

ORIGINAL



Duquesne Light
A DQE Company

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Regina M Sestak
Attorney

May 13, 2002

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Certificate of Mailing

MAY 13 2002

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P O Box 3265
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE Dennis W Seach v Duquesne Light Company
Docket No C-20027455

Dear Secretary McNulty:

Enclosed for filing in the above-referenced matter are an original and three copies of Duquesne Light Company's Answer. A copy of this document has been served upon the Complainant in accordance with Commission regulations.

DOCUMENT
FOLDER

Sincerely,

Regina M Sestak
Attorney for
Duquesne Light Company

encs

c Dennis W Seach (w/enclosure)

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MAY 13 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DENNIS W SEACH,)
)
Complainant.)
)
v)
)
DUQUESNE LIGHT COMPANY,)
)
Respondent)

Docket No C-20027455

ANSWER

TO THE HONORABLE COMMISSION

AND NOW comes the Respondent, Duquesne Light Company, by and through its attorney, Regina M. Sestak, and files the within Answer of which the following is a statement.

1 Admitted However, by way of further response, Respondent believes and therefore avers that the account in question is a commercial account for service to 1272 Benton Avenue, Pittsburgh, PA 15212, which is billed to Complainant under Account Number 7001185098001

2 Admitted

3 Denied in part and admitted in part

Complainant's averment "I received bill for 1800.00," is an apparent reference to the multi-month corrected bill issued on said commercial account on November 23, 2001. If so, this averment is denied as stated. On the

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DOCKETED

MAY 28 2002

contrary, said bill, due December 11, 2001, indicated that, for the months during which Complainant's meter could not be read, he should have been billed \$1,840.49. When payments received during that period were deducted from this amount, Complainant's account balance was \$1,755.36.

Complainant's averment that there was no actual reading on the account in question until October, 2001 is admitted.

As it is not clear who Complainant intends to mean by "workmen," after reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainant's averments "[w]orkmen told me he could not get accurate reading because meter was faulty" and "[h]e reported it to co. who told me someone would put in new meter," and these averments are therefore denied. To the extent that a response may be deemed necessary, Meter No. G94822533 had been installed at the premises on January 7, 1999, prior to Complainant becoming ratepayer of record. A reading was obtained on January 29, 2001, the date Complainant became ratepayer of record. Said meter, which is located inside the premises, was fitted with a remote reading device which failed to function properly, although the meter was accurately measuring consumption. Respondent was therefore unable to obtain a reading prior to gaining access to the premises on November 20, 2001. As a result, estimated bills were issued to Complainant.

Complainant's averment that a man replaced the meter at Complainant's premises in December, 2001 is denied. On the contrary, Meter Number G94822533 was replaced with Meter Number G94824756 on February 7, 2002,

although Respondent had attempted to gain access to the premises prior to that date in order to effectuate the meter change.

After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainant's averment "man repl. Meter & told me old meter gave him same readings in Oct that it did in Jan & meter was definitely broke," "[h]e told me co would contact me to determine bill owed," and "I rec'd same bill with no adjustments," and these averments are therefore denied. By way of further response, the corrected bill issued November 23, 2001, was based upon the reading obtained on November 20, 2001. Subsequent bills were estimated until an actual reading was obtained from Meter G94824756 on March 31, 2002.

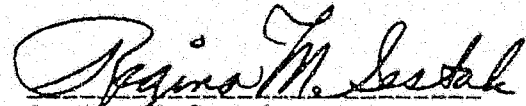
4 To the extent this paragraph contains requests for relief, no response is required.

As Complainant's averment "(address for meter is Seach Bakery, 1272 Benton Ave , Pgh., PA)" identifies the location of the commercial account in question, it is admitted.

WHEREFORE, Respondent requests that after reasonable investigation and hearing the Complaint be dismissed

Respectfully submitted:

DUQUESNE LIGHT COMPANY
By Counsel:



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AFFIDAVIT

I, Fred R. Allison, being duly sworn according to law depose and say that I am authorized to make this affidavit on behalf of Duquesne Light Company being the holder of the office of Vice President – Information Technology and Revenue Cycle Services with that corporation, and that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and Duquesne Light Company expects to be able to prove the same at any hearing hereof.

Fred R. Allison

Fred R. Allison

Sworn and subscribed before me this 13th day of May, 2002.

Mary Jane Hammer

Notary Public

My Commission Expires

Notarial Seal
Mary Jane Hammer, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Oct. 6, 2003
Member, Pennsylvania Association of Notaries

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

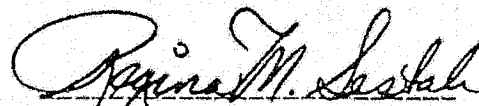
DENNIS W SEACH,)
)
 Complainant,)
)
 v) Docket No. C-20027455
)
 DUQUESNE LIGHT COMPANY,)
)
 Respondent)

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)

Dennis W. Seach
425 N. 4th Street
Clairton, PA 15025

Dated this 13th day of May, 2002



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