

Stevens & Lee

111 N. Sixth Street
P.O. Box 679
Reading, PA 19603
(610) 478-2000
www.stevenslee.com

Direct Dial: (610) 478-2216
Email: donald.wagner@stevenslee.com
Direct Fax: (610) 988-0846

August 25, 2022

Via Electronic Filing

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

Re: Indian Head Development LLC v. Duquesne Light Company
Docket Nos. C-2022-3034290 and C-2022-3034309

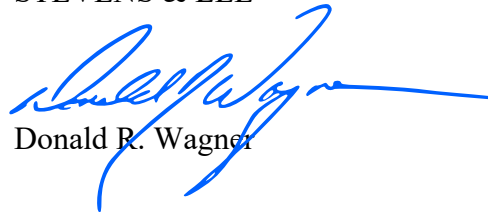
Dear Secretary Chiavetta:

Enclosed for filing is the Motion to Consolidate of Respondent, Duquesne Light Company to the above-referenced Dockets. A copy has been served in accordance with the attached Certificate of Service. The Company will be concurrently filing an Answer and New Matter in each of the above-referenced dockets via separate filings.

If you have any questions, please contact me.

Very truly yours,

STEVENS & LEE



Donald R. Wagner

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INDIAN HEAD DEVELOPMENT LLC	:	
Complainant	:	
	:	
v.	:	Docket No. C-2022-3034290
	:	C-2022-3034309
DUQUESNE LIGHT COMPANY	:	
Respondent	:	
	:	

NOTICE TO PLEAD

To: *Indian Head Development LLC*

You are hereby notified to file a written response to the attached Motion to Consolidate of Duquesne Light Company within twenty (20) days from the date of service of this notice. If you do not file a written response to the Motion to Consolidate within twenty (20) days of service, the facts set forth by Duquesne Light Company may be deemed to be true, thereby requiring no other proof, and judgment may be entered against you. All pleadings, such as responses to the Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

You must also serve a copy of your response on the undersigned counsel for Duquesne Light Company.

STEVENS & LEE



Donald R. Wagner (Attorney ID No. 80280)
David R. Beane (Attorney ID No. 53343)
111 N. 6th Street
Reading, PA 19601
Phone: (610) 478-2216 / Fax: (610) 988-0846
email: donald.wagner@stevenslee.com
email: david.beane@stevenslee.com
COUNSEL FOR DUQUESNE LIGHT COMPANY

Dated: August 25, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INDIAN HEAD DEVELOPMENT LLC	:	
Complainant	:	
	:	
v.	:	Docket No. C-2022-3034290
	:	C-2022-3034309
DUQUESNE LIGHT COMPANY	:	
Respondent	:	
	:	

**MOTION TO CONSOLIDATE OF RESPONDENT,
DUQUESNE LIGHT COMPANY**

Pursuant to 52 Pa Code §§ 5.103 and 5.61, Duquesne Light Company (“Duquesne Light” or “Company”), by and through its attorneys Stevens & Lee, P.C., hereby files this Motion to Consolidate the Matters of Indian Head Development LLC v. Duquesne Light Company at Docket No. C-2022-3034290 and Indian Head Development LLC v. Duquesne Light Company at Docket No. C-2022-3034309 because both complaints involve the identical parties and raise common questions of law and fact. In support of this motion:

1. On or about August 1, 2022, Complainant Indian Head Development LLC (“Complainant”) filed a formal complaint in Docket No. C-2022-3034290 (the “First Complaint”) alleging an incorrect billing address was set up by the Company for electric service at 612 ½ Monongahela Avenue, Glassport, PA 15045 (“Property 1”).

2. On or about August 1, 2022, Complainant filed a formal complaint in Docket No. C-2022-3034309 (“Second Complaint”) alleging an incorrect billing address was set up by the Company for electric service at 1048 E. 8th Avenue, Munhall, PA 15120.

3. The First Complaint and the Second Complaint (collectively, the “Complaints”) involve the same parties and appear to make substantially similar allegations concerning electric service at Property 1 and Property 2.

4. The Company avers that judicial economy would be served by consolidating the Complaints pursuant to 52 Pa. Code § 5.81(a), which provides that the Commission or presiding officer may order proceedings involving a common question of law or fact to be consolidated.

5. Both Complaints involve common issues of law and fact. The parties, as well as the relief sought in the complaints, are identical. To the extent a hearing is required, the Company expects the witnesses for both parties to be the same in both matters.

6. Consolidating these Complaints would not prejudice either party.

REQUEST FOR RELIEF

WHEREFORE, for all the reasons stated herein, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission grant its Motion to Consolidate.

Respectfully submitted,

STEVENS & LEE



Donald R. Wagner (Attorney I.D. No. 80280)

David R. Beane (Attorney ID No. 53343)

111 N. 6th Street

Reading, PA 19601

Phone: (610) 478-2216 / Fax: (610) 988-0846

email: donald.wagner@stevenslee.com

email: david.beane@stevenslee.com

COUNSEL FOR DUQUESNE LIGHT COMPANY

Dated: August 25, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

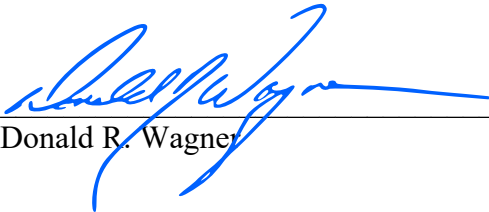
INDIAN HEAD DEVELOPMENT LLC	:		
Complainant	:		
	:		
v.	:	Docket No.	C-2022-3034290
	:		C-2022-3034309
DUQUESNE LIGHT COMPANY	:		
Respondent	:		
	:		

CERTIFICATE OF SERVICE

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

VIA ELECTRONIC MAIL

Indian Head Development LLC
c/o Daniel Lloyd
434 E. 8th Ave, FL 2
Munhall, PA 15120
Email: DLloyd@MDLInsurance.com



Donald R. Wagner

Dated: August 25, 2022