

From The Desk of:

**Richard J. Coppola**

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*Transmittal*

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**FEB 20 2013**

**PA-PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**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 OBJECTIONS TO RESPONDENT RESPONSE TO COMPLAINANT'S REQUEST FOR ADMISSIONS, SET 1.

Very Truly Yours,



**Richard Coppola, Jr.**

RJC/lg

2013/02/20 11:34:57

Via.: USPS with Delivery Confirmation

Page 1 of 1 plus attachments

Copy: File

**DISCLOSURE NOTICE**

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

FEB 20 2013

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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 OBJECTIONS TO RESPONDENT RESPONSE TO  
COMPLAINANT'S REQUEST FOR ADMISSIONS, SET 1.**

COMES NOW Complainant pursuant to ss 5.342 and ss 1.36 in his objections to respondent's "response" to Complainant's Request for Admissions, Set 1.

1. Complainant served a copy of his Request for Admissions upon respondent on 2/5/2013.

2. Respondent allegedly "answered" Complainant's Requests without proper verification in accordance with ss 1.36 as referenced within ss 5.342(6)(c). See Exhibit "A"

3. Respondent's "verification" is not a verification at all. The verifying party Renee Tarpley specifically states that "I do not have personal knowledge of all the facts recited in the foregoing answers" to Complainants Requests for Admissions and furthermore specifically states that her said answers were "furnished by various PECO personnel". This so-called "verification" permits Ms. Tarpley to escape verification penalties of C.S. Ss 4904 as well as her answers to Complainant's requests. A proper verification is attached to this Complainants Objection without exceptions, qualifications,

loop holes, disqualifiers, and other language designed to evade legal responsibility.

4. Respondent has therefore NOT personally verified ANYTHING to which Complainant can rely upon. Furthermore these "various PECO personnel" who provided Ms. Tarpley with information used to answer Complainant's Request for Admissions critical to Complainant's case must now be identified and served with appropriate discovery request(s) so as to permit Complainant to prosecute his case in accordance with due process, the Administrative Rules, and without prejudice.

WHEREFORE, Complainant respectfully requests that respondent's answers to Complainant's Request for Admissions, Set 1 be (a) dismissed entirely and respondent ORDERED to re-file its answers with the proper verification or (b) ORDER respondent to properly verify it's answer(s) subject to stated penalties and to which Complainant can rely upon as being verified.

Dated: 2/20/13



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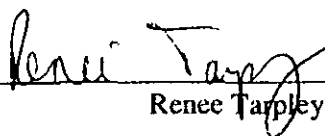
Richard J. Coppola, Jr.  
Complainant  
(215) 497-1000  
(business - daytime phone)

(Mailing Address)  
25 Parkside Drive  
Langhorne, PA 19047

**VERIFICATION**

I, Renee Tarpley, hereby declare that I am a Senior Regulatory Assessor of PECO Energy Company; that as such I am authorized to make this verification on its behalf; that I do not have personal knowledge of all the facts recited in the foregoing Answers of PECO Energy Company to Complainant's Request for Admissions, the information contained in Said Answers having been furnished to me by various PECO Energy Company personnel, but that the facts set forth in the Answers are true to the best of my information and belief based upon the information made available to me, and hat these Answers are, accordingly, verified on behalf of PECO Energy Company.

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
Renee Tarpley

Date: 2/7/13

Exhibit A

VERIFICATION

I, Richard J. Coppola, Jr., Complainant verifies that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief. Plaintiff understands that false statements herein are subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: 2/20/13



---

Richard J. Coppola, Jr.  
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Langhorne, PA 19047

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**FEB 20 2013**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

CERTIFICATION OF SERVICE

I, Richard J. Coppola, Jr., do hereby certify that a true and correct copy of **COMPLAINANT'S OBJECTIONS TO RESPONDENT RESPONSE TO 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: 2/20/13



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

(Mailing Address)  
25 Parkside Drive  
Langhorne, PA 19047

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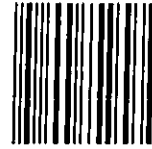
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2301 Market Street  
Philadelphia, PA 19101

Respondent



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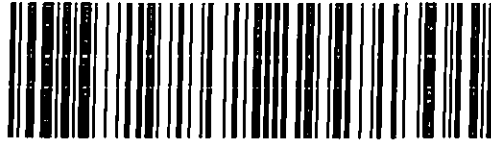
Joe International, Inc.

1st Office Box 878

Newtown, PA 18940 USA

Rosemary Chiavetta, Secretary - PUC  
PO Box 3265  
Harrisburg PA 17105

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