

March 24, 2026

Via Electronic Filing

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

**Re: Docket No. C-2026-3060107
Zimoras 1 Stop Beauty Bar LLC v. PECO Energy Company
Motion to Dismiss of PECO Energy Company**

Dear Secretary Homsher:

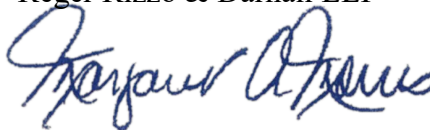
Attached for filing is the Motion of PECO Energy Company to dismiss the Formal Complaint filed by Zimoras 1 Stop Beauty Bar LLC in the above-referenced proceeding.

A copy of the Motion to Dismiss has been forwarded to the Complainant in the manner indicated on the attached Certificate of Service.

If there are any questions, please contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/co
Enclosures

cc: The Hon. Alphonso Arnold III, PA Public Utility Commission [w/encls.]
Anthony Gay, Esquire, PECO Energy Company [w/encls.]
Janice Little, Zimoras 1 Stop Beauty Bar LLC [w/encls.]

**Re: Docket No. C-2026-3060107
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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 person(s) listed below, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via Electronic Mail

Zimoras 1 Stop Beauty Bar LLC
c/o Janice Little
Zimorascoregroup@gmail.com
careers.zimorasonestop@gmail.com

Dated: March 24, 2026


Margaret A. Morris, Esquire

3. On February 18, 2026, the Company filed an Answer and New Matter denying the material allegations therein and maintaining that at all times relevant to this proceeding, its actions have been reasonable and performed in accordance with all applicable laws, as well as PECO's Commission-approved tariff, the Pennsylvania Public Utility Code (Code), Commission regulations and orders. In its New Matter, the Company avers that the Complainant is a Pennsylvania corporation and is not represented by an attorney as required by the Commission's regulations. A copy of the Complainant's corporate status with the Commonwealth of Pennsylvania is provided as Attachment 1.

4. A Hearing Notice, dated March 20, 2026, was issued for the Initial Call-in Telephonic Hearing on May 19, 2026, before the Honorable Alphonso Arnold III.

5. As of the filing of this Motion, no attorney has filed an Entry of Appearance on behalf of the Complainant in the instant proceeding.

III. Corporations Must be Represented by Counsel

6. Representation before the Commission is governed by the Commission's regulations at 52 Pa. Code §§ 1.21-1.23. These regulations provide that "[i]n adversarial proceedings, partnerships, corporations, trusts, associations, agencies, political subdivisions and government entities shall be represented only by . . . an attorney." 52 Pa. Code § 1.21. An adversarial proceeding begins with the filing of an Answer. 52 Pa. Code § 1.8 *New Fizon Catering, Inc. v. PECO Energy Company*, Docket Nos. C-2008-2065498 and C-2008-2079076 (Order entered June 24, 2009).

7. A non-attorney owner/operator of a limited liability corporation may file a formal complaint pleading, without an attorney, but thereafter must be represented by counsel. *Tyler Run, LLC v. Penelec*, Docket No. C-200438888 (Order entered January 5, 3005) and *Snyderville*

Community Development Corporation v. Philadelphia Gas Works, Docket No. C-20055032 (Order entered July 31, 2006).

8. The Commission's obligation to require attorneys in adversarial proceedings for parties other than individual *pro se* proceedings is well-settled:

In Pennsylvania, the Supreme Court is responsible for regulating the practice of law, and this Commission is bound by the Supreme Court's rules. The only persons authorized to practice law in Pennsylvania are as follows: (1) persons fully admitted to the Pennsylvania Bar; (2) persons admitted *pro hac vice* under Rule 301; and (3) persons qualified as certified legal interns under Rule 321. The Pennsylvania Supreme Court in *Shorz v. Farrell*, 327 Pa. 81, 193 A.20 (1937), held that if the nature of an administrative hearing is to determine questions of fact or interpretation of administrative law, then the hearing is of a judicial character. Any participation in such a hearing constitutes the practice of law. Accordingly, it would be unlawful to allow non attorney representation in adversarial proceedings before the Commission.

James and Judith Simon v. Franklin Water Company, Docket No. C-00956589 (Order entered January 29, 1996).

9. Consequently, a corporation that files a formal complaint with the Commission must obtain counsel to proceed with all other aspects of the proceeding, including, without limitation, responsive pleadings, discovery, testimony preparation, attendance at hearing, examination of witnesses and briefing.

10. At this point, the Company is required to incur the time and expense to prepare for a full evidentiary hearing without knowing if the Complainant will even be represented by counsel.

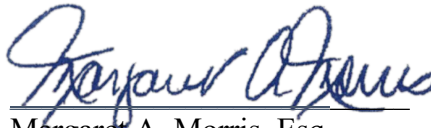
11. In order to minimize any further prejudice, time and/or expense by the Company, the Complainant should be ordered to have a Pennsylvania licensed attorney file an Entry of Appearance within ten (10) days of the issued order, or the proceedings will be dismissed.

WHEREFORE, for the foregoing reasons, PECO Energy Company, respectfully requests that the Commission:

a) Enter an order directing the Complainant to have a Pennsylvania licensed attorney enter an appearance on behalf of Zimoras 1 Stop Beauty Bar LLC within ten (10) days of the issued order; and

b) Dismiss the Formal Complaint in this proceeding if a Pennsylvania licensed attorney does not enter an appearance on behalf of Zimoras 1 Stop Beauty Bar LLC in compliance with any applicable order.

Respectfully submitted,



Margaret A. Morris, Esq.
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Reger Rizzo & Darnall LLP
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2929 Arch Street
Philadelphia PA 19104
(215) 495-6524 tel.
mmorris@regerlaw.com

Dated: March 24, 2026

Counsel for PECO Energy Company

Docket No. C-2026-3060107
Zimoras 1 Stop Beauty Bar LLC v. PECO Energy Company

Attachment 1

Corporate Status

Zimoras 1 Stop Beauty LLC (6794729)



**File Annual
Report**



**Request
Certificate**

Initial Filing Date

11/06/2018

Status

Active

Formed In

PENNSYLVANIA

Filing Type

**Domestic Limited Liability
Company**

Filing Subtype

Limited Liability Company

Registered Office

**312 West Trenton Ave suite
3
Morrisville, PA 19067
County: Bucks**