

3835 Acorn Street
Pittsburgh, PA 15207

January 9, 2020

VIA ELECTRONIC FILING

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 Complainant's (my) Request for Entry of a Protective Order in the above-referenced matter. A copy of this document has been served on the Respondent's Counsel, Shane Miller, Esq., in accordance with Commission regulations and as shown in the Certificate of Service.

Please contact me if you have any questions.

Sincerely,



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

Attachment

Cc: ALJ Watson
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS

vs.

DUQUESNE LIGHT COMPANY

Docket No. C-2018-3002741

REQUEST FOR ENTRY OF A PROTECTIVE ORDER

January 9, 2020

Your Honor,

As I prepare for the Initial Telephonic Hearing on February 27, 2020, I have no assurance that personal information about daily activities in my home will be kept confidential. I am not submitting the information specified in Discovery Requests #16 and #18 of Duquesne Light Company's Second Motion to Compel Discovery Responses at this time until I can be certain of confidentiality.

I provided a Stipulated Protective Agreement to DLC in my filing of February 19, 2019. DLC did not respond and has not signed the Stipulated Protective Agreement. Instead, they sent their own agreement three days before filing their Second Motion to Compel Discovery Responses on December 23, 2019.

I will provide the information if DLC signs the Stipulated Protective Agreement provided in my filing of February 19, 2019. I am a *pro se* complainant and will not be rushed into signing a document provided at the last minute by DLC when I cannot reliably determine that it will offer me an equal or greater level of protection compared to the Stipulated Protective Agreement. If DLC wants me to sign their confidentiality agreement in relation to information they provide me, I am amenable to doing so.

Providing detailed information such as "the type (with make and model)" about "devices, appliances, and equipment used in [my] home or by [me] in [my] daily life" in a document that is destined for public record may compromise the safety and security of my home. DLC specifically wants details on any of my possessions "that produce radio frequency or low frequency fields," which unknown parties could infiltrate if they had the skill and desire to do so.

Therefore, Your Honor, I am requesting a Protective Order to be entered to protect this personal information pertaining to my home, my daily activities, and the daily activities of all who visit.

Respectfully Submitted,



Miranda Grace Edwards
Complainant

1.36 Verification

Verification

I, Miranda Grace Edwards, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 (relating to unsworn falsification to authorities).

1-9-2020

Date



Signature

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

CERTIFICATE OF SERVICE

I, Miranda Grace Edwards, hereby certify that I have this day served a true copy of my Request for Entry of a Protective Order upon the participant listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

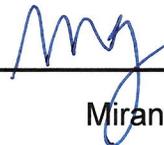
VIA EMAIL AND E-FILING:

Paul Shane Miller, Esquire
PA I.D. No. 319174
smiller@tuckerlaw.com
1500 One PPG Place
Pittsburgh, PA 15222
Fax: 412-594-5619

VIA E-FILING:

Administrative Law Judge Jeffrey A. Watson
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222

Dated this 9th day of January, 2020



Miranda Grace Edwards
msea.mdew@gmail.com
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Pittsburgh, PA 15207