

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00 :
2. BUREAU: ALJ :
3. SECTION(S): : 4. PUBLIC MEETING DATE:
5. APPROVED BY: : 00/00/00
DIRECTOR: :
SUPERVISOR: :
6. PERSON IN CHARGE: : 7. DATE FILED: 03/22/02
8. DOCKET NO: F-01088937 : 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: SULLIVAN, TAWNIA

RESPONDENT/APPLICANT: DUQUESNE LIGHT COMPANY

COMP/APP COUNTY: ALLEGHENY

UTILITY CODE: 110150

ALLEGATION OR SUBJECT

COMPLAINANT STATES THAT SHE HAS HAD SOME PROBLEMS AND IS NOT ABLE TO PAY HER BILL. SHE ASKS FOR A CHANCE TO WORK IT OUT.

DOCUMENT
FOLDER

DOCKETED
MAR 29 2002

ORIGINAL

FORMAL COMPLAINT FORM
Pennsylvania Public Utility Commission

Please Print:

F- 01088937
110150

BCS1088937
3/26/02

1. Your Name, Mailing Address and Telephone Number.

Name Tawna Sullivan

Street/P.O. Box 22 Allen street Apt # —

City pittsburgh State Pa Zip 15210

County Allegheny Home Telephone-Area Code (412) 431-3201
Work Telephone-Area Code () Not working

2. Name of Company your complaint concerns: Duquene lights

3. What is your complaint?

I'm on the Cap and I was paying on
time however a lot of tragedy has struck
my family my mother died unexpected my
mental state of mind was gone my children
are asthmatic & diabetic and they took
all my intentions are good I've just had a
rough struggle I have had surgery on
Feb 26 to have my lymph nodes removed its
been hard. I loss my job at Allegheny General
hospital and I've currently have been called back

(If you need more space, use additional paper and attach to this form).

(-over-)

RECEIVED
2002 MAR 22 AM 10:17
SECRETARY'S BUREAU
PUC

4. What do you want the Public Utility Commission to do about your complaint?

just to please give me a chance I know
I've used you in the past but things never
ever got any better for me but I do try
hard.

(If you need more space, use additional paper and attach to this form)

5. You must sign and date your complaint below.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Liam Sullivan
Original Signature of complaining person

3-19-02
Date

6. If you are represented by a lawyer you must provide your lawyer's name, address and telephone number.

Lawyer's Name _____

Street _____

City _____ State _____ Zip _____

Telephone Number-Area Code (_____) _____

APPEAL FORM

I want to appeal this Informal Complaint Decision. Please send me formal complaint forms at the address listed below

1088937

BCS Number

February 25, 2002

Date of Mailing

Company Name:

Verizon PA

717 Arch Street, 17th Floor

Philadelphia, PA 19103

Attention: B. Gamble

RECEIVED

MAR 01 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

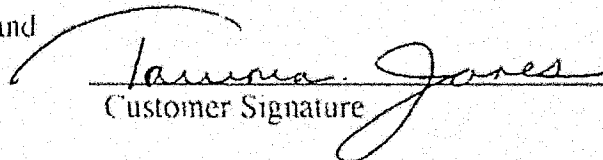
CUSTOMER NAME AND ADDRESS

Please correct any mistakes in your name and address.

TAWNIA A. JONES

22 ALLEN ST.

PITTSBURGH, PA 15210


Customer Signature

412 - 431 - 3201

(Area code) Telephone no.

Mail this completed form to:

Secretary

PA Public Utility Commission

P. O. Box 3265

Harrisburg, PA 17105-3265

THIS SLIP MUST BE RETURNED WITHIN 10 DAYS OF THIS DATE:

February 25, 2002

APPEAL DATE

You Do Not Need a Lawyer to File
A Formal Complaint and Have a Hearing!



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

3/26/02

IN REPLY PLEASE
REFER TO OUR FILE

MARCH 6, 2002

BCS1088937

TAWNIA A. JONES
22 ALLEN STREET
PITTSBURGH PA 15210

Dear Sir/Madam:

We have received your request to appeal the decision of the Bureau of Consumer Services.

We have enclosed one complaint form for you to complete. Please read carefully the instructions to help you complete the form.

** Please make sure you sign the form. We must receive your original signature in order for us to process your complaint. Your form will be returned to you if an original signature is not received.

Return the form to us on or before MARCH 26, 2002 to the address listed below:

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

While you wait for us to reach a decision on your complaint, you must pay all undisputed bills (ones that are not a part of your complaint). As long as you pay all undisputed bills and return these formal complaint forms to us on time, the company is not permitted to terminate your service.

Commission Procedures for Formal Complaints

- We send a copy of this letter to the company so they know you are appealing the Bureau of Consumer Services' decision;
- We also send the company a copy of your completed formal complaint forms. Once they receive it, they have 20 days to send us an answer to your complaint. The company will send you a copy of their answer.
- Once we receive all the paperwork, we usually will schedule your hearing before an Administrative Law Judge.

- We will notify both you and the company by mail when the hearing date is set.
- If you cannot travel to your hearing, you can request that the hearing be held by phone. This is called a telephonic hearing. If we can, we will schedule a telephonic hearing for you.
- We will most likely schedule your hearing sometime within three months after you file your complaint forms. If you know of certain dates when you will not be available for a hearing, let us know when you file your forms. We will try to work around your schedule.
- If you cannot attend the hearing on the scheduled date, you must request a different time or date. You should request the change at least 5 days before your hearing by writing to:

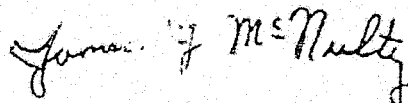
Office of Administrative Law Judge
Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

YOU SHOULD INCLUDE YOUR DAYTIME TELEPHONE NUMBER IN YOUR LETTER. DEPENDING ON YOUR REASON FOR NOT BEING ABLE TO ATTEND THE SCHEDULED HEARING, YOUR REQUEST TO CHANGE THE HEARING MAY OR MAY NOT BE APPROVED. WE WILL LET YOU KNOW OUR DECISION ON YOUR REQUEST FOR CHANGING THE HEARING DATE BEFORE THE DATE OF THE HEARING.

YOU MUST ATTEND SCHEDULED HEARINGS IN PERSON OR BY PHONE. IF YOU DO NOT ATTEND, YOUR COMPLAINT MAY BE DISMISSED (THROWN OUT).

If you have any questions about the complaint process, please call the Bureau of Consumer Services, toll free, at 1-800-782-1110.

Very truly yours,



James J. McNulty
Secretary

JIH

CC: VERIZON PA INC

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: MARCH 29, 2002

TAWNIA SULLIVAN
Complainant

VS.

DUQUESNE LIGHT COMPANY
Respondent

Complaint Docket
No. F-01088937

DOCUMENT
FOLDER

DOCKETED
MAR 29 2002

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: DUQUESNE LIGHT COMPANY

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

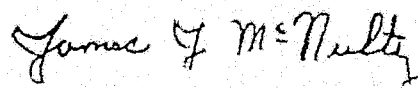
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66

Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: MARCH 29, 2002

F-01088937

DUQUESNE LIGHT CO
JOHN MARSHALL PRESIDENT
411 7TH AVENUE
PITTSBURGH PA 15219-1905

DOCUMENT
FOLDER

Dear Sir/Madam

A complaint has been filed against you before the Pennsylvania Public Utility Commission by TAWNIA SULLIVAN. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

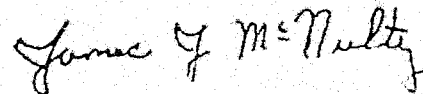
MARCH 29, 2002

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,



James J. McNulty
Secretary

dbs



Duquesne Light

A DQE Company

Legal Department
411 Seventh Avenue, 9th
Pittsburgh, PA 15219

Tel: 412-393-5446
Fax: 412-393-4118
sestak@dlc.com

ORIGINAL

Regina M. Sestak
Attorney

April 22, 2002

Certificate of Mailing

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

RE: Tawnia Sullivan v. Duquesne Light Company
Docket No. F-01088937

Dear Secretary McNulty:

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

DOCUMENT
FOLDER

Sincerely,

Regina M. Sestak
Attorney for
Duquesne Light Company

RECEIVED

APR 22 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

encs

c Tawnia Sullivan (w/enclosure)

143

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TAWNIA SULLIVAN,)
)
 Complainant,)
)
 v)
)
 DUQUESNE LIGHT COMPANY,)
)
 Respondent.)

Docket No. F-01088937

DOCUMENT
FOLDER

DOCKETED

APR 29 2002

ANSWER AND NEW MATTER

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 and New Matter of which the following is a statement

Answer

1. Admitted. However, the ratepayer of record for the account in question is Nathaniel Sullivan. Complainant has identified herself as the ratepayer's spouse in her contacts with Respondent.

2. Admitted. However, by way of further response, the correct spelling of Respondent's name is Duquesne Light Company.

3. Denied

Complainant's averment "I am on the CAP" is denied as stated. As noted above, Complainant is not ratepayer of record for the account in question

RECEIVED

APR 22 2002

PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

By way of further response, said account was placed on Respondent's Customer Assistance Program (CAP) on July 16, 2001. Based upon household income, the original CAP agreement required payment of 70% of the regular budget amount. The regular budget is an average based upon usage that is recomputed monthly and is therefore subject to change. Due to Respondent's elimination of the Competitive Transition Charge (CTC), the CAP agreement was reviewed and changed on March 20, 2002. The new agreement requires payment of 80% of the budget amount.

Complainant's averment that she was paying on time is denied. On the contrary, there have only been four payments made on the account in question since July 16, 2001: \$38.00 on September 6, 2001, \$39.00 on October 4, 2001, \$38.00 on November 13, 2001 and \$38.00 on December 24, 2001.

After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainant's averments regarding her mother's death, her health and the health of her children, and these averments are therefore denied.

Complainant's averments "[m]y intentions are good," and "I've just had a rough struggle," are statements of opinion to which no response is required.

After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainant's averment that she had surgery on Feb. 26th nor the reason for said surgery, and this averment is therefore denied.

Complainant's averment "its been hard" is a statement of opinion to which no response is required.

After reasonable investigation, Respondent is without sufficient knowledge or information to form a belief as to the truth of Complainant's averments that she lost her job at Allegheny General Hospital and that she has currently been called back, and these averments are therefore denied.

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

Complainant's averments, "I know I used you in the past but things never ever got any better for me," and "but I do try hard," are statements of opinion to which no response is required.

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

New Matter

5. Paragraphs one through four above are hereby incorporated by reference.

6. The Public Utility Commission (PUC) Bureau of Consumer Services (BCS) issued a decision at BCS Case Number 1090347 which required payment of the CAP catch up amount of \$200.00 by April 5, 2002. A copy of the Closing Data Sheet is attached hereto, incorporated herein, and marked Exhibit 1.

7. Since the BCS decision went into effect, Respondent has not received any payments on the account in question.

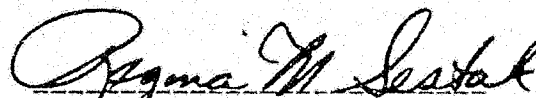
WHEREFORE, Respondent requests that the Commission

- 1) Authorize Respondent to add Complainant Tawnia Sullivan as co-ratepayer of record,

- 2) Issue an interim order, which requires that payments be made as directed by said BCS decision pending further order on this complaint.
- 3) Authorize Respondent to terminate service to the account in question prior to hearing in the event that payments as directed by said BCS decision are not made; and
- 4) Require a lump sum payment of the amount due and payable to Respondent pursuant to said BCS decision which remains unpaid as of the date of the hearing or date of final order.

Respectfully submitted

DUQUESNE LIGHT COMPANY
By Counsel:



Regina M. Sestak
Pa. I.C. # 23632
Duquesne Light Company
411 Seventh Avenue, 9-1
Pittsburgh, PA 15219
Telephone (412) 393-1546
FAX (412) 393-1418

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 22nd day of April, 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

TAWNIA SULLIVAN,)
)
)
Complainant,)
)
v.)
)
DUQUESNE LIGHT COMPANY,)
)
Respondent)

Docket No. F-01088937

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).


Tawnia Sullivan
22 Allen Street
Pittsburgh, PA 15210

RECEIVED

APR 22 2002

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dated this 22nd day of April, 2002



Regina M. Sestak
Pa. I.D. # 23632
Duquesne Light Company
411 Seventh Avenue
Mail Drop 9-1
Pittsburgh, PA 15219
Telephone (412) 393-1546
FAX (412) 393-1418



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Office Of Administrative Law Judge
P.O. Box 3265, Harrisburg, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

July 8, 2002

In Re: F-01088937

(See attached list)

Tawnia Sullivan v. Duquesne Light Company

Requests payment arrangements.

Telephone Hearing Notice

This is to inform you that a hearing by telephone on the above-captioned case will be held as follows:

Type: Initial telephone hearing
Date: Monday, August 19, 2002
Time: 10:00 a.m.
Presiding: Administrative Law Judge Larry Gesoff
1103 Pittsburgh State Office Building
300 Liberty Avenue
Pittsburgh, PA 15222
Telephone: (412) 565-3550
Fax: (412) 565-5692

The judge will be presiding as authorized by Chapter §56.174 of the Pennsylvania Code.

If you have not provided a current telephone number where you can be reached for participation in the hearing OR YOUR AREA CODE HAS CHANGED, then you must contact the presiding officer at least 7 days before the actual hearing and provide the necessary information.

DOCUMENT
FOLDER

DOCKETED
JUL 11 2002

At the above date and time, the Presiding Officer will contact the parties as follows:

Tawnia Sullivan	(412) 431-3201
Regina M. Sestak, Esquire	(412) 393-1546

If you have any hearing exhibits to which you will refer during the hearing, 3 copies must be sent to the Administrative Law Judge and 1 copy each must be sent to every other party. All copies must be received at least 3 days before the hearing.

Attention: You may lose the case if you do not take part in this hearing and present facts on the issues raised.

Except for those individuals representing themselves, the Commission's rules require that all parties have an attorney; therefore, you should have an attorney of your choice file an entry of appearance before the scheduled hearing.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission:

- Scheduling Office: (717) 787-1399.
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

pc: Judge Gesoff
Susan Licon
Beth Plantz
Docket Section
Calendar File