

March 30, 2026

Via Electronic Filing

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

**Re: Docket No. C-2026-3060148
Latifa Briggman 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 Latifa Briggman (Complainant) on behalf of Briggman Housing & Development Company 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. Marta Guhl, PA Public Utility Commission [w/encls.]
Anthony Gay, Esquire, PECO Energy Company [w/encls.]
Latifa Briggman, Briggman Housing & Development Company, LLC [w/encls.]

**Re: Docket No. C-2026-3060148
Latifa Briggman v. PECO Energy Company
Motion to Dismiss of PECO Energy Company**

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

Latifa Briggman
Briggman Housing & Development Company, LLC
lalalandbhd@gmail.com

Dated: March 30, 2026


Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LATIFA BRIGGMAN	:	
	:	
v.	:	Docket No. C-2026-3060148
	:	
PECO ENERGY COMPANY	:	

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 Dismiss of PECO Energy Company within **twenty (20) days** from service of this Notice, the facts set forth by PECO Energy Company in the Motion to Dismiss may be granted. All pleadings, such as an Answer to the Motion to Dismiss, 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 to the Honorable Marta Guhl, the Presiding Officer in the above-captioned proceeding.

File by Mail or e-file with:

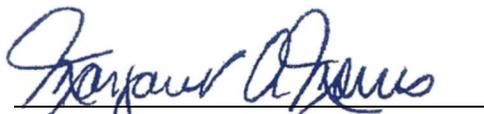
Matt Homsher, Esquire
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Margaret A. Morris, Esquire
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
Philadelphia, PA 19104
mmorris@regerlaw.com

The Hon. Marta Guhl
c/o erball@pa.gov

Date: March 30, 2026



Margaret A. Morris, Esquire
Attorney ID No. 75048
Reger Rizzo & Darnall LLP
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Philadelphia, PA 19104
(215) 495-6524 (tel.)
mmorris@regerlaw.com

Counsel for PECO Energy Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LATIFA BRIGGMAN	:	
	:	
v.	:	Docket No. C-2026-3060148
	:	
PECO ENERGY COMPANY	:	

**MOTION OF PECO ENERGY COMPANY TO
DISMISS THE FORMAL COMPLAINT OF LATIFA BRIGGMAN**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PECO Energy Company, (Respondent, PECO, or Company), by and through its attorneys, Reger Rizzo and Darnall, LLP, files this Motion to Dismiss, pursuant to 52 Pa. Code § 5.103. In support, the Respondent avers as follows:

I. Introduction

1. In this Motion, the Respondent seeks the dismissal of the Formal Complaint captioned *Latifa Briggman v. PECO Energy Company* filed by Latifa Briggman (Complainant) on behalf of Briggman Housing & Development Company LLC (Customer), a Pennsylvania business entity registered on or about January 3, 2006. As a Pennsylvania corporation with the Pennsylvania Bureau of Corporations, the Customer is required at this stage of the proceeding to be represented by an attorney at law in accordance with Commission regulations, 52 Pa. Code §§ 1.21-1.23.

II. Factual Background

2. The Formal Complaint was filed against the Company on January 30, 2026, and relates to residential electric service in the Customer's name to 6533 Regent Street, Philadelphia, Pennsylvania (Service Address) under Account No. 5432149631 (Account).

3. On March 3, 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 specifically avers that the Customer is a Pennsylvania corporation and is not represented by an attorney as required by the Commission's regulations. A copy of the Customer's corporate status with the Commonwealth of Pennsylvania is provided as Attachment 1.

4. A Hearing Notice, dated March 25, 2026, was issued for the Initial Call-in Telephonic Hearing on May 29, 2026, before the Honorable Marta Guhl (Judge Guhl).

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 Briggman Housing & Development Company 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 Briggman Housing & Development Company LLC in compliance with any applicable order.

Respectfully submitted,



Margaret A. Morris, Esq.
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

Dated: March 30, 2026

Counsel for PECO Energy Company

Docket No. C-2026-3060148
Latifa Briggman v. PECO Energy Company

Attachment 1

Corporate Status

BRIGGMAN HOUSING & DEVELOPMENT COMPANY, LLC (570172)



**File Annual
Report**



**Request
Certificate**

<i>Initial Filing Date</i>	01/03/2006
<i>Status</i>	Active
<i>Formed In</i>	PENNSYLVANIA
<i>Filing Type</i>	Domestic Limited Liability Company
<i>Filing Subtype</i>	Limited Liability Company
<i>Registered Office</i>	Corporation Service Company
<i>County</i>	Dauphin
