

March 30, 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 Complainant's Application for Subpoenas**

Dear Secretary Homsher:

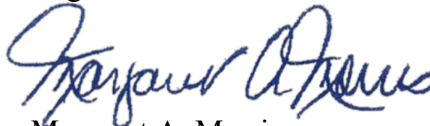
Pursuant to the *Interim Order on Complainant's March 16, 2026 Filing and Deadline for Objections*, dated March 23, 2026, attached for filing is the Objections of PECO Energy Company to the Complainant's Application for Subpoenas.

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 Complainant's Application for Subpoenas**

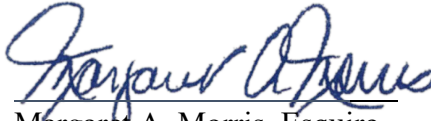
CERTIFICATE OF SERVICE

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 30, 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 APPLICATION FOR SUBPOENAS OF DJ CHRISTOPHER NORMAN**

Pursuant to the *Interim Order on Complainant’s March 16, 2026 Filing and Deadline for Objections*, dated March 23, 2026, issued by the Honorable Erin Gannon (Judge Gannon), 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). PECO responds to the Complainant’s specific 15 paragraphs as follows:

1. The Complainant alleges that he made an oral request for a subpoena at the scheduled Hearing on the Complainant’s Petition for Emergency Relief before the Honorable Steven Haas (Judge Haas). The Hearing occurred on November 25, 2025, and Judge Haas summarized the agreement of the parties on the record. Specifically, the Complainant agreed to engage a plumber, PECO agreed to have a Field Technician on site to observe the pressure test and establish the gas service and to place a credit on the Complainant’s Account for the cost of the pressure test. Tr. 6-8. There was no discussion of any subpoena.

The Complainant also incorrectly contends that at the Prehearing Conference before Judge Gannon, the parties agreed to informal discovery. Rather Judge Gannon issued an *Interim Order on Continuance and Procedural Deadlines*, dated January 25, 2026, directing, *inter alia*, that any application for subpoena must be filed with the Commission's Secretary. Clearly there was no agreement for informal discovery.

2. The Complainant's discussion regarding his difficulty in e-filing his filing requesting the subpoenas is moot given the *Interim Order on Complainant's March 16, 2026 Filing and Deadline for Objections*.

3. The Complainant cites Commission regulations, 52 Pa. Code 5.41(a)(2), in support of his argument that he made an oral request for subpoena. A review of the record for the proceedings before Judge Haas and Judge Gannon does not support the Complainant's allegation.

4. The Complainant simply states his Notice of Intent to Subpoena, in conjunction with his verbal request, his Complaint and his Pre-Trial Memorandum support the requested subpoenas and provide the required information. Commission regulations at 52 PA Code § 5.421(b) specifically requires 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.

PECO avers that the Complainant has simply restated the requirement of Section (1) and has never stated the facts to be proved by the documents requested for each person he seeks to subpoena. The issue in this proceeding is the Complainant's allegation that PECO unlawfully required a pressure test.

5. The timeliness of the Complainant's filing docketed on March 4, 2026, is moot given the *Interim Order on Complainant's March 16, 2026 Filing and Deadline for Objections*.

6. The timeliness of the Complainant's filing docketed on March 4, 2026, is moot given the *Interim Order on Complainant's March 16, 2026 Filing and Deadline for Objections*.

7. The Complainant alleges that the Notice of Intent was "in full compliance with the mutually agreed upon process established at the Emergency Hearing." The transcript for the Emergency Hearing does not support this allegation. As stated above, the issue of subpoena was never addressed at the Emergency Hearing before Judge Haas and no agreement was reached by the parties. Tr. 6-8.

8. The Complainant argues that an application was not required since the process was "informalized at the direction of Judge Haas." As stated above, the issue of subpoena was never addressed at the Emergency Hearing. Judge Haas did not direct any discovery process. Tr. 6-8. This is a complete fabrication.

9. The Complainant contends, without any support, that the Notice of Intent was not required to conform to the standards for a formal Application for Subpoena. The Complainant provides no support for this conclusion. PECO avers that Complainant's position conflict with Judge Gannon's *Interim Order on Continuance and Procedural Deadlines*, which set forth the deadline for the filing of an application for a subpoena.

10. The Complainant contends a formal application was not required since the process was "informalized at the direction of Judge Haas." As stated above, the issue of subpoena was never addressed at the Emergency Hearing before Judge Haas and no agreement was reached by the parties. Tr. 6-8. This is a complete fabrication.

11. In support of his requests, the Complainant alleges, for the first time, that he has not received a bill. He also alleges that PECO has "refused to identify the specific names of any other documents created for this account over the last seven (7) months" and his request for all documents "on specific days is very precise and not overly broad." PECO avers that in the Notice of Intent the Complainant requested "all documents or things directly or indirectly associated with C-2025-3057175." The Complainant has utterly failed to meet the requirements for the issuance of a subpoena. He only speaks in generalities. The Complainant does not specify the relevancy, materiality and scope of the testimony for the person he seeks to subpoena. The Complainant does not explain what facts would be proved by the requested documents.

12. The Complainant argues that Eric "Doe" is clearly identified and contacted him by phone. In support he states that the photos of the field Techs were provided so therefore "the

identifying information was provided.” The Complainant does not specify the relevancy, materiality and scope of the testimony for Eric “Doe” or explain what facts would be proved by the documents requested from Eric “Doe.”

13. The Complainant alleges that Khadijah Scott, an attorney who no longer works for PECO, was “identified as a witness and co-conspirator at the Emergency Hearing and that she withdrew her representation of PECO since it was a “conflict of interest.” A review of the transcript of the Emergency Hearing does not support this outrageous allegation against Attorney Scott and is a complete fabrication. The Complainant does not specify the relevancy, materiality and scope of the testimony for Attorney Scott or explain what facts would be proved by the documents requested from Attorney Scott.

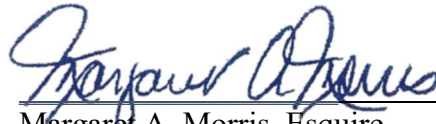
14. The Complainant alleges that “Nicole Pinata” is clearly identified as a PECO employee and active participant in his Complaint who contacted by him *via* phone. Ms. Pinata is not employed by PECO. Her contact information and relationship to the Formal Complaint is unknown to PECO.

15. The Complainant alleges “his request must be granted as a matter of law.” He provides no support for this conclusion. PECO avers the Complainant has failed to comply with 52 PA Code § 5.421 which requires the Complainant to provide the required information so that Judge Gannon can determine the necessity of issuing said subpoenas.

PECO notes that the request for a subpoena for the appearance for Lisa Crespo and John Leu at the evidentiary hearing scheduled for April 1, 2026, before Judge Gannon is moot. Both individuals will be presented as a PECO witness. However, PECO does object to the request that the identified PECO witness bring to the scheduled hearing “all documents or things directly or indirectly associated with C-2025-3057175.” The Complainant has failed to explain what facts would be proved by the documents requested from the identified PECO witnesses.

WHEREFORE, for the reasons set forth above, PECO Energy Company, respectfully requests that the requested Subpoena to Attend and Testify of 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 30, 2026