

February 25, 2026

Via Electronic Filing

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

**Re: Docket Nos. C-2025-3059038, C-2023-3039169, C-2025-3058086, C-2025-3058088, and C-2025-3058831
Charmaine Prater v. PECO Energy Company
Motion to Consolidate of PECO**

Dear Secretary Homsher:

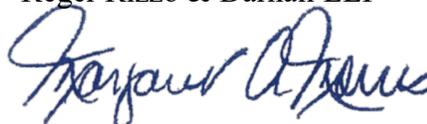
Attached for filing is the Motion of PECO Energy Company (Respondent) to consolidate the Formal Complaints of Charmaine Prater (Complainant) at Docket Nos. C-2023-3039169, C-2025-3058086, C-2025-3058088, C-2025-3058831 and C-2025-3059038.

A copy of the attached Motion to Consolidate has been provided to the Complainant 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: The Hon. Barbara Shadie Nause, PA Public Utility Commission [w/encls.]
The Hon. Steven K. Haas, PA Public Utility Commission [w/encls.]
Anthony Gay, Esquire, PECO Energy Company [w/encls.]
Charmaine Prater [w/encls.]

**Re: Docket Nos. C-2025-3059038, C-2023-3039169, C-2025-3058086, C-2025-3058088, and C-2025-3058831
Charmaine Prater v. PECO Energy Company
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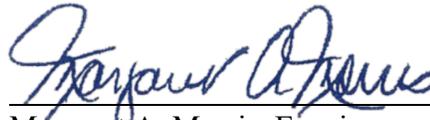
CERTIFICATE OF SERVICE

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 and First-Class Mail

Charmaine Prater
[REDACTED]

Dated: February 25, 2026



Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CHARMAINE PRATER	:	
	:	Docket Nos. C-2023-3039169
v.	:	C-2025-3058086
	:	C-2025-3058088
	:	C-2025-3058831
PECO ENERGY COMPANY	:	C-2025-3059038

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.103, you are hereby notified that if you do not file a written response to the enclosed Motion to Consolidate of PECO Energy Company, within five (5) days from service of this Notice, the facts set forth by PECO Energy Company in the Motion to Consolidate may be deemed to be true, whereby requiring no other proof. All pleadings, such as Answer to Motion to Consolidate, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PECO Energy Company, Margaret A. Morris, Esq., and the Honorable Barbara Shadie Nause, and Honorable Steven K. Haas, the Administrative Law Judges presiding over the issue.

File by Mail or e-filing with:

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

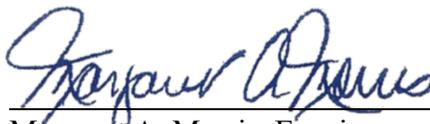
With a copy to:

Margaret A. Morris, Esquire
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mmorris@regerlaw.com

The Hon. Barbara Shadie Nause
c/o pmcneal@pa.gov

The Hon. Steven K. Haas
sthaas@pa.gov

Date: February 25, 2026



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Counsel for PECO Energy Company

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CHARMAINE PRATER	:	
	:	Docket Nos. C-2023-3039169
v.	:	C-2025-3058086
	:	C-2025-3058088
	:	C-2025-3058831
PECO ENERGY COMPANY	:	C-2025-3059038

**MOTION OF ENERGY COMPANY TO CONSOLIDATE FORMAL COMPLAINTS
FILED BY CHARMAINE PRATER**

PECO Energy Company, (Respondent, PECO, or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, hereby submits its Motion to Consolidate the Formal Complaints of Charmaine Prater aka Charmaine Custis (Complainant) filed in the above-captioned dockets with the Pennsylvania Public Utility Commission (Commission), pursuant the Commission’s regulations, 52 Pa. Code §§ 5.103 and 5.81. In response thereto, the Company avers and represents as follows:

I. BACKGROUND

1. On March 9, 2023, Complainant filed a Formal Complaint with the Commission at Docket No. C-2023-3039169 (First Complaint) regarding service to [REDACTED] [REDACTED]¹ ([REDACTED] Service Location) under Account No. [REDACTED] ([REDACTED] Account) alleging, *inter alia*, improper billing and service termination procedures and that PECO has illegally blocked her from her accounts..

2. On September 10, 2025, Complainant, using the name Charmaine Custis, filed a Formal Complaint with the Commission at Docket No. C-2025-3058086 (Second Complaint)

¹ Complainant asserts an active Protection from Abuse order (PFA). As of the filing of this Motion, PECO has not been supplied with any evidence of an active PFA.

regarding service to the [REDACTED] Service Location under the [REDACTED] Account, again alleging, among other things, improper billing and service termination procedures, as well as meter tampering by PECO personnel. On November 11, 2025, pursuant to 52 Pa. Code § 5.62, the Company filed its responsive Answer to the Second Complaint.

3. On September 11, 2025, Complainant filed a Formal Complaint with the Commission at Docket No. C-2025-3058088 (Third Complaint) regarding service to the [REDACTED] ([High Street] Service Location) under the Account No. [REDACTED] ([REDACTED] Account) which she again alleged, among other things, improper billing, meter tampering by PECO personnel and improper service termination procedures. On November 11, 2025, pursuant to 52 Pa. Code § 5.62, the Company filed its responsive Answer to the Third Complaint.

4. On November 25, 2025, Complainant filed a Formal Complaint with the Commission at Docket No. C-2025-3058831 (Fourth Complaint) regarding service to the [REDACTED] ([REDACTED] Service Location) under the Account No. [REDACTED] ([REDACTED] Account) appealing the decisions of informal case # 4095112, 4094862, 4087874, 4069204 and 4037393, issues raised in her prior complaints. Furthermore, Complainant argued that these decisions were withheld in violation of her civil rights of due process and the Americans with Disabilities Act (ADA). On December 11, 2025, pursuant to 52 Pa. Code § 5.62, the Company filed its responsive Answer and Preliminary Objection to the Fourth Complaint. In its preliminary objection, PECO argued that any allegations involving violations of Complainant's civil rights and the ADA should be dismissed as beyond the jurisdiction of the Commission. The Complainant did not file a response to PECO's Preliminary Objection.

5. On December 3, 2025, Complainant filed a Formal Complaint with the Commission at Docket No. C-2025-3059038 (Fifth Complaint) regarding service to the [REDACTED] [REDACTED] (Service Location) under the Account No. [REDACTED] (Current Account) alleging, *inter alia*, incorrect charges, fake readings on her bill as a result of ongoing balance transfers, and that the Secretary's Bureau created a hostile environment during her on site visit. On December 12, 2025, pursuant to 52 Pa. Code § 5.62, the Company filed its responsive Answer to the Fourth Complaint.

6. By Order, dated November 14, 2025, the cases docketed C-2023-3039169, C-2025-3058086, and C-2025-3058088 (First, Second and Third Complaint) are consolidated for hearing and adjudication.

7. By Notice, dated January 9, 2026, the consolidated cases (First, Second and Third Complaint) are scheduled for Telephonic Prehearing Conference on February 23, 2026, before the Honorable Steven K. Haas (Judge Haas).

8. By Notice, dated January 16, 2026, the Fourth Complaint is scheduled for Telephonic Hearing on March 10, 2026, before the Honorable Barbara Shadie Nause (Judge Shadie Nause).

9. By Order, dated January 22, 2026, sustained the Preliminary Objection, filed by PECO in connection with the Fourth Complaint, to the extent it seeks to strike the allegations pertaining to violations of the ADA. Furthermore, it ordered that the Fourth Complaint, docketed C-2025-3058831, be consolidated with the previously consolidated cases docketed C-2023-3039169, C-2025-3058086, and C-2025-3058088 for hearing and adjudication.

II. CONSOLIDATION

10. Section 5.81 of the Commission's regulations, 52 Pa. Code § 5.81, allows the Commission or the presiding officer to order the consolidation of proceedings "involving a common question of law or fact." Both the First and Second Complaints contain identical issues of law and fact, which, in order to further judicial economy and avoid needless duplication of litigation, justify consolidation.

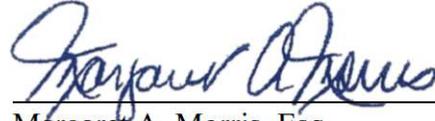
11. As noted *supra*, the Complainant's four (4) prior complaints were consolidated by *Orders* dated November 14, 2025, and January 22, 2026. In those *Orders*, Judge Haas noted that the complaints involve the same Complainant, the same Respondent and common allegations, including improper billing and service termination procedures. Likewise, the Complainant's Fifth Complaint involves the same Respondent and common allegations.

12. The Commission has significant discretion in deciding a Motion to Consolidate Proceedings. Consolidation of these proceedings will avoid: (i) the need to appoint a separate administrative law judge to preside over both Formal Complaints; (ii) participation by the parties in two separate proceedings on identical issues; and (iii) duplication of witnesses, discovery, testimony, and cross-examination. Moreover, consolidation of the Formal Complaints for hearing and decision will avoid the potential for inconsistent decisions due to separate treatment in different proceedings, which ultimately may require Commission resolution. Basic principles of judicial economy, the avoidance of needless duplication of litigation and a desire to save Commission, and the parties' resources, all support consolidation of these proceedings

WHEREFORE, for the foregoing reasons, PECO Energy Company, respectfully requests that its Motion to Consolidate the Formal Complaints filed by Charmaine Prater at Docket Nos. C-2023-3039169, C-2025-3058086, C-2025-3058088, C-2025-3058831 and C-2025-3059038 be granted.

Dated: February 25, 2026

Respectfully submitted,



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