

December 6, 2013

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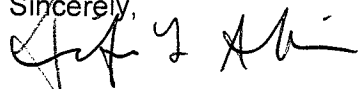
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Flora Mosaka-Wright v. Duquesne Light Company
Docket No. F-2013-2371635

Dear Secretary Chiavetta:

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

Sincerely,



Jennifer L. Allison
Attorney for Duquesne Light Company

Enclosure

cc: Flora Mosaka-Wright (with enclosure)
Administrative Law Judge Mary D. Long (with enclosure)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

FLORA MOSAKA-WRIGHT,	:	
	:	
Complainant,	:	
	:	
vs.	:	No: F-2013-2371635
	:	
DUQUESNE LIGHT COMPANY,	:	
	:	
Respondent.	:	

RESPONDENT'S REPLY BRIEF

I. Introduction

This formal complaint concerns Flora Mosaka-Wright's allegations that her meter is not functioning correctly and that Duquesne Light Company has not provided her with reasonable customer service in its explanation of her inquiries. The record reflects that Complainant lived in a poorly-insulated apartment, that her meter registered her consumption correctly, that she had the potential to consume the electricity that she was billed for, and although Respondent erroneously advised her that she was not being billed on the correct meter, Respondent promptly corrected its mistake and provided Complainant with accurate information.

II. Household Conditions

Complainant alleges that her bills in the winter of 2012-2013 were unreasonably high. However, she the billing was exacerbated by "big gaps in the front door that lets warm air escape," "the patio-sliding door that brings in so much cold air that we are not even able to sit long in the living room," and by "badly insulated three windows in each room." Complaint at 53. Complainant affirmed the accuracy of these claims in her testimony at an initial telephonic

hearing held on Wednesday, October 2, 2013. Tr. at 51-55. Complainant testified that she kept her apartment heated to 75 degrees in the winter. Tr. at 26.

III. Meter Inspection

On January 9, 2013, Respondent sent its technician Thomas Stack to inspect Complainant's meter. Mr. Stack tested Complainant's meter at full load and at light load, and neither had an error in registration of more than 2.0%, which is required by 52 Pa. Code §57.20(c). Tr. at 94-95. He also checked for a grounds condition and for foreign wiring, and he found neither. Tr. at 97.

Mr. Stack's analysis also determined that Complainant had the potential to consume the electricity for which she was billed. When he checked her meter, she was using 17,280 watts. If this usage remained consistent for one hour, it would result in consumption of almost 17.3 kilowatt hours. Tr. at 96. If she continued to use electricity at this rate for one day, daily usage would reach nearly 415 kilowatt hours. Mr. Stack was not able to determine the wattage of Complainant's furnace, but in his experience, furnaces tend to use 10,000 watts when they are active. If a 10,000 watt furnace ran for one hour, it would result in consumption of 10 kilowatt hours. Tr. at 98. Mr. Stack concluded that Complainant had the potential to use the electricity for which she was billed. Tr. at 96.

IV. Update to Complainant

After the Meter Inspection was completed, Respondent's Customer Care Representative sent a utility report to Complainant on January 11, 2013. This report was introduced into evidence as Complainant's Exhibit 2 and was accompanied by a cover letter that was admitted into evidence as Complainant's Exhibit 4, and it advised Complainant that she was being billed from the wrong meter. This report was sent in error. Tr. at 70. On January 17, 2013, the Customer Care Representative corrected her mistake and sent Complainant a report that

indicated that her meter was registering correctly. This report was introduced into evidence as Complainant's Exhibit 3 and was accompanied by a cover letter that was admitted into evidence as Complainant's Exhibit 5.

Mr. Stack is Respondent's only employee who had direct firsthand knowledge of the inspection. He testified that there was nothing that made him suspect that there was a problem with Complainant's meter or that she was being billed from the incorrect meter.


Respondent did make a mistake in the January 11, 2013 report that it sent to Complainant. However, it promptly corrected the error, and the record reflects that Complainant was billed from the correct meter.

V. Conclusion

The record reflects that Complainant's apartment was poorly insulated, that her meter was functioning correctly, that she had the potential to use the electricity for which she was billed, and that a report that advised Complainant that she was being billed from the wrong meter was sent in error, and that the error was promptly corrected and Complainant was provided with accurate information. For the foregoing reasons, Respondent respectfully requests that this complaint be dismissed.

Respectfully submitted,

TUCKER ARENSBERG, P.C.


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