

BEFORE THE
PENNSYLVANIA PUBLIC SERVICE COMMISSION

Petition of IBEW Local 614 Requesting a Public, On-The-Record Investigation into the Reasonableness, Safety, Adequacy, and Sufficiency of the Service and Facilities of PECO Energy Company

Docket No. P-2026-3062224

ANSWER TO PRELIMINARY OBJECTIONS

Pursuant to 52 Pa. Code § 5.101, the International Brotherhood of Electrical Workers Local Union 614 (IBEW Local 614 or the Local) answers the preliminary objections filed by PECO Energy Company (PECO or the Company).¹ PECO's preliminary objections are meritless. IBEW Local 614 respectfully requests that the Pennsylvania Public Utility Commission (Commission) (1) deny them as soon as reasonably possible within than the maximum 30-day period permitted by 52 Pa. Code § 5.101(g); and (2), pursuant to its authority under 52 Pa. Code §§ 5.61(a) and 5.101(e)(1), establish an accelerated seven-day deadline for any answer to the Petition.²

The Local further requests that the Commission establish a comment date to gather public input on the pressing matters addressed in the Petition.

¹ Preliminary Objections of PECO Energy Company to the Petition for Commission Investigation of IBEW Local 614 (May 20, 2026) (Preliminary Objections). IBEW Local 614 notes that PECO failed to include a notice to plead in accordance with 52 Pa. Code § 5.101(a)(2). The Local is not claiming the Preliminary Objections should be rejected based on this deficiency.

² Petition of IBEW Local 614 Requesting a Public, On-The-Record Investigation into the Reasonableness, Safety, Adequacy, and Sufficiency of the Service and Facilities of PECO Energy Company (Apr. 29, 2026) (Petition).

In support of its answer, IBEW Local 614 submits the following:

I. LEGAL STANDARD

In ruling on PECO's preliminary objections, the Commission must accept as true all well-pled material facts in the Petition, as well as every reasonable inference deducible from those facts.³ The Commission must view the Petition in the light most favorable to IBEW Local 614 and may dismiss the Petition only if it appears the Local would not be entitled to relief under any circumstances as a matter of law.⁴ Any doubts must be resolved in favor of the Local.⁵

These precedents mean that PECO faces a steep uphill climb in seeking to convince the Commission that the Local's Petition should be summarily dismissed. By any standard, however, it should be clear that the Company has not raised any argument—factual or legal—that justifies dismissal.

II. ANSWER TO PECO'S PRELIMINARY OBJECTIONS

At the outset, PECO appears to misunderstand the nature of the Petition. The Petition presents specific, detailed facts and legal authority in support of the Local's request that the Commission consider invoking its regulatory and oversight authority under the Public Utility Code to ensure the reasonableness, safety, adequacy, and sufficiency of PECO's service and facilities.⁶ It is not a complaint. The Local does not allege that PECO

³ *Allegheny Cnty. v. Commonwealth*, 490 A.2d 402, 408 (1985); *McCauley v. Pa. Elec. Co.*, Docket No. C-2017-2583092, Order Denying Preliminary Objections at 1 (Pa. Pub. Util. Comm'n June 21, 2017) ("Commission preliminary objection practice is comparable to Pennsylvania civil practice respecting the filing of preliminary objections").

⁴ *DeMarco v. PECO Energy Co.*, Docket No. C-2017-2613087, Order Denying Respondent's Preliminary Objections at 2 (Pa. Pub. Util. Comm'n Oct. 13, 2017).

⁵ *Stilp v. Commonwealth*, 910 A.2d 775, 781 (Pa. Commw. Ct. 2006), *aff'd*, 974 A.2d 491 (2009).

⁶ Petition at 1-2 (citing 52 Pa. Code § 5.41).

has violated any specific provision of law or regulation. The Petition asks the Commission to initiate an investigation into how the Company is managing the operation and maintenance of its electric distribution system. The relief, if any, to be provided would depend on the results of that fact-finding investigation.

PECO's contention that the Petition fails due to "insufficient specificity" is not credible.⁷ The Petition provides extensive and detailed factual and legal support, including three separate affidavits from Local members with first-hand knowledge of the subject matter. The evidence presented in support of the request for the initiation of an investigation includes:

- Photographs of PECO electric distribution facilities exhibiting various degrees of apparent disrepair,⁸ the authenticity of which is supported by sworn statements.⁹
- Explanations of the safety and reliability risks that may be posed by deficient conditions on the Company's system similar to those depicted in the photographs.¹⁰
- Sworn statements describing PECO's operational processes for identifying and remedying electric distribution system deficiencies¹¹ and why those systems may not be functioning as intended.¹²
- Sworn statements describing the mapping systems used in PECO's distribution system operations¹³ and the serious risks created by the current documentation backlog at the Company.¹⁴

⁷ Preliminary Objections at 1.

⁸ Petition at 9-15; *id.*, Affidavit of Lawrence Anastasi (Anastasi Affidavit), Ex. A, B, and C.

⁹ Anastasi Affidavit at 3, 8-10.

¹⁰ Petition at 8-16; Anastasi Affidavit at 3-8.

¹¹ *See generally* Petition, Affidavit of James McGill.

¹² Anastasi Affidavit at 10-14.

¹³ *See generally* Petition, Affidavit of Jimmene Howard.

¹⁴ Anastasi Affidavit at 11. PECO entirely ignores these sworn statements and those described in the prior bullet, beyond the cursory and incorrect remark that they "are based on the allegations of issues with PECO

- Sworn statements supporting the concern that PECO is not properly staffed to address current infrastructure maintenance needs.¹⁵
- Citations to legal authority supporting Commission jurisdiction over the Petition and authorizing initiation of the requested investigation.¹⁶

PECO's specificity objection fails in the face of these showings. Indeed, the Local suspects that this objection was included less because of a substantive concern and more to secure additional time to prepare an answer pursuant to 52 Pa. Code § 5.101(e).¹⁷

PECO's second preliminary objection—that the Petition is “legally insufficient”¹⁸—is equally unsupported. There is nothing legally infirm about asking the Commission to initiate an investigation of a utility's maintenance of its distribution system. PECO itself admits that “[t]he Commission is authorized to initiate investigations . . . whenever it deems necessary to investigate and examine the condition and management of any public utility.”¹⁹ Title 52 Pa. Code. § 5.41 allows private parties such as IBEW Local 614 to petition the Commission to invoke its regulatory and oversight authority.²⁰ And the

facilities” depicted in the photographs. Preliminary Objections at 12 n. 17. To the contrary, the serious operational and documentation issues described in the Petition are freestanding issues sufficient to support the Local's request for a Commission investigation in their own right.

¹⁵ *Id.* at 12-13.

¹⁶ Petition at 3-5.

¹⁷ PECO makes much of the Local's sensible decision to provide photographs without specific pole numbers or address information. Rather than simply ask for the data, PECO stands on ceremony, arguing that it cannot respond fully to the Petition without seeing more specific locational information. The Company's self-inflicted injury—to the extent it is an injury at all—is not a reason to dismiss the Petition. *See also infra* at 8-9 (explaining that Local is willing and able to provide additional locational information on a confidential basis upon request).

¹⁸ Preliminary Objections at 5.

¹⁹ *Id.* at 13.

²⁰ *See, e.g., Petition of Commc 'ns Workers of Am. for a Pub., On-the-Record Comm 'n Investigation of the Safety, Adequacy, & Reasonableness of Serv. Provided by Verizon Pa. LLC*, Docket No. P-2015-2509336, Order at 15-17 (Pa. Pub. Util. Comm'n Apr. 21, 2016) (*Petition of CWA*); *Petition of Twin Lakes Utils., Inc. for a Comm 'n Ord. Authorizing the Acquisition of Twin Lakes Utils., Inc. by a Capable Pub. Util. Pursuant to 66 Pa. C.S. § 529*, Docket No. P-2020-3020914, Order at 12 (Pa. Pub. Util. Comm'n Sept. 17, 2020) (*Petition of Twin Lakes*) (instituting investigation in response to petition by private party and expressly

Commission has previously considered similar petitions for investigation under 52 Pa. Code § 5.41, as PECO concedes.²¹

Contrary to PECO's arguments, neither *Lyness v. State Board of Medicine* nor the Commission's 1994 delegation policy require dismissal of the Petition.²² To start, the instant proceeding was initiated by a petition filed by the Local pursuant to 51 Pa. Code § 5.41, not by the Commission. Neither *Lyness* nor the Commission's delegation policy apply to proceedings initiated by private parties.²³

To the extent that PECO's objection turns on the nature of the relief requested in the Petition—namely, the initiation of a fact-finding investigation into the Company's service and facilities, and the consideration of any appropriate further relief upon

rejecting argument that “a private complainant may not seek to institute an investigation”); *Petition of the Off. of Small Bus. Advocate Seeking Intervention by the Pa. Pub. Util. Comm'n in Procs. before the Fed. Energy Reg. Comm'n Regarding the Proposed Merger of Exelon Corp. and Constellation Energy Grp.*, Docket No. P-2011-2247936, Order (Pa. Pub. Util. Comm'n Oct. 14, 2011); *Petition to Open an Investigation into the Wire Ctrs. that Verizon Pa. Inc. & Verizon N. Inc. Assert are Non-Impaired Under the FCC's Triennial Rev. Remand Ord. of ATX Licensing Inc.*, Docket No. P-00062210, Order (Dec. 12, 2006).

²¹ Preliminary Objections at 16 (acknowledging Commission consideration of prior petition for investigation filed under 52 Pa. Code § 5.41); *see also, e.g., Petition of Twin Lakes Utils., Inc. for a Comm'n Ord. Authorizing the Acquisition of Twin Lakes Utils., Inc. by a Capable Pub. Util. Pursuant to 66 Pa. C.S. § 529*, Docket Nos. P-2020-3020914 et al., Order at 1 n.2 (Pa. Pub. Util. Comm'n Nov. 18, 2021) (“As a procedural matter, Twin Lakes' Petition was ultimately treated as a petition for relief, *properly brought pursuant to 52 Pa. Code § 5.41*, requesting that the Commission institute a Section 529 investigation into whether the Commission should authorize the acquisition of Twin Lakes by a capable public utility . . .” (emphasis added)).

²² *Lyness v. State Bd. of Med.*, 605 A.2d 1204 (1992) (*Lyness*); *Delegation of Prosecutory Auth. to Bureaus with Enf't Resp.*, Docket No. M-00940593, Order (Pa. Pub. Util. Comm'n Sep. 2, 1994) (Delegation Policy Order). As a threshold matter, the Delegation Policy Order expresses the Commission's discretionary policy and does not limit or constrain the Commission's legal authority or responsibilities under the Public Utility Code. *Pa. Pub. Util. Comm'n v. UGI Utils., Inc.*, Docket No. R-00943064, Order at 22 (Pa. Pub. Util. Comm'n Nov. 10, 1994), *aff'd sub nom. UGI Utils., Inc. Gas Div. v. Pa. Pub. Util. Comm'n*, 673 A.2d 43 (Pa. Commw. Ct. 1996) (noting with respect to the Delegation Policy Order that “[d]elegation does not mean abdication”). Thus, the Delegation Policy Order itself cannot support a preliminary objection based on legal insufficiency.

²³ *Petition of CWA* at 25 (“[T]his is not a Commission-instituted investigation. Rather, CWA initiated this proceeding by filing its Petition. Thus *Lyness* is not implicated.”); Delegation Policy Order at 3 (“It should be noted . . . that the above procedures apply only to agency-initiated proceedings.”).

completion of the investigation—the Commission has ample authority and discretion to grant that relief consistent with *Lyness*. The photographic evidence in the Petition, coupled with the sworn assertions of persons with first-hand knowledge of the issues, is more than sufficient to justify the initiation of the requested fact-finding investigation. Such a fact-finding investigation, which would not result in the imposition of penalties or fines absent further “formal action” by the Commission, is not prosecutory within the meaning of *Lyness*.²⁴

Should the Commission prefer, however, there are procedural alternatives to a Commissioner-directed fact-finding investigation. For example, the Commission could refer the Petition to its Bureau of Investigation and Enforcement (BIE) to determine whether a formal prosecutorial investigation should be instituted. Or the Commission could assign an Administrative Law Judge to make factual findings and recommendations in the instant proceeding (which as noted above is not an agency-instituted proceeding).²⁵ The Commission has discretion to structure its proceedings and regulatory actions as it sees fit to avoid any *Lyness* issues, real or perceived, and the Petition is non-prescriptive as to the procedural approach the Commission might take.

Because the Petition addresses important matters affecting the public interest, the Local further respectfully requests that, in conjunction with denying the preliminary

²⁴ *In re Section 506 Request of United Tel. Co. of Pa.*, Docket No. M-00940639, Order at 3 (Pa. Pub. Util. Comm’n Apr. 5, 1995), *rev’d on other grounds sub nom. United Tel Co. v. Pa. Pub. Util. Comm’n*, 676 A.2d 1244 (Pa. Commw. Ct. 1996) (Commission order initiating investigation of customer service issues did not implicate *Lyness* because it “involve[d] a fact-finding function on the part of the Commission rather than a prosecutory function”). PECO’s claim that such a fact-finding investigation would be inherently “prosecutorial” is unsupported by any citation, conclusory, and incorrect. *See* Preliminary Objections at 15.

²⁵ This would be similar to the approach the Commission took in *Petition of CWA*. As PECO concedes, “[t]he Commission determined that there was no *Lyness* violation” with respect to its consideration of the communications workers’ petition. Preliminary Objections at 16.

objections, the Commission establish a date for submission of written comments on the Petition by the public and issue notice of the comment date.²⁶ Establishing a comment date will allow for interested stakeholders and impacted communities to present—and for the Commission to consider—their perspectives on the matters at issue.

A. Answer to Background

1. The first three sentences are admitted. The referenced document speaks for itself. *But see* Petition at 20 n.9 (“The Local understands that the PUC’s recent annual reliability reports have found that PECO adequately achieved certain reliability benchmarks. While we do not challenge the findings in those reports, the Local is concerned that the metrics evaluated by the Commission may not be capturing the conditions that its members experience working on the electric distribution system on a daily basis. *See* [Anastasi Affidavit] at P 50.”).

2. Admitted in part and denied in part. The first sentence is admitted. As to the second sentence, IBEW Local 614 agrees that PECO’s most recent I&M Plan described PECO’s inspection programs for its distribution system and that its programs and facilities must comply with applicable standards. But the Local cannot verify at this time whether the programs are “extensive” as compared to relevant benchmarks. The I&M Plan speaks for itself.

²⁶ The Commission has established public comment dates for other petitions filed under 51 Pa. Code § 5.41. *See, e.g., Petition to Initiate a Proc. to Issue a Pol’y Statement on Elec. Util. Rate Design for Elec. Vehicle Charging*, Docket No. P-2022-3030743, Secretarial Letter (Pa. Pub. Util. Comm’n Feb. 25, 2022) (establishing public comment date within 30 days of letter).

3. Admitted in part and denied in part. The first sentence is denied. The second sentence is admitted. IBEW Local 614 cannot verify the veracity of the third sentence at this time, so it is denied.

4. Admitted in part. As to the last sentence, the Local asked that the Commission initiate an investigation and decide, based on the results of that investigation, whether any specific remedy is appropriate.

5. Denied. By way of further answer, IBEW Local 614 notes that the status of its collective bargaining agreement is irrelevant to the merits of PECO's objections and of the Petition. The Petition addresses matters squarely within the Commission's regulatory purview.²⁷ As to the last sentence, the Commission's treatment of the relief that the Local may have sought in the prior rate case has no bearing on whether the evidence and argument offered in support of the instant Petition justifies the initiation of an investigation.

6. The first sentence states a legal conclusion to which no answer is required. The second sentence is denied. The third sentence is admitted. The fourth sentence is admitted, to the extent it refers to the photographs included in the body of the Petition. The Local cannot verify the veracity of the fifth sentence at this time, so it is denied. By way of further answer, PECO appears to confuse the photographs included in the body of the Petition—which are unconnected to the November and December 2025 surveys—with the survey photographs in Exhibits A, B, and C.

7. The first sentence is admitted. IBEW Local 614 notes that PECO has not asked the Local for specific information on the pole photographs, including the pole

²⁷ See Petition at 3-4.

numbers and addresses. As stated in the Petition, specific locational information was withheld out of an abundance of caution for security and privacy reasons, and the Local remains willing and able to share the information on a confidential basis upon request.²⁸ The second sentence is denied to the extent it makes factual assertions about the Petition; to the extent it states a legal conclusion, no answer is required.

8. This paragraph states legal conclusions to which no answer is required. By way of further answer, the current proceeding was not initiated by the Commission, and the Commission has discretion to grant the requested relief, as explained above at 5-6. The Petition speaks for itself.

B. Answer to Preliminary Objection No. 1

9. Admitted. In addition to the “series of photographs,” the allegations in the Petition are supported by three detailed affidavits from Local members, which are also addressed in the body of the Petition itself.

10. Admitted.

11. Admitted. The pole numbers were redacted from Exhibits A, B, and C because of confidentiality concerns. The Local is, as noted in the Petition, prepared to provide specific pole numbers and addresses for each of the photographs in the Exhibits if the Commission requests that the Local do so. And, again, it should be emphasized that the Petition contains evidence in addition to the photographs: the statements of three Local members with first-hand knowledge of the “facts on the ground” in the PECO service territory.

²⁸ *Id.* at 7 n.3.

12. Admitted, to the extent that “address” means the detailed street address including house/property number.

13. Admitted.

14. Admitted. By way of further response, the Petition states that only the photographs in Exhibits A, B, and C were taken during the November and December 2025 surveys. The photographs in the body of the Petition are not connected to the surveys.

15. Admitted. As noted, Mr. Anastasi testifies that Local members took the photographs.²⁹ In light of the assertion, the Local fails to see why the Company needs the specific names of the Local members who took the photographs. That information is not relevant; we question why the Company suggests otherwise.

16. Admitted. The statement is correct, but the Local fears that PECO misses (or seeks to obscure) the point of the survey. The Petition makes clear that the surveys were not intended to be a scientifically-rigorous investigation. The point was simply to test whether the Local’s impressions of the status of PECO’s distribution infrastructure are consistent with conditions on the ground in various portions of the PECO service territory. Further, as explained in the sworn statement of Mr. Anastasi:³⁰

[T]he examples of disrepair identified in and attached to this Affidavit, and detailed in the Petition, are not isolated incidents. Local 614 members routinely encounter such conditions in the course of their day-to-day work. Based on my own observations, I believe that the examples provided in the Petition and this affidavit are indicative of the state of PECO’s infrastructure across many parts of its service territory.

²⁹ Anastasi Affidavit at 3.

³⁰ *Id.* at 10.

17. Admitted. As noted above, PECO has not requested the redacted information from IBEW Local 614. The Local has no objection to providing the information to the Company on a confidential basis.

18. Admitted, to the extent that “address information” means the detailed street address including house/property number.

19. Admitted.

20. Denied. By way of further answer, IBEW Local 614 believes that PECO should have mechanisms in place that allow it to identify infrastructure issues on its system, and that precise information about individual pole locations is not necessary to respond to the Petition.

21. The first sentence is denied. IBEW cannot verify the information in the second sentence at this time, so it is also denied.

22. Admitted in part and denied in part. IBEW cannot verify the information concerning PECO pole counts in the referenced areas at this time, so this part of the statement is denied.

23. Denied. IBEW Local 614 is unable to verify the veracity of PECO’s statements, although the Local has no specific reason to believe that they are false.

24. Denied. IBEW Local 614 is unable to verify the veracity of PECO’s statements, although the Local has no specific reason to believe that they are false. With respect to the referenced report, the Local notes that it is unable to determine based on this document how long the condition existed before PECO claims it was first identified and whether the condition had been (or should have been) previously identified.

25. Denied. IBEW Local 614 is unable to verify the veracity of PECO's statements, although the Local has no specific reason to believe that they are false. With respect to the referenced report, the Local notes that it is unable to determine based on this document how long the condition existed before PECO claims it was first identified and whether the condition had been (or should have been) previously identified.

26. This paragraph states legal conclusions to which no answer is required. IBEW Local 614 notes that the cited statement in *Shasta-Patrice Brown v. Philadelphia Gas Works*, Docket No. C-2024-3050761, Order (Pa. Pub. Util. Comm'n Sep. 11, 2025), pertains to an adverse complaint proceeding and is inapplicable to a petition requesting the Commission to invoke its regulatory authority.

27. Denied. By way of further answer, IBEW Local 614 surveyed approximately 460 poles, not 86 poles as stated by PECO.³¹ Regardless, as stated in the Petition, the purpose of the Local's surveys "was not to establish systematically or conclusively the extent of issues within PECO's service territory."³² The Local lacks the time, resources, and investigational authority to conduct a more comprehensive survey of PECO's system and facilities, which underscores the need for a Commission investigation. Again, the Local's position, supported by sworn testimony, is that the examples included in the photos are indicative of the state of PECO's infrastructure across many parts of its service territory. Anastasi Affidavit, P 31.

As to the final sentence, the two referenced Petition photographs, again, are unconnected to the November and December 2025 surveys. *See supra* at 10.

³¹ See Anastasi Affidavit, Ex. A at 1; Ex. B at 1; Ex. C at 1.

³² Anastasi Affidavit at 8.

As to footnote 17, PECO is incorrect that the issues related to PECO's mapping systems, staffing levels, and worker safety "are based on the allegations of issues with PECO facilities." The serious mapping, staffing, and safety problems identified in the Petition are independently supported by specific facts and sworn statements, raise significant management operational concerns, and are freestanding issues sufficient to establish a need for a Commission investigation in their own right. For example, the Local's presentation includes the assertions by affiant Anastasi that "PECO is several years behind in updating its system maps[,]" and that "[i]naccurate maps can complicate efforts both to address identified deficiencies and to manage outage restoration efforts."³³

28. This paragraph states a legal conclusion to which no answer is required.

29. This paragraph states a legal conclusion to which no answer is required.

C. Answer to Preliminary Objection No. 2

30. This paragraph states a legal conclusion to which no answer is required. By way of further answer, see the Local's narrative response above at 4-7.

31. The first sentence is admitted. The second sentence states a legal conclusion to which no answer is required.

32. This paragraph states legal conclusions to which no answer is required. IBEW Local 614 notes, however, that this paragraph concedes that the Commission is authorized to grant the relief sought in the Petition by initiating the requested investigation.

33. This paragraph states a legal conclusion to which no answer is required. By way of further answer, see above at 4 n. 20.

³³ *Id.* at 11.

34. This paragraph states legal conclusions to which no answer is required. The *Lyness* decision speaks for itself. We have addressed the relevance, if any, of the ruling in *Lyness* above at 4-7.

35. This paragraph states legal conclusions to which no answer is required. The Commission's delegation policy order and 66 Pa. Cons. Stat. § 308.2(b) speak for themselves.

36. This paragraph states legal conclusions to which no answer is required. By way of further answer, IBEW Local 614 notes that the first sentence is unsupported by any citation and conclusory.

37. This paragraph states legal conclusions to which no answer is required. The referenced documents speak for themselves.

38. This paragraph states legal conclusions to which no answer is required. The referenced document speaks for itself.

39. IBEW Local 614 agrees that no answer has been filed and that PECO has filed timely objections. The remainder of this paragraph states legal conclusions to which no answer is required.

III. CONCLUSION

IBEW Local 614 respectfully requests that the Commission issue an order as expeditiously as reasonably possible rejecting PECO's preliminary objections and establishing a seven-day deadline for any answer to the Petition. The Local further requests that the Commission establish a public comment date for the Petition, to enable interested parties to weigh in on the matters addressed therein.

Respectfully submitted,

/s/ Joseph D. Richardson

Joseph D. Richardson, Esq. (Pa. Bar No. 311147)
Samuel H. Datlof, Esq. (Pa. Bar No. 324716)
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
(215) 656-3600
jrichardson@wwdlaw.com
sdatlof@wwdlaw.com

Scott H. Strauss
Samuel B. Whillans
SPIEGEL & MCDIARMID LLP
1818 N Street, NW
8th Floor
Washington, DC 20036
Tel. (202) 879-4000
scott.strauss@spiegelmc.com*
samuel.whillans@spiegelmc.com*
**pro hac vice motions pending*

Attorneys for IBEW Local 614

June 1, 2026

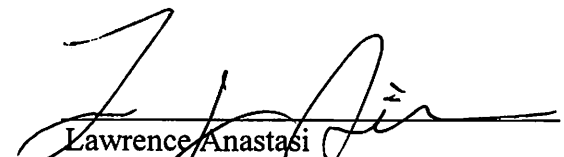
BEFORE THE
PENNSYLVANIA PUBLIC SERVICE COMMISSION

Petition of IBEW Local 614 Requesting a Public, On-The-Record Investigation into the Reasonableness, Safety, Adequacy, and Sufficiency of the Service and Facilities of PECO Energy Company

Docket No. P-2026-3062224

VERIFICATION

I, Lawrence Anastasi, hereby state that the facts contained in the foregoing Answer to Preliminary Objections are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 10 Pa. Cons. Stat. § 4904 (relating to unsworn falsification to authorities).


Lawrence Anastasi
President/Business Manager
IBEW Local 614
Date: June 1, 2026

BEFORE THE
PENNSYLVANIA PUBLIC SERVICE COMMISSION

Petition of IBEW Local 614 Requesting a
Public, On-The-Record Investigation into
the Reasonableness, Safety, Adequacy,
and Sufficiency of the Service and
Facilities of PECO Energy Company

Docket No. P-2026-3062224

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing motion and verifications has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Dated on this 1 day of June, 2026.

VIA ELECTRONIC MAILING

Anthony E. Gay, Esq.
Matthew N. Korenoski, Esq.
Catherine Nguyen, Esq.
Jeanne J. Dworetzky, Esq.
Kenneth M. Kulak, Esq.
Mark A. Lazaroff, Esq.
PECO Energy Company
anthony.gay@exeloncorp.com
matthew.korenoski@exeloncorp.com
catherine.nguyen@exeloncorp.com
jeanne.dworetzky@exeloncorp.com
ken.kulak@morganlewis.com
mark.lazaroff@morganlewis.com
Counsel for PECO Energy

Allison Kaster, Esq.
Bureau of Investigation
Enforcement
Pennsylvania Public Utility
Commission
akaster@pa.gov
Counsel for I&E

Rebecca Lyttle, Esq.
Office of Small Business Advocate
ra-sba@pa.gov
Counsel for OSBA

Harrison W. Breitman, Esq.
Senior Assistant Consumer Advocate
HBreitman@paoca.org
Counsel for Darryl A. Lawrence
Consumer Advocate

/s/ Joseph D. Richardson

Joseph D. Richardson, Esq. (Pa. Bar
No. 311147)
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
(215) 656-3600
jrichardson@wwdlaw.com

Attorney for IBEW Local 614