

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rodrick McDowell, Complainant

v.

PECO ENERGY COMPANY, Respondent

DOCKET NO: C-2026-3061171

REPLY TO NEW MATTER OF PECO ENERGY COMPANY

Pursuant to 52 Pa. Code § 5.63, Complainant hereby files this Reply to the New Matter of PECO Energy Company:

1. Regarding PUC Jurisdiction: Complainant acknowledges that the Commission does not award monetary damages. However, Complainant seeks a formal Finding of Fact and a determination that PECO failed to provide "adequate, efficient, safe, and reasonable service" as required by 66 Pa. C.S. § 1501. Such a finding is necessary to establish a record of service violation.
2. Regarding "Reasonable" vs. "Perfect" Service: Complainant denies that the service provided was "reasonable." While perfection is not required, the safe and continuous delivery of gas is. A service history spanning from December 2022 to November 2025 involving recurring water infiltration, "snow" blockages, and the odor of gas constitutes a recurring safety hazard and an unreasonable failure of infrastructure.
3. Regarding the Nature of the Service Failure: Complainant asserts that the service was inadequate by PECO's own standards, evidenced by the fact that PECO eventually determined it was necessary to perform a major street excavation, replace the gas main, and convert the service from a low-pressure system to a medium-pressure regulated system to resolve the chronic failures.
4. Conclusion: Complainant requests that the Commission deny PECO's New Matter and move this case forward to a formal hearing to address the documented history of unsafe and inadequate service.

Respectfully Submitted,

Rodrick McDowell

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