

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Faith Canaan Baptist Church, Complainant

v.

PECO Energy Company, Respondent

Docket No. F-2025-3058706

COMPLAINANT'S RESPONSE TO PECO ENERGY COMPANY'S MOTION TO DISMISS AND
NEW MATTER

Faith Canaan Baptist Church ("Complainant"), by its Authorized Representative, Elizabeth Scott, respectfully submits this Response to PECO Energy Company's Answer, New Matter, and Motion to Dismiss.

I. INTRODUCTION

On December 4, 2025, PECO filed an Answer, New Matter, and Motion requesting dismissal of the Complainant's Formal Complaint. Complainant opposes PECO's Motion and responds to PECO's New Matter within the required timeframe.

II. RESPONSE TO PECO'S MOTION TO DISMISS

A. Representation

PECO incorrectly asserts that Complainant must be represented by counsel. Faith Canaan Baptist Church is a religious ministry, not a commercial corporation. It may appear through an authorized representative.

B. Motion Based on "Correct Billing"

Complainant does not allege billing errors. The issue is affordability and the need for a reasonable payment arrangement.

III. RESPONSE TO NEW MATTER

1. Customer Classification

Denied. Faith Canaan Baptist Church is not a commercial business.

2. BCS Payment Arrangement

Admitted in part; denied in part.

One of the church's leaders had been personally assisting the church with its utility obligations using his own finances and credit. When he became seriously ill, this support was no longer available.

Since the COVID-19 pandemic, the church has experienced a steady and continual decline in active membership. The church now has approximately 25 active members, and not all are giving members. As a result, the church's income has significantly decreased over time.

Due to reduced membership and loss of personal financial assistance, the church did not have the income to meet the BCS arrangement. The required monthly payments (\$2,201.72-\$3,366) were not financially possible. The church never agreed to or accepted the arrangement because it was unaffordable.

The request to check the meter was precautionary only. Complainant does not allege billing errors.

3. New Payment Arrangement Under §1405(d)

Denied. A new arrangement is permitted due to changes in income and financial hardship.

4. Billing Accuracy

Complainant is not disputing billing accuracy. Bills were not always consistently received, which added difficulty, but no allegations of billing errors are being made.

IV. REQUEST FOR RELIEF

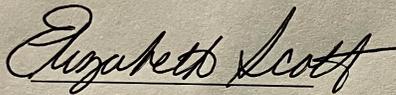
Complainant respectfully requests that the Commission:

1. Deny PECO's Motion to Dismiss;
2. Allow the complaint to proceed;

3. Issue a new affordable payment arrangement;
4. Prevent termination while this complaint is pending;
5. Grant any additional relief appropriate;
6. ****Complainant respectfully requests that any hearing in this matter be conducted by telephone due to the church's limited resources and logistical constraints.****

VERIFICATION

I, Elizabeth Scott, verify that the statements contained herein are true and correct to the best of my knowledge.



Elizabeth Scott

Authorized Representative

Faith Canaan Baptist Church

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this Response upon:

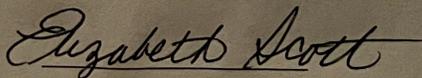
Khadijah Scott, Esquire

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Elizabeth Scott