

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION
IN THE MATTER OF:

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PA P.U.C.
SECRETARY'S BUREAU

LEO Z. TARR	}	
	}	
Complainant	}	
	}	
VS	}	Docket No. C-201-2325267
	}	
DUQUESNE LIGHT COMPANY	}	
	}	
Respondent	}	

MOTION TO COMPEL RESPONSES TO DISCOVERY

COME NOW, Complainant Leo Z. Tarr respectfully requests that Respondent be compelled to respond to his informal Discovery request.

During the first week of November, 2012, Complainant called Respondent via the company's Customer Service telephone line and made an informal / verbal request for:

- a. All itemized bills for Complainant's 3131 Vernon Avenue Pittsburgh, PA 15227 address for the date range of July 2006 through January 2011.
- b. Names, telephone number, and addresses of all collection company(ies) respondent used as means of collecting payments for the balance respondent alleged complainant owed from The 3131 Vernon Avenue Pittsburgh, PA 15227 address.
- c. Dates the alleged balance was submitted to the company (ies).
- d. All phone records, letters of intent to collect said balance or any other means by which respondent and or the collection company((ies) attempted to collect this balance between January 2011 to now

On October 9th, 2012 Respondent answered Complainant complaint and essentially went line by line denying almost every single item in the complaint.

Complainant then called Respondent via the company's customer service telephone during the first week of November and specifically instructed the company to respond to the above listed Discovery request no later than December 10th, 2012. To date, no Response has been received.

Incredibly, while this request is yet to be produced, Respondent was able to make time to file a motion for continuance while at the same time calling complainant via his (412) 722-9744 number and to leave voice messages letting him know that their motion was granted by the commission.

This obvious disregard on the part of respondent is just one of the many schemes Respondent have used and continued to use as their way of stonewalling every concern(s) or question(s) complainant have had regarding the company's mode of billing him.

Respondent's failure to provide any responses to the above discovery request has seriously hampered Complainant's ability to timely complete any Discovery within the strict time deadlines as well as satisfactorily represents himself at any hearing in this matter.

As a result of this action Respondent has indisputably and unjustifiably delayed this matter.

To that end, Complainant respectfully prays that this honorable Commission compels Respondent to provide the above discovery material before any hearing is scheduled in this matter.

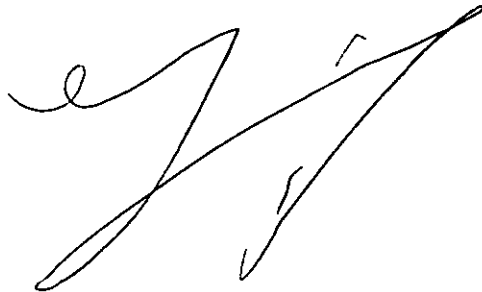
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CERTIFICATE OF SERVICE BY REGULAR MAIL

I, **LEO Z. TARR**, do hereby certify that a true and exact copy of the foregoing motion **to Compel** was served on January 2nd, 2013 via United States mail, to Respondent's attorney of record as followed:

Jennifer L. Allison
Pa. I.D. # 307945
Duquesne Light Company
411 Seventh Avenue
Mail Drop 16-1
Pittsburgh, PA 15219
Telephone: (412) 393-6851
Fax: (412) 393-1418

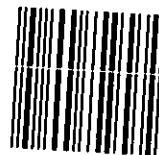


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From: Leo Z. Tarr
1123 Lakewood Ave
Pittsburgh, PA 15229



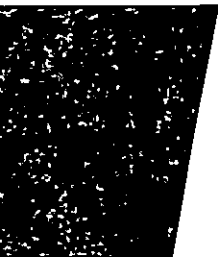
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