

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

Telefax: 215.497.9000

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## Transmittal

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**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 NOTICE OF DEPOSITION WITH ATTACHED ORDER

Very Truly Yours,



**Richard Coppola, Jr.**

RJC/lg

2013/03/08 10:26:26

Via.: USPS with Delivery Confirmation

Page 1 of 1 plus attachments

Copy: File

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**MAR 15 2013**

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

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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: No.: F-2012-2325791

Complainant

MAR 15 2013

v.

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

: Administrative Law

Respondent

**COMPLAINANT'S NOTICE OF DEPOSITION**  
**WITH ATTACHED ORDER**

Complainant, Richard J. Coppola, Jr., hereby files his Notice of Deposition upon respondent pursuant to ss 5.343 and section 333(b) of the Act of the following individuals employed by respondent and specifically identified by respondent within respondent pleadings throughout this matter and being employed individuals of the respondent.

1. Respondent is to make available for scheduling and to appear without subpoena for oral deposition(s) the following active party individuals specifically identified by respondent by and through respondent's answers, responses, and pleadings in this matter as having direct knowledge of Complainant's case now before this commission, and in accordance with ss 5349 and 5.343(d) shall bring with the deponent(s) for inspection and other purposes the attached identified documents listed within Complainant's Request for Production of Documents, Set 1 and tangible things at the taking of the deposition(s). Pursuant to ss 5.346(a) the oral depositions of the following individuals in no certain order will commence with the first deponent of the

place where the deposition(s) will be held by and before Complainant so appointed on May 13, 2013 at the Bucks County Bar Association, 135 E. State Street Doylestown PA 18901 at 2:00 PM. Deposition(s) of the herein initially noticed individual(s) and subsequently noticed individual(s) named herein when called shall commence and continue until complete.

2. Pursuant to ss 5.343(c) deposition inquiries may include but not be limited to: any and all communications with respondent representatives, respondent policies, records, technical documents and procedures, customer service relating to complainant's complaint, testimony to date, answer to complainant complaint, respondent averments, identification of additional witnesses and/or deponents, case facts, *allegations, respondent responses and admissions, discovery, relevant subject matter, etc.*

3. Renee Tarpley, and individuals who "furnished said answers" to Complainant's Request for admissions, Set 1 and Complainant's Request for Interrogatories, Sets 1 through 3 as verified by Ms. Tarpley:

2. Thomas Lerro

3. Frank Frankenfield

4. Roberto Alicea

5. Thiel Mont

6. Mike Begley

7. Darryl Myrick

8. Anita Armstead

9. Unnamed individual(s) who allegedly performed a site visit to Complainant's Residence on 2/20/2012. The identity of this individual has not been disclosed despite repeated Interrogatory Requests and per Pg. Nine of the Commission's Interim Order Dated 2/7/13. "Mr. Myrick" is employed as a back office representative of respondent and was Apparently not the individual dispatched to Respondent's location on 2/7/13 to

Perform a meter and other required tests Furthermore, Mr. Myrick is obviously not the individual who allegedly appeared at the Complainant's residence regarding the purported "high bill report".

Dated: 3/15/13



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

(Mailing Address)  
25 Parkside Drive  
Langhorne, PA 19047

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**MAR 15 2013**

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

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

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: Administrative Law

**ORDER**

Application GRANTED. So ORDERED this \_\_\_\_\_ day of

\_\_\_\_\_ 2013.

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Presiding Office

CERTIFICATION OF SERVICE

I, Richard J. Coppola, Jr., do hereby certify that a true and correct copy of **COMPLAINANT'S NOTICE OF DEPOSITION** 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: 3/15/13



---

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  
Philadelphia, PA 19101

Respondent

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**MAR 15 2013**

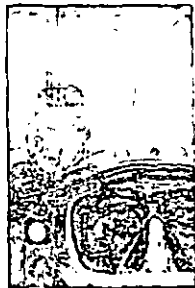
**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**



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*Underwater and Marine Services*

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

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**PA PUBLIC UTILITY COMMISSION  
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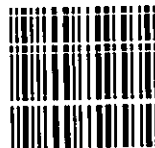


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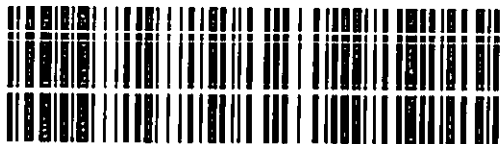
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