



Duquesne Light

Our Energy...Your Power

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Krycia Kubiak
Assistant General Counsel

November 30, 2010

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Neville Island Supply v. Duquesne Light Company
Docket No. C-2009-2132987

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's Motion to Compel Discovery. A copy of this document has been served upon Complainant's counsel in accordance with Commission regulations.

Sincerely,

Krycia Kubiak
Assistant General Counsel
Duquesne Light Company

encs

cc: James R. Cooney, Esquire (w/enclosure)
Administrative Law Judge John H. Corbett, Jr. (w/enclosure)

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

NEVILLE ISLAND SUPPLY)	
)	
Complainant,)	
)	
v.)	Docket No. C-2009-2132987
)	
DUQUESNE LIGHT COMPANY,)	
)	
Respondent.)	

**RESPONDENT'S DUQUESNE LIGHT COMPANY'S
MOTION TO COMPEL DISCOVERY**

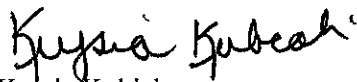
TO THE HONORABLE COMMISSION:

NOW comes Respondent Duquesne Light Company, by and through its attorney Krysia Kubiak, and files this Motion to Compel Discovery:

1. Respondent Duquesne Light Company served its Interrogatories on Complainant Neville Island Supply by first-class mail on October 29, 2010. See Exhibit 1.
2. Respondent's Requests for Documents were within the permissible scope of discovery detailed in 52 Pa. Code §5.321(c).
3. Commission Regulation 5.342(d), 52 Pa. Code §5.342(d), provides that the party upon whom the request is served shall serve a written response within 20 days after the service of the request.
4. Commission Regulation 5.342(e), 52 Pa. Code §5.342(e), provides that the objecting party shall serve objections within ten days of service of the interrogatories.
5. Respondent received no response and no objection to its requests for documents.

WHEREFORE, Respondent requests that the Commission compel Complainant to fully and completely answer said document requests forthwith.

Respectfully submitted,

A handwritten signature in black ink that reads "Krysia Kubiak". The signature is written in a cursive, flowing style.

Krysia Kubiak
Attorney for Respondent
Duquesne Light Company
411 7th Avenue (16-1)
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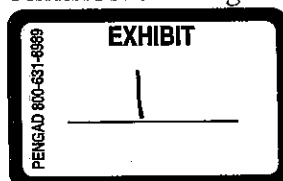
Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

NEVILLE ISLAND SUPPLY,)
)
Complainant,)
)
v.) Docket No. C-2009-2132987
)
DUQUESNE LIGHT COMPANY,)
)
Respondent)

**RESPONDENT DUQUESNE LIGHT COMPANY'S
INTERROGATORIES**

TO THE HONORABLE COMMISSION:

AND NOW comes Respondent Duquesne Light Company, by and through its attorney Krysia Kubiak, and files these Interrogatories in accordance with Commission Regulation 5.341, 52 Pa. Code § 5.341. In accordance with Commission Regulation 5.342(d), 52 Pa. Code § 5.342(d), Complainant shall serve answers on Respondent 20 days after service. In accordance with Commission Regulation 3.342(a), 52 Pa. Code § 5.342(a), answers to interrogatories must (1) be in writing, (2) identify the name and position of the individual who provided the answer, (3) be submitted as an answer and may not be submitted as an exhibit or in another form, (4) answer each interrogatory fully and completely unless an objection is made, (5) restate the interrogatory which is being answered, and (6) be verified according to Commission Regulation 1.36, 52 Pa. Code § 1.36.



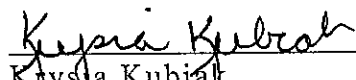
Respondent submits the following interrogatories:

1. What type of business is Neville Island Supply engaged in?
2. Between 2008 and the present, what other types of business has Neville Island Supply been engaged in?
3. What Neville Island Supply operations currently take place at 200 G. Neville Rd., Pittsburgh, PA 15225?
4. Between 2008 and the present, what other Neville Island Supply operations took place at 200 G. Neville Rd., Pittsburgh, PA 15225?
5. What machinery currently exists at 200 G. Neville Rd., Pittsburgh, PA 15225?
6. Between 2008 and the present, what other machinery existed at 200 G. Neville Rd., Pittsburgh, PA 15225?
7. How many people are currently employed by Neville Island Supply and work at 200 G. Neville Rd., Pittsburgh, PA 15225?
8. Between 2008 and the present, how many people were employed by Neville Island Supply and worked at 200 G. Neville Rd., Pittsburgh, PA 15225?
9. What is the highest number of employees who were concurrently employed by Neville Island Supply and worked at 200 G. Neville Rd., Pittsburgh, PA 15225?
10. Who are the owners of Neville Island Supply?

11. Is Neville Island Supply a corporation?
12. If the answer to No. 11 is yes, please list the date of incorporation.
13. If the answer to No. 11 is no, please state whether is Neville Island Supply is a partnership, a sole proprietorship or a limited liability company.

Respectfully submitted,

DUQUESNE LIGHT COMPANY
By Counsel:



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