

MONDAY, FEBRUARY 7, 2011

(CERTIFIED MAILING) 7010 0780 0000 1561 2316

ROSEMARY CHIAVETTA, SECRETARY
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET
COMMONWEALTH KEYSTONE BUILDING
SECOND FLOOR
HARRISBURG, PA 17120

SUBJECT: WALLACE E. MARTIN &
JANET LOUISE MARTIN

vs.

DUQUESNE LIGHT
(REFERENCE F 2010-2214227)

RESPONSE TO DUQUESNE LIGHT'S ANSWER
DATED JANUARY 31, 2011

WHAT KIND OF RUBBISH IS THIS ANSWER FROM DUQUESNE LIGHT AND WHAT KIND OF COUNSEL IS THIS KRYSIA KUBIAK? THE CASE SHOULD BE RULED IN OUR FAVOR DUE TO STUPIDITY, BACKWARDNESS AND RACIAL STEREOTYPING AND SLURS. THEIR ANSWER IS FULL OF INACCURATE STATEMENTS, FAILURE TO PROVE {WHATEVER} POINT THEY ARE TRYING TO MAKE AND STATEMENTS THAT HAVE NOTHING TO DO WITH THIS CASE.

DUQUESNE LIGHT - "RESPONDENT HAS ATTEMPTED TO CONTACT COMPLAINANTS REGARDING THE MATTER AT HAND BUT HAS BEEN UNABLE TO REACH COMPLAINANTS".

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PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

MARTIN RESPONSE: NO DATES AND TIMES OF THESE ALLEGED CONTACTS WERE LISTED. WERE THEY PHONE CALLS, NOTES, LETTERS. I WANT TO SEE THEIR TELEPHONE LOG SO IT CAN BE VERIFIED. AND IF NOTES AND LETTERS WERE SENT, I WANT TO SEE THE POSTMARKS AND OR CERTIFIED RECEIPT/S.

DUQUESNE LIGHT - "MONEY ORDERS THAT WERE ALLEGEDLY SENT"

MARTIN RESPONSE - COPIES CAN BE SHOWN AND SUBSTANTIATED.

DUQUESNE LIGHT - "RESPONDENT IS WITHOUT SUFFICIENT KNOWLEDGE OR INFORMATION TO FORM A BELIEF AS TO TRUTH OF THE ATTACHED LETTERS WERE SENT TO RESPONDENT"

MARTIN RESPONSE - COPIES OF LETTER AND SIGNED CERTIFIED RECEIPT/S CAN BE PROVEN.

DUQUESNE LIGHT - "MISPLACED MONEY ORDERS SENT BY COMPLAINANTS"

MARTIN RESPONSE - I WONDER WHY DUQUESNE LIGHT'S COUNSEL USED THE WORD "MISPLACED". IN OUR CORRESPONDENCE WE ASKED DUQUESNE LIGHT TO "FIND THE MONEY ORDERS" SENT TO THEM. WE HAVE/HAD NO KNOWLEDGE OF WHETHER DUQUESNE LIGHT "MISPLACED" THEM, TORE THEM UP, ATE THEM, SHREDDED THEM OR WHAT. IT IS ODD IN OUR MIND THAT THE WORD "MISPLACED" WAS USED, UNLESS THAT IS, THEY HAVE

INFORMATION AS TO WHAT HAPPENED TO THEM AND REFUSE TO OWN UP TO IT.

DUQUESNE LIGHT - "RESPONDENT DENIES THAT THE HANDWRITTEN ANNOTATIONS THAT APPEAR ON SAID ATTACHMENT WERE MADE BY RESPONDENT"

MARTIN RESPONSE - IS THIS COUNSEL FOR DUQUESNE LIGHT ALIVE AND AWAKE? NO MENTION, REPEAT, NO MENTION WAS EVER MADE THAT DUQUESNE LIGHT EVER MADE ANY HANDWRITTEN COMMENTS THAT APPEARED ON THE BILL. THE BILLING WAS MADE A PART OF THE COMPLAINT TO SHOW HOW DUQUESNE LIGHT KEPT ADDING ON THE \$92.93 WHICH HAD BEEN SENT IN BY WAY OF MONEY ORDERS WITHOUT INVESTIGATING WHAT MIGHT HAVE HAPPENED TO OUR PAYMENTS.

DUQUESNE LIGHT - "TRUTH OF AVERMENTS THAT RESPONDENT FAILED TO CONTACT COMPLAINANTS BY MAIL AND THEY ARE THEREFORE DENIED"

MARTIN RESPONSE - ONCE AGAIN, WE WANT SOLID PROOF BY WAY OF PHONE LOGS, LETTER DATES, POSTMARKED ENVELOPES AND CERTIFIED RECEIPT/S OF THESE ALLEGED CALLS AND LETTERS THAT WERE MADE AND SENT TO US.

MARTIN RESPONSE - TO DUQUESNE LIGHTS ITEM 6, ITEM 9, ITEM 11, ITEM 12. WE CAN SHOW AND PROVE OUR PAPERWORK AND DOCUMENTATION.

MARTIN RESPONSE AND OUTRAGE OF POINT 6 (PAGE 5) OF DUQUESNE LIGHT'S ANSWER. WHAT IN THE HELL IS THIS - "AFTER REASONABLE

INVESTIGATION RESPONDENT IS WITHOUT SUFFICIENT KNOWLEDGE OR INFORMATION TO FORM A BELIEF AS TO THE TRUTH OF COMPLAINANT'S AVERMENT THAT A COURT HAS GRANTED A PROTECTION FROM ABUSE ORDER FOR HER PERSONAL SAFETY"

THERE IS ABSOLUTELY NOTHING IN THE COMPLAINT THAT MAKES REFERENCE TO A PROTECTION FROM ABUSE ORDER. WHERE DID THIS IDIOT ATTORNEY GET THIS FROM, AND HOW AND WHY WAS IT MADE A PART OF DUQUESNE LIGHT'S ANSWER????

THIS PROVES BEYOND A DOUBT THE STANCE AND ATTITUDE OF DUQUESNE LIGHT HOW THEY FEEL ABOUT US AND OUR CHARGES;

THEREFORE

WE ARE ASKING THAT OUR CLAIM/CASE BE RULED IN OUR FAVOR DUE TO DUQUESNE LIGHT'S REFUSAL TO OFFER DATES, TIMES, RECEIPTS DOCUMENTS OF THEIR ALLEGED CONTACT DATES;

THEY FAILED TO ADDRESS THE 10-DAY SHUT OFF NOTICE - WHY IT WAS NECESSARY, WHEN THE SUBJECT MATTER WAS LOST MONEY ORDER PAYMENTS;

DUQUESNE LIGHT CONTINUES TO REFUSE TO DISCUSS WHAT DID OR MIGHT HAVE HAPPENED TO OUR PAYMENTS;

THEY CONTINUE TO REFUSE TO ADDRESS THE
CONTINUED ADD ON OF AN UNWARRANTED .40 LATE
CHARGE; **AND FINALLY**

THEIR CLAIM OF A PFA (POINT SIX, PAGE 5) IS
TOTALLY WRONG, ERRONEOUS, HAS NOTHING TO DO
WITH THIS CASE, IS RACIALLY INSULTING
(INDICATING THAT BLACKS ALWAYS HAVE TO BE
INVOLVED IN OR CONNECTED WITH SOME SORT OF
TRASH AND OR NOTORIETY, TO SAY NOTHING OF IT
BEING SLANDEROUS. HOW DID DUQUESNE LIGHT
TURN A PUC CLAIM INTO A CHARACTER
ASSASINATION?

WE ARE ASKING IN ADDITION TO THE CASE BEING
DISMISSED, A FULL SCALE INVESTIGATION INTO
DUQUESNE LIGHTS ANSWER, THE QUALIFICATIONS
AND MOTIVES OF THEIR COUNSEL AND HOW THEY
ASSOCIATED OUR HOUSEHOLD WITH A PFA (POINT
SIX - PAGE FIVE).

WE ARE ALSO ASKING FOR \$_____, TO BE
DETERMINED LATER FOR MENTAL TORMENT,
CHARACTER ATTACKS BY WAY OF LIES, ATTEMPTING
TO TAINT THE CASE IN THE EYES OF THE PUC
SECRETARY BY USING MALICIOUS, UNTRUE
STATEMENTS.

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FEB 6 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

WE SINCERELY HOPE DUQUESNE WILL BE HELD ACCOUNTABLE FOR THEIR LACK OF ACTION WHEN IT CAME TO OUR SEEKING HELP AS TO WHAT HAPPENED TO OUR PAYMENTS AND THEIR NEGATIVE ACTIONS AND LIES WHEN DEALING WITH OUR PUC CHARGE.

WALLACE E. MARTIN AND *Wallace E. Martin*
JANET LOUISE MARTIN *Janet Louise Martin*
1331 OAKDENE STREET
EAST LIBERTY
PITTSBURGH, PENNSYLVANIA 15206-1949

ATTACHMENT

FIRST CLASS MAILING TO:

KRYSIA KUBIAK
DUQUESNE LIGHT COMPANY
411 SEVENTH AVENUE, 16-1
PITTSBURGH, PENNSYLVANIA 15219

Thurs E Garbage

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

WALLACE & JANET MARTIN,)
)
Complainants,)
)
v.)
)
DUQUESNE LIGHT COMPANY,)
)
Respondent.)

Docket No. F-2010-2214227

ANSWER

TO THE HONORABLE COMMISSION:

AND NOW comes the Respondent, Duquesne Light Company, by and through its attorney, Krysia Kubiak, and files the within Answer of which the following is a statement:

1. Admitted.
2. Admitted.
3. Admitted.
4. A. Complainants' averment that they received a notice that their utility service is being terminated is admitted.

Complainants' averment, "Please See Attachments," is an apparent attempt to incorporate the attached documents into Complainants' complaint. The substance of the attached documents can be summarized as follows:

Complainants apparently aver that Respondent misplaced money orders sent by Complainants as payment for electric service and that Respondent was unresponsive to inquiries regarding the money orders that were allegedly sent.

*Supply Dates And Times
of us being allegedly contacted*

If so, these averments are denied. On the contrary, Respondent has properly credited all payments made by Complainants on behalf of this account.

Furthermore, Respondent has attempted to contact Complainants regarding the matter at hand but has been unable to reach Complainants.

Although the material allegations have been summarized and denied above, specific averments which were attached to the Formal Complaint will be addressed as follows:

all letters sent certified and signed for
Items 1, 2 and 3: After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of that the *This can be proven* attached letters were sent to Respondent and these averments are therefore denied. However, Respondent admits Complainants have sent letters to Respondent regarding money orders. Complainants' averment that letters sent to Respondent were ignored is denied. On the contrary, Respondent attempted to contact Complainant regarding letters that Complainant sent to Respondent. *When*

Item 4: Admitted in part and denied in part. Respondent admits that the attachment labeled "4" contains a photocopy of a Complainants' June 2010 bill.

Respondent denies that the handwritten annotations that appear on said attachment were made by Respondent.

Item 5: Admitted in part and denied in part. This paragraph is admitted to the extent that the bills that Respondent sends out contain contact information. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of the averments that Respondent failed to contact Complainants by mail and they are therefore denied.

Item 6: As it is unclear what Complainants are referring to in these averments, after reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of these averments and they are therefore denied.

Item 7: This paragraph and attachment contain a statements of opinion to which no response is required.

Item 8: This paragraph is admitted to the extent that said attached documents contain information on the decision on the informal complaint filed by Complainants with the Public Utility Commission (PUC) Bureau of Consumer Services (BCS) at BCS Case Number: 2703161 and a statement requesting formal complaint forms.

Item 9: After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of these averments and they are therefore denied.

Item 10: It is admitted that the attached document is a 10-day Shut Off Notice from Respondent.

After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainants' averment that they received the 10-day Shut Off Notice four days after the Bureau of Consumer Services sent in its findings, and this averment is therefore denied.

Further averments in this paragraph are statements of opinion to which no response is required.

Item 11: After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainants' averment that the attached copy is of a check that was sent to Respondent, and this averment is therefore denied.

Item 12: After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainants' averment regarding the attached copy of a signed sheet and this averment is therefore denied.

B. Complainant's averment, "Please See Attached," is an apparent attempt to incorporate the attached documents into Complainant's complaint. If so, said documents have been addressed above in Paragraph 4A.

5. Complainants' averment, "Please See Attachments," is an apparent attempt to incorporate the attached documents labeled "Relief" into Complainant's complaint. If so, said documents will be addressed as follows:

Complainants' averment regarding the removal of a forty cent late charge from their bill is a statement of opinion and/or request for relief to which no response is required. By way of further response, said averment is an apparent reference to a forty cent balance that remains on Complainant Wallace Martin's account at 1331 Oakdene Street, Pittsburgh, PA 15206, under Account No. 0000073856001.

The following issues raised in the attached documents labeled "Relief" are statements of opinion and/or requests for relief to which no response is required: Complainants' averment regarding five money orders, Complainants' averment regarding Respondent's alleged refusal to investigate the matter at

What is this

hand, Complainant's averment regarding \$75.00 paid to Money Gram International, Complainant's averment regarding an unnecessary termination notice.

What kind of investigation

6. After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainant's averment that a court has not granted a "Protection from Abuse" order for her personal safety, and this averment is therefore denied.

7. It is admitted that Complainant has spoken to a utility company representative about this complaint.

8. As this paragraph is blank, no response is required.

9. No response is required to Complainant's verification and signature.

WHEREFORE, Respondent requests that after reasonable investigation and hearing the Complaint be dismissed.

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Respectfully submitted:

DUQUESNE LIGHT COMPANY
By Counsel:

Krista Kubiak

Krista Kubiak
Pa. I.D. # 90619
Duquesne Light Company
411 Seventh Avenue, 16-1
Pittsburgh, PA 15219
Telephone: (412) 393-6505
FAX (412) 393-1418

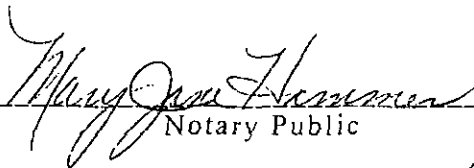
AFFIDAVIT

I, Michele R. Sandoe, being duly sworn according to law depose and say that I am authorized to make this affidavit on behalf of Duquesne Light Company being the holder of the office of Director, Customer Care with that corporation, and that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and Duquesne Light Company expects to be able to prove the same at any hearing hereof.



Michele R. Sandoe

Sworn and subscribed before me this 31st day of January, 2011.



Notary Public

My Commission Expires Oct. 6, 2011

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Mary Jane Hammer, Notary Public
City Of Pittsburgh, Allegheny County
My Commission Expires Oct. 6, 2011
Member, Pennsylvania Association of Notaries

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

WALLACE & JANET MARTIN,)
)
 Complainants,)
)
 v.)
)
 DUQUESNE LIGHT COMPANY,)
)
 Respondent.)

Docket No. F-2010-2214227

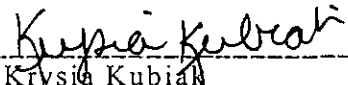
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participant listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant).

Wallace Martin
1331 Oakdene Street
Pittsburgh, PA 15206

Janet Martin
1331 Oakdene Street
Pittsburgh, PA 15206

Dated this 31st day of January 2011.



Krysia Kubiak
Pa. I.D. # 90619
Duquesne Light Company
411 Seventh Avenue
Mail Drop 16-1
Pittsburgh, PA 15219
Telephone: (412) 393-6505
FAX (412) 393-1418

WALLACE E. MARTIN AND
JANET LOUISE MARTIN
1331 OAKDENE STREET
EAST LIBERTY
PITTSBURGH, PENNSYLVANIA 15206-1949

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0395 PITTSBURGH PA FEB 06 11
15208



ROSEMARY CHIAVETTA, SECRETARY
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