

Legal Department
2301 Market Street / S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Direct Dial: 215-841-6863

August 5, 2016

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

**RE: Cynthia Randall and Paul Albrecht v. PECO Energy Company
Docket No. C-2016-2537666**

Dear Ms. Chiavetta:

Enclosed for filing is PECO's Energy Company's Motion to Compel Answers to Discovery.

Very truly yours,



Ward L. Smith
Counsel for PECO Energy Company

WS/ab
Enclosure

cc: Christopher P. Pell, ALJ
Darlene D. Heep, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Cynthia Randall and Paul Albrecht

v.

PECO Energy Company

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Docket No. C-2016-2537666

NOTICE TO PLEAD

Pursuant to the discovery modifications in this case, you are hereby notified that you must reply to this Motion to Compel within 3 days. You must provide a full copy of answer to counsel for PECO and to the Commission and the Administrative Law Judges.

File with:

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

With a copy to:

Ward L. Smith
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, August 5, 2016



Ward L. Smith
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19101-8699
215-841-6863
Ward.Smith@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|------------------------------------------|---|-----------------------|
| Cynthia Randall and Paul Albrecht | : | |
| | : | |
| v. | : | C-2016-2537666 |
| | : | |
| PECO Energy Company | : | |

**PECO Energy Company's
Motion to Compel Answers to Discovery**

On May 11, 2016, PECO posed its Set I interrogatories to Complainants Cynthia Randall and Paul Albrecht. At that time, no discovery modifications were in place in this docket¹, objections were thus due within five days, and were due within twenty days. No objections were lodged, and no answers have been provided.

Eighty-six days have now passed. PECO has made repeated requests for status updates as to when these discovery questions will be answered. As of today, PECO has not even been able to elicit a status update from Complainant.

PECO therefore moves to compel answers to its Set I Interrogatories, within five days, and in support thereof states as follows:

1. On May 11, 2016, PECO served its Set I interrogatories on Complainants. A copy of the transmitting email and the Set I discovery questions are attached to this Motion as Exhibit 1. Set I is comprised of three questions regarding Complainants' use of cell phones and other devices, and seeking medical records.

¹ By later Prehearing Order, modified discovery rules were adopted, with a 10-day return on discovery.

2. On May 11, 2016, PECO also filed and served a transmittal letter and certificate of service for Sets I. A copy of the transmittal email and certificate are attached as Exhibit 2.
3. On May 16, 2016, the period for lodging objections expired. No objections were lodged.
4. On May 31, 2016, the then-in-place 20-day return date expired. No answers were provided.
5. On June 28, 2016, PECO sent a request for an update to Complainant's counsel. The email re-transmitted the discovery requests and asked, in relevant part: "I recognize that these questions were sent during a very busy time [during preparation for the Povacz hearing], but it has now been 48 days since these questions were asked. May I please have an update on when we can expect answers to them?" A copy of the June 28 email is attached as Exhibit 3.
6. On July 8, 2016, Mr. Lanza replied by email: "I received your emails regarding outstanding discovery responses in the different smart meter cases. I'm on vacation this week, but I will get you those answers when I return." A copy of Mr. Lanza's July 8 email is attached as Exhibit 4.
7. On July 19, 2016, PECO sent Complainant's counsel an email proposal for a joint schedule in the *Van Schoyck* matter.
8. On July 19, 2016, Mr. Lanza replied by email: "We would like to discuss the schedule for these cases and other issues with you soon. I will confer with Steve and we will circle back to you shortly." A copy of Mr. Lanza's July 19, 2016 email is attached as Exhibit 5.
9. On July 19, 2016, PECO replied with a request for a date for such discussion, inquiring and stating: "When can we expect that discussion to occur? I realize that you likely

have matters other than discovery that you want to roll into the discussion, but you are now deeply overdue on discovery answers – and even on updates on the status of discovery matters We need to hear from you this week [that is, by July 22] on discovery, even if the other agenda items need more time to ripen.” A copy of PECO’s July 19 email is attached as Exhibit 6.

10. PECO received no response to this request. On July 28, 2016 PECO sent Complainant’s counsel an email with the subject line: “pls call me.” It stated: “Ed: Pls call me. I’m going to have to start filing motions in the next day or so unless I hear something substantive from you ASAP. Please call me. 267-324-8426.” A copy of PECO’s July 28 email is attached as Exhibit 7. The number provided in the email was to Mr. Smith’s cell phone.

11. On July 28, 2016, Mr. Lanza replied by email: “Ward, no need to file the motions. I’ll call you tomorrow. Thanks.” A copy of Mr. Lanza’s July 28, 2016 email is attached as Exhibit 8.

12. On Friday, July 29, 2016 at 4:00 p.m., Mr. Lanza called Mr. Smith’s office phone and left a message with PECO administrative staff that he had called.

13. On Friday, July 29, 2016 at 4:30 p.m., Mr. Smith returned Mr. Lanza’s call. There was no answer, and Mr. Lanza’s voice mail box was full. PECO therefore sent the following email to Complainant’s counsel: “Ed: I see that I missed your call at 4:00. I just tried to leave you a voice message – you voice mail is full. Please call me back on my cell phone – 267-324-8426. I really need to talk today or this weekend.” A copy of PECO’s July 29 email is attached as Exhibit 9.

14. As of the date of the filing of the instant Motion, an additional seven days have passed since PECO’s most recent request for a status update on discovery. Complainant’s

counsel has not contacted Mr. Smith to discuss the discovery matters at issue through email or phone.²

15. Answers to these discovery questions were due 10 days after service.
16. PECO's Set III and Set IV discovery were served 86 days ago today.
17. PECO respectfully submits that it has exhausted all reasonable efforts to resolve this discovery dispute informally between the parties.

WHEREFORE:

PECO respectfully requests that Your Honors issue an Order requiring Complainant to provide full and complete answers to PECO's Set III and Set IV discovery within five calendar days of the issuance of such Order.

Respectfully submitted,



Ward Smith
Assistant General Counsel
PECO Energy Company
215-841-6863
ward.smith@exeloncorp.com

August 5, 2016

² Mr. Lanza did communicate with Ms. Lee by email on several occasions during that week to coordinate the relocation of the Tucker meter.

Exhibit 1

Smith, Ward L:(PECO)

From: Smith, Ward L:(PECO)
Sent: Wednesday, May 11, 2016 1:25 PM
To: 'Edward Lanza'
Cc: 'Tom Watson'; Lee, Shawane L.:(PECO)
Subject: Cynthia Randall and Paul Albrecht v. PECO, C-2016-2537666, PECO Discovery, Set I, Qs 1-3 (Substance)
Attachments: C2537666_Rogs_RPDs_Set_I.PDF

Ed:

A copy of PECO's Discovery, Set I, Qs 1-3, is attached.

Ward



**PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

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Your filing has been electronically received. Upon review of the filing for conformance with the Commission's filing requirements, a notice will be issued acknowledging such compliance and assigning a Docket Number. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

Print this page for your records. The date filed on will be the current day if the filing occurs on a business day before or at 4:30 PM Harrisburg, PA time. It will be the next business day if the filing occurs after 4:30 PM Harrisburg, PA time or on weekends or holidays.

If your filing exceeds 252 pages, you are required to submit a paper copy of the filing within 3 business days of submitting the electronic filing. This paper copy can be mailed to: Secretary, Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, 2nd Floor, Harrisburg, PA 17120. Please print a copy of this page and attach it to the paper copy of your filing as the first page.

| eFiling Confirmation | |
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| Docket Number: | C-2016-2537666 |
| Description: | Cynthia Randall and Paul Albrecht - PECO Energy Company Certificate of Service - Interrogatories and Request for Production - Set 1 |
| Transmission Date: | 5/11/2016 1:08:01 PM |
| Filed On: | 5/11/2016 1:08:01 PM |
| eFiling Confirmation Number: | 1633079 |

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| Cynthia Randall - Certificate of Service.pdf | Other Filing | Certificate of Service |



An Exelon Company

Legal Department
2301 Market Street / S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Direct Dial: 215-841-6863

May 11, 2016

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

RE: Cynthia Randall and Paul Albrecht v. PECO Energy Company
Docket No. C-2016-2537666

Dear Ms. Chiavetta:

Enclosed for filing is a Certificate of Service demonstrating that this day PECO served its Interrogatories and Requests for Production of Documents, Set I, Qs. 1-3 in this proceeding.

Very truly yours,

A handwritten signature in cursive script that reads "Ward L. Smith".

Ward L. Smith
Counsel for PECO Energy Company

WS/ab
Enclosure

cc: Christopher P. Pell, ALJ (w/out encl)
Darlene D. Heep, ALJ (w/out encl)
Certificate of Service (w/enc)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Cynthia Randall and Paul Albrecht

v.

PECO Energy Company

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Docket No. C-2016-2537666

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 55.42, you are hereby notified that you must object, within 5 days or provide written responses to the enclosed Interrogatories and Request for Production of Documents, Set 1, within 20 days from service of this notice. You must provide a full copy of any objection or answer to counsel for PECO. If you serve an objection or answers, you may not file the substance of such objection or answer with the Commission or the Administrative Law Judge; however, you must file a certificate of service with the Secretary of the Pennsylvania Public Utility Commission with the Administrative Law Judge, evidencing the service of such objection or answers on PECO.

File with:

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

With a copy to:

Ward L. Smith
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103

Dated at Philadelphia, PA, May 11, 2016



Ward L. Smith
Counsel for PECO Energy Company
2301 Market Street S-23
Philadelphia, PA 19101-8699
215-841-6863
Ward.Smith@exeloncorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Cynthia Randall and Paul Albrecht

v.

PECO Energy Company

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C-2016-2537666

**PECO Energy Company's
Interrogatories and Requests for Production of Documents,
Set I**

Respondent PECO Energy Company ("PECO") hereby submits the following Interrogatories and Requests for Production of Documents, Set I, upon Complainants Cynthia Randall and Paul Albrecht, to be answered separately and fully in writing and in accordance with 52 Pa. Code §§ 5.341 and 5.349 of the rules and regulations of the Pennsylvania Public Utility Commission.

PECO Interrogatory I-1:

Please identify the type (with make and model) of all devices, appliances, and equipment used in Complainant's home that produce radio-frequency fields, including cell phones, microwave ovens, wireless internet access, and WIFI routers.

PECO Interrogatory I-2:

For each cell phone identified in response to PECO Interrogatory I-1, please provide six months of phone bills or other usage records for the phone with sufficient detail to show actual usage for that period.

PECO Interrogatory I-3:

Please provide all medical records that meet any of the following criteria:

- (a) Any medical record that states that Complainant, or any resident in Complainant's household, has a medical or health condition that was caused by exposure to radiofrequency fields
- (b) Any medical record that states that Complainant, or any resident in Complainant's household, has a medical or health condition that was exacerbated by exposure to radio frequency fields;
- (c) Any medical record that states that exposure to radio frequency fields could cause Complainant, or any resident in Complainant's household, to develop a new medical or health condition;
- (d) Any medical record that states that exposure to radio frequency fields could exacerbate any existing medical or health condition of Complainant, or any resident in Complainant's household;
- (e) Any medical record that states that Complainant, or any resident in Complainant's household, has sensitivity or hypersensitivity to electromagnetic fields, radio frequency fields, or any similar diagnosis (a "Sensitivity Diagnosis").
- (f) If there is no medical record setting forth the Sensitivity Diagnosis, please state the first date on which such Sensitivity Diagnosis was made by a medical professional, and state the name and address of the medical professional who rendered that diagnosis.
- (g) For each member of Complainant's household with a Sensitivity Diagnosis, please describe and provide a copy of the results of all diagnostic tests that support the Sensitivity Diagnosis.

(h) For each member of Complainant's household with a Sensitivity Diagnosis, please describe the symptoms experienced by that person, and state the date (by approximate month and year) that the individual first began to experience those symptoms.



Ward Smith
Assistant General Counsel
PECO Energy Company
215-841-6863
ward.smith@exeloncorp.com

May 11, 2016
Date:

Shawane Lee
Assistant General Counsel
PECO Energy Company
215-841-6841
shawane.lee@exeloncorp.com

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Cynthia Randall and Paul Albrecht

v.

PECO Energy Company

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:
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:
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Docket No. C-2016-2537666

CERTIFICATE OF SERVICE

I, Ward L. Smith, hereby certify that I have this day served a copy of PECO Energy Company's Interrogatories and Requests for Production of Documents, Set I via e-mail to:

Ed Lanza, Esquire
The Lanza Firm, LLC
P.O. Box 61336
Harrisburg, PA 17105

Dated at Philadelphia, Pennsylvania, May 11, 2016



Ward L. Smith
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19101-8699
(215) 841-6863
Fax: 215.568.3389
Ward.Smith@exeloncorp.com

Exhibit 2

Smith, Ward L:(PECO)

From: Smith, Ward L:(PECO)
Sent: Wednesday, May 11, 2016 1:23 PM
To: 'Heep, Darlene'; 'Pell, Christopher'; 'Edward Lanza'
Cc: 'Tom Watson'; Lee, Shawane L.:(PECO)
Subject: Cynthia Randall and Paul Albrecht v. PECO, C-2016-2537666, PECO Discovery, Set I, Qs 1-3 (Proof of Service)
Attachments: Cynthia Randall - Certificate of Service.pdf

Your Honors and Mr. Lanza

Today PECO served its discovery (Set 1, Qs. 1-3) in this matter. A transmittal letter and certificate of service evidencing that service are attached.

A full copy with the substance of the questions will be forwarded to Mr. Lanza separately.

Ward Smith



PENNSYLVANIA
PUBLIC UTILITY COMMISSION

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Print this page for your records. The date filed on will be the current day if the filing occurs on a business day before or at 4:30 PM Harrisburg, PA time. It will be the next business day if the filing occurs after 4:30 PM Harrisburg, PA time or on weekends or holidays.

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| Docket Number: | C-2016-2537666 |
| Description: | Cynthia Randall and Paul Albrecht - PECO Energy Company Certificate of Service - Interrogatories and Request for Production - Set I |
| Transmission Date: | 5/11/2016 1:08:01 PM |
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May 11, 2016

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

**RE: Cynthia Randall and Paul Albrecht v. PECO Energy Company
Docket No. C-2016-2537666**

Dear Ms. Chiavetta:

Enclosed for filing is a Certificate of Service demonstrating that this day PECO served its Interrogatories and Requests for Production of Documents, Set I, Qs. 1-3 in this proceeding.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ward L. Smith".

Ward L. Smith
Counsel for PECO Energy Company

WS/ab
Enclosure

cc: Christopher P. Pell, ALJ (w/out encl)
Darlene D. Heep, ALJ (w/out encl)
Certificate of Service (w/enc)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Cynthia Randall and Paul Albrecht

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Docket No. C-2016-2537666

CERTIFICATE OF SERVICE

I, Ward L. Smith, hereby certify that I have this day served a copy of PECO Energy Company's Interrogatories and Requests for Production of Documents, Set I via e-mail to:

Ed Lanza, Esquire
The Lanza Firm, LLC
P.O. Box 61336
Harrisburg, PA 17106

Dated at Philadelphia, Pennsylvania, May 11, 2016



Ward L. Smith
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19101-8699
(215) 841-6863
Fax: 215.568.3389
Ward.Smith@exeloncorp.com

Exhibit 3

Smith, Ward L:(PECO)

From: Smith, Ward L:(PECO)
Sent: Tuesday, June 28, 2016 3:31 PM
To: 'Edward Lanza'
Cc: Diaz Jr, Romulo L:(PECO); Lee, Shawane L.:(PECO); 'Tom Watson'
Subject: Randall v PECO -- Request for Status Update on Discovery Answers
Attachments: C2537666_Rogs_RPDs_Set_I.PDF

Ed:

On May 11, 2016, PECO served the attached discovery requests on Ms. Randall (via email to you).

At that time, I don't believe the Randall matter had discovery modifications, so these questions had a 20-day reply, and thus were due on May 31.

I recognize that these questions were sent during a very busy time, but it has now been 48 days since these questions were posed. May I please have an update on when we can expect answers to them?

Thanks.

Ward

Exhibit 4

Smith, Ward L:(PECO)

From: Edward Lanza <ed@lanzafirm.com>
Sent: Wednesday, July 06, 2016 3:37 PM
To: Smith, Ward L:(PECO)
Cc: Steve Harvey
Subject: [EXTERNAL] Outstanding Discovery - Smart Meter Cases

Ward,

I received your emails regarding outstanding discovery responses in the different smart meter cases. I'm on vacation this week, but I will get those answers to you when I return.

Thanks,

Ed

The Lanza Firm, LLC
P.O. Box 61336
Harrisburg, PA 17106
(717) 576-2696
www.lanzafirm.com

Exhibit 5

Smith, Ward L:(PECO)

From: Edward Lanza <ed@lanzafirm.com>
Sent: Tuesday, July 19, 2016 5:58 PM
To: Steve Harvey; Smith, Ward L:(PECO)
Cc: Lee, Shawane L:(PECO); Tom Watson; Curt Renner
Subject: RE: Van Schoyck v PECO C-2015-2478239

Thanks, Ward.

We would like to discuss the schedule for these cases and other issues with you soon. I will confer with Steve and we will circle back shortly.

Ed

THE LANZA FIRM, LLC
P.O. Box 61336
Harrisburg, PA 17106-1336
(717) 576-2696

---- Smith, Ward L:(PECO) wrote ----

Counsel:

The purpose of this email is to discuss interim scheduling issues in the *Van Schoyck* matter.

As you know, in their April 8, 2016 Prehearing Order, the ALJs previously set forth a schedule for this proceeding that was predicated on the previously scheduled but now inoperative July 26-27 hearing dates. That schedule was:

May 19: Settlement discussions (we had a couple of discussions, but remain open to more)

May 24: Expert witness identification (we exchanged expert witness identification on this date per the schedule. See attached).

May 31: Dispositive Motions

July 12: Exhibit exchange

July 22: Stipulations

On April 19, we jointly proposed that the above schedule be superceded by the following schedule for the exchange of written testimony:

Van Schoyck Direct -- June 9

PECO Rebuttal -- June 30

Van Schoyck Surrebuttal -- July 18

Hearing -- July 26-27

As you know, that schedule also became inoperative.

On June 21, by email, the ALJs informed us that we would not be using written testimony in *Van Schoyck* and that "Prehearing Orders in *Van Schoyck* and *Randall* will contain deadlines for exchange of expert reports."

We subsequently received a new Prehearing Order in *Randall* (attached), but not *Van Schoyck*. We could just ask the ALJs to issue a template Prehearing Order #2 in *Van Schoyck* based on the *Randall* template, but I would prefer to translate the *Randall* template to a concrete schedule, and then jointly propose those dates.

The *Randall* prehearing has six key deadlines, each designated as "x days before hearing." Based on the *Randall* instructions that we have a ten-day return on discovery and that "the timing of discovery requests must allow time for responses" prior to the end of the discovery period, I've interpolated an additional deadline for the final day to pose discovery. That results in the following:

70 days: expert witness id

50 days: exchange expert reports

40 days: ask final discovery (really, 10 days prior to close of discovery, which itself can vary with weekends; interposed by me)

30 days: discovery closes

20 days: settlement conference

15 days: exhibit exchange

5 days: stipulations

If I make that concrete for *Van Schoyck*, based on the scheduled October 23 start of hearings, and taking into consideration the days on which the deadline falls on a weekend, we get the following:

Expert witness id – complete

Monday, September 5: exchange expert reports

Wednesday, September 16: ask final discovery

Monday, September 26: discovery closes

Tuesday, Oct. 4: settlement conference

Monday, Oct. 10: exchange exhibits

Wednesday, Oct. 19: stipulations

May I have your comments and concurrence at your earliest convenience?

Ward

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Exhibit 6

Smith, Ward L:(PECO)

From: Smith, Ward L:(PECO)
Sent: Tuesday, July 19, 2016 8:15 PM
To: 'Edward Lanza'; 'Steve Harvey'
Cc: Lee, Shawane L.:(PECO); 'Tom Watson'; 'Curt Renner'
Subject: RE: Van Schoyck v PECO C-2015-2478239

Ed:

Thanks.

When can we expect that discussion to occur?

I realize that you likely have matters other than discovery that you want to roll into the discussion, but you are now deeply overdue on discovery answers – and even on updates on the status of discovery answers -- in *Van Schoyck*, *Murphy*, and *Randall/Albrecht*. We need to hear from you this week on discovery, even if the other agenda items need more time to ripen.

W

From: Edward Lanza [<mailto:ed@lanzafirm.com>]
Sent: Tuesday, July 19, 2016 5:58 PM
To: Steve Harvey; Smith, Ward L:(PECO)
Cc: Lee, Shawane L.:(PECO); Tom Watson; Curt Renner
Subject: RE: Van Schoyck v PECO C-2015-2478239

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THE LANZA FIRM, LLC
P.O. Box 61336
Harrisburg, PA 17106-1336
(717) 576-2696

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Wednesday, Oct. 19: stipulations

May I have your comments and concurrence at your earliest convenience?

Ward

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Exhibit 7

Smith, Ward L:(PECO)

From: Smith, Ward L:(PECO)
Sent: Thursday, July 28, 2016 2:21 PM
To: 'Edward Lanza'
Subject: pls call me

Ed:

Pls call me. I'm going to have start filing motions in the next day or so unless I hear something substantive from you ASAP. Please call me.

267-324-8426

W

Exhibit 8

Smith, Ward L:(PECO)

From: Edward Lanza <ed@lanzafirm.com>
Sent: Thursday, July 28, 2016 7:15 PM
To: Smith, Ward L:(PECO)
Subject: RE: pls call me

Ward,
No need to file motions.
I'll call you tomorrow.
Thanks,

Ed

THE LANZA FIRM, LLC
P.O. Box 61336
Harrisburg, PA 17106-1336
(717) 576-2696

----- Smith, Ward L:(PECO) wrote -----

Ed:

Pls call me. I'm going to have start filing motions in the next day or so unless I hear something substantive from you ASAP. Please call me.

267-324-8426

W

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Exhibit 9

Smith, Ward L:(PECO)

From: Smith, Ward L:(PECO)
Sent: Friday, July 29, 2016 4:33 PM
To: 'Edward Lanza'
Subject: Pls call

Ed:

I see that I missed your call at 4:00. I just tried to leave you a voice message – your voice mail is full.

Please call back on my cell phone. 267-324-8426. I really need to talk today or this weekend.

W

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Cynthia Randall and Paul Albrecht :
 :
 v. : Docket No. C-2016-2537666
 :
 PECO Energy Company :
 :

CERTIFICATE OF SERVICE

I, Ward L. Smith, hereby certify that I have this day served a copy of PECO'S Energy Company's Motion to Compel Answers to Discovery in the above matter upon all interested parties via e-mail and postage prepaid to:

Via Electronic Mail
Ed Lanza, Esquire
The Lanza Firm, LLC
P.O. Box 61336
Harrisburg, PA 17106

Dated at Philadelphia, Pennsylvania, August 5, 2016



Ward L. Smith
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19101-8699
(215) 841-6863
Fax: 215.568.3389
Ward.Smith@exeloncorp.com