

November 12, 2018

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Bldg. 2nd Floor W
400 N. Street
Harrisburg, PA 17120

RE: Sage Gardner v. Duquesne Light Company
Docket No. C-2018-3003550

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's Motion to Compel Discovery Responses.

A copy of this document has been served upon Complainant in accordance with Commission regulations.

Sincerely,



Paul Shane Miller
Attorney for Duquesne Light Company

Jeremy V. Farrell
Attorney for Duquesne Light Company

Enclosure

c: Sage Gardner (with enclosure)
ALJ Jeffrey Watson (with enclosure)

TADMS:5056779-1 014657-158498

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SAGE GARDNER

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2018-3003550

**MOTION TO COMPEL DISCOVERY
RESPONSES**

Filed on behalf of Respondent
Duquesne Light Company

Counsel of Record for this Party:

Paul Shane Miller, Esquire
PA I.D. No. 319174
(412) 594-5503

Jeremy V. Farrell, Esquire
PA I.D. No. 316258
(412) 594-3938


1500 One PPG Place
Pittsburgh, PA 15222
Counsel for Respondent

NOTICE TO PLEAD

TO COMPLAINANT SAGE GARDNER:

YOU ARE NOTIFIED TO FILE A WRITTEN RESPONSE TO RESPONDENT'S MOTION TO COMPEL DISCOVERY RESPONSES WITHIN TWENTY DAYS OF SERVICE PURSUANT TO 52 PA CODE § 5.103.

TUCKER ARENSBERG, P.C.



Paul Shane Miller, Esquire
Attorney for Duquesne Light Company

MOTION TO COMPEL DISCOVERY RESPONSES

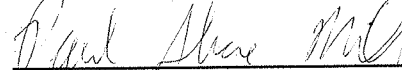
Pursuant to 52 Pa. Code. § 5.103, Duquesne Light Company ("Duquesne Light") files this Motion to Compel Discovery Responses ("Motion to Compel"):

1. In this Motion to Compel, Duquesne Light seeks an order requiring Complainant Sage Gardner ("Complainant") to respond to discovery requests submitted by Duquesne Light.
2. Complainant filed this action on or about July 17, 2018 in an effort to opt out of Duquesne Light's smart meter implementation plan.
3. On September 4, 2018, Duquesne Light served its First Set of Discovery Requests Directed to Complainant. Defendant's responses were due on September 24, 2018.
4. Complainant has not responded to Duquesne Light's First Set of Discovery Requests.
5. Duquesne Light, therefore, respectfully requests that the Commission order Complainant to respond to Duquesne Light's First Set of Discovery Requests within ten days or by November 22, 2018.

WHEREFORE, Duquesne Light Company respectfully requests that the Commission grant its Motion to Compel Discovery Responses and require Complainant Sage Gardner to provide complete answers to Duquesne Light's First Set of Discovery Requests Directed to Complainant on or before November 22, 2018.

Respectfully submitted,

TUCKER ARENSBERG, P.C.



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SAGE GARDNER

Complainant,

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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):

Sage Gardner
4134 Gladstone Street
Pittsburgh, PA 15207

Dated this 12th day of November, 2018



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