

Bradley S. Tupi
1470 Redfern Drive
Pittsburgh, PA 15241
January 28, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17120

Re: Reliability Complaint
Docket No. C-2019-3013785
Tupi and Clyne v. West Penn Power

Dear Ms. Chiavetta:

Attached for filing is a Letter to Administrative Law Judge Mark A. Hoyer in response to West Penn's January 22 "Letter Answer" to Complainants' Motion to Compel Discovery. Thank you.

Very truly yours,

/s/ Bradley S. Tupi

Bradley S. Tupi

Attachment

cc: Hon. Mark A. Hoyer, Deputy Chief Administrative Law Judge
Margaret A. Morris, Esquire

Bradley S. Tupi
1470 Redfern Drive
Pittsburgh, PA 15241
January 28, 2020

Via Electronic Filing and US Mail

Hon. Mark A. Hoyer
Deputy Chief Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 Fifth Avenue
Pittsburgh, Pennsylvania 15222

Re: Reliability Complaint
Docket No. C-2019-3013785
Tupi and Clyne v. West Penn Power

Dear Judge Hoyer:

We write in response to a "Letter Answer" addressed to Your Honor and filed by West Penn's counsel on January 22. West Penn's letter was in connection with Complainants' Motion to Compel. That motion was rejected by the filing clerk. It seems we should have filed our Motion as a single PDF, instead of as a Motion and exhibits.

We did not re-file the Motion because we received discovery responses from West Penn. While West Penn's discovery responses are not entirely satisfactory, we will today serve some additional discovery demands that, we hope, will yield the necessary information in advance of the February 28 hearing.

In short, the Motion to Compel requires no action. Thank you.

Very truly yours,

/s/ Bradley S. Tupi

Bradley S. Tupi

cc: Margaret A. Morris, Esquire