



**Emily M. Farah**  
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November 18, 2020

**Via Electronic Filing**

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

**RE: Donald Hubsch v. Duquesne Light Company**  
**Docket No. F-2020-3022646**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's Motion to Consolidate the two Formal Complaints filed by Donald Hubsch at docket numbers F-2020-3022645 and F-2020-3022646. A copy of this document and the enclosed filing have been served upon Complainant in accordance with Commission regulations.

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

Respectfully,

A handwritten signature in blue ink, appearing to read "Emily M. Farah", is written over a light blue circular stamp.

Emily M. Farah  
Counsel, Regulatory

cc: Donald Hubsch

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DONALD HUBSCH,	:	
	:	
Complainant,	:	
	:	
v.	:	No: F-2020-3022646
	:	
	:	
DUQUESNE LIGHT COMPANY,	:	
	:	
Respondent.	:	

**MOTION TO CONSOLIDATE**

Filed on behalf of Respondent  
Duquesne Light Company

Counsel of Record for this Party:  
Emily M. Farah, Esquire  
PA I.D. No. 322559  
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(412) 393-6431  
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Pittsburgh, PA 15219

**NOTICE TO PLEAD**

**TO COMPLAINANT DONALD HUBSCH**

**YOU ARE HEREBY NOTIFIED TO FILE A WRITTEN RESPONSE TO THE WITHIN MOTION TO CONSOLIDATE WITHIN TWENTY (20) DAYS OF SERVICE HEREOF OR A JUDGMENT MAY BE ENTERED AGAINST YOU.**

DUQUESNE LIGHT COMPANY

  
\_\_\_\_\_  
Emily M. Farah  
Counsel for Duquesne Light Company

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DONALD HUBSCH,	:	
	:	
Complainant,	:	
	:	
v.	:	No: F-2020-3022646
	:	
	:	
DUQUESNE LIGHT COMPANY,	:	
	:	
Respondent.	:	

**MOTION TO CONSOLIDATE**

Pursuant to 52 Pa. Code § 5.103, Respondent Duquesne Light Company ("Duquesne Light" or the "Company") files this Motion to Consolidate:

1. On or about November 5, 2020 Complainant Donald Hubsch (“Complainant”) filed two formal complaints (collectively, “Complaints”) with the Pennsylvania Public Utility Commission (“PUC” or Commission”) against Duquesne Light Company.
2. Complainant is the owner of a two-unit residential building located at 908 Duss Avenue, Ambridge, PA 15003 (the “Property”).
3. The Formal Complaint identified by docket number F-2020-3022645 is associated with Unit #2 at the Property (“Unit 2”).
4. The Formal Complaint identified by docket number F-2020-3022646 is associated with Unit #1 at the Property (“Unit 1”).
5. Both of the aforementioned Formal Complaints involve the same parties and contain substantially similar allegations concerning whether the Complainant is responsible for the electric charges at the Property because of the presence of foreign load.
6. To the extent a hearing is required, Duquesne Light Company expects the witnesses for both parties to be the same in both matters.
7. Consolidating these Complaints would not prejudice either party.

8. In the interest of judicial economy, Duquesne Light Company moves to consolidate the Complaints, and handle together the Complaints associated with to 908 Duss Avenue, Unit #1 and Unit #2, Ambridge, PA 15003.

**WHEREFORE**, Duquesne Light Company respectfully requests that the Commission grant its Motion to Consolidate.

November 18, 2020

Respectfully submitted,

DUQUESNE LIGHT COMPANY



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Counsel for Duquesne Light Company  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DONALD HUBSCH,	:	
	:	
Complainant,	:	
	:	
vs.	:	No: F-2020-3022646
	:	
	:	
DUQUESNE LIGHT COMPANY,	:	
	:	
Respondent.	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Motion to Consolidate upon the participant listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

**VIA FIRST-CLASS MAILING AND ELECTRONIC MAILING**

Donald Hubsch  
1210 1<sup>st</sup> Avenue  
Coraopolis, PA 15108  
[Acire.property.llc@gmail.com](mailto:Acire.property.llc@gmail.com)

Dated this 18<sup>th</sup> day of November, 2020.

  
\_\_\_\_\_  
Emily M. Farah, Esquire  
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