

Illinois Commerce Commission

Qi Ji Liu, )  
vs )  
Commonwealth Edison Company ) No: 12-0374  
Complaint as to billing/charges in Chicago ) Hon. Heather Jorgenson

**COMPLAINANT'S PROPOSED REQUESTS FOR ADMISSIONS**  
**FROM COMMONWEALTH EDISON COMPANY ("COMED")**

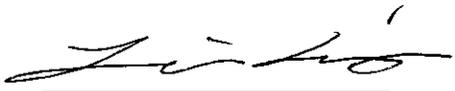
Complainant, Qi Ji Liu hereby, pursuant to Rule 201 of Illinois Supreme Court, requests that Commonwealth Edison Company ("ComEd") to respond to these Requests for Admissions within twenty-eight (28) days after service of the Requests for Admissions.

1. Plaintiff has incorporated instructions into the first set of request for admission.  
See Exhibit A.
2. ComEd has no legitimate reason to assign a new account number 9075113100 for Complainant in 2010.
3. For more than four years Complainant has been lived at the present address 2913 S. Union Chicago IL 69616. Complainant had neither called ComEd on August 16, 2010, nor had he moved from the above-mentioned location.
4. It is a deliberate false statement in writing from ComEd that it contended a "new tenant" moved in 2913 S. Union Ave. Chicago IL60616 on August 16, 2010.

5. ComEd can never submit a copy of a bill issued to such "new tenant" starting on August 16, 2010, because neither such a bill nor such a "new tenant" is of existence. The sole purpose of the deliberate false argument on this issue from ComEd is to deceive the Illinois Commerce Commission ("the ICC").
6. ComEd has no legitimate or any reason to "close" the account number 9075113084 for Complainant on August 16, 2010.
7. The account number 9075113084 is not closed, as ComEd continued using it to receive and transfer payments from February of 2011 to this day. The sole purpose of ComEd's fraudulent contention on this issue is to deceive the ICC.
8. From February 2011 to this day, ComEd sends incorrect, confusing, misleading bills with intent to overcharge a consumer in violation of 815 ILCS 505/2 et. seq.
9. In its written response submitted to the ICC, ComEd claims that it had issued a refund check to Complainant. And in more than one year, over the phone, ComEd repeated the same wanton and false argument on numerous occasions by contending it issued several refund checks to Complainant already. All these statements from ComEd are completely false.
10. In 2011 and 2012, ComEd, knowingly and willingly, sends Complainant incorrect, misleading, and fraudulent bills with intent to overcharge a consumer. The accumulated dollar amount exceeds \$500 or more when all erroneous billings from ComEd are accounted for and added up.

11. The current customer records, billing records, billing software, billing practice and customer service at ComEd create errors, confusion, inconvenience and frustration for consumers. This is in violation of 220 ILCS 5/8-101 et. seq..
12. Wanton and deliberate false responses from ComEd to the ICC are in violation of 83 Ill. Admin. Code 280.160 and 220 ILCS 5/5-101 et. seq.
13. Even as of this day, ComEd is still overcharging and double-billing Complainant.
14. At the August 28, 2012 hearing, in order to get permission for filing, ComEd states that a motion to dismiss will be submitted based on Statute of Limitation.
15. The phrase of "statute of limitation" cannot be found anywhere in Respondent's motion to dismiss. It is a fact ComEd and its lawyer provided a frivolous, false or deceptive statement from the start, in front of an Administrative Law Judge.

Respectfully submitted,



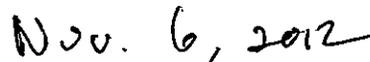
(Complainants Signature)

Qi Ji Liu

3121 S. Union Ave.

Chicago, IL 60616

Tel: (312) 225-4401



(Date)

Illinois Commerce Commission

Qi Ji Liu, )  
vs )  
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**COMPLAINANT'S PROPOSED INTERROGATORIES**  
**TO COMMONWEALTH EDISON COMPANY**

Complainant Qi Ji Liu respectfully requests, pursuant to Rule 201 of Illinois Supreme Court, that Commonwealth Edison Company ("ComEd") answers the following interrogatories.

**Interrogatories No. 1** Please state the name, address, telephone number, and relationship to the Respondent of each person who prepared or assisted in the preparation of the response to these interrogatories. See INSTRUCTION #1. (Do not identify any one who simply typed or reproduced the responses.)

**Interrogatories No. 2** Have Respondent and its lawyer ever stated ComEd will file a motion to dismiss based on "statute of limitation" before and at the August 28, 2012

hearing? If so, please identify where the phrase of "statute of limitation" is in the subject motion.

**Interrogatories No. 3** Did Respondent have any factual and/or legal ground for each time it entered "denied," "lack information" in its Response to the Request for Admission? If so, identify the paragraph number in each document, and for each of all paragraphs in your Response, provide specific facts or reasons in support your denials and assertions of lacking information.

**Interrogatories No. 4** Please provide the dates and total dollar amounts, month by month, ComEd demanded Complainant to pay in all and each of the bills from February of 2011 to this day.

**Interrogatories No. 5** Please provide the dates and dollar amounts ComEd charged Complainant for monthly electric usage, month by month, in all and each of the bills from February of 2011 to this day. What is the total dollar amount when all the charges for monthly electric usage in these bills are added up?

**Interrogatories No. 6** Please provide the dates and dollar amounts ComEd received from Complainant's payments via account numbers 8830614016, 9075113100, 9075113084 respectively. What is the total dollar amount when all these payments are added up?

**Interrogatories No. 7** Identify the "new tenant" ComEd referred in its motion to dismiss. Can ComEd provide a copy of a single electric bill issued to such a "new tenant" starting from 08/16/2010? If so, please do it; otherwise, explain why.

**Interrogatories No. 8** Identify the employee that ComEd asserted he/she had talked to the “new tenant” and “closed” Complainant account on August 16, 2010. Can ComEd provide his/her verified statement in support of ComEd contention in its motion to dismiss? If so, please do it; otherwise, explain why.

**Interrogatories No. 9** Has ComEd ever created or issued any refund checks to Complainant? If so, please provide copies of all and any of the refund checks ComEd created and issued to the Complainant from February of 2011 to this day.

**Interrogatories No. 10** Identify any ComEd employees, who informed Complainant that he could talk to a supervisor at ComEd, or, contact Illinois Commerce Commission when he was not satisfied with ComEd’s response from August of 2011 to this day.

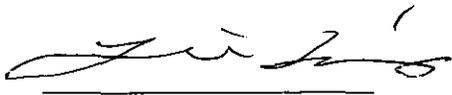
**Interrogatories No. 11** Does ComEd have any legal and factual ground for a meaningful defense and filing an Answer? If so, when an Answer is filed, please provide any factual and/or legal ground for each time it entered “denied,” “lack information” in its Answer. If ComEd prefers to submit a separate response to this Interrogatory immediately after filing an Answer, please identify the paragraph number in your Answer, and for each of all paragraphs in your Answer, provide specific facts or reasons in support your denials and assertions of lacking information.

**Interrogatories No. 12** Pursuant to Illinois Supreme Court Rule 213(f) provide the name and address of each witness who will testify for ComEd.

**Interrogatories No. 13** Has ComEd ever been a party in legal proceedings at Illinois Commerce Commission or in a court in the past two years? If so, describe all

proceedings to which ComEd has been a party. Such description should include the case number, identification of all parties, and current status of such legal proceedings.

Respectfully submitted,



(Complainant's Signature)

Nov. 6, 2012

(Date)

Qi Ji Liu

2913 S. Union Ave.

Chicago, IL 60616

Tel: (312) 225-4401

**Illinois Commerce Commission**

Qi Ji Liu, )  
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**COMPLAINANT’S PROPOSED REQUEST FOR PRODUCTION OF DOCUMENTS**

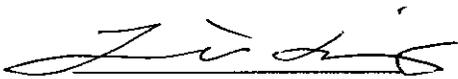
Pursuant to Illinois Supreme Rule 201, Complainant, Qi Ji Liu, requests Respondent Commonwealth Edison Company (“ComEd” ) for copying and inspection, the following documents within 28 days of service. In responding to this Request for Production of Documents, please consult and adhere to the definition and instructions attached as Exhibit A, please pay special attention to the definition of the terms, such as “identify”, “document(s)” and “person(s)”.

1. Produce true and genuine copies of all authentic documents used by ComEd to answer Complainant’s Requests for Admissions, and Interrogatories.
2. Produce copies of any and all authentic additional documents used by ComEd in support of its defense on this subject matter.
3. Produce authentic copies of all and any of the bills, month by month, ComEd sent to Complainant Qi Ji Liu from February of 2010 to this day.

4. Produce authentic copies of all documents which reflect each customer name, each billing address, each mailing address and each effective date for account numbers 8830614016, 9075113100, and 9075113084 respectively.
5. Produce authentic copies of all documents which show ComEd received Complainant's payments, month by month, on each account number of 8830614016, 9075113100, and 9075113084 from February of 2010 to this day.
6. Produce authentic copies of any and all refund checks ComEd created, issued or mailed to Complainant Qi Ji Liu as ComEd repeatedly claimed, orally or in writing.
7. Produce all authentic documents, which support Respondent's written response to the informal complain that: "On 08/19/10 ComEd was notified a new tenant was moving to your promise address..."
8. Produce the name of the "new tenant" Respondent claimed in its written response to Complainant's informal complaint or ICC's inquires, and produce a copy of the electric bill issued to the same "new tenant" starting from 08/19/10.
9. Produce authentic copies of any and all authentic oral and written communication records between ComEd and Complainant from September of 2010 to this day.
10. Produce any and all authentic documents which reflect the requirement(s) or procedure for Respondent ComEd to close a customer account.
11. Produce any and all authentic documents which reflect the requirement(s) or procedure for Respondent ComEd to open a customer account.

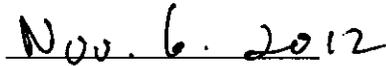
12. Produce authentic document(s) which shows the definition of a closed account at ComEd. And produce any and all documents which support the practice that Respondent can still be allowed to receive, cash in and transfer payments from an account which Respondent ComEd had been claimed as closed.

Respectfully submitted,



(Complainant's Signature)

Qi Ji liu



(Date)

3121 S. Union Ave

Chicago, IL 60616

Tel: (312) 225-4401

**Illinois Commerce Commission**

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**Exhibit A**

**INSTRUCTIONS AND DEFINITION FOR COMPLAINANT'S PROPOSED  
INTERROGATORIES, REQUESTS FOR PRODUCTION,  
AND REQUESTS FOR ADMISSION**

Complainant, Qi Ji Liu hereby requests that Commonwealth Edison Company ("ComEd"), pursuant to Rule 201 of Illinois Supreme Court,

Answer the Interrogatories set forth herein; produce the documents designated below for inspection and copying; and respond to these Requests for Admissions within twenty-eight (28) days.

These Interrogatories, Requests for Production and Requests for Admissions are deemed to be continuing to the full extent permissible pursuant to Rule 213 of Illinois Supreme Court Rules.

## INSTRUCTIONS

1. "You," "ComEd.," shall refer to the Respondent Commonwealth Edison Company., Respondent's employees, including former employees, or agents.
2. The "ICC" shall refer to the Illinois Commerce of Commission
3. Complainant refers to Qi Ji Liu.
4. Each answer must be as complete and straightforward as the information reasonably available to you, ComEd., or anyone acting on your behalf, permits. "YOU, OR ANYONE ACTING ON YOUR BEHALF" includes you, your agents, your employees, your attorneys, your accountants, your consultants and expert witnesses, and anyone else acting on your behalf.
5. If an Interrogatory cannot be answered completely, answer it to the extent possible. If you do not have enough personal knowledge to fully answer an Interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations.
6. Whenever an Interrogatory may be answered by referring to a document (such as business records), the document(s) may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the Interrogatory can be found.
7. In the event that ComEd objects to answering any of the Interrogatories, producing any of the documents requested or responding to any of the Requests for Admissions, Respondent should state the precise ground(s) for each

objection and the basis for asserting that such ground is applicable. Such statement should be made separately for each Interrogatory, Request for Production and Request for Admission with respect to which Respondent asserts an objection.

8. If any information or document responsive to any of the following Interrogatories, Requests for Production, or Request for Admissions is withheld under a claim of privilege, describe or identify:
  - A. The subject matter of any information or communication withheld, and
  - B. The format and date of such communication, and
  - C. All Parties to such communication, or others who may have records of same, and
  - D. The precise nature of any privilege under which it is withheld, and
  - E. The Party asserting the privilege, and
  - F. The Party /Attorney /custodian /other person bound by the privilege.
9. If Respondent exercises the option to produce business records in lieu of responding to any Interrogatory, the following procedure is to be employed:
  - A. In response to such Interrogatory, please identify and attach the records containing the information;
  - B. In producing such record(s), Respondent shall produce such record(s) separately and designate the Interrogatory to which such record(s) corresponds.

10. Complainant requests that the documents specified below in the Request for Production of Documents be produced at Qi Ji Liu, 2913 S. Union Ave, Chicago, IL 60616, within twenty-eight (28) days from service of these Interrogatories, Request for Production of Documents, and Request for Admissions, and on successive dates thereafter until Complainant's inspection and copying has been completed.
11. For each REQUEST FOR ADMISSION, please ADMIT or DENY such requests. For each DENIAL of such REQUEST, please specify each and every basis for such DENIAL, and fully disclose and explain such facts as support such DENIAL.

#### **DEFINITIONS**

1. "Document" means any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, regardless of origin and location, any book, pamphlet, periodical, letter, memorandum (including any memorandum or report of a meeting or conversation), invoice, bill, order form, receipt, financial statement, accounting entry, diary, calendar, telex, telegram, cable, report, record, contract, agreement, study, handwritten note, draft, working paper, chart, paper, print, laboratory record, drawing, sketch, graph, index, list, tape, photograph, microfilm, data sheet or data processing card, or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced, which is in your possession, custody or control, or which was, but is no longer, in your possession, custody or control.

2. "Person" means any individual or entity, including, but not limited to, partnership(s), association(s), corporation(s), principal, agent, government institution, or other.
3. "And/or" shall each be construed disjunctively or conjunctively so as to require the broadest possible production in response to any given Interrogatory.
4. "Describe" means to set forth specifically and in detail all facts known about the matter of which the Interrogatory requires.
5. "Identify" when used with reference to a natural person, means to state each of the following:
  - A. The person's full name;
  - B. The person's present residential address; and
  - C. His present employer, title, substantive responsibilities, business address, his immediate supervisor, and the designation of the office or department in which the person is employed.
6. "Identify" when used in reference to a document, means to state each of the following:
  - A. The nature of the document (e.g., letter of memorandum);
  - B. Its title or caption;
  - C. Its date;
  - D. The name, title, and employer of each author of the document at the time the document was written;

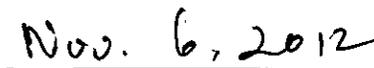
- E. At the time the document was written, the name, title, and employer of each person to receive the document, or to whom a copy thereof was distributed;
- F. The present location of the document; and
- G. The name and address of the person in whose custody or control the document is currently held.

Respectfully submitted,



(Complainant's Signature)

Qi Ji Liu



(Date)

2913 South Union Ave.

Chicago, IL 60616

Tel: (312) 225-4401