

March 16, 2026

Via Electronic Filing

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

**Re: Docket No. F-2025-3055494
Katie Paulison v. PECO Energy Company
Reply Exceptions of PECO**

Dear Secretary Homsher:

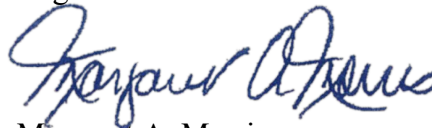
Attached for filing is the Reply of PECO Energy Company to the Exceptions filed by Katie Paulison in the above referenced proceeding.

A copy of the Reply Exceptions 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. Marta Guhl, PA Public Utility Commission [w/encls.]
Office of Special Assistants, PA Public Utility Commission [w/encls.]
Anthony Gay, Esquire, PECO Energy Company [w/encls.]
Katie Paulison [w/encls.]

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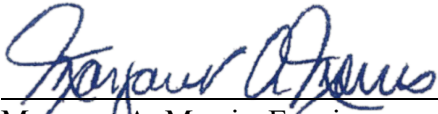
CERTIFICATE OF SERVICE

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 First-Class Mail

Katie Paulison
149 North 4th Street, Apt.# 20
Telford, PA 18969

Dated: March 16, 2026



Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

KATIE PAULISON	:	
	:	
v.	:	Docket No. F-2025-3055494
	:	
PECO ENERGY COMPANY	:	

**REPLY OF PECO ENERGY COMPANY
TO THE EXCEPTIONS OF KATIE PAULISON**

March 16, 2026

Margaret A. Morris, Esq.
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Counsel for PECO Energy Company

I. Introduction

Pursuant to the Secretarial Letter, dated March 5, 2026 and Section 5.535 of the Commission's Regulation,¹ PECO Energy Company, (PECO or Company), submits its Reply to the Exceptions of Katie Paulison (Complainant), which supports the adoption of the Initial Decision, without modification, of the Honorable Marta Guhl (Judge Guhl). The Commission should deny the Exceptions, affirm the Initial Decision in its entirety and sustain the dismissal of the Formal Complaint. The findings of facts and conclusions of law set forth in the well-reasoned Initial Decision are based on the record evidence and sustain the dismissal of the Formal Complaint.

II. Procedural Background

On May 23, 2025, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (Commission) alleging there were incorrect charges on her bills. She contends that her bills, starting in January 2025, are too high and not in line with prior bills. On June 19, 2025, PECO timely filed its Answer denying the material allegations.

On July 2, 2025, the Commission issued a *Hearing Notice* scheduling the matter for a Call-In Telephonic Hearing on September 2, 2025, before Judge Guhl. Also on July 2, 2025, Judge Guhl issued a *Prehearing Order* outlining the relevant procedural rules governing the proceeding.

The telephonic hearing was held on September 2, 2025, as scheduled. The Initial Decision was issued on December 19, 2025. On March 5, 2026, the Complainant filed Exceptions.

III. Initial Decision

Judge Guhl, based on the record, stated the following:

The Complainant testified that the Service Address is a rental property located in a two-story building with eight apartments. Tr. 19. The Complainant's apartment is on the second

¹ 52 Pa. Code § 5.535.

floor and has two bedrooms and one bathroom. Tr. 19. The apartment has a gas house heater and gas water heater. Tr. 13. In December 2024, the Complainant was without heat for 10 days. Tr. 10. The Complainant did not contact PECO about the heating issue but dealt with on-site maintenance. Tr. 11.

PECO's witness, Ms. Milburn, testified that on February 25, 2025, PECO sent a technician to the Service Address to conduct a high bill investigation. Tr. 33; PECO Exh. 1. She indicated that during the course of the investigation, the technician found that there was a meter mix-up, where the Complainant was being billed for another apartment and vice versa. Tr. 33; PECO Exh. 1. Ms. Milburn noted that PECO did a billing review of the Complainant's account and found that the Complainant was underbilled as a result of the meter mix-up. Tr. 33-34; PECO Exh. 3. She also stated the Company provided a utility report to the Complainant regarding the results of their investigation into the Complainant's high bill allegations on March 14, 2025. Tr. 42; PECO Exh. 2. Ms. Milburn asserts that the Complainant's current account balance at the time of the hearing was \$473.36. Tr. 43; PECO Exh. 4.

The Complainant has asserted that her bills are higher than normal. The Complainant did not provide any evidence to support this claim. "Mere bald assertions, personal opinions or perceptions do not constitute evidence. *MidAtlantic Power Supply Assoc. of Pa. v. Pa. Pub. Util. Comm'n*, 746 A.2d 1196, 1200 (Pa. Cmwlth. 2000)(citing *Pa. Bureau of Corrections v. City of Pittsburgh*, 532 A.2d 12, 14 (Pa. 1987)).

Based on the information presented by PECO's witness, it is clear that there was a meter mix-up that was discovered on February 25, 2025. As a result of the mix-up, the Complainant was underbilled for her gas service. The Complainant's bills are now based on the correct meter readings and are based on actual usage. There is nothing to indicate that the bills are too high. Thus, the Complainant has not met her burden of demonstrating that her bills are too high and as such the Complaint should be denied.

Initial Decision at PP.6-7.

IV. Discussion

In her Exceptions the Complainant's dispute specific findings reached by Judge Guhl as well as presenting matters not addressed at the hearing and non-record testimony.

The Exceptions violate Section 5.533(b) of the Commission's regulations² which requires each exception to be numbered, to identify the finding of fact or conclusion of law to which exception is taken, and to cite to relevant pages of the Initial Decision. While the Company recognizes that the Commission has been hesitant to rule unfavorably against *pro se* litigants like the Complainant based on technical grounds, in this case a substantial part of the Exceptions should be summarily rejected because their content is well beyond the scope of what the Commission may consider. Specifically, the Complainant's Exceptions that she characterized as "relevant matter not addressed at the hearing" and non-record testimony/evidence "regarding the meter connected to her home" are based entirely on non-record evidence.

As the Commission has previously recognized, a *pro se* litigant is not absolved of complying with procedural rules.³ In *Blauhut v. PECO Energy Co.*,⁴ the Commission recognized that a *pro se* litigant whose exceptions were based on evidence not of record and additional argument were not a basis for exceptions under Section 5.533 of the Commission's regulations and could not be considered. The same result should occur here; the Complainant's Exceptions raising issues outside the scope of the proceeding should not be considered by the Commission.

The Complainant simply disagrees with the findings and conclusions of law reached by Judge Guhl based on the record evidence. The Initial Decision was served on the Complainant, *via* US Mail, to the City listed in the Formal Complaint. However, the Complainant misspelled the City so the Service List misspelled the City. The Complainant excepts to the admission of PECO's Exhibits over her objection at hearing arguing she was not served. She contends that since the Initial Decision was not received, there is substantial proof that she also never received PECO's Exhibits. As reflected in PECO's Cover Letter for its Proposed Exhibits, dated August 28, 2025, PECO served the Complainant its Proposed Exhibits

² 52 Pa. Code § 5.533(b).

³ *Tremayne Shanault Lewis v. PECO Energy Co.*, Docket No. C-2010-2189187 (Order entered May 4, 2011).

⁴ *Adolf H. Blauhut v. PECO Energy Co.*, Docket No. C-2009-2087552 (Order entered January 29, 2010).

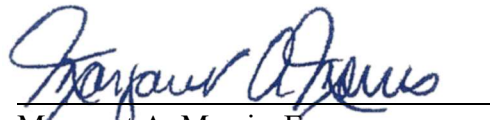
via Federal Express, not US Mail. Judge Guhl properly admitted PECO's Exhibits into the record. The rest of the Complainant's Exceptions simply disagree with Judge Guhl's findings. She offers only opinion testimony at hearing. She did not provide any evidence to support her claim that her bills are higher than normal.

V. Conclusion

The Exceptions are without merit. The record evidence supports the finding that the Complainant failed to carry her burden of proof that her "bills are too high."

For the reasons set forth above, PECO Energy Company respectfully requests that the Commission adopt, without modification, the Initial Decision of the Honorable Marta Guhl and dismiss the Formal Complaint of Katie Paulison.

Respectfully submitted,



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Dated: March 16, 2026

Counsel for PECO Energy Company