

March 12, 2026

Via Electronic Filing

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

**Re: Docket No. C-2025-3057175
DJ Christopher Norman v. PECO Energy Company
Objections to Subpoena Request**

Dear Secretary Homsher:

Pursuant to the *Interim Order on Continuance and Procedural Deadlines* issued by the Honorable Erin L. Gannon on January 15, 2026, attached for filing is the Objections of PECO Energy Company to the Complainant's Subpoena Request.

A copy of the attached Objections has been provided to the Complainant in the manner indicated on the enclosed Certificate of Service.

If there are any questions, please feel free to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/co
Enclosures

cc: The Hon. Erin Gannon, PA Public Utility Commission [w/encls.]
Anthony Gay, Esquire, PECO Energy Company [w/encls.]
DJ Christopher Norman [w/encls.]

**Re: Docket No. C-2025-3057175
DJ Christopher Norman v. PECO Energy Company
Objections to Subpoena Request**


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 Mail

DJ Christopher Norman
dnorman1@ccp.edu
dnorman1@student.ccp.edu

Dated: March 12, 2026


Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DJ CHRISTOPHER NORMAN	:	
	:	
v.	:	Docket No. C-2025-3057175
	:	
PECO ENERGY COMPANY	:	

**OBJECTIONS OF PECO ENERGY COMPANY
TO THE SUBPOENA REQUEST OF DJ CHRISTOPHER NORMAN**

PECO Energy Company (PECO or Respondent), by and through its attorneys, Reger Rizzo & Darnall LLP, pursuant to 52 Pa. Code § 5.421(f), hereby submits its Objections to the requested subpoenas filed by DJ Christopher Norman (Complainant). In support of its objections, PECO avers and represents as follows:

1. On January 15, 2026, the Honorable Erin Gannon (Judge Gannon) issued an *Interim Order on Continuance and Procedural Deadlines* directing, *inter alia*, that any application for subpoena must be filed with the Commission’s Secretary (and emailed to Judge Gannon and PECO) **no later than March 2, 2026** (Emphasis in Original) and any response or objection must be filed with the Commission’s Secretary **no later than March 12, 2026** (*Interim Order*) (Emphasis in Original).

2. On March 4, 2026, at 10:10 AM, the Complainant emailed PECO and Judge Gannon six (6) respective Notice of Intent to Serve a Subpoena to Attend and Testify (collectively Notice) pursuant to 52 Pa. Code § 5.421 for the following persons: Khadijah Scott,

Nicole Pinata, John Leu, Eric “Doe” and 7 “unidentified John Doe’s.” The Notice was docketed by the Commission on March 4, 2026, and listed as a “Motion for Subpoena.”

3. In addition to the *Interim Order*, 52 PA Code § 5.421(a)(2) specifically states that other than a subpoena issued by the Commission, a *subpoena will issue only upon application in writing* to the presiding officer. (Emphasis added).

4. 52 PA Code § 5.421(b) specifically states that the written application:

(1) Must specify as nearly as possible the general relevance, materiality and scope of the testimony or documentary evidence sought, including, as to documentary evidence, specification as nearly as possible of the documents desired.

(2) Must list the facts to be proved by the documents in sufficient detail to indicate the necessity of the documents.

5. The Notice was not timely filed. The deadline for filing “any application” was March 2, 2026.

6. Although dated March 2, 2026, the Notice was not served and docketed until March 4, 2026.

7. The Notice does not comply with the *Interim Order* or Commission regulations.

8. No application was filed by the Complainant, as required for any of the requested subpoena.

9. The Notice does not, as required, specify the general relevance, materiality and scope of the testimony or document sought, or the facts to be proved by the requested documents to indicate the necessity of the documents.

10. The Notice simply states that the Complainant intends to serve a subpoena identical to the one attached.

11. The material listed in each of the respective subpoena is overly broad and simply requests “all documents or things directly or indirectly associated with C-2025-3057175.”

12. The Complainant requests a subpoena be issued for an Eric “Doe” and to “John Doe’s (Seven (7) unidentified PECO employees).” No other identifying information is provided.

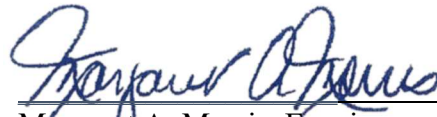
13. The Complainant requests a subpoena be issued for Khadijah Scott, an attorney who is no longer employed by PECO. The Complainant requests that Attorney Scott produced “all documents” including notes and emails that are protected by the Attorney work product.

14. The Complainant requests a subpoena be issued for Nicole Pinata. No other identifying information is provided. Ms. Pinata is not employed by PECO. Her contact information and relationship to the Formal Complaint is unknown to PECO.

15. The request for 12 subpoenas should be denied as untimely and not providing the required relevant information so that Judge Gannon can determine the necessity of issuing said subpoenas.

For the reasons set forth above, PECO Energy Company, respectfully requests that the seven Notices of Intent to Serve a Subpoena to Attend and Testify late-filed by DJ Christopher Norman be denied.

Respectfully submitted,



Margaret A. Morris, Esquire
Attorney ID No. 75048
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
(215) 495-6524 (tel.)
mmorris@regerlaw.com

Counsel for PECO Energy Company

Date: March 12, 2026