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June 8, 2016

**VIA EFILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

Re: WHEMCO-Steel Castings, Inc. v. Duquesne Light Company  
Docket No. C-2014-2459527

Dear Secretary Chiavetta:

On behalf of WHEMCO-Steel Castings, Inc., I have enclosed for electronic filing the Motion of WHEMCO-Steel Castings, Inc. to Compel Answers to Interrogatories and Requests for Production of Documents Propounded upon Duquesne Light Company in the above-captioned proceeding.

This document has been served as indicated in the attached Certificate of Service.

Sincerely,

  
Alan M. Seltzer

AMS/tlg

Enclosure

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>WHEMCO-STEEL CASTINGS, INC.</b>	:	
	:	
v.	:	<b>DOCKET NO. C-2014-2459527</b>
	:	
<b>DUQUESNE LIGHT COMPANY</b>	:	

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**MOTION OF  
WHEMCO-STEEL CASTINGS, INC. TO  
COMPEL ANSWERS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS PROPOUNDED UPON DUQUESNE LIGHT COMPANY**

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WHEMCO-Steel Castings, Inc. (“Whemco”), by and through its attorneys, hereby files the following Motion to Compel Answers to Interrogatories and Requests for Production of Documents Propounded Upon Duquesne Light Company (“Motion”), pursuant to Section 5.342 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.342, and in connection therewith represents as follows:

**I. Introduction**

1. Through this Motion, Whemco seeks to compel full and complete responses to certain interrogatories previously issued by Whemco to Duquesne Light Company (“Duquesne”). Since the interrogatories were issued in preparation for Whemco’s submission of its rebuttal testimony on June 14, 2016, it is critical that Duquesne be required to answer the subject discovery completely and timely in order to avoid prolonging this proceeding unnecessarily and needlessly occupying the time, resources and expense of the litigants as well as the presiding Administrative Law Judge (“ALJ”) in a manner that is inconsistent with the overall purpose of the Commission’s rules on discovery.

## **II. Background**

2. On December 23, 2014, Whemco filed with the Commission a formal complaint against Duquesne (“Formal Complaint”) alleging, among other things, that Duquesne wrongfully terminated as of December 31, 2010, for its Rate L customers a certain distribution-rate related discount contained in Rider No. 5 of Duquesne’s then-prevailing and Commission approved retail electric service tariff. The Formal Complaint further alleged that the wrongful termination of the Rider No. 5 discount was the result of the improper implementation of a settlement of a default service proceeding that covered the period January 1, 2008 through December 31, 2010 at Docket No. P-00072247 (“Default Service Proceeding”).

3. As a result of Duquesne’s improper and unlawful implementation of the settlement in the Default Service Proceeding and termination of the distribution-related rate discount contained in Rider No. 5 applicable to Rate L customers like Whemco, Whemco’s electric distribution service bills from Duquesne more than doubled as of January 2011. This caused Whemco’s demand, for billing purposes, to increase from a monthly average of 7,287 kilowatts (“kW”) in 2010 to a monthly average of 18,256 kW in 2011.

4. The Formal Complaint seeks, among other things, a refund from Duquesne under Section 1312 of the Public Utility Code (“Code”), 66 Pa. C. S. § 1312, in the amount of \$2,480,374.16, plus interest on all unpaid amounts.

5. On January 21, 2015, Duquesne filed an Answer and New Matter denying the material allegations in the Formal Complaint.

6. On February 10, 2015, Whemco filed a Reply to Duquesne’s New Matter, denying the material allegations therein.

7. Prior to the appointment of an Administrative Law Judge (“ALJ”) and the issuance of a Hearing Notice, the parties had commenced active discovery in this proceeding. On February 11, 2015, Whemco propounded its first set of interrogatories upon Duquesne.

8. On March 27, 2015, the Commission issued a formal notice of an evidentiary hearing in this matter for May 7, 2015, along with the appointment of ALJ Jeffrey A. Watson as the presiding officer.

9. Discovery has been ongoing and dynamic in this proceeding by both parties and has included written interrogatories, requests of admission, and depositions.

10. On May 17, 2016, Whemco issued Set III Interrogatories and Requests for Production of Documents (“Interrogatories”) on Duquesne. The Interrogatories are attached hereto as Exhibit A. There are twenty-six questions in the Interrogatories, based on the testimony of Duquesne witness William V. Pfrommer whose testimony was filed on May 2, 2016.

11. Duquesne provided responses to the Interrogatories on June 6, 2016. It is clear that upon review, certain of the answers to the Interrogatories are incomplete and/or unresponsive. Since receipt of full and complete answers to the Interrogatories is critical to the preparation of Whemco’s rebuttal testimony, which is due to be filed on June 14, 2016, Whemco is filing this Motion simultaneously with its efforts to informally resolve with Duquesne its dispute regarding the sufficiency of the “responses” to the Interrogatories.

12. This Motion seeks full and complete answers to the following questions in the Interrogatories: Nos. 2, 3, 4, 8, 18, and 20 (“Disputed Discovery”). The “responses” provided by Duquesne to the Disputed Discovery are set forth in Exhibit B hereto and incorporated by reference herein.

### **III. Argument**

#### **A. Whemco is entitled to Full and Complete Answers to the Disputed Discovery Prior to the Submission of its Rebuttal Testimony on June 14, 2016.**

13. Interrogatory No. 2 asks for all efforts taken and documents used to contact former Duquesne employees who Duquesne claims have not been available to them. However, the response only provides the names of the former employees and *does not* describe the actions taken to contact these employees or the documents utilized in that effort. Thus, the answer is on its face non-responsive. If Duquesne has not contacted these former employees as of the date it responded or developed any documents then it should state so; otherwise, Whemco is entitled to a detailed description of the efforts utilized and the documents employed in attempting to contact these former employees.

14. Interrogatory No. 3 asks two specific questions relating to the notice of the DSP IV proceeding, namely, whether such notice stated anything about (i) the elimination of the Rider No. 5 discount for Rate L customers and (ii) any other modification of a *non-generation* rate. For the first time in the proceeding Duquesne has now provided to Whemco what Duquesne claims to be the actual notice with respect to the DSP IV proceeding that was filed in 2007, but *does not* answer the two specific questions about the notice. Whemco is entitled to clear answers to Interrogatory No. 3 (a) and (b).

15. Interrogatory No. 4 asks Duquesne how a party to the DSP IV proceeding could challenge or complain about any action with respect to the Rider No. 5 discount applicable to Rate L customers based on the *notice* which, as noted above, is attached to the answer to Interrogatory No. 3. Duquesne's answer discusses the tariff and compliance filing in the DSP IV proceeding, neither of which has anything to do with the "notice". This clearly non-responsive answer needs to be corrected.

16. Based on witness Pfrommer's testimony, stating that other non-Whemco Rate L customers participated in the DSP IV proceeding, Interrogatory No. 18 asks Duquesne (i) if any of these other customers were aware of the proposed elimination of the Rider No. 5 discount in that proceeding and (ii) to provide all documents in Duquesne's possession that suggest these parties were aware of the proposed elimination Rider No. 5 discount. The answer makes a general reference to the tariff and compliance filing made by Duquesne, but does not indicate (i) if these are the only documents Duquesne claims are responsive to the interrogatory and, more importantly, (ii) *does not* provide any explanation of how such documents suggest "actual awareness" of the Rider No. 5 discount proposed elimination, as requested in Interrogatory No. 18.

17. Similar to Interrogatory No. 18, Interrogatory No. 20 asks if any party to the DSP IV proceeding showed awareness of the proposed elimination of the Rider No. 5 discount at the time the DSP IV tariff compliance filing was made or was later approved by the Commission. Duquesne's answer states that any party reviewing the documents "should have been aware" of the proposed elimination of the Rider No. 5 discount. That is not the question, which is whether Duquesne's possessed knowledge that any party was actually aware of the proposed elimination of the Rider No. 5 discount at the two identified milestones. Once again, Duquesne's answer to Interrogatory No. 20 is unresponsive and must be corrected.

#### **IV. Conclusion**

18. Section 5.342(a) of the Commission's regulations, 52 Pa. Code § 5.342(a), requires that answers to interrogatories (i) be in writing; (ii) identify the name and position of the individual who provided the answer; (iii) be submitted as an answer and not as an exhibit or in

another form; and (iv) *answer each interrogatory fully and completely unless an objection is made.*

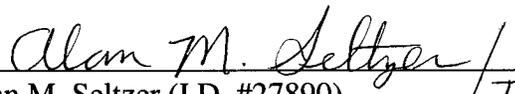
19. Duquesne's answers to the Interrogatories generally fail to identify the name and position of the individual who provided the answer. But more importantly, Duquesne's responses to the Disputed Discovery do not contain full and complete answers as noted above. Critically, Duquesne *did not object* to the Disputed Discovery and Whemco is therefore legally entitled to receive full and complete answers. The failure to provide such full and complete answers is a direct violation of 52 Pa. Code § 5.342(a), which must be remedied immediately.

20. It is unfair to allow Duquesne to evade providing direct, accurate and legally sufficient responses to the Disputed Discovery that were not the subject of prior valid objections. Whemco carefully and narrowly tailored the Interrogatories to elicit information it believed to be relevant to the preparation of its rebuttal testimony. Duquesne's incomplete and/or non-responsive answers to the Disputed Discovery needs to be immediately corrected so Whemco has the benefit of the answers to this proper discovery in completing its rebuttal testimony and supporting its claim for substantial refunds as requested in the Formal Complaint.

WHEREFORE, WHEMCO-Steel Castings, Inc. hereby respectfully requests that the ALJ grant this Motion in its entirety and direct Duquesne Light to provide complete and timely answers to Nos. 2, 3, 4, 8, 18, and 20 of the Interrogatories in a manner so as to not prejudice Whemco's filing of its rebuttal testimony on June 14, 2016.

Respectfully submitted,

Dated: June 8, 2016

  
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Attorneys for WHEMCO-Steel Castings, Inc.

# Exhibit A

**Interrogatories and Requests for Production of Documents  
to Duquesne – Set III Regarding Testimony of William V. Pfrommer**

1. Ref, page 4, lines 12-15: Is it correct that Duquesne was advised in Whemco's response to Duquesne Interrogatory Set II-6 that Whemco first became aware of potential unlawful or improper conduct by Duquesne with respect to the elimination of the Rider No. 5 discount applicable to Rate L customers in Fall of 2013?
2. Ref, page 4, lines 16-17: Identify by name, title, job description and date of retirement or departure from Duquesne each employee that formerly worked at Duquesne that Duquesne believes whose current absence has prejudiced Duquesne in defending itself in this proceeding.
  - a. Identify and describe all efforts made and actions taken to date by Duquesne to identify, locate, contact and/or interview any and all former employees of Duquesne who have or might have information relevant to this proceeding.
  - b. Identify and provide any and all documents developed, used, mailed, and/or sent to or received by former Duquesne employees in connection with the efforts addressed in No. 2a above.
3. Ref: page 7, lines 18-22: Did the notice allegedly provided in connection with the DSP IV Proceeding state that Duquesne intended to:
  - a. eliminate the Rider No. 5 discount applicable to Rate L customers in that proceeding?
  - b. modify any non-generation rate?
4. If the answer to Question No. 3 above is no, identify and explain how any party could complain or challenge any action with respect to the Rider No. 5 discount applicable to Rate L customers based upon that notice.
5. Ref: page 7, lines 5-6: To the best of Duquesne's knowledge, was Pam Polacek providing legal representation and acting as legal counsel to Whemco in connection with the DSP IV proceeding? Provide all documents in support of your answer.
6. Ref: page 7, lines 5-6: To the best of Duquesne's knowledge, during the time that Whemco received notice of the DSP IV proceeding from Ms. Polacek, was she Whemco's legal counsel? Provide all documents in support of your answer.

7. Ref: page 7, lines 6-9: Identify, describe, provide and explain all information and documents made available to the Duquesne Industrial Intervenors (“DII”) with respect to the elimination of the Rider No. 5 discount applicable to Rate L customers that were not available to Whemco at the time Whemco elected not to participate in the DII industrial group.
  - a. Identify, describe, provide and explain all information and documents available to the Duquesne Industrial Intervenors (“DII”) with respect to the elimination of the Rider No. 5 discount applicable to Rate L customers that were provided or made available to DII during the DSP IV proceeding.
8. Identify, describe, explain and provide any data, information or documents Duquesne has in its possession or is aware of establishing or confirming that any party/participant in the DSP IV proceeding had knowledge or awareness at any time during that proceeding that Duquesne Light intended to eliminate the Rider No. 5 discount applicable to Rate L customers in that proceeding.
9. Ref: page 8, lines 3-4: Explain how Duquesne is currently aware that it invited all customers to Rate Schedules GL, GLH, L and HVPS to a meeting on December 11, 2007 to discuss the DSP IV filing? Provide all documents in support of your answer.
10. Ref: page 8, lines 3-4: Identify and describe all topics actually discussed at the referenced December 11, 2007 meeting.
11. Ref: page 8, lines 3-4: Provide all information and documents confirming or establishing that the elimination of the Rider No. 5 discount applicable to Rate L customers was a topic that was identified by Duquesne Light or was actually discussed by the participants at the December 11, 2007 meeting.
12. Ref: page 8, lines 10-12: Provide all documents or other information that identify and describe Duquesne Light’s “practice” to post all tariff filings on its website.
13. Ref: page 8, lines 10-12: How long has Duquesne Light maintained the practice of posting all tariff filings on its website?
14. Ref: page 8, lines 10-12: How and under what circumstances does Duquesne Light advise customers of the availability of tariff filings on its website.
15. Ref: page 8, lines 18-20: Identify and describe the basis for, and provide all documents in support of, your view that customer notices “provide general notice of a utility filing.”
16. Ref: page 12, lines 15-16: Identify and describe (without reference to the customer name) the service characteristics, rate schedule(s) under which service was then being provided, and nature and type of electric load for the two customers Duquesne Light claims were receiving a discount under Rider No. 5 that participated in the DSP IV proceeding.

17. Ref: page 12, lines 15-16: Identify and describe the actual impacts on the rates then being charged to the referenced customers by the elimination of the Rider No. 5 discount.
18. Ref: page 12, lines 15-16: To the best of Duquesne's knowledge, were either of the two referenced customers, any other Duquesne Light Customer, or any party in the DSP IV proceeding aware of the proposed elimination of the Rider No. 5 discount during the conduct of the DSP IV proceeding?
  - a. Identify and provide any and all documents in Duquesne's possession and/or filed in the DSP IV Proceeding suggesting that either of the two referenced customers were aware of the proposed elimination of the Rider No. 5 discount during the conduct of the DSP IV proceeding.
19. Ref: page 13, lines 4-11: Does the Settlement Stipulation in the DSP IV proceeding expressly state that the Rider No. 5 discount for Rate L customers is being eliminated or will be eliminated at some future date? Please fully explain your answer.
20. Ref: page 13, lines 16-18: To the best of Duquesne's knowledge, was any party in the DSP IV proceeding aware of the proposed elimination of the Rider No. 5 (i) at the time the DSP IV tariff compliance filing was made and (ii) later approved by the Commission? Provide all documents in support of your answer.
21. Ref: page 13, lines 25 and page 14, lines 1-7: Identify all portions of this testimony that reflects information provided by counsel.
22. Ref: page 14, lines 14-15: Did Duquesne's 2010 base rate case filing contain a new and different Rider No. 5 than the one at issue in the DSP IV proceeding? Explain your answer.
23. Ref: page 14, lines 14-15: Was the Rider No. 5 discount applicable to Rate L customers eliminated in the 2007-2008 DSP IV proceeding, effective December 31, 2010? Explain your answer.
24. Ref: page 14, line 10. How much time transpired between the date when Duquesne filed its 2010 base rate proceeding and when Duquesne advised Whemco that the discount to Rider No. 5 applicable to Rate L was being terminated as of December 31, 2010? Explain your answer.
25. Ref: page 16, lines 5-11: At the time the Commission suspended Duquesne's 2010 base rate proceeding, to the best of Duquesne's knowledge was Whemco aware of any actual or potential claim or issue that the elimination of the Rider No. 5 discount that occurred in the 2007-2008 DSP IV proceeding was unlawful or in any way erroneous? Explain your answer.
26. Provide copies of each customer notice Duquesne has (i) sent to customers, (ii) published in general circulation newspapers, (iii) caused to be published in the Pennsylvania Bulletin, and/or (iv) provided or sent to customers or the public in any medium, in connection with each of Duquesne's last four default service proceedings.

# Exhibit B

**Interrogatories and Requests for Production of Documents  
to Duquesne - Set III Regarding Testimony of William V. Pfrommer**

2. Ref, page 4, lines 16-17: Identify by name, title, job description and date of retirement or departure from Duquesne each employee that formerly worked at Duquesne that Duquesne believes whose current absence has prejudiced Duquesne in defending itself in this proceeding.
  - a. Identify and describe all efforts made and actions taken to date by Duquesne to identify, locate, contact and/or interview any and all former employees of Duquesne who have or might have information relevant to this proceeding.
  - b. Identify and provide any and all documents developed, used, mailed, and/or sent to or received by former Duquesne employees in connection with the efforts addressed in No. 2a above.

**Response:**

The primary former employees are Kim Titley, Nancy Krajovic, Lynda Pekarsky and Gary Jack. The Company is disadvantaged in this proceeding because former employees have other jobs and have limited time to devote to former employers and do not have access to their files after they leave the Company.

**Interrogatories and Requests for Production of Documents  
to Duquesne - Set III Regarding Testimony of William V. Pfrommer**

3. Ref: page 7, lines 18-22: Did the notice allegedly provided in connection with the DSP IV Proceeding state that Duquesne intended to:
  - a. eliminate the Rider No. 5 discount applicable to Rate L customers in that proceeding?
  - b. modify any non-generation rate?

**Response:**

In preparing the responses to these interrogatories, the Company was able to locate a copy of the DSP IV bill insert. This bill insert is attached.

## **NOTICE OF PROPOSED RATE CHANGES**

### **To Our Customers:**

Duquesne Light Company is filing with the Pennsylvania Public Utility Commission (PUC) a request to implement a comprehensive Generation Supply Plan, as required under State law, to provide "default" generation service in the event that a customer does not choose a competitive supplier. The plan, which includes supply of electric generation service and associated rates, covers the period from Jan. 1, 2008 through Dec. 31, 2010. This Notice describes the company's plan, the requested rates for generation supply service, the PUC's role, and what actions you can take.

Duquesne Light's plan would result in an overall increase in generation rates of approximately \$46 million per year. This amount is for electric generation supply for Duquesne's default service, also known as its provider of last resort obligation. If the company's entire request is approved, the total bill for an average residential (Rate RS) customer using 600 kilowatts per month would increase from \$72.30 to \$78.98 or 9.2%. The total bill for an average commercial (Rate GM) customer using 6,000 kW hours would increase from \$535.67 to \$585.37 or 9.3%. The total bill for an average industrial customer is unknown since they will be billed on hourly priced service and those rates can increase or decrease depending on market price. These proposed increases and percentages represent total Duquesne Light rates, which include rates for distribution, transmission and generation.

To find out your customer class or how the Generation Supply Plan may affect your electric bill, contact Duquesne Light at 1-888-393-7100. The rates requested by the company are contained in the filing that Duquesne Light made to the PUC. You may examine the material filed with the PUC, which explains the requested increase and the reasons for it. A copy of this material is available for your review at 411 Seventh Ave., Pittsburgh, PA 15219. Upon request, the company will send you a copy of the Petition. The state agency that approves rates for public utilities is the PUC. The PUC will examine the Generation Supply Plan and may investigate and/or hold hearings on the request.

(over)

The company must prove that the requested rates are reasonable. After examining the evidence, the PUC may grant all, some, or none of the request or may reduce existing rates.

The PUC may change the amount of the rate increase or decrease requested by the utility for each customer class. As a result, the rate charged to you may be different than the rate requested by the company and shown above.

There are three ways to challenge the company's Generation Supply Plan.

1. You can file a formal complaint. If you want a hearing before a judge, you must file a formal complaint. By filing a formal complaint, you assure yourself the opportunity to take part in hearings about the Generation Supply Plan. If no formal complaints are filed, the Commission may grant all, some or none of the request without holding a hearing before a judge.

2. You can send the PUC a letter telling why you object to the Generation Supply Plan. Sometimes there is information in these letters that makes the Commission aware of problems with the company's service or management. This information can be helpful when the Commission investigates the rate request. Send your letter or request for a formal complaint form to the Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, PA 17105-3265.

3. You can be a witness at a public input hearing. Public input hearings are held if the Commission opens an investigation of the company's filing and if there are a large number of customers interested in the case. At these hearings, you have the opportunity to present your views in person to the PUC judge hearing the case and the company representatives. All testimony given "under oath" becomes part of the official rate case record. These hearings are held in the service area of the company.



**Duquesne Light**

*Our Energy...Your Power™*

**Interrogatories and Requests for Production of Documents  
to Duquesne - Set III Regarding Testimony of William V. Pfrommer**

4. If the answer to Question No. 3 above is no, identify and explain how any party could complain or challenge any action with respect to the Rider No. 5 discount applicable to Rate L customers based upon that notice.

**Response:**

The tariff that was filed with the DSP IV filing clearly provided that Rider No. 5 – Time of Day Discounts was being eliminated December 31, 2010 for all customers. The same tariff provision was included in the DSP IV Compliance filing and was approved by the Pennsylvania Public Utility Commission.

**Interrogatories and Requests for Production of Documents  
to Duquesne - Set III Regarding Testimony of William V. Pfrommer**

8. Identify, describe, explain and provide any data, information or documents Duquesne has in its possession or is aware of establishing or confirming that any party/participant in the DSP IV proceeding had knowledge or awareness at any time during that proceeding that Duquesne Light intended to eliminate the Rider No. 5 discount applicable to Rate L customers in that proceeding.

**Response:**

All such documents that Duquesne Light is aware of at this time are in the public file in the DSP IV proceeding, including the tariff and testimony. Duquesne Light cannot be certain that these are the only documents due to the passage of time and Whemco's substantial delay in filing its Complaint.

**Interrogatories and Requests for Production of Documents  
to Duquesne - Set III Regarding Testimony of William V. Pfrommer**

18. Ref: page 12, lines 15-16: To the best of Duquesne's knowledge, were either of the two referenced customers, any other Duquesne Light Customer, or any party in the DSP IV proceeding aware of the proposed elimination of the Rider No. 5 discount during the conduct of the DSP IV proceeding?
- a. Identify and provide any and all documents in Duquesne's possession and/or filed in the DSP IV Proceeding suggesting that either of the two referenced customers were aware of the proposed elimination of the Rider No. 5 discount during the conduct of the DSP IV proceeding.

**Response:**

The Company did not assess customer awareness of the DSP IV filing.

- a. The tariff that was filed with the DSP IV filing clearly provided that Rider No. 5 – Time of Day Discounts was being eliminated for all customers. The same tariff provision was included in the DSP IV Compliance filing and was approved by the Pennsylvania Public Utility Commission.

**Interrogatories and Requests for Production of Documents  
to Duquesne - Set III Regarding Testimony of William V. Pfrommer**

20. Ref: page 13, lines 16-18: To the best of Duquesne's knowledge, was any party in the DSP IV proceeding aware of the proposed elimination of the Rider No. 5 (i) at the time the DSP IV tariff compliance filing was made and (ii) later approved by the Commission? Provide all documents in support of your answer.

**Response:**

Any party that reviewed the compliance filing should have been aware that Rider No. 5 – Time of Day Discounts was being eliminated for all rate schedules as is evident from the clear language in the tariff that was marked with a (C). The compliance filing was provided as DLC Exhibit WVP-11.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>WHEMCO-STEEL CASTINGS, INC.</b>	:	
	:	
<b>v.</b>	:	<b>DOCKET NO. C-2014-2459527</b>
	:	
<b>DUQUESNE LIGHT COMPANY</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the Motion of WHEMCO-Steel Castings, Inc. to Compel Answers to Interrogatories and Requests for Production of Documents Propounded upon Duquesne Light Company upon the parties and in the manner listed below:

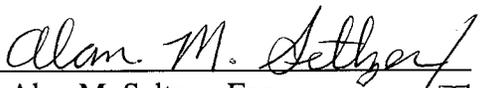
**Via Email and First-Class Mail**

Administrative Law Judge Jeffrey A. Watson  
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Dated this 8<sup>th</sup> day of June, 2016.

  
\_\_\_\_\_  
Alan M. Seltzer, Esq. *TLG*