

May 16, 2016

*Via Electronic Filing*

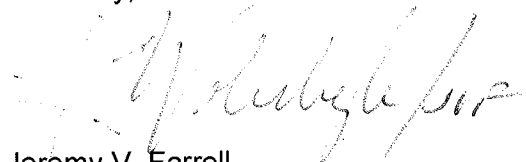
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**RE: Kyle Reynolds v. Duquesne Light Company**  
Docket No. F-2016-2541646

Dear Secretary Chiavetta:

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

Sincerely,



Jeremy V. Farrell  
Attorney for Duquesne Light Company

Lauren N. Woleslagle  
Attorney for Duquesne Light Company

Enclosure

cc: Kyle Reynolds (with enclosure)  
Steven Robinson, Esq. (with enclosure)

LIT:605635-1 014657-158498

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

KYLE REYNOLDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: F-2016-2541646

**PRELIMINARY OBJECTIONS**

Filed on behalf of Respondent  
Duquesne Light Company

Counsel of Record for this Party:  
Filed on behalf of Respondent  
Duquesne Light Company

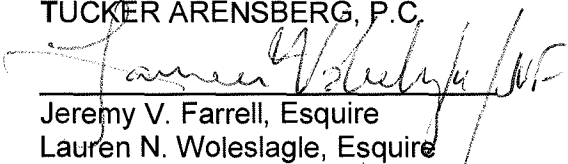
Counsel of Record for this Party:  
Jeremy V. Farrell, Esquire  
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(412) 566-1212  
Tucker Arensberg, PC  
1500 One PPG Place  
Pittsburgh, PA 15222

**NOTICE TO PLEAD**

**TO: COMPLAINANT, KYLE REYNOLDS**

**YOU ARE HEREBY NOTIFIED TO FILE A WRITTEN RESPONSE TO THE WITHIN  
PRELIMINARY OBJECTIONS OF RESPONDENT, DUQUESNE LIGHT COMPANY, WITHIN  
TWENTY (20) DAYS OF SERVICE HEREOF, OR A JUDGMENT MAY BE ENTERED  
AGAINST YOU.**

TUCKER ARENSBERG, P.C.

  
Jeremy V. Farrell, Esquire  
Lauren N. Woleslagle, Esquire  
Counsel for Duquesne Light Company



6. "Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public." 66 Pa.C.S.A. § 1501.

7. Here, Complainant has alleged no facts indicating that Duquesne Light failed to provide adequate, efficient, safe and reasonable service, or that it violated any other provision of the Public Utility Code.

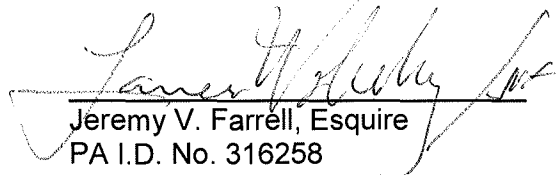
8. To the contrary, Complainant's allegations are admittedly directed at his supplier, Palmco Power, and not Duquesne Light.

9. As such, the Complaint against Duquesne Light is legally insufficient and/or lacks the required specificity for a pleading.

10. For these reasons, the Complaint against Duquesne Light should be dismissed.

WHEREFORE, Duquesne Light Company respectfully requests that the Commission sustain its Preliminary Objections and dismiss the Complaint against Duquesne Light with prejudice.

TUCKER ARENSBERG, P.C.



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Counsel for Respondent  
Duquesne Light Company

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

KYLE REYNOLDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: F-2016-2541646

**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):

Kyle Reynolds  
225 Washington Avenue  
Oakmont, PA 15139

Palmco Power PA, LLC  
c/o Steven Robinson, Esq.  
Cullen and Dykman, LLP  
44 Wall Street  
New York, NY 10005  
(Via Fax and Regular Mail)

Dated this 16<sup>th</sup> day of May, 2016

TUCKER ARENSBERG, P.C.

  
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