

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION
DOCKET NO. C-2024-3052605

Denise Mitchell, Pro Se

Complainant

v.

PECO Energy Company (PECO)

Respondent

Date: 4/13/2026

File with:

Mr. Homsher, Secretary

Pennsylvania Public Utility Commission

Commonwealth Keystone Building

400 North Street, Second Floor

Harrisburg, PA 17120

RE: Denise Mitchell v. PECO Energy Company Supplemental Clerical Errata Sheet
Date of Hearing: Thursday, April 23, 2026 @ 10:00am

Dear Secretary Homsher:

Enclosed for filing in the above-captioned matter is the Complainant's Supplemental Clerical Errata Sheet correcting several non-substantive clerical and typographical errors identified in the March 25, 2026 Revised Filing. These corrections do not alter the substance of the filing, the claim, the evidence, or the requested relief. They are submitted solely to maintain a clean and accurate record for the April 23, 2026 Hearing. A corrected Table of Contents and the JUDGE'S ROADMAP Page has been provided to the Honorable Judge Barbara Shadie Nause,

A. Typographical Errors Inside the Document

Here are the **actual typos** the Claimant found in the body of the filing, with citations to the exact lines.

1. Table of Contents

2. Location: JUDGE'S ROADMAP

Text: Exhibit 10, page 2-6, (a) through (g)

Correction: Exhibit 10, pages 2-5, (a) through (g)

3. "accurate, record" — Comma Error

Location: Notice of Replacement Filing Packet

Text: "submitted solely to maintain an **accurate, record** for the April 23, 2026 Hearing."

Correction: "accurate record" (remove comma)

4. "engineer' report" — Apostrophe Error

Location: Legal Argument, Section III, 7

Text: "the engineer' report"

Correction: "the engineer's report"

5. "PECO's" — Incorrect Quotation Mark

Location: Exhibit 14 description

Text: "PECO"s claim manager"

Correction: "PECO's claim manager"

6. "engineer' report" (second occurrence)

Location: Issues To Be Presented, Section III, 4

Text: "the engineer's report"

Correction: "the engineer's report"

7. "Claimant submission. PECO continues..." — Missing hyphen or conjunction

Location: Exhibit 15 description

Text: "Claimants submission. PECO continues..."

Correction: "Claimant's submission. PECO continues..."

8. "engineer' s" — Spacing Error

Location: Legal Argument, Section III, 7

Text: "engineer's instructions"

Correction: "engineer's instructions"

9. Summary of Claimant's Position, IV, 3

Location: Exhibit 11 page 2 and 3(a)

Correction: Exhibit 11 page 2(a) and 3(b)

Respectfully submitted,

10. PECO's site visit, VII, 5

Location: Exhibit 8 page 2(a)

Correction: Exhibit 8, page 7(g)

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Margaret A. Morris

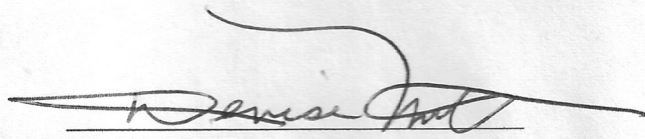
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To The Honorable Barbara Shadie Nause,
C/O – Legal Assistant Pamela McNeal at pmcneal@pa.gov
Administrative Law Judge PA Public Utility Commission
801 Market Street, 4th Floor, STE 4063
Philadelphia, PA 19107

RE: Denise Mitchell v. PECO Energy Company Supplemental Clerical Errata Sheet
Date of Hearing: Thursday, April 23, 2026 @ 10:00am

Ms McNeal:

Enclosed for filing in the above-captioned matter is the Complainant's Supplemental Clerical Errata Sheet correcting several non-substantive clerical and typographical errors identified in the March 25, 2026 Revised Filing. These corrections do not alter the substance of the filing, the claim, the evidence, or the requested relief. They are submitted solely to maintain a clean and accurate record for the April 23, 2026 Hearing. A corrected Table of Contents and the JUDGE'S ROADMAP Page has been attached for The Honorable Barbara Shadie Nause,

A. Typographical Errors Inside the Document

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Correction: numbering of page references

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Correction: **Exhibit 10, pages 2-5, (a) through (g)**

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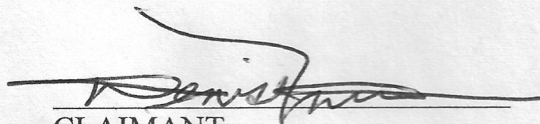
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To The Honorable Barbara Shadie Nause,
Administrative Law Judge PA Public Utility Commission
801 Market Street, 4th Floor, STE 4063
Philadelphia, PA 19107

RE: Denise Mitchell v. PECO Energy Company
Date of Hearing: Thursday, April 23, 2026 at 10:00am

To the Honorable Administrative Law Judge:

Complainant respectfully submits this Supplemental Clerical Errata Sheet to correct three non-substantive clerical errors identified in the Table of Contents of the March 25, 2026 revised filing. These corrections do not alter the substance of the filing, the claims, the evidence, or the requested relief. They are submitted solely to maintain an accurate and judge-friendly record.

Corrections:

A corrected Table of Contents and Judge's Roadmap page is attached noting corrections.

A. Typographical Errors Inside the Document

Here are the **actual typos** I found in the body of the filing, with citations to the exact lines.

Corrections

1. Table of Contents

2. Location: JUDGE'S ROADMAP

Respectfully submitted,

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TABLE OF CONTENTS

1. Cover Letter To Secretary – Pages 1–2
2. Judge’s Roadmap – Page 4
3. Exhibits Forwarded To Legal Assistant Pamela McNeal – Page 5
4. **NOTICE OF REPLACEMENT FILING PACKET FOR April 23, 2026 HEARING** –Page 6
5. Motion to Notify The ALJ of PECO’s Failure To Comply With The Interim Order – Pages 7–9
6. Notice To Plead - Petition For Special Relief – Pages 10-11
7. Discussion And Statement Of The Facts – Pages 11–14
8. Appendix A – Case-at-a-Glance – Pages 15–16
9. Appendix B – Claimant’s Exhibit Packet - Exhibits 1–16, A & B (email excerpts) – Pages 17-19
EXHIBIT Packet - Each Exhibit Is Labeled – Followed By Numbered Pages Containing
Alphabetical Reference To Information
10. Motion To The Court – Page 20
11. Issues To Be Presented – Pages 21-25 -correction: **should be pages 21 -26**
12. Certificate of Service – Page 26 – correction: **should be page 27**
13. Verification – Page 27 – correction: **should be page 28**

A. Confirmed Table of Contents Corrections

1. “Issues To Be Presented”

- **Listed:** Pages 21–25
- **correction:** **should be pages 21–26**

2. Certificate of Service

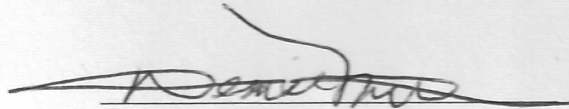
- **Listed:** Page 26
- **correction:** should be Page 27

3. Verification

- **Listed:** Page 27
- **correction:** should be Page 28

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JUDGE’S ROADMAP: SIX KEY FACTS ESTABLISHED BY THE EXHIBITS

This Roadmap is provided to assist the Court in reviewing the evidentiary record for the April 23, 2026 Hearing. The following six facts are the central issues to be proven by the Claimant’s Exhibit Packet Exhibits 1–16, A & B (email excerpts) and are directly relevant to whether PECO violated **66 Pa.C.S. §1501**.

1. PECO’s deteriorated service equipment was pulling on the Claimant’s rear wall.

PECO’s Work Order #19203009-04 documents that its bracket collapsed and that PECO’s aerial wires were “pulling on bricks at the back of the Claimant’s house.” **Exhibit 11, page 2 (a), 3(b) & Exhibit 1, page 3, photo 9(b)–9(c)**

2. The Claimant notified PECO of the hazardous condition on January 3, 2022.

The Claimant’s initial written notice reported that PECO’s aerial lines were pulling on the Claimant’s rear wall and causing structural distress. **Exhibit 3**

3. Independent engineering reports confirm PECO’s equipment caused the structural damage.

Tantala Engineering ‘2023 and ‘2025 reports confirm the failure originated from PECO-owned equipment and that the resulting structural damage was consistent with tension from PECO’s aerial utility connections. **Exhibit 9, page 3(a)**

4. PECO withheld critical information needed for resolution

PECO did not provide Work Order #19203009-04 to the Claimant until April 22, 2025, despite repeated requests and despite knowing the Claimant’s structural engineer required the document. **Exhibit 11, page 2(a), 3(b) and 6(c)**

5. Damage continued because PECO failed to follow the engineer’s repair instructions.

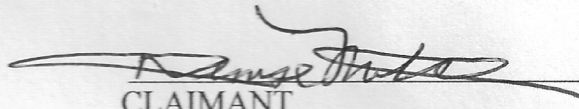
The June 13, 2025 engineering inspection report documented missing mortar, open separations, and ongoing water intrusion, confirming that PECO’s repairs were incomplete and continued to cause new damage. **Exhibit 10, page 2-5, (a) through (g).**

6. PECO's conduct demonstrates a pattern of unreasonable service.

PECO's delayed responses, incomplete repairs, failure to disclose mold, refusal to provide documentation, and denial of responsibility despite its own records all constitute unreasonable service under 66 Pa.C.S. §1501.

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