

July 11, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Miranda Grace Edwards v. Duquesne Light Company
Docket No. C-2018-3002741

Dear Secretary Chiavetta:

Attached please find the Agreement between Shane Miller, Esq., Counsel for Duquesne Light Company, and the Complainant, Miranda Grace Edwards, to extend the due dates for the Complainant's responses to 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, Shane Miller, Esq., in accordance with Commission regulations.

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

Sincerely,



M. Grace Edwards
Complainant
msea.mdew@gmail.com

Attachment

Cc: Shane Miller, Esquire, Counsel for Duquesne Light Company (with attachment)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

**Agreement to Extend
Complainant's Response Dates
for**

**PRELIMINARY OBJECTIONS TO
FORMAL COMPLAINT
ANSWER AND NEW MATTER TO
FORMAL COMPLAINT**

Filed by Miranda Grace Edwards

msea.mdew@gmail.com
3835 Acorn Street
Pittsburgh, PA 15207

AGREEMENT TO EXTEND WRITTEN RESPONSE DATES OF COMPLAINANTS

COMPLAINANT: MIRANDA GRACE EDWARDS

RESPONDENT: SHANE MILLER, ESQUIRE

COUNSEL FOR DUQUESNE LIGHT COMPANY

AGREED TO EXTEND COMPLAINANT'S RESPONSE DUE DATES TO:

AUGUST 6, 2018 – for PRELIMINARY OBJECTIONS TO FORMAL COMPLAINT

AUGUST 15, 2018 – for ANSWER AND NEW MATTER TO FORMAL COMPLAINT



Miranda Grace Edwards

July 11, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

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

TO THE HONORABLE COMMISSION:

On July 11, 2018, Shane Miller, Esquire, Counsel for Duquesne Light Company, agreed to extend the response due dates for the Complainant Miranda Grace Edwards

to August 6, 2018 – for the PRELIMINARY OBJECTIONS TO FORMAL COMPLAINT

and August 15, 2018 – for the ANSWER AND NEW MATTER TO FORMAL COMPLAINT

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

Miranda Grace Edwards v. Duquesne Light Company, Docket No. C-2018-3002741

Mr. Miller,

Thank you for granting my request. I appreciate the additional time to understand the contents of the legal documents pertaining to this matter correctly and completely.

So, to restate your concurrence with my request:

1. I am to submit my response to your Preliminary Objections to my Complaint by August 6, 2018, at 4:30 p.m.
2. I am to submit my response to your Answer and New Matter to my Complaint by August 15, 2018, at 4:30 p.m.

Please let me know if any part of 1. or 2. is incorrect.

Thanks again,
Grace Edwards

Miller, Shane 5:01 PM (27 minutes ago)

to me, Jeremy

Ms. Edwards:

I do not oppose a 20-day extension of the deadlines to file your response to Duquesne Light's Answer and New Matter and Preliminary Objections, respectively. However, as Secretary Chiavetta stated, you must submit an official filing containing your request. In your request, you can state that counsel for Duquesne Light does not oppose a 20-day extension of the deadlines. But if you request more than a 20-day extension of the deadlines, please note that I do not consent to that request.

Sincerely,

Shane Miller, Esq.

Litigation Associate

1500 One PPG Place

Pittsburgh, PA 15222

Phone: 412.594.5503

E-mail: smiller@tuckerlaw.com

[Bio](#) [Website](#)

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M. Grace Edwards <msea.mdew@gmail.com> 10:45 AM (6 hours ago)

to kmeyers

Hello Ms. Meyers,

I haven't received a response from either Mr. Miller or Mr. Farrell to my email of yesterday, so I am just checking in. The matter in question is time-sensitive, otherwise I would not be following up so soon after my initial email. Can you tell me if Mr. Farrell will be in the office and answering emails today?

Thank you,
Grace Edwards

Farrell, Jeremy

Jul 10 (1 day ago)

to me

Thanks for your message. I am out of the office this afternoon with limited access to email. If you need immediate assistance, please contact my assistant Katie Meyers at kmeyers@tuckerlaw.com or 412-594-5593.

Chiavetta, Rosemary

Jul 10 (1 day ago)

to me, smiller, jfarrell

Parties of Record:

Please confer with each other without including me in the emails in the future.

Ms. Edwards:

If you need additional time to respond, you may make an official filing with my office by mail or by opening an e-filing account through the Commission's website. If you choose mail, I recommend overnight delivery to my address below because the deposit date in overnight delivery will preserve your filing date even if the filing does not physically reach my office until the next day. The other Parties to the case, namely the Respondent, may agree to an extension, but if you have justification for the extension, the Respondent's agreement is not necessary. You must always include with your filing a Certificate of Service that you mailed a copy of your

filing to the Respondent Party or its counsel. Emailed and faxed filings are not considered official filings and not acceptable.

Regarding your other question, the date of service begins the clock ticking. The count begins on the next day following the date of service. If the date of service (the date at the top of the filing) is July 5, the count of 10 or 20 days begins with July 6. The count is in calendar days, and if the last day (the deadline to respond) falls on a Saturday, Sunday or holiday, the next business day becomes the deadline. A business day is the Commission's hours of 8 a.m. to 4:30 p.m. Mondays through Fridays.

All of these rules are covered in the Consumer Manual which can be found on the PUC's website and was prepared for the purpose of educating pro se complainants about the formal complaint process.

Thank you.

Rosemary Chiavetta, Esq.

Secretary

Pennsylvania Public Utility Commission

Commonwealth Keystone Building

400 North Street

Harrisburg, Pennsylvania 17120

rchiavetta@pa.gov

M. Grace Edwards <msea.mdew@gmail.com>

Jul 10 (1 day ago)

to smiller, jfarrell, rchiavetta

Dear Mr. Miller and Mr. Farrell,

I have questions concerning the material I received from you dated July 5, 2018, regarding **Miranda Grace Edwards v. Duquesne Light Company, Docket No. C-2018-3002741**.

You sent two documents, each requiring a response within different time periods—one being 10 days and the other being 20 days.

It is unclear to me, after reading the letters attached to your documents, exactly what the deadline response dates are. Here are my questions:

1. Your documents are dated July 5, but, I did not receive the documents until July 6. I assume, therefore, that the count starts from the date I received your documents. Please confirm whether this is the case—that the 10- and 20-day counts to the deadlines for submitting my responses begins on July 5.

2. I am not sure if your document references 10 and 20 business days, or 10 and 20 calendar days. (The calendar-day count would include Saturdays and Sundays.) Which is the case?

Ten calendar days from July 5 would mean my response to your preliminary objections is due by the end of July 16; 20 calendar days from July 6 would mean my response to your answer and new matter is due by the end of July 26. Ten business days from July 6 would mean my response to your preliminary objections is due by the end of July 20; 20 business days from July 6 would mean my response to your answer and new matter is due by July 30.

Would you please tell me which dates are correct?

3. Also, am I correct in assuming that if you receive my responses by the end of the day on the due dates in question, the responses will be considered timely? The business day vs. calendar day question also applies here—is 5 p.m. or 11:59 p.m. the correct time deadline?

Request for an extension: I need additional time to completely review your documents and make sure I fully understand the content. I am a single parent with a full-time job and family and community obligations I cannot completely abandon over the next 10-20 days. Yet doing exactly that, at minimum, would be necessary to devote the full amount of time required to complete a review and generate an informed response.

As a result I am requesting an extension of the 10- to 20-day deadlines, in the interest of fairness. Specifically, I request that my response to your preliminary objections be extended to a due date of August 6 (I intended 30 days, but this date actually reflects 31 days to account for August 5 falling on a Sunday); and my response to your answer and new matter be extended to a due date of August 15.

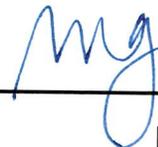
I hope this is agreeable to you; I think I have made a reasonable request. Please let me know as soon as possible so I can plan accordingly.

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

Sincerely,

M. Grace Edwards

Respectfully submitted,



Miranda Grace Edwards

July 11, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

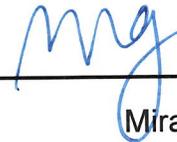
CERTIFICATE OF SERVICE

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):

Shane Miller, Esquire
Jeremy V Farrell, Esquire
1500 One PPG Place
Pittsburgh, PA 15222
Fax: 412-594-5619

Counsel for Respondent, Duquesne Light Company

Dated this 11th day of July, 2018



Miranda Grace Edwards
mseam.dew@gmail.com
3835 Acorn Street
Pittsburgh, PA 15207