

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**Flora Mosaka-Wright**

**Complainant**

:

**v.**

:

**F-2013-2371635**

**Duquesne Light**

**Respondent**

:

December 10, 2013

Via US Postal Services

Rosemary Chiavetta, Secretary

Pennsylvania Public Utility Commission

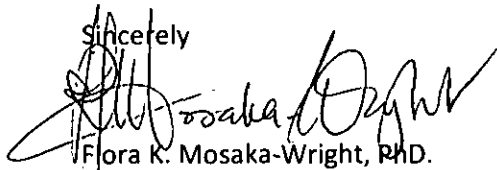
P.O. Box 3165

Harrisburg, PA 17105-3265

Dear Secretary Chiavetta:

Enclosed please find Flora K. Mosaka-Wright's response to Duquesne Light Company's Reply Brief. A copy of this document has been served upon Respondent in accordance with Commission regulations.

Sincerely



Flora K. Mosaka-Wright, PhD.

Bro Se

Enclosure

cc. Jennifer L. Allison

Administrative Law Judge Mary D. Long

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

This is in response to Respondent Duquesne Light Company's Reply Brief of December 6, 2013 to Complainant's main brief of November 15, 2013. To which Complainant wishes to make following pertinent observations:

1. According to the most Honorable Judge Mary D. Long's "BRIEFING ORDER" of October 25, 2013, "Any reply brief should be succinct and should not repeat arguments already made in the Complainant's main brief." To that, Respondent had to address points raised by Complainant on the stark differences in billing between Direct Energy and Duquesne Light. On the contrary, Respondent reiterated same arguments discussed at the court's Initial Telephonic Hearing of Wednesday, October 2, 2013, rather than to respond directly to the issues addressed by Complainant's main brief of November 15, 2013, i.e. Exhibit 1, attached hereunder for clarity and not for repetition.

**DIRECT ENERGY AND FLORA MOSAKA-WRIGH'S ACCOUNT 7001-203-992-003**

PERIOD	Kwhs Consumed	Amount Payable	Bills paid in the period	Date Received
Jan. 10 – Feb. 7	4320	\$342.07	\$305.00	
Feb. 8 – March 8	4152	\$328.76	\$350.00	
Mar. 9 – Apr. 9	3744	\$396.45	\$434.00	4/4/13 and 4/5/13
Apr. 10 – May 7	1500	\$118.77		

**TOTAL \$1,186.00 \$1,089.00**

The above is verifiable with Direct Energy.

**DUQUESNE LIGHT AND FLORA MOSAKA-WRIGHT'S ACCOUNT 7001-203-992-003**

DATE & TOTAL AMOUNT BALANCE to DLC	BUDGET PLAN AMOUNT	PAYMENT RECEIVED	PAYMENT RECEIVED DATE
11/8/2012 = \$147.73	\$114 = 6383Kwhs	N/A	N/A
12/10/2012 = \$692.82	441.69 includes \$244.69 Transfer from Previous residence Balance should be = \$197.00 = 6665Kwhs	\$202.00	12/3/12
1/10/2013 = \$937.28	\$362.00 = 7048Kwhs	\$305.00	1/4/13
2/8/2013 = \$1,114.05	\$364.00 = 7406Kwhs	\$350.00	2/6/13
3/11/2013 = \$1,609.36	\$698.00 = 7752Kwhs		
4/10/2013 = \$1,622.72	\$598.00 = 8064Kwhs	\$434.00	4/4/13 4/5/13
5/7/2013 = \$1,809.20	\$1809.00 = 8189Kwhs		
<b>Totals</b>		<b>\$1,291.00</b>	

Complainant wants to know how this is possible.

2. Complainant requested the Judge, at the Initial Court Hearing that, if the cost of court transcripts should be unaffordable, then the use of recollection of that court's proceedings would be used to write the main brief. The judge concurred. It came to pass however, that over \$300.00 in transcript costs was indeed not affordable to the Complainant.
3. Although Complainant was not able to quote specific transcript numbers, it is astounding that Respondent wishes to extensively refer to points not discussed with Respondent at all, except for a point that was rebutted by Complainant in court, about whether "precipitation was inside or outside the door". That is all discussion I can remember specific to the apartment!
4. It is surprising that Respondent, without verification or attempt thereof, now wishes to push responsibility to the inadequacies of the Apartment, rather than the responsibility that Duquesne Light had to take for the protection of their consumer, amid all questions and stresses that the Complainant was experiencing at the time - thus turning the consumer into a victim of circumstances that prevailed, without any protection!
5. The twelve month consumption history of the apartment tells a different story however, according to EXHIBIT 2 of September 23, 2013 of Duquesne Light. The most hyped-up kWh consumption starts on 11/8/2012, hardly two weeks of taking occupancy of the apartment (6383kWhs = \$147.73) Refer to point 1 above. It leaves one wondering whether these apartment inadequacies started with the Complainant as a new tenant or they were contrived! Please compare and contrast energy consumption and billing above between Direct Energy billing and Duquesne Light, which actually was the main reason for Complainant to vacate the apartment.

**REQUESTED RELIEF AND REMEDY SOUGHT:**

WHEREFORE, Complainant respectfully requests that the Pennsylvania Public Utility Commission grant the relief sought by Complainant:

1. For Duquesne Light to reconcile statements with Direct Energy, as a legitimate energy supplier by law, and not contradict their billing.
2. For Duquesne Light to cancel, dismiss, and make good all escalated, accumulated electricity costs, allegedly outstanding, as discussed in court on October 2, 2013, with prejudice, due to reckless conflicting dates and "wrong meter readings", which were later retracted and denied by Duquesne representatives.

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 10<sup>th</sup> day, of December, 2013, served a true copy of the foregoing document upon the participants listed below, in accordance with the requirements of 52 PA. Code # 1.54 (relating to service by a participant):

**Rosemary Chiavetta, Secretary,**

**Commonwealth of Pennsylvania**

**Pennsylvania Public Utility Commission**

**Office of Administrative Law Judge, Re: F-2013-2371635**

**P.O. Box 3265, HARRISBURG, PA 17105-3265 as well as to:**

**Presiding: Administrative Law Judge Mary D. Long**

**Piatt Place, Suite 220**

**301 5<sup>th</sup> Avenue, Pittsburgh, PA 15222**

**Telephone: 412-565-3550**

**AND**

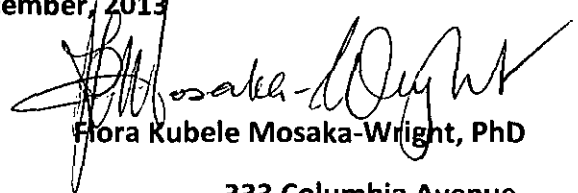
**JENNIFER L. ALLISON ESQUIRE**

**TUCKER ARENSBERG PC**

**1500 ONE PPG PLACE, PITTSBURGH PA 15222**

**412-594-5527**

**Dated this 10<sup>th</sup> day of December, 2013**



**Flora Kubele Mosaka-Wright, PhD**

**333 Columbia Avenue,**

**Pittsburgh, PA 15229**

**Tel: 412-415-0913**

**florakmw@yahoo.com**

**Pro Se**

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From: FLORA K. MOSAKA-WRIGHT  
333 Columbia Avenue  
Pittsburgh, PA 15229.

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Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
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PA PUBLIC UTILITY COMMISSION

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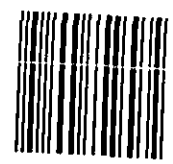
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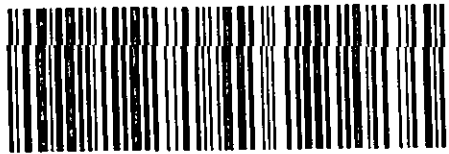
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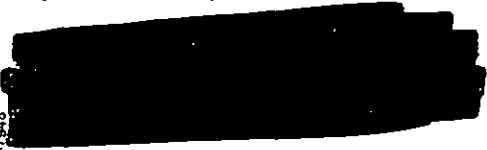


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