

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Deree J. Norman)	
19 Linden Ave)	
Lansdowne, PA 19050)	
)	
Petitioner)	C-2025-3057175
)	
Vs.)	
)	
PECO Energy Company)	
Exelon Business Services)	
2301 Market Street S23-1)	
Philadelphia, PA 19103)	
)	
Respondent)	

ORDER

And now, this ____ day of, _____ 2026, upon consideration of Petitioner DJ Christopher Norman’s Motion to Compel and Response to PECO’s Objection to Subpoena request, it is hereby ORDERED and DECREED that Petitioner’s, Motion is GRANTED.

It is further ORDERED that:

- 1) PECO will comply with request listed in Petitioner’s Subpoena’s

BY THE COMMISSION:

ALJ.

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**MOTION TO COMPEL AND RESPONSE TO OBJECTIONS OF PECO ENERGY
COMPANY TO SUBPOENA REQUEST OF DJ CHRISTOPHER NORMAN**

Pursuant to 52 Pa. Code § 5.421 (a)(2) and 66 Pa. C.S. § 333(f), DJ Christopher Norman (“Petitioner”) respectfully moves this Honorable Commission to Compel PECO Energy Company (“Respondent”) to comply with the Subpoena request of Petitioner in the above-captioned matter.

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).*

Agreed in Part, Denied in Part: Prior to Judge Gannon’s Interim Order an Emergency Hearing in the proceeding was held before the Honorable Steve K. Haas (Judge Haas) where an oral request for subpoena pursuant to 52 Pa. Code § 5.421(a)(2) and 66 Pa. C.S. § 333 was proffered by Petitioner to produce specific documents and to identify Eric “Doe” and seven (7) “John Doe’s”. The Parties agreed to an informal line of communication (e.g. email) with Margaret Morris (Attorney for PECO) asking that Petitioner document subpoenas to be requested. Copies were filed with the Commission’s Secretary and emailed to Judge Gannon and PECO.

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.”*

Agreed in Part, Denied in Part: On February 27, 2026, Petitioner attempted to file a Notice of Intent to Subpoena pursuant to the informal agreement established during the Emergency Hearing via the PUC electronic system. Moreover, while navigating the PUC’s electronic system, there is no selection in the provided list to file an Application for Subpoena. The Petitioner made several calls between February 27, 2026, and March 4, 2026, to the PUC, therein contacting multiple departments, including the Law Bureau and the number listed for Judge Gannon, none of which could provide an answer on how to submit the request. Petitioner was promised a callback from multiple people, none of which ever occurred. On March 4, 2026, at approximately 8:30 AM Petitioner was transferred to a person only known as Christina who 1) spoke with a Judge (unknown) who knew of no solution to the issue and 2) informed Petitioner to file the Notice as a Motion. The Motion was accepted and docketed by the Commission.

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).*

Agreed in Part, Denied in Part: 52 Pa. Code § 5.421(a)(2) also specifically states, “except that during a hearing in a proceeding, the application may be made orally on the record before the presiding officer, who will determine the necessity of issuing the subpoena.” (Emphasis added). Also See: Petitioner’s response to paragraph 1 above.

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.*

Agreed in Part, Denied in Part: Petitioner's Notice of Intent to Subpoena in conjunction with Petitioner's verbal request for subpoenas, Petitioner's Complaint and Petitioner's Pre-Trial Memorandum have addressed the fundamentals of the request to ensure that said request is not frivolous, deficient or legally unsound thus the request is nearly as possible to the general relevance, materiality and scope of the testimony or documentary evidence sought, including, as to documentary evidence, to which the specification is nearly as possible of the documents desired

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

Denied: Petitioner's Notice was filed in a timely fashion when the PUC provided the means and made it possible for said Notice to be able to be filed.

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

Agreed in Part, Denied in Part: Neither the date of service of said Notice nor the docketing of said Notice caused any delay that would adversely affect the hearing scheduled for April 1, 2026. PECO was clearly not burdened by the date of service or docketing of said Notice, which is evident by PECO's timely objection on March 12, 2026. (*See: response to ¶ 2 above*)

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

Denied: Petitioner's Notice is in full compliance with the mutually agreed upon process established during the Emergency Hearing, as well as the Interim Order and Commission regulations.

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

Denied: Since the process was informalized at the direction of the presiding Judge, Judge Haas, which was agreed to by both Parties, a formal application was not required.

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.*

Agreed in Part, Denied in Part: The Notice of Intent to Subpoena is not required to conform to the standards of a formal Application for Subpoena.

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

Denied: Since the process was informalized at the direction of the presiding Judge, Judge Haas, a formal application was not required.

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.”*

Denied: The account in question was activated in August of 2025. As of March 16, 2026, despite Petitioner’s February 10, 2026, email request, Petitioner has not received a monthly statement of charges for the account associated with the subject property. PECO has refused to identify the specific names of any other documents created for this account over the last seven (7) months. Petitioner’s request for copies of all documents (e.g., notes, forms, contracts, letters, e-mails, directives, decisions, witness statements, list of service calls for specific individuals on specific days, and GPS locations of specific individuals on specific days etc.) is very precise and not overly broad.

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.*

Agreed in Part, Denied in Part: Eric “Doe” is clearly identified as a PECO employee and active participant in Petitioner’s Complaint who contacted Petitioner via telephone on PECO’s behalf. (See: Section 5) To date, PECO has refused to identify this individual. Photographs of (Seven (7) unidentified PECO employees) were provided to PECO’s Counsel as well as the Commission via Petitioner’s Pre-Trial Memorandum. Thus, identifying information was 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.*

Agreed in Part, Denied in Part: Khadijah Scott signed the verification page of PECO's Answer to the Complaint. Thus, any document used to complete said Answer is no longer protected as work product. Moreover, Khadijah Scott was identified as a witness and co-conspirator at the Emergency Hearing thereby making it a conflict of interest for her to continue representing PECO. Subsequently, she entered a Withdrawal of Appearance at the same time Margaret Morris entered an Entry of Appearance. Khadijah Scott's employment with PECO is irrelevant as it does not stop her from being held accountable for her actions in this matter while she was employed by PECO. Moreover, current Counsel had an obligation to inform Petitioner of Khadijah Scott's contact information considering her separation from PECO.


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.*

Agreed in Part, Denied in Part: Nicole Pinata is clearly identified as a PECO employee and active participant in Petitioner's Complaint who contacted Petitioner via telephone on PECO's behalf. (See: Section 7 paragraph c) If Nicole Pinata is no longer employed by PECO, Counsel had an obligation to inform Petitioner of Nicole Pinata's contact information considering her separation from 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.*

Denied: Petitioner's request for all subpoenas must be granted as a matter of Law

For the reasons set forth above, DJ Christopher Norman, respectfully requests that the seven Notices of Intent to Serve a Subpoena to Attend and Testify be granted and PECO be compelled to comply with all requests forthwith.


Deree J. Norman

March 16, 2026,

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VERIFICATION

I, Deree J. Norman, hereby declare that the facts set forth in the foregoing Motion to Compel and Response to PECO’s Objections to Subpoena request are true to the best of my knowledge, information, and belief. I make this verification subject to the penalties of 18 Pa. C.S. §4904 pertaining to false statements to authorities.

Date: March 16, 2026,

Respectfully submitted

By: /s/ Deree J. Norman
Deree J. Norman
19 Linden Ave
Lansdowne, Pa 19050
(267) 304-2162
dereenorman@yahoo.com


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CERTIFICATE OF COMPLIANCE

I, Deree J. Norman, do hereby certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that requires filing confidential information and documents differently than non-confidential information and documents.

March 16, 2026,


Deree J. Norman

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CERTIFICATE OF SERVICE

I, Deree J. Norman, do hereby certify that on this 16th day of March 2026 a true and correct copy of the foregoing Motion to Compel and Response to PECO’s Objections to Subpoena request and accompanying papers, was served on the individuals listed below by electronic delivery.

Administrative Law Judge Erin Gannon
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
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Counsel for PECO Energy Company


By: Deree J. Norman