

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NATALIE SCHMIDT :

v.

Docket No. C-2026-3062901

PECO ENERGY COMPANY

**COMPLAINANT'S ANSWER TO
RESPONDENT'S PRELIMINARY OBJECTIONS**

The Complainant, Natalie Schmidt, respectfully requests that the Administrative Law Judge deny Respondent's (PECO) Preliminary Objections to dismiss this matter on the basis of prejudice, based on the following reasons:

- 1. Genuine Disputes of Material Fact Exist:** The core of this dispute involves a large billing pattern (several thousand dollars annually for a 1-bedroom apartment) that strongly suggests an undetected billing glitch or a "foreign load" (mixed metering) issue. **Exact financial figures are currently unavailable because PECO holds exclusive possession of the billing history.**
- 2. PECO's Delays Caused the Lack of Inspection:** PECO alleges a lack of physical evidence, yet PECO took months to respond to my initial billing dispute. The failure to conduct a timely field check or coordinate with the landlord is entirely due to PECO's own administrative negligence. Dismissing this case would reward PECO for its own delays.
- 3. PECO Violated Regulatory Dispute Protections:** Pursuant to 52 Pa. Code § 56.411, Respondent was legally required to cease all adverse collection and enforcement actions on the disputed, held balance during the pendency of the internal investigation and the open BCS informal proceeding.
 - 1.** In direct violation of PA PUC regulations and its own internal hold policies, Respondent bypassed the active regulatory process and transferred Complainant's held account balance to a third-party debt collection agency.
 - 2.** Respondent's unlawful collection actions during an active dispute directly caused severe financial duress and forced Complainant to file this Formal Complaint to preserve regulatory protections and prevent further credit damage.
- 4. Public Interest Demands a Hearing:** Dismissing this case "with prejudice" would deny an unrepresented consumer due process and shield the utility company from

accountability regarding systemic billing upgrades and unauthorized collection practices.

WHEREFORE, Complainant respectfully requests that the Commission deny Respondent's Preliminary Objections and allow this matter to proceed to a formal evidentiary hearing.

VERIFICATION

I, Natalie Schmidt, hereby state that the facts above are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature: 
Date: 6/22/26

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Natalie Schmidt, Complainant v. PECO Energy Company, Respondent
Docket No. C-2026-3062901

CERTIFICATE OF SERVICE

I, Natalie Schmidt, hereby certify that I have served a true and correct copy of the foregoing Answer to Preliminary Objections upon the office of Respondent's legal counsel in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Served via Email to:

Margaret A. Morris, Esq.
Attorney I.D. # 75045
Reger Rizzo & Darnall, LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104-2899
(215) 495-6524 (voice)
(215) 495-6600 (fax)
mmorris@regerlaw.com
Attorney for PECO Energy Company

Date: June 22, 2026

A handwritten signature in grey ink that reads "Natalie Schmidt". The signature is fluid and cursive, with the first name "Natalie" and last name "Schmidt" clearly distinguishable.

Natalie Schmidt
2100 Walnut St
APT 8K
Philadelphia, PA, 19103