

From The Desk of:

Richard J. Coppola
Post Office Box 99
25 Parkside Drive
Langhorne Pennsylvania 19047
Telephone: (Daytime) 215.497.1000, (Cell) 215.990.9900
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Email: hut@globalweb.com

Transmittal

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: Richard Coppola v. PECO Energy Company
PUC Docket No.: F-2012-2325791

Dear Ms. Chiavetta,

Enclosed for filing with the Commission are the following documents in the matter referenced above along with their respective Certificates of Service.

1. Complainant's Motion to Compel.

Very Truly Yours,



Richard Coppola, Jr.

RJC/lg
2012/11/08 14:55:54
Via.: USPS with Certificate of Mailing
Page 1 of 1
Copy: File

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2013 JAN 30 AM 10:18
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SECRETARY'S BUREAU

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Richard J. Coppola, Jr.
P.O Box 99
Langhorne, PA 19047

Complainant

: No.: F-2012-2325791

v.

PECO Energy Company
2301 Market Street
Philadelphia, PA 19101

: Administrative Law

Respondent

ORDER

AND NOW This _____ day of _____ 2012, Upon consideration of Complainant's Motion to Compel Discovery Responses it is hereby ORDERED and DECREED that Complainant's Motion is GRANTED. Respondent shall serve upon Complainant full and complete responses to Complainant's Request for interrogatories, Set 1 within twenty (20) days from the date of this ORDER or suffer such sanctions as the COMMISSION may impose. It is further ORDERED that Respondent serve Complainant with all Pleadings both by United States Postal Service and electronically.

Presiding Officer

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Richard J. Coppola, Jr.
P.O Box 99
Langhorne, PA 19047

: No.: F-2012-2325791

Complainant

v.

PECO Energy Company
2301 Market Street
Philadelphia, PA 19101

: Administrative Law

Respondent

**COMPLAINANT'S MOTION TO COMPEL
RESPONSES TO INTERROGATORIES
DIRECTED TO RESPONDENT, SET 1**

COMES NOW Complainant RICHARD COPPOLA and submits his Motion to Compel Responses to Request for Interrogatories, Set 1 directed to Respondent PECO Energy Company pursuant to Pa. Code, Title 52, Chapter 5, ss 5.342(2)(g)(1)(2).

1. Complainant served Respondent with Request for Interrogatories, Set 1 on 10/17/2012 Electronically and by USPS.

2. Respondent failed and/or refused to serve a copy of their "responses" upon Complainant until 11/8/2012. A true and correct copy of Complainant's electronic communication to and between Respondent is attached hereto and marked as Exhibit "A".

3. As a result of Respondent's failure to serve Complainant with their "response" to Complainant's Requests for Interrogatories, Set 1, Complainant expended approx. 2.8 hrs. of work preparing his original Motion to Compel attached hereto and marked as Exhibit "B".

Exhibit A

4. After review of Respondent's response to Complainant's Interrogatory Requests, Respondent's so-called "responses" behind their abusive objections to virtually each and every request to Complainant's carefully prepared and focused requests which are relevant and that will no doubt lead to evidence required at trial, Respondents "responses" are non-responsive.

WHEREFORE Complainant respectfully requests that the Presiding Officer COMPEL Respondent to provide Complainant with full and complete responses to his Interrogatories, Set 1 according to the proposed ORDER attached herewith.

Dated: 11/8/12



Richard J. Coppola, Jr.
Complainant
(215) 497-1000
(business - daytime phone)

(Mailing Address)
25 Parkside Drive
Langhorne, PA 19047

RECEIVED

JAN 22 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Rich Coppola

From: "Rich Coppola" <RC@GlobalWeb.com>
To: <Shawane.Lee@exeloncorp.com>
Sent: Thursday, November 08, 2012 12:55 PM
Attach: motion to compel.pdf
Subject: peco
See attached motion to compel.

Richard Coppola

Exhibit A

11/8/2012

Rich Coppola

From: "Rich Coppola" <RC@GlobalWeb.com>
To: <Shawane.Lee@exeloncorp.com>
Sent: Thursday, November 08, 2012 2:24 PM
Subject: peco - no service of your pleadings

I have had a chance to review your so-called "responses" to my interrogatories. They are largely non-responsive so you are notified that the Motion to Compel will now not be mailed to the PUC however it will be modified to address your lack of response. It is you that should be concerned about sanctions should you decide to continue your course of conduct.

You are to EMAIL any and all pleadings from this point forward. I should request sanctions for my time anyway for your strategic failure to serve me with your interrog. ans. From now on I will have zero tolerance for that kind of nonsense.

Richard Coppola

----- Original Message -----

From: Shawane.Lee@exeloncorp.com
To: RC@GlobalWeb.com
Cc: renee.tarpley@peco-energy.com
Sent: Thursday, November 08, 2012 1:54 PM
Subject: Richard Coppola vs. PECO Energy - F-2012-2325791

Mr. Coppola,

Attached is PECO Energy's Responses to your discovery requests, which were sent to you on November 6, 2012 (within the 20 day period required to respond). Accordingly, at your soonest convenience, kindly withdraw your Motion to Compel PECO Energy's Discovery Responses or I will file a Motion for Sanctions and request that the PUC order a fine,

Thank you in advance for your cooperation.

Very truly yours,

Shawane L. Lee, Assistant General Counsel
 Exelon Business Services Company, LLC
 Legal Department
 2301 Market Street, S23-1
 Philadelphia, PA 19103
 Tel: (215) 841-6841
 Fax: (215) 568-3389

 Please consider the environment before printing this e-mail.

From: Rich Coppola [<mailto:RC@GlobalWeb.com>]
Sent: Thursday, November 08, 2012 12:56 PM
To: Lee, Shawane L.:(BSC)
Subject: peco

See attached motion to compel.

Richard Coppola

Exhibit A

11/8/2012

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Exhibit A
11/8/2012
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Richard Coppola

Exhibit A
 Exhibit A ^{11/8/2012}

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delete the original and any copy of this e-mail and any printout. Thank You.

CERTIFICATION OF SERVICE

I, Richard J. Coppola, Jr., do hereby certify that a true and correct copy of COMPLAINANT'S MOTION TO COMPEL RESPONSES TO INTERROGATORIES DIRECTED TO RESPONDENT, SET 1 was served upon the Defendant by United States Postal Service and electronically in PDF file format, in accordance with the requirements of ss 1.54 on or about the below written date:

Dated: 11/8/12



Richard J. Coppola, Jr.
Complainant
(215) 497-1000
(business - daytime phone)

(Mailing Address)
25 Parkside Drive
Langhorne, PA 19047

PECO Energy Company
2301 Market Street
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