

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joy Lucretia Clark, Complainant

v.

PECO Energy Company, Respondent

Docket No. C-2026-3061342

MOTION TO SUPPLEMENT THE RECORD WITH EVIDENCE OF GOOD-FAITH MEDIATION EFFORTS, HOUSEHOLD ECONOMIC HARDSHIP, TREASURY-RELATED FINANCIAL OBLIGATIONS, AND ADDITIONAL SUPPORTING DOCUMENTATION

I. INTRODUCTION

Complainant, Joy Lucretia Clark, proceeding pro se, respectfully moves the Pennsylvania Public Utility Commission to supplement the administrative record with additional documentary evidence demonstrating:

- Good-faith mediation efforts;
- Formal settlement proposals;
- Preservation of written communications;
- Household financial hardship;
- Treasury-related financial obligations;
- CAP/LIHEAP equity concerns;

- Broader public policy implications.

This Motion is necessary to ensure a full evidentiary record, preserve procedural fairness, and allow complete review of the cumulative financial burdens impacting Complainant's ability to maintain essential utility services.

II. FACTUAL BASIS

A. Good-Faith Mediation Efforts

Complainant proactively submitted a detailed mediation and settlement framework to Respondent's counsel, Margaret Morris, Esquire, including:

- Full billing ledger demands;
- Transaction-level accounting;
- Excess credit calculations of at least approximately \$2,791;
- Refund or equivalent credit demand;
- CAP and LIHEAP accounting demands;
- Willingness to negotiate in good faith.

B. Written Communication Preservation

On April 29, 2026, Complainant confirmed in writing her request that all substantive settlement discussions and mediation communications occur via email to preserve documentary integrity.

C. Respondent's Failure to Meaningfully Resolve

Despite these documented efforts:

- No complete accounting has been provided;
 - No substantive settlement proposal has been offered;
 - No meaningful corrective action has occurred.
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III. HOUSEHOLD ECONOMIC HARDSHIP AND TREASURY-RELATED CONSIDERATIONS

Complainant's household faces broader financial hardship, including federally related financial obligations, Treasury-linked economic responsibilities, and cumulative debt burdens that materially affect:

- Household financial stability;
- Utility affordability;
- Educational continuity;
- Employment access;
- Government service access;
- Financial preservation.

Federally issued financial instruments and related obligations further underscore the necessity of:

- Fair utility billing;
 - Hardship accommodations;
 - Prevention of cumulative financial destabilization;
 - Equitable administration of essential services.
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IV. LEGAL AUTHORITY

Pennsylvania Public Utility Code:

- **66 Pa.C.S. §1301** — Just and reasonable rates;
- **66 Pa.C.S. §1501** — Adequate, efficient, safe, and reasonable service.

Pennsylvania Utility Regulations:

- **52 Pa. Code §56.12** — Accurate and understandable billing;
- **52 Pa. Code §56.91** — Billing disputes;

- **52 Pa. Code Chapter 5** — Formal complaint procedures;
- CAP and LIHEAP consumer protection frameworks.

Federal/Public Policy:

- LIHEAP assistance objectives;
- Consumer financial hardship protections;
- Treasury-related economic stability considerations;
- Essential service preservation;
- Public policy favoring utility accessibility for vulnerable households.

Administrative Law:

- Due process;
 - Complete evidentiary record;
 - Procedural fairness;
 - Equitable review.
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V. ARGUMENT

Supplementation is warranted because the proffered evidence directly demonstrates:

- Good-faith settlement participation;
- Exhaustion of informal dispute resolution;
- Preservation of written record;
- Financial hardship;
- Broader economic vulnerability;
- Potential disproportionate burden;
- Public policy concerns.

Complainant's cumulative financial obligations, including Treasury-related burdens, are relevant to the equitable review of PECO's billing administration, CAP/LIHEAP application, and overall consumer fairness.

A complete administrative record is essential to:

- Assess billing transparency;
 - Evaluate hardship;
 - Determine compliance;
 - Ensure equitable adjudication.
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VI. RELIEF REQUESTED

WHEREFORE, Complainant respectfully requests that the Commission:

1. Grant this Motion;
 2. Supplement the administrative record with all attached mediation, settlement, hardship, and Treasury-related documentation;
 3. Accept all exhibits as evidence;
 4. Consider Respondent's responsiveness;
 5. Evaluate cumulative hardship and affordability concerns;
 6. Grant such further equitable, declaratory, or corrective relief as is just and proper.
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VII. CONCLUSION

Complainant has consistently acted in good faith to resolve this matter while preserving transparency, documentation, and procedural integrity. Supplementation of the record is necessary to ensure complete adjudication of billing disputes, hardship concerns, and broader consumer protection issues.

Respectfully submitted,

Joy Lucretia Clark

Complainant, Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of _____, 2026, a true and correct copy of the foregoing Motion to Supplement the Record with Evidence of Good-Faith Mediation Efforts, Household Economic Hardship, Treasury-Related Financial Obligations, and Additional Supporting Documentation was served upon:

Margaret Morris, Esquire

Reger Rizzo & Darnall LLP

Counsel for PECO Energy Company

Cira Centre

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Service was made via email and/or first-class mail in accordance with applicable Commission rules.

Respectfully submitted,

Joy Lucretia Clark

Complainant, Pro Se