

From The Desk of:

Richard J. Coppola
Post Office Box 99
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Langhorne Pennsylvania 19047
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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 PRODUCTION OF DOCUMENTS, SET 1.

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MAR 7 2013

PA PUBLIC UTILITIES COMMISSION
SECRETARY'S OFFICE

Very Truly Yours,



Richard Coppola, Jr.
RJC/lg
2013/03/04 17:24:17
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**

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

Complainant

v.

PECO Energy Company
2301 Market Street
Philadelphia, PA 19101

Respondent

: No.: F-2012-2325791

: Administrative Law

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**COMPLAINANT'S REQUEST FOR
PRODUCTION OF DOCUMENTS, SET 1.**

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

THE FOLLOWING DOCUMENTS are to be produced pursuant to Pa. Code, Title 52, Chapter 5, ss 5.349(a) at Complainant's address; 25 Parkside Drive, Langhorne PA, 19047 within twenty (20) days from service of this request.

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.

1. Daily KWH usage records for the last four (4) years from the date of this request.
2. Monthly bill (actual) records for the last four (4) years from the date of this request.
3. All documents relating to PECO's investigation of Complainant's complaint.
4. All documents inclusive but not limited to any (a) reports, (b) records, (c) notes, (d) test results, (e) test scheme(s), (e1) and test method(s) performed, (f) time of

arrival of ALL PECO personnel at Complainant's address relating to Complainant's complaint.

5. Personal qualifications of any and all PECO personnel dispatched and/or sent to Complainant's address relating to Complainant's complaint.

6. True and correct copies of all phone logs between Complainant and PECO from 1/1/2011 and the date of this request.

7. True and correct copies of all phone log transcripts between Complainant and PECO from 1/1/2011 and the date of this request.

8. True and correct copies of all phone log notes between Complainant and PECO from 1/1/2011 and the date of this request.

9. True and correct copies of all computer screen prints from all phone logs and notes pertaining to Complainant's complaint between 1/1/2011 and the date of this request.

10. *True and correct copies of any and all documents and (a) interoffice communication and between PECO and (b) any subcontractors, consultants, and/or hires in any form transmitted pertaining to Complainant's complaint between 1/1/2011 and the date of this request.*

11. True, correct, and complete copies of any contracts and agreements between PECO and any inside, outside, or other contractors, subcontractors, consultants, and/or hires of any kind relating in any way without limitation to Complainant's complaint.

12. Any and All "Company" aka PECO "records", documents notes, reports, logs, etc., without limitation referenced in the informal complaint decision of the PUC dated 8/22/2012.

13. Any and All "Company" aka PECO "records", documents notes, reports, logs, etc., without limitation submitted to the PUC investigator Rowena Marjan and/or

any other PUC representative or agent regarding the (a) informal complaint and (b) complaint decision of the PUC dated 8/22/2012.

14. All company records referenced and referred to in Paragraph 1 of the PUC "decision on informal complaint".

15. All company records referenced and referred to in Paragraph 2 of the PUC "decision on informal complaint".

16. All company records referenced and referred to in Paragraph 3 of the PUC "decision on informal complaint".

17. All company records referenced and referred to in Paragraph 4 of the PUC "decision on informal complaint".

18. Any and all phone records from PECO's phone service provider showing any and all calls made to Complainant referenced in PECO's correspondence to Complainant and representation(s) to the PUC regarding the (a) informal complaint and (b) complaint decision of the PUC dated 8/22/2012.

19. Complete, true, and correct copy of the off peak service; (a) application, (b) Complainant's off peak rate and (b1) "scheduled off peak periods", (c) all documents, (d) agreement, (e) policy, (f) statements, (g) frequently asked questions documents (FAQ's), (h) guidelines, (i) information, (j) billing records, and (k) any and all related documents and information between PECO and Complainant.

20. Any and all documents used or referred to in your answers and responses to Complainant's Request for Admissions, Set 1.

21. Any and all documents used or referred to in your answers and responses to Complainant's Request for Interrogatories, Set 1.

22. Any and all documents used or referred to in your answers and responses to Complainant's Request for Interrogatories, Set 2.

23. Any and all documents used or referred to in your answers and responses to Complainant's Request for Interrogatories, Set 3.

24. Any and all information you intend to use at any hearing or at trial.

Dated: 3|8|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 PRODUCTION OF DOCUMENTS, 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: 3/8/13



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

(Mailing Address)
25 Parkside Drive
Langhorne, PA 19047

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MAR 7 2013

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PECO Energy Company
2301 Market Street
Philadelphia, PA 19101

Respondent

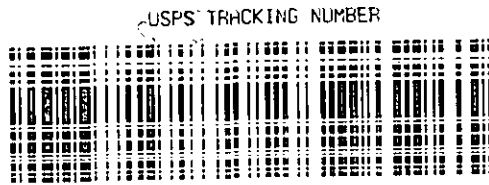


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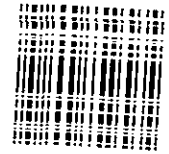


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Rosemary Chiavetta, Secretary - PUC
PO Box 3265
Harrisburg PA 17105



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