



Duquesne Light

Our Energy...Your Power

Legal Department
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Jennifer L. Allison
Attorney

August 2, 2011

Via Electronic Filing

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

RE: Pamela Tift v. Duquesne Light Company
Docket No. F-2011-2214982
Pamela Derry Tift v. Duquesne Light Company
Docket No. F-2011-2238028

Dear Secretary Chiavetta:

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

Sincerely,

Jennifer L. Allison
Duquesne Light Company

encs

cc: Pamela Derry Tift (w/enclosure)
Administrative Law Judge Mark A. Hoyer (w/enclosure)

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PAMELA TIFT,)
)
 Complainant,)
)
 v.) No. F-2010-2214982
)
 DUQUESNE LIGHT COMPANY,)
)
 Respondent)

PAMELA DERRY TIFT,)
)
 Complainant,)
)
 v.) No. F-2011-2238028
)
 DUQUESNE LIGHT COMPANY,)
)
 Respondent)

**RESPONDENT DUQUESNE LIGHT COMPANY'S
MOTION TO CONSOLIDATE**

TO: PAMELA DERRY TIFT

TAKE NOTICE THAT COMMISSION REGULATION 5.103(c), 52 Pa. Code §5.103(c), PROVIDES THAT YOU HAVE THE RIGHT TO RESPOND IN WRITING TO THIS MOTION WITHIN 20 DAYS OF ITS SERVICE UPON YOU.

Respondent Duquesne Light Company (“Duquesne Light”) by and through its attorney Jennifer L. Allison, files this Motion to Consolidate in accordance with Commission Regulation 5.81, 52 Pa. Code §5.81:

1. Complainant Pamela Derry Tift (filed the first above-captioned Formal Complaint (hereinafter “the initial Derry Tift Complaint”) on or about December 10, 2010, which contained averments that Respondent unreasonably terminated Complainant’s electric service.

2. Complainant Pamela Derry Tift filed the second above-captioned Formal Complaint (hereinafter “the second Derry Tift Complaint”) on or about April 14, 2011, which contained averments that Respondent unreasonably maintained an account in Complainant’s name after she had sold the property associated with the account.

3. Both of the above-captioned Formal Complaints contain averments Respondent failed to provide Complainant with reasonable electric service.

4. Pennsylvania law requires that “[e]very public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities.” 66 Pa. C.S.A. §1501.

5. Both of the above-captioned Formal Complaints concern a common question of law. Both Complaints concern the reasonableness of Respondent’s actions toward Complainant.

6. Commission Regulation 5.81, 52 Pa. Code §5.81 provides for consolidation of proceedings involving a common question of law or fact.

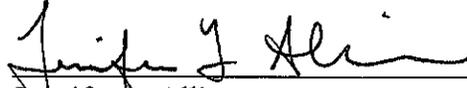
7. Consolidation of these matters will not unduly delay either proceeding.

WHEREFORE, Respondent requests that the Commission consolidate the proceedings on the above-captioned Formal Complaints.

Respectfully submitted,

DUQUESNE LIGHT COMPANY

By Counsel:

A handwritten signature in cursive script, appearing to read "Jennifer L. Allison", written over a horizontal line.

Jennifer L. Allison

Pa. I.D. # 307945

Duquesne Light Company

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Pittsburgh, PA 15219

Telephone: (412) 393-6851

FAX: (412) 393-1418

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

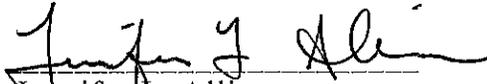
PAMELA TIFT,)	
)	
Complainant,)	
)	
v.)	Docket No. F-2010-2214982
)	
DUQUESNE LIGHT COMPANY,)	
)	
Respondent)	
)	
PAMELA DERRY TIFT,)	
)	
Complainant,)	
)	
v.)	Docket No. F-2011-2238028
)	
DUQUESNE LIGHT COMPANY,)	
)	
Respondent)	

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).

Pamela Derry Tift
10 Mineola Avenue
Pittsburgh, PA 15229

Dated this 2nd day of August 2011.


Jennifer L. Allison
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