1</sup> 66 Pa.C.S. § 1501.

*Company*, 80 Pa. PUC 662 (November 19, 1993). The Respondent avers that at all times, it has provided adequate and reasonable service to the Complainant consistent with the Code, Commission regulations and orders.

5. To the extent the allegations contained within this paragraph are construed to purport allegations of fact, rather than requests for relief, any such allegation of fact is denied. This paragraph contains a prayer for relief to which no response is required. The Respondent specifically denies that Complainant is entitled to the relief requested.

By way of further response, PECO avers that the Commission already tracks the customer service performance for jurisdictional utilities in the electric, gas, water and telecommunications industries. The annual UCARE Report is available on the Commission's website.

6. No response required.

7a. Admitted there is no underlying informal complaint.

7b. No response required.

7c. To the extent the allegations contained within this paragraph are construed to purport allegations of fact, rather than the Complainant's opinions, beliefs, or requests for relief, any such allegation of fact is denied. PECO specifically denies that it provided unreasonable or

inadequate service in handling the concerns/issues of the Complainant. Strict proof substantiating this allegation is demanded at hearing.

8. No response required.

9. No response required.

10. No response required.

11. No response required.

**WHEREFORE**, PECO Energy Company, requests that the Amended Formal Complaint filed by Michael Hanford be dismissed with prejudice or denied in its entirety.

Respectfully submitted,



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Dated: August 21, 2025

*Attorney for PECO Energy Company*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MICHAEL HANFORD	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3056641
	:	
PECO ENERGY COMPANY and	:	
CONSTELLATION NEWENERGY, INC.	:	
Respondent(s)	:	

**VERIFICATION**

I, Michael Begley, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect PECO Energy Company to 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.

08/21/2025  
Date

Michael Begley  
Michael Begley