

December 18, 2018

Via Electronic Filing

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

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

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's Motion to Extend Discovery Response Deadline.

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

cc: Miranda Grace Edwards (with enclosure)
ALJ Jeffrey Watson (with enclosure)

TADMS:5073855-1 014657-158498

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

No: C-2018-3002741

**MOTION TO EXTEND DISCOVERY
RESPONSE DEADLINE**

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 MIRANDA GRACE EDWARDS:

**YOU ARE NOTIFIED TO FILE A WRITTEN RESPONSE TO RESPONDENT'S MOTION TO
EXTEND DISCOVERY RESPONSE DEADLINE WITHIN TWENTY DAYS OF SERVICE
PURSUANT TO 52 PA CODE § 5.342.**

TUCKER ARENSBERG, P.C.



Paul Shane Miller, Esquire
Attorney for Duquesne Light Company

6. Duquesne Light's counsel attempted to contact Complainant by phone and email to ask if she objects to this Motion but did not receive a response.

7. Duquesne Light respectfully requests that the Presiding Administrative Law Judge provide the Company with an additional 30 days to respond to Complainant's Discovery Requests.

8. If this request is granted, Duquesne Light's discovery responses would be due on or before January 30, 2019.

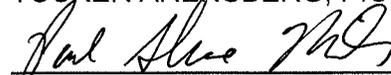
9. Under the Presiding Administrative Law Judge's *Interim Order Establishing Initial Litigation Schedule*, which was issued on November 28, 2018, the parties must conclude discovery on or before February 28, 2018.

10. Accordingly, the discovery deadline established by the Initial Litigation Schedule will not be affected if the Presiding Administrative Law Judge grants this Motion and extends the deadline for Duquesne Light to respond to Complainant's Discovery Requests to January 30, 2019.

WHEREFORE, Duquesne Light Company respectfully requests that the Presiding Administrative Law Judge grant its Motion to Extend Discovery Response Deadline and permit Duquesne Light Company to provide its responses to the *Interrogatories of Miranda Grace Edwards and Requests for Production of Documents, Set I* on or before January 30, 2019.

Respectfully submitted,

TUCKER ARENSBERG, P.C.



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