

January 24, 2020

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

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

Dear Secretary Chiavetta:

Attached please find the Status Report of Miranda Grace Edwards v. Duquesne Light Company in the above-referenced matter. It is being submitted after the deadline of November 18, 2019, for reasons detailed in the Status Report.

A copy of this document has been served upon the Respondent's Counsel, Shane Miller, Esq., in accordance with Commission regulations and as shown in the Certificate of Service.

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

Sincerely,



M. Grace Edwards  
Complainant  
mseamde@gmail.com

Attachment

Cc: ALJ Watson  
Shane Miller, Esquire, Counsel for Duquesne Light Company (via email) (with attachment)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

**STATUS REPORT FOR MIRANDA GRACE EDWARDS V. DUQUESNE COMPANY**

**Date: January 24, 2020**

Dear Honorable Judge Watson,

On October 25, 2019, Your Interim Order Setting Requirements Including Proposals for Dates for Hearing was entered. Item 2 established that on or before November 18, 2019, the parties shall file a joint letter or status report if the parties can agree on a date to reschedule the hearing in this matter and serve the opposing party and the undersigned presiding officer. The submission of this Status Report for Miranda Grace Edwards v. Duquesne Light Company fulfills item 2 of the Interim Order previously referenced.

I was unsure whether I could still file a Status Report since I missed the deadline. However, I figured it could not hurt to do so. Therefore, I submit this Status Report:

1. On November 28, 2018, an interim order was entered establishing an “initial litigation schedule.” This order specified January 4, 2019, as the date by which “any Party wishing to present expert testimony of any person other than Complainant must provide to the other Party in writing, the name and business address of that person and a written summary of the expected testimony of that person.” The order also specified that on the same date, “any Party wishing to present expert testimony (including but not limited to medical, technical, etc.) must provide to the other Party in writing, the name and business address of that person and a written summary of the expected testimony of that person.”

The specified deadline of January 4, 2019, was impossible for me to meet. The interim order of November 28, 2018, was filed six days after Thanksgiving—well into the holiday season when I, and likely most experts, have increased family obligations.

While DLC has a stable of (likely paid) witnesses lined up to testify in response to multiple complaints, I am one *pro se* complainant with a full-time job and other responsibilities. I did not already know suitable witnesses at the time the November 28 interim order was entered.

2. On December 10, 2018, I filed a motion to adjust the initial litigation schedule. This request reflected my concerns as stated above. I averred that the schedule as set forth would be impossible to meet and requested more time. I asked to extend the January 4, 2019, deadline to February 28, 2019. I asked to extend the February 28, 2019 deadline to conclude discovery to April 25, 2019. I requested to extend the date to file a “progress report” from March 11, 2019, to May 7, 2019.
3. As of January 24, 2020, I still have received no response from either PUC or DLC concerning my motion to adjust the initial litigation schedule. Both PUC and DLC have proceeded according to the initial litigation schedule that I stated I could not meet—beginning with the first deadline of January 4, 2019, immediately following the winter holidays. Furthermore, my obligations unrelated to this Complaint only increased as 2019 progressed. I had even less time than before but received no accommodation.
4. On December 18, 2018, DLC filed a motion to extend the discovery response deadline. This motion was granted and also agreed to by me. On or about January 31, 2019, I received an envelope from DLC Counsel via U.S. mail. The envelope contained a two-paragraph letter dated January 30, 2019, and a CD with 21 files constituting DLC’s responses to my discovery requests. DLC supplied no direct answers to any of my questions.

On March 25, 2019, 21 days after I filed my Amended Complaint, DLC filed Responses to Interrogatories of Miranda Grace Edwards and Requests for Production of Documents for Production of Documents, Set I. Only then did DLC provide direct answers to any of my discovery requests.

5. Because of the situation and events outlined in items 1-4 of this Status Report, I missed the deadline to provide a list of potential witnesses or expert reports. I also was unable to fully engage in the Discovery process in a timely manner.
6. In my February 19, 2019, Responses to Respondent’s First Set of Discovery Requests (“Supplemental Discovery Responses”), I provided a Stipulated Protective Agreement. I wrote in my response to DLC, “Please sign the attached Stipulated Protective Agreement and I will provide the information as specified in the interim order of January 28, 2019.”

As of January 24, 2020, I have received no response from DLC concerning the Stipulated Protective Agreement I provided. DLC did not sign the Stipulated Protective Agreement.

7. Per the Call-Out Telephone Notice submitted December 20, 2019, the Initial Telephonic Hearing is scheduled to take place on Thursday, February 27, 2020, at 10 a.m.

8. On December 20, 2019, I filed a Motion to Stay of Proceedings in light of *William and Jean Haas, Petitioners v. Pennsylvania Public Utilities Commission, Respondent*, Docket No. 658 MD 2019. On January 9, 2020, Duquesne Light Company filed an Answer in Opposition to my Motion to Stay of Proceedings. As of January 24, 2020, I have not received a response from the Pennsylvania Public Utilities Commission.
9. In their January 9 filing, DLC cited my failure to file a status report by November 18, 2019, as a relevant fact in their Answer. I will counter their argument in my forthcoming response to DLC's Answer.
10. Subsequent to my filing of the Motion to Stay of Proceedings, I learned of additional cases pending in Commonwealth Court in which the PUC itself has requested a stay of proceedings.

Respectfully submitted,



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Miranda Grace Edwards

January 24, 2020

**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 Status Report in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

**VIA EMAIL:**

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

**VIA EMAIL AND E-FILING:**

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

Dated this 24<sup>th</sup> day of January, 2020



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Miranda Grace Edwards

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