



An Exelon Company

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August 25, 2020

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

**RE: Emergency Order re: Establishing Public Utility Service Termination Moratorium
Docket No. M-2020-3019244**

Dear Ms. Chiavetta:

A copy of the **Answer of PECO Energy Company to the Joint Petition of TURN and CAUSE-PA et al. for Due Process Relief** is enclosed for filing. A Certificate of Service precedes PECO's filing.

Very truly yours,

Ward L. Smith

Ward Smith
Counsel for PECO Energy Company

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Emergency Order Re: Establishing Public Utility : M-2020-3019244
Service Termination Moratorium :

CERTIFICATE OF SERVICE

I, Ward L. Smith, hereby certify that I served a copy of the **Answer of PECO Energy Company to the Joint Petition of TURN and CAUSE-PA *et al.* for Due Process Relief**, via email, on:

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Dated August 25, 2020

Ward L. Smith

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Emergency Order Re: Establishing Public Utility : M-2020-3019244
Service Termination Moratorium :

**ANSWER OF PECO ENERGY COMPANY TO
THE JOINT PETITION OF TURN AND CAUSE-PA, *ET AL.*
FOR DUE PROCESS RELIEF**

Pursuant to 52 Pa. Code § 5.61, PECO Energy Company (“PECO”) hereby responds to the Joint Petition for Due Process Relief (“Joint Petition”) filed on August 5, 2020 by the Tenant Union Representative Network, Action Alliance of Senior Citizens of Greater Philadelphia and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (collectively, the “Low Income Advocates”). In the Joint Petition, the Low Income Advocates contend that the Pennsylvania Public Utility Commission (the “Commission”) should not lift its emergency moratorium on service terminations for all utility customers unless and until it conducts an on-the-record proceeding.

The Energy Association of Pennsylvania (“EAP”) is contemporaneously filing a substantive Answer to the Joint Petition.¹ PECO supports and adopts the EAP’s Answer. Rather than repeating the EAP’s arguments and position, PECO hereby incorporates the EAP’s Answer as though fully set forth herein.

¹ The Joint Petition was not served on PECO. Service was affected on EAP, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Commission’s Bureau of Investigation and Enforcement.

In addition, PECO wishes to inform the Commission that, if the Commission convenes an on-the-record proceeding in this docket, PECO intends to file a Petition to Intervene in that proceeding and to fully participate in any such on-the-record proceeding.

CONCLUSION

For the reasons stated in the EAP's Answer and incorporated herein, PECO requests that the Commission deny the relief requested in the Joint Petition.

Respectfully submitted,

Ward L. Smith

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Jack R. Garfinkle (Pa. No. 81892)
Ward L. Smith (Pa. No. 47670)
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Date: August 25, 2020