

331 Shady Ridge Drive  
Monroeville, PA 15146

November 11, 2016

*Via Paper Filing*

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

RE: **Michele Hriadil and Francis Hriadil v. Duquesne Light Company**  
Docket No. C-2016-2571726

Dear Secretary Chiavetta:

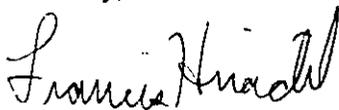
Enclosed please find the Agreement between Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company, and the Complaints, Michele Hriadil and Francis Hriadil, to extend the due dates for the Complaints responses to both Duquesne Light Company's

Preliminary Objections to the Formal Complaint  
and Answer and New Matter to the Formal Complaint

A copy of this document has been served upon the Respondent's Counsel, Jeremy V Farrell, Esquire, in accordance with Commission regulations.

Please feel free to contact me if you have any questions.

Sincerely,



Francis Hriadil  
Complainant  
(412) 779-3314  
hriadil@attglobal.net

Enclosure

Cc: Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company (with enclosure)

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NOV 12 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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NOV 11 2016

MICHELE HRIADIL and  
FRANCIS HRIADIL,

PA PUBLIC UTILITY COMMISSION  
SECRETARIES BUREAU

Complainant,

vs.

No: C-2016-2571726

DUQUESNE LIGHT COMPANY,

Respondent.

**Agreement to Extend Complainants  
Response Dates for**

**PRELIMINARY OBJECTIONS TO  
FORMAL COMPLAINT**

**ANSWER AND NEW MATTER TO  
FORMAL COMPLAINT**

Filed by Michele and Francis Hriadil

hriadil@attglobal.net  
(412) 779-3314  
331 Shady Ridge Drive  
Monroeville, PA 15146

**AGREEMENT TO EXTEND WRITTEN RESPONSE DATES OF COMPLAINANTS**

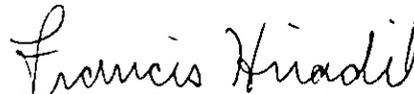
**COMPLAINANTS: MICHELE AND FRANCIS HRIADIL**

**RESPONDENT: JEREMY V FARREL, ESQUIRE  
COUNSELS FOR DUQUESNE LIGHT COMPANY**

**AGREED TO EXTEND COMPLAINANTS RESPONSE DUE DATES TO:**

**DECEMBER 1, 2016 - for PRELIMINARY OBJECTIONS TO FORMAL COMPLAINT**

**DECEMBER 15, 2016 - for ANSWER AND NEW MATTER TO FORMAL  
COMPLAINT**



Francis Hriadil  
November 11, 2016

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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NOV 13 2016

MICHELE HRIADIL and  
FRANCIS HRIADIL,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

No: C-2016-2571726

**Agreement to Extend Complainants Response Dates for  
PRELIMINARY OBJECTIONS TO FORMAL COMPLAINT  
ANSWER AND NEW MATTER TO FORMAL COMPLAINT**

TO THE HONORABLE COMMISSION:

On November 10, 2016, Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company, agreed to extend the response due dates for the Complainants Michele and Francis Hriadil to December 1, 2016 - for the PRELIMINARY OBJECTIONS TO FORMAL COMPLAINT and December 15, 2016 - for the ANSWER AND NEW MATTER TO FORMAL COMPLAINT

The correspondences between the Complainants and the Counsel for Duquesne Light Company documenting this agreement are copied on the following pages.

From: hriadil@attglobal.net  
To: jfarrell@tuckerlaw.com  
Date: 11/10/2016 08:13  
Subject: RE: Questions, etc. concerning your documents dated November 4, 2016.

Cc: Irulli@tuckerlaw.com, rchiavetta@pa.gov

Dear Att Farrell.

RE: Michele Hriadil and Francis Hriadil v Duquesne Light Company, Docket No. C-2016-2571726.

Thank you for your quick response.

I was initially confused by the blank response. No problem, mistakes happen. I hope everyone understands here that we bear no ill will toward anyone, and we are simply trying to do what we believe is best for our family, and our circumstances.

I understand your statement regarding us understanding our obligation in responding to Duquesne Light's position. That was the main reason for us asking for a clarification about the due dates, and requesting a short extension to allow us a little bit more time to make sure we understand everything correctly and completely.

We understand that you represent Duquesne Light in this matter, and have a legal responsibility to represent them to the best of your ability. We cannot fault anyone for that. All we ask for is fair and reasonable treatment and consideration.

So, to restate your concurrence with our request:

1. We are to submit our response to your Preliminary Objections to our Complaint by December 01, 2016.
2. We are to submit our response to your Answer and New Matter to our Complaint by December 15, 2016.

Thank you for granting our request.

Best regards.  
Francis Hriadil.

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From: "Farrell, Jeremy" <jfarrell@tuckerlaw.com>  
To: "hriadil" <hriadil@attglobal.net>  
Date: 11/10/2016 07:43  
Subject: RE: Questions, etc. concerning your documents dated November 4, 2016..

Mr. Hriadil:

I believe that I just sent you a blank email in error. I apologize for that.

Before I respond to the questions in your email, I am compelled to note that I represent Duquesne Light and cannot provide you with any legal advice regarding your obligations in responding to Duquesne

Light's Answer/New Matter and Preliminary Objections. You have the right to consult with an attorney if you so wish. That being said, I have no objection to the continuances that you requested in your email below, which I believe moots your other questions.

You may advise the Commission that I consent to your requested extension. Thank you.

Jeremy V. Farrell, Esq.  
Tucker Arensberg, P.C.  
Direct Dial: (412) 594-3938  
=====

From: hriadil [mailto:hriadil@attglobal.net]  
To: Farrell, Jeremy; Rulli, Lauren  
Date: Thursday, November 10, 2016 7:31 AM  
Subject: Questions, etc. concerning your documents dated November 4, 2016.

Cc: Chiavetta, Rosemary

Dear Att Farrell and Att Rulli.

I have a question concerning the material we received from you dated November 4, 2016, regarding: Michele Hriadil and Francis Hriadil v Duquesne Light Company, Docket No. C-2016-2571726.

You sent 2 sets of documents each requiring a response within different return periods, one being 10 days and the other being 20 days.

We have the following questions as it is unclear to us from your documents, exactly what those return dates are.

- 1; Your documents are dated November 4. But, we did not receive the documents until November 7. So, we assume that the count starts from the date we received your documents. Please confirm that that is the case, that the count begins from 11/7, for us to submit our response.
2. Also, it is unclear whether your document means 10 and 20 business days respectively, or does it mean 10 and 20 literal days, including non-work days (i.e. Saturday and Sundays). Which is the case?

10 business days from 11/7 would mean due by 11/21 for our response to your preliminary objections  
20 business days from 11/7 would mean due by 12/05 for our response to your answer and new matter

10 literal days from 11/7 would mean due by 11/18 for our response to your preliminary objections  
20 literal days from 11/7 would mean due by 11/28 for our response to your answer and new matter

Please indicate which dates are correct?

3. Request for a short extension:

For us to completely review your documents to make sure we fully understand its content, we would need some time to review them, to be fair. As a result, we are requesting a short extension of those dates, to account for the election and family holiday activities, etc:

For us to completely review your documents to make sure we fully understand its content, we would need some time to review them, to be fair. As a result, we are requesting a short extension of those dates, to account for the election and family holiday activities, etc:

Specifically, we are requesting that our response to your preliminary objections be extended to a due date of 12/1.

And, our response to your answer and new matter be extended to a due date of 12/15.

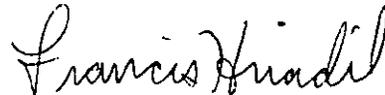
We hope that this is agreeable to you. We think that this is a reasonable request. Please let us know as soon as possible so that we can plan accordingly.

A copy of this request has been sent to Rosemary Chiavetta, Secretary of the PA PUC so that she is aware of our request.

Sincerely yours,  
Francis Hriadil.

=====

Respectfully submitted,



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Francis Hriadil  
(412) 779-3314  
331 Shady Ridge Drive  
Monroeville, PA 15146

November 11, 2016

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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MICHELE HRIADIL and  
FRANCIS HRIADIL,

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DUQUESNE LIGHT COMPANY,

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

No: C-2016-2571726

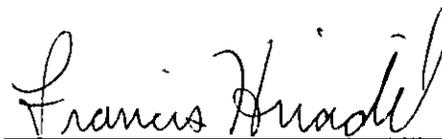
**CERTIFICATE OF SERVICE**

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):

Jeremy V Farrell, Esquire  
Lauren N. Rulli, Esquire  
1500 One PPG Place  
Pittsburgh, PA 15222  
(412) 594-5619 (Fax)

Counsel for Respondent, Duquesne Light Company

Dated this 11<sup>th</sup> day of November, 2016



Michele and Francis Hriadil  
331 Shady Ridge Drive  
Monroeville, PA 15146

(412) 779-3314  
hriadil@attglobal.net

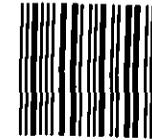
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F. Hriadil  
331 Shady Ridge Drive  
Monroeville, PA 15146

**Rosemary Chiavetta, Secretary**  
**Pennsylvania Public Utility Commission**  
**400 North Street**  
**Harrisburg, Pennsylvania 17120**