

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EDRIE FIELDS	:	
Complainant	:	
v.	:	DOCKET NO: C-2025-3055095
PECO ENERGY COMPANY	:	
Respondent	:	

EXCEPTIONS

Introduction / Background

Complainant Edrie Fields (“Claimant”) filed a complaint against PECO Energy Company (“PECO”) regarding its handling of lawful tender submissions for payment of utility services.

The Initial Decision issued on November 17, 2025, in Docket No. C-2025-3055095, concluded that PECO’s actions were not unreasonable and dismissed the complaint.

Claimant respectfully submits these Exceptions pursuant to 52 Pa. Code § 5.533 to correct factual and legal errors in the Initial Decision. At issue is whether PECO’s internal policies prevented employees from properly evaluating lawful submissions and responding appropriately, resulting in unreasonable service and adverse actions contrary to the Public Utility Code and Commission regulations. The grounds for these Exceptions are set forth below.

Exception No. 1 — The Initial Decision Did Not Apply the Commission’s Jurisdiction Correctly

The Initial Decision correctly states that the Commission has jurisdiction over this dispute under 66 Pa.C.S. § 701. However, after acknowledging jurisdiction, the decision does not fully use that authority to evaluate PECO's conduct under the Commission's own standards.

The Commission can decide whether PECO acted reasonably under §1501 without ruling on instrument negotiability. The issue is whether PECO acted reasonably and followed the Public Utility Code and Commission regulations when handling the submission of tender. That is squarely within the jurisdiction.

During the hearing, PECO's own witness made clear that PECO relied only on internal policy, not statute or regulation, when deciding how to treat my submissions. Whether that conduct is "reasonable service" under 66 Pa.C.S. § 1501 is something the Commission **can** decide and is required to decide.

By focusing on negotiability instead of evaluating PECO's actions against Commission standards, the Initial Decision does not fully apply the Commission's jurisdiction. This is an error and should be corrected.

Exception No. 2 – PECO Policy Prevents Employees from Acting Consistently with Law

During cross-examination, PECO's witness confirmed that employees are required to follow internal policy and are not authorized to act contrary to that policy, customers reference applicable law, preventing a proper response to submissions. This admission demonstrates that PECO's rigid policies can prevent employees from addressing submissions or evaluating lawful tender in accordance with applicable law.

The Initial Decision does not acknowledge this testimony or the impact it has on the reasonableness of PECO's customer service practices.

Exception No. 3 — PECO Did Not Conduct a Reasonable Investigation of My Submissions

PUC regulations require a utility to actually look into a customer's submissions and give a clear explanation of its decision. See 52 Pa. Code §§ 56.141–56.163.

During the hearing, PECO's witness testified that employees:

- are limited to internal policy when handling all customer submissions,
- cannot review or consider documents outside that policy,
- and cannot evaluate or respond to statutory references or instructions sent by a customer.

This means PECO did **not** review the information I sent, did **not** investigate anything that was sent in individually, did not consider submissions beyond the limits of internal policy.

That falls short of what the regulations require.

The Initial Decision does not address this testimony or explain how PECO's approach qualifies as a "reasonable investigation" under the Commission's rules. Because the findings do not reflect what was actually said on the record, this is a clear error that must be corrected.

Exception No. 4 — PECO's Rigid Policy Is Unreasonable

PUC regulations require utilities to provide reasonable service. See 66 Pa. C.S. § 1501.

PECO's internal policy stops employees from:

- reviewing customer correspondence,
- considering the substance of a submission,
- exercising judgment, or
- escalating issues for proper review.

The witness admitted that employees are required to follow internal policy even when a customer submits something that falls outside those limits. That makes the process unreasonable. PECO's policy allows the company to ignore or selectively apply statutory requirements, which denies customers a fair and consistent standard.

As a result, PECO ignored submissions, issued termination notices, and allowed charges and late fees to accrue, contrary to 52 Pa. Code §§ 56.140, 56.141, and 56.151. Internal policy cannot override these regulatory obligations.

The Initial Decision does not address this point or explain why this rigid approach meets the legal standard of "reasonable service."

Exception No. 5 – PECO's Failure to Respond Resulted in Improper Charges and Termination Notices

PECO received my submissions of negotiable instruments with instructions to contact me within five business days if there were any problems, but they ignored these instructions. PECO claims I "have not made any payments," yet this is different from refusing or failing to accept properly tendered instruments, which I can prove were received. Despite this, they issued termination notices and allowed charges and late fees to accrue. Under 52 Pa. Code § 56.151, a utility cannot

take adverse action while a customer's submission is pending. PECO's rigid policy may have prevented employees from responding, but it does not excuse ignoring instructions or taking improper action. Had the Commission considered the evidence, I would have sought declaratory relief or summary judgment to show that PECO acted unreasonably and mishandled my submissions.

REQUESTED RELIEF AND REMEDY

Based on the record, testimony, and applicable regulations, I respectfully request that the Commission:

1. **Order PECO to zero the balance** on my account that resulted from the ignored submissions and improper handling of lawful instruments.
2. **Reverse or modify the Initial Decision** to reflect that PECO failed to conduct a reasonable review of my submissions.
3. **Find that PECO's rigid internal policies**—which prevent employees from evaluating lawful submissions or responding—constitute unreasonable service under 66 Pa.C.S. § 1501.
4. **Prohibit termination or collection actions** on the disputed amounts until PECO performs a proper review.
5. **Require PECO to conduct a full, lawful review** of my submissions, in accordance with 52 Pa. Code §§ 56.141–56.163.
6. **Grant any additional relief** the Commission deems just and necessary.

Conclusion

PECO’s internal policy is treated as unquestionable, and employees are required to follow it even when it conflicts with the facts, the evidence, or basic fairness. This leaves no room for reasonable judgment. Employees are not allowed to evaluate submissions on their merits—they can only follow the script.

Because of this, the evidence I submitted was pushed aside, not due to any defect in the evidence, but because it did not fit PECO’s preset policy. When a company’s policy prevents employees from fairly reviewing information, responding, or providing service before issuing termination notices, a fair outcome is impossible.

For these reasons, Claimant respectfully requests that the Pennsylvania Public Utility Commission sustain these Exceptions, reverse or modify the Initial Decision, and grant the relief requested herein.

Respectfully submitted,

_____/s/_____

**Edrie Fields
c/o 320 Commons Drive Suite 180
Parkesburg, Pennsylvania [19365]
December 1st 2025**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the Exceptions to the Initial Decision upon the following parties of record, in accordance with 52 Pa. Code § 1.54, by the methods indicated below:

Served via Electronic Mail and U.S. Mail (First-Class):

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Date: December 1st 2025

Respectfully submitted,

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