

**FORMAL RESPONSE TO AMENDED ANSWER OF PECO ENERGY  
COMPANY**  
**Docket No. F-2026-3061271 | Filing No. 2994503**  
April 20, 2026

Matthew Homsher, Esquire  
Secretary, Pennsylvania Public Utility Commission

**Re: Formal Response to PECO Energy Company's Amended Answer; Request for Targeted  
Discovery, Preservation of Status Quo, and Suspension of Disputed Charges**

Dear Secretary, Homsher, Counsel Morris, Mr. Gay, and Ms. Lumpkin-Ramage:

Christine and Jeffrey Keisling respectfully submit this formal response in the above-captioned proceeding. The property at issue, 936 Lincoln Road, Phoenixville, Pennsylvania 19460, is presently under active renovation in order to accommodate the medical and accessibility needs of our disabled son, with an anticipated move-in date of May 6, 2026.

PECO's Amended Answer materially corroborates the factual basis of the Complaint. Specifically, PECO expressly acknowledges that the account has been billed on an estimated basis since June 2025, that multiple bills have been issued (including bills for a meter that had been removed as acknowledged in PECO's response), that technical irregularities existed, and that the company remains in the process of attempting to correct the underlying billing deficiencies.

These admissions constitute substantive confirmation that the account has not been accurately billed and that the controversy remains unresolved.

Notwithstanding these admissions, PECO's filing fails to set forth any competent factual basis supporting its denial of the Keislings' concerns regarding the meter multiplier, rebill calculations, and account history. Accordingly, the Keislings respectfully request that PECO be directed to produce the following targeted discovery and supporting documentation:

1. The actual physical meter multiplier assigned to Meter No. 036139838;
2. All engineering, meter shop, installation, and service records supporting the use of a multiplier of 160
3. The exact meter readings and dates used for each rebill issued from June 2025 forward;
4. The methodology and calculations utilized for all estimated bills from June 2025 to present;
5. Documentation identifying the cause of the technical failure and any internal remediation efforts;
6. A definitive date by which permanent correction will be completed;
7. The complete billing calculation history, including rebill worksheets, ledger adjustments, and account notes;
8. All records relating to the meter replacement and any account number reassignment or transfer.

***The Keisling's further respectfully request that all disputed charges remain suspended, that no collection efforts proceed, and that the account remain protected from service termination pending final adjudication by the Commission.***

The documentary record previously submitted—including PECO bills, bank payment records, photographs of the current meter, written correspondence, and documented telephone communications—clearly reflects a multiplier of 160. While one written communication inadvertently referenced a multiplier of 120, that clerical error was immediately corrected. **The multiplier of 160 appears consistently throughout the billing statements and related documents which PECO and its representatives expressly acknowledged receiving and reviewing.** The Keisling's contend that the verification letter signed by MS Lumpkin-Ramage (April 14, 2026 to M.A. Morris Reger, Rizzo, Darnell LLP) regarding the meter multiplier and billing information is inaccurate and a misrepresentation of clearly submitted photographic evidence (note 18 Pa.C.S. Paragraph 4904).

The Keisling's are deeply concerned that this isolated typographical error was disproportionately emphasized in PECO's response in a manner that obscures the substantial documentary evidence supporting the Complaint. Reference letter of April 1, 2026 to Ms Lumpkin Ramage documenting that photographic evidence of a PECO bill clearly showing a multiplier of 160, and multiple photographs of THE ACTUAL meter indicating a multiplier of 80. The evidentiary record speaks for itself and overwhelmingly supports the accuracy of the multiplier concern raised by the Keisling's.

PECO replaced the meter on or about June 2025 and created a new the account number designation without prior notice to the Keisling's. The Keisling's first became aware of this change only upon receipt of multiple duplicate erroneous bills for TWO separate meters for 936 Lincoln Rd, in November 2025 (i.e., the same property).

PECO has in fact billed the Keisling's for a meter, that by PECO's own admission, was removed from service. As another example PECO's complete lack of billing accuracy, the Keisling's received 7 (SEVEN) invoices, with differing billing amounts, estimated meter readings, differing dates, ALL RECEIVED BY THE KEISLINGS WITHIN A 20 Day period. These inaccurate invoices have been submitted to PECO, and PECO has these billing records.

Of even greater concern is the threatened discontinuance of electric service notwithstanding repeated verbal and written assurances that the account was on hold during the pendency of this formal complaint. On March 30, 2026, the Keislings received a ten-day shutoff notice demanding payment of \$2,495.61 by April 7, 2026. Immediate termination of electric service would pose a substantial and irreparable risk to the health and safety of their disabled son, who suffers from erythromelalgia and a rare thermoregulatory disorder requiring stable environmental conditions.

Medical documentation from treating physicians at Johns Hopkins and the University of Pennsylvania Health System is available and will be promptly furnished upon request.

Due to the imminent threat of service interruption and the apparent lack of coordination between PECO departments, payment was made under protest, under duress, and without waiver of any rights, claims, defenses, reimbursement demands, credits, offsets, or remedies available at law or in equity.

The Keisling's respectfully request that the Commission compel production of the above-referenced discovery materials, preserve all protections against service termination, maintain suspension of disputed charges, and require PECO to provide a definitive written timetable for permanent correction of the billing errors.

Respectfully submitted,

Christine Keisling  
Jeffrey Keisling

**cc:**

David M. Vorhos, President and CEO, PECO Energy Company  
Ms. Amy Quigg (ESQ), HRMML, LLP  
Margaret A. Morris, Esquire, Partner, Reger, Rizzo & Darnall, LLP  
Anthony Gay, Esquire, Vice President and Legal Counsel to PECO  
Felicia Lumpkin-Ramage, Regulatory Assessor  
Case File / Docket Record