

From The Desk of:

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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 REQUEST FOR ADMISSIONS, SET 1.

RECEIVED

FEB 6 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Very Truly Yours,



Richard Coppola, Jr.

RJC/lg
2013/02/04 16:35:05
Via.: USPS with Delivery Confirmation
Page 1 of 1 plus attachments
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**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 REQUEST FOR
ADMISSIONS, SET 1.**

Complainant, Richard J. Coppola, Jr., hereby requests pursuant to Pa. Code, Title 52, Chapter 5, ss 5.350(a)(b) that Respondent PECO within thirty (20) days from Complainant's receipt of this request, admit the truth of each of the following items for purposes of this action, and subject to all pertinent objections as to the admissibility thereof that may be interposed at any related hearing or trial.

INSTRUCTIONS

You are required to either admit or deny the following statements in accordance with applicable law. Please note that any denials of the following statements are subject to applicable law, which allows for sanctions in providing any statements that you deny in these requests. Your responses are also subject to the penalties of 18 Pa. C.S. ss 4904 pertaining to unsworn falsifications to authorities.

DEFINITIONS

As used in this request, "you" shall refer to PECO, and any contractor, subcontractor, consultant, employee, representative, agent or hire of PECO or any PECO affiliate.

REQUESTS

1. Daily KWH usage and/or "daily meter readings" are not stored, retained, or archived by PECO, PECO affiliate, or by any outside 3rd. party on hard copy or by electronic record storage entity after forty five (45) days.

Response:

2. Daily KWH usage and/or "daily meter readings" are not in the possession of PECO after forty five (45) days.

Response:

3. Daily KWH usage and/or "daily meter readings" are not stored or archived by PECO in the form of microfilm at any time after forty five (45) days.

Response:

4. PECO does not have access to any Daily KWH usage and/or "daily meter readings" at any time after forty five (45) days.

Response:

5. PECO does not have any record or file storage system of any kind of Daily KWH usage and/or "daily meter readings" at any time after forty five (45) days.

Response:

6. While an off-peak meter is in off-peak shut-down mode, there is no electric power being provided by the off-peak meter.

Response:

7. Mr. Alicea is not a licensed electrician within Middletown Township or within the State of Pennsylvania.

Response:

8. In section four (4) of the complaint, the Complainant's averment specifically states "PECO has refused to provide Complainant with requested records in the form requested".

Response:

9. PECO has provided Complainant with Complainant's specifically requested records pursuant to Complainant's Section four (4) averment:

Response:

10. PECO has provided Complainant with Complainant's specifically requested records pursuant to Complainant's 3/19/2012 transmittal (items 1,2,3) to PECO.

Response:

11. During the period that electric service is off-peak, the electric service is interrupted.

Response:

12. During the period that electric service is off-peak, if the electric service is not interrupted there is usage occurring.

Response:

13. PECO scheduled and performed a "meter check in Complainant's presence" after 4:30pm pursuant to Complainant's 3/19/2012 letter request to PECO.

Response:

14. Respondent received Complainant's Request for Interrogatories, Set 1.

Response:

15. Respondent received Complainant's Request for Interrogatories, Set 2.

Response:

16. Respondent received Complainant's Motion to Compel Responses to Interrogatories, Set 1.

Response:

17. Respondent received Complainant's Motion to Compel Responses to Interrogatories, Set 2.

Response:

18. Respondent received Complainant's Re-Filed Motion to Compel Responses to Interrogatories, Set 2.

Response:

Dated: 2/5/13



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

(Mailing Address)
25 Parkside Drive
Langhorne, PA 19047

CERTIFICATION OF SERVICE

I, Richard J. Coppola, Jr., do hereby certify that a true and correct copy of **COMPLAINANT'S REQUEST FOR ADMISSIONS, 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: 2/5/13



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

(Mailing Address)
25 Parkside Drive
Langhorne, PA 19047

RECEIVED

FEB 6 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PECO Energy Company
2301 Market Street
Philadelphia, PA 19101

Respondent



Flat Rate Envelope

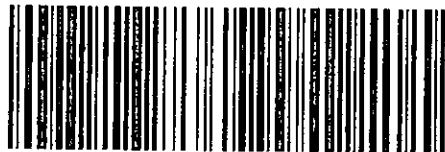
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