

September 11, 2025

VIA E-FILING

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

RE: Vidhyadhar Nanadana v. PECO Energy Company
Docket No. C-2025-3056974

Dear Mr. Homsher,

Enclosed for filing with the Commission is Vidhyadhar Nandana's reply to the Answer of respondent.

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 on this matter.

Your sincerely,

A handwritten signature in blue ink that reads "Vidhyadhar N." with a stylized flourish at the end.

Vidhyadhar Nandana

3138014667

vidhyadharnandana@gmail.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VIDHYADHAR NANADANA,	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2025-3056974
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

CERTIFICATE OF SERVICE

I, Vidhyadhar Nandana, hereby certify that I have this day served a copy of reply to answer in the above matter upon all interested parties via E-mail to:

KHADIJAH SCOTT
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
(267) 533-1830
Fax: 215.568.3389
Via email: Khadijah.Scott@exeloncorp.com

Dated: September 11, 2025

Vidhyadhar N.

Vidhyadhar Nandana
6306 Foxhill Rd,

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

VIDHYADHAR NANADANA,	:	
Complainant	:	
	:	
v.	:	DOCKET NO. C-2025-3056974
	:	
PECO ENERGY COMPANY	:	
Respondent	:	

COMPLAINANT’S REPLY TO ANSWER

On September 10, 2025, Complainant, Vidhyadhar Nandana, received an answer to formal complaint filed by PECO Energy Company ("PECO") in the above captioned docket. Complainant hereby submits this reply to respondent’s answer, and states as follows:

1. In reply to answer to paragraph 1, Respondent admitted the allegations therein contained.
2. In reply to answer to paragraph 2, Respondent admitted the allegations therein contained.
3. In reply to answer to paragraph 3, Respondent admitted the allegations therein contained.
4. In reply to answer to paragraph 4, Respondent denied the allegations and asserted that complainant has an outstanding balance of \$953.34. Complainant expressly denies owing this amount and demands strict proof of record thereof.

Complainant requests that respondent produce and provide documentation of actual meter readings for the following billing periods, for the meter number: **514018753 only**;

- a. March 10 – March 17, 2025**
- b. March 17 – April 16, 2025**
- c. April 16 – May 16, 2025**
- d. May 16 – June 17, 2025**
- e. June 17 – July 23, 2025**

f. July 23 – August 15, 2025

g. August 15 – September 4, 2025

Complainant cannot be held responsible for arbitrary billing amounts. In respondent's own utility company report (Exhibit 1), PECO admitted meter mix-up and claimed complainant owed \$1,255.47. Yet in its answer, respondent claims that complainant owes a balance of \$ 953.34.

Complainant expressly demands clarification and provide the documentation showing how respondent arrived at these inconsistent balances.

Complainant denies owing the balance of \$953.34.

Complainant has already produced photographs of actual meter readings. The meter readings in respondent's billings should match with the photographs of the actual meter readings submitted by complainant.

5. In reply to answer to para 5, respondent denied factual allegations. To the extent this paragraph contains factual allegations, Complainant denies them for the reasons set forth in response to Paragraph 4 above.

6. In reply to answer to paragraph 6, Respondent admits the allegations therein contained.

7. No response required.

8. No response required.

9. No response required.

10. No response required.

11. No response required.

“WHEREFORE, Complainant respectfully requests that the Honorable Commission deny respondent's request for dismissal, and direct PECO to :

A. produce the actual meter readings from March 10, 2025, through Sep 4, 2025, for each billing period individually.

B. Produce complete billing records for each of the above periods.

C. Adjust the balance to reflect actual usage and remove erroneous charges.

Respectfully submitted,

A handwritten signature in black ink, reading "Vidhyadhar N." with a stylized flourish at the end.

Vidhyadhar Nandana
6306 Foxhill Rd,
Philadelphia, PA 19120
313-801-4667
vidhyadharnandana@gmail.com