

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Todd Koger

v.

C-2019-3013238

C-2020-3020394

BSC Case # 3767867

DUQUESNE LIGHT COMPLAINT

NEW MATTER

AND MOTION TO AMEND TO INCLUDE NEW INFORMATION

AND NOW, Complainant files the forgoing “New Matter” and “Motion to Amend to Include new information: C-2019-3013238, C-2020-3020394 and BSC #3767867.

1. On November 11, 2020, Duquesne Light “disconnected” service without the new PUC required mandate “20-day Notice.”
2. Complainant telephoned Duquesne Light and spoke with “Ebony.”

3. Duquesne Light (“Ebony”) said: “She is **NOT** aware of the new PUC regulation that mandates a ‘20-day Termination Notice’ and ‘waives’ security deposits.”
4. Duquesne Light (“Ebony”) also said: “No supervisor is available to address the ‘lack of 20-day Termination Notice’ and PUC’s ‘waving security deposits.’”
5. Michael Selep a supervisor of Duquesne Light spoke with a Ms. Winters of the local LIHEAP on or about September 17, 2020, and appears to have “conspired” to induce a “new” electric service application for unlawful purposes -- (1) obtain credit report and credit history; and (2) elimination eligibility for “pandemic relief.”
6. Complainant advised Ms. Winters of the local LIHEAP “He didn’t want to do a new Duquesne Light and wasn’t “waving” any rights to LIHEAP and/or electrical service based on his August 2018 “electric service and application.”
7. Complainant was “denied” LIHEAP (pandemic relief” as a result of the new application/service.
8. The new information now filed avers both PUC violations and 42 USC 1981, 1983, AND 1985.

9. Duquesne Light knowingly “terminated” service on the new account #2893-406-613 established September 18, 2020 without first providing a “20-day notice.”
10. Duquesne Light knowingly “terminated” service on the new account #2893-406-613 established September 18, 2020 “despite the PUC’s new regulations waving ‘security deposits.’”

WHEREFORE, for the above-stated averments of “NEW” information discovered and affirmative acts of the Respondent Duquesne Light, that have taken place after the first and second hearing, the “New Matter” and related new complaint is now amended to C-2019-3013238, C-2020-3020394 and BSC Case # 3767867.

By: Todd Koger (/s/)

Complainant

CERTIFICATE OF SERVICE

I, Todd Koger, Complainant, do hereby certify that the forgoing was served to opposing counsel Emily M. Farah by email efarah@duqlight.com.

By: Todd Koger (/s/)

DATED: NOVEMBER 11, 2020