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December 11, 2025

**VIA E-FILING**

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

**RE: Edrie Fields v. PECO Energy Company**  
**Docket No. C-2025-3055095**

Dear Mr. Homsher:

Enclosed for filing with the Commission is *PECO Energy Reply Exceptions* for the above reference matter.

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.

Very truly yours,

A handwritten signature in blue ink that reads "Khadijah Scott".

Khadijah Scott, Esquire  
Assistant General Counsel, PECO Energy Company

cc: Steve Haas, Administrative Law Judge (via email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**EDRIE FIELDS  
COMPLAINANT**

**v.**

**PECO ENERGY COMPANY,  
RESPONDENT**

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**Docket No. C-2025-3055095**

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**REPLY EXCEPTIONS OF PECO ENERGY COMPANY**

PECO Energy Company (“PECO Energy”) hereby replies to the Exceptions filed by EDRIE FIELDS (“Complainant”) on December 2, 2025. On May 12, 2025, PECO Energy was served with a formal complaint filed by the Complainant against PECO Energy. In the formal Complaint, the Complainant alleged that PECO refused to accept his Bills of Exchange as lawful tender of payment. On May 30, 2025, PECO Energy filed an Answer to the Complaint denying all conclusions of law and material allegations of the Complaint and averred that it accepts Visa, MasterCard, Discover, Star, Pulse, NYCE, Accel, cash, money orders or personal checks to pay for utility bills. All payments made in these formats have been credited to the Complainant’s account. On July 29, 2025, a hearing was held before the Honorable Administrative Law Judge Steven K. Haas (ALJ Haas).

On November 17, 2025, ALJ Haas issued a well-reasoned Initial Decision in this matter denying the Complainant’s Complaint. On December 2, 2025, the Complainant filed Exceptions to the Initial Decision. In his writing, the Complainant seems to attempt to relitigate the facts of the Complaint before the Commission.

PECO Energy files the instant Reply Exceptions and hereby respectfully requests that the Commission deny the Complainant's Exceptions and issue an Order adopting the Initial Decision of ALJ Haas.

**I. Scope of Review**

As the proponent of a rule or order, the Complainant in this proceeding bears the burden of proof pursuant to Section 332(a) of the Code, 66 Pa. C.S. § 332(a). To establish a sufficient case and satisfy the burden of proof, the Complainant must show that the respondent utility, PECO Energy, is responsible or accountable for the problem described in the Complaint through a violation of the Code or a regulation or order of the Commission. *Patterson v. The Bell Telephone Company of Pennsylvania*, 72 Pa. P.U.C. 196 (1990). Such a showing must be by a preponderance of the evidence. *Samuel J. Lansberry, Inc. v. Pa. PUC*, 578 A.2d 600 (Pa. Cmwlth. 1990), alloc. denied, 602 A.2d 863 (Pa. 1992). That is, the Complainant's evidence must be more convincing, by even the smallest amount, than that presented by the respondent. *Se-Ling Hosiery, Inc. v. Margulies*, 70 A.2d 854 (Pa. 1950).

Additionally, the Commission's decision must be supported by substantial evidence in the record, which is defined as evidence that a reasonable mind might accept as adequate to support a conclusion. More is required than a mere trace of evidence or a suspicion of the existence of a fact sought to be established. *Norfolk & Western Ry. Co. v. Pa. PUC*, 413 A.2d 1037 (Pa. 1980).

Upon the presentation by a complainant of evidence sufficient to initially satisfy the burden of proof, the burden of going forward with the evidence, sometimes called the burden of persuasion, to rebut the evidence of the complainant, shifts to the respondent. If the evidence presented by the respondent is of co-equal value or "weight," the burden of proof has not been satisfied. The

complainant now has to provide some additional evidence to rebut that of the respondent. *Burleson v Pa. PUC*, 443 A.2d 1371 (Pa. Cmwlth. 1982), *aff'd*, 433 A.2d 1234 (Pa. 1983). While the burden of persuasion may shift back and forth during a proceeding, the burden of proof never shifts. The burden of proof always remains on the party seeking affirmative relief from the Commission. *Milkie v. Pa. PUC*, 768 A.2d 1217 (Pa. Cmwlth. 2001).

It should be noted that the Commission is not required to consider expressly or at length each contention or argument raised by the parties. *Consolidated Rail Corp. v. Pa. PUC*, 625 A.2d 741 (Pa. Cmwlth. 1993); *See also*, generally, *University of Pennsylvania v. Pa. PUC*, 485 A.2d 1217 (Pa. Cmwlth. 1984).

## **II. Legal Argument**

### **a. The Complainant has failed to identify any law, statute or regulation that PECO violated.**

In his Exceptions, it appears that the Complainant is challenging PECO's internal policies regarding tender of payment and asserts a violation of Public Utility Commission regulations. These issues are without merit. PECO, as a company, only accepts cash, certified checks, money orders, and valid bank checks in payment of utility accounts. The company accepts Visa, MasterCard, Discover, Star, Pulse, NYCE, Accel, cash, money orders or personal checks to pay for utility bills. All payments made in these formats have been credited to the Complainant's account. PECO will not apply as credit to any customer account non-negotiable documents, sight drafts, 1040 Forms, Acceptance for Value, UCC Certified Tender of Payments, Promissory Notes or other UCC documents. By way of further response, this issue has already been decided in James Coppedge v. PECO, Docket No. F-2014-2406180 (Order entered Jul. 29, 2014). The PUC determined that "even accepting as true the Complainant's contentions, nothing in either PECO's tariff or our Regulations requires PECO to accept all forms of payment." *Id.*

Accordingly, ALJ Haas 's Initial Decision is well-reasoned with ample support from the law. As detailed in the Initial Decision, the Complainant has failed to prove that PECO has violated any statute, regulation or law. Accordingly, the Complainant's Exceptions should be dismissed.

### **III. Conclusion**

ALJ Haas correctly determined correctly determined that the Complainant had not met his burden of proof in this matter. Accordingly, ALJ Haas 's decision to dismiss the Complainant's case against PECO Energy should be upheld.

For the reasons set forth above, PECO respectfully requests that the Commission deny the Exceptions and issue an Order upholding the Initial Decision in its entirety.

Respectfully submitted,



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Khadijah Scott  
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Philadelphia, PA 19103  
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**VERIFICATION**

I, Khadijah Scott, hereby declare that I am counsel for PECO Energy Company; that as such I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Pleading are true to the best of my knowledge, information and belief, and that I make this verification subject to the penalties of 18 Pa. C.S. §4904 pertaining to false statements to authorities.

Date: December 11, 2025



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**Khadijah Scott**

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**Docket No. C-2025-3055095**

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**CERTIFICATE OF SERVICE**

I, Khadijah Scott, hereby certify that I have on this day served a copy of PECO Energy Company's Reply Exceptions in the above matter upon all interested parties by E-mailing a copy to:

EDRIE FIELDS  
320 COMMONS DRIVE  
PARKESBURG, PA 19365  
*Via email: edriedf@gmail.com*

Dated: December 11, 2025



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