

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CINNAMON COPRICH
Complainant

v.

DUQUESNE LIGHT COMPANY
Respondent

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:
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:
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Docket No. C-2022-3035891

NOTICE TO PLEAD

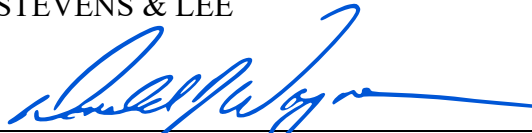
To: *Cinnamon Coprich*

You are hereby notified to file a written response to the attached Motion for Judgment on the Pleadings of Duquesne Light Company within twenty (20) days from the date of service of this notice. If you do not file a written response denying or correcting the enclosed New Matter 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 Answers to Motions, 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. Failure to respond to this Motion for Judgment on the Pleadings could result in the dismissal of your case.

STEVENS & LEE



Donald R. Wagner (Attorney ID No. 80280)
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: November 28, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CINNAMON COPRICH	:	
Complainant	:	
	:	
v.	:	Docket No. C-2022-3035891
	:	
DUQUESNE LIGHT COMPANY	:	
Respondent	:	
	:	

**MOTION FOR JUDGMENT ON THE PLEADINGS
DUQUESNE LIGHT COMPANY**

Pursuant to 52 Pa Code § 5.102, Duquesne Light Company (“Duquesne Light” or “Company”), by and through its attorneys Stevens & Lee, hereby files this Motion requesting dismissal of the Complaint of Cinnamon Coprich (“Complainant”) as moot. In support thereof, the Company avers as follows:

BACKGROUND

1. On October 5, 2022, Duquesne Light was served with a copy of the formal complaint (the “Formal Complaint”) that Complainant filed with the Pennsylvania Public Utility Commission (the “PUC” or “Commission”) against Duquesne Light. A copy of Complainant’s Formal Complaint, which has been redacted to remove Complainant’s personal information from public disclosure, is attached hereto as **Exhibit A**.

2. In Paragraph 4 of the Formal Complaint, Complainant’s only averment was that the Company threatened to shut off her service or had already shut off her service. See Formal Complaint, ¶4.

3. In the Formal Complaint, Complainant did not ask for a payment arrangement. See Formal Complaint, ¶¶4-5.

4. In the Formal Complaint, Complainant did not ask for any relief. See Formal Complaint, ¶5.

5. On October 25, 2022, Duquesne Light filed an Answer and New Matter (the “Answer”) with a notice to plead,¹ a copy of which is attached hereto as **Exhibit B**.²

6. In its Answer, Duquesne Light explained that Complainant no longer has service in her name on the account (the “Account”) that is the subject of the Formal Complaint as of October 17, 2022; did not provide the Company with a forwarding mailing address; did not express an intent of reapplying for service from the Company and that the Company had discontinued Complainant’s service on the Account. See Answer and New Matter, ¶12.

7. In its Answer, Duquesne Light explained that the Company stayed the termination of Complainant’s service for failure to pay past due amounts pending the resolution of the Formal Complaint and did not shut off Complainant’s service before service was established in someone else’s name at the service address. See Answer and New Matter, ¶16.

8. Thirty-four (34) days have elapsed since Duquesne Light filed its Answer and New Matter on October 25, 2022.

¹ Which notice to plead provided:

You are hereby notified to file a written response to the attached Answer and New Matter of Duquesne Light Company within twenty (20) days from the date of service of this notice. If you do not file a written response denying or correcting the enclosed New Matter 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 New Matter, 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. Failure to respond to this Answer and New Matter could result in the dismissal of your case.

² Exhibit B has been redacted to remove Complainant’s personal information from public disclosure.

9. The Complainant did not file an Answer to Duquesne Light's New Matter. As such, the averments in the Company's New Matter may be deemed admitted. See 52 Pa. Code §5.63(b).

10. The Commission's regulation at 52 Pa. Code §5.102(a) permits any party to move for summary judgment or judgment on the pleadings after the pleadings are closed, but within such time as to not delay a hearing. The presiding officer will grant the motion if the pleadings, depositions, answers to interrogatories, admissions and affidavits show that there is no genuine issue as to a material fact and that the moving party is entitled to judgment as a matter of law. 52 Pa. Code §5.102(d)(1).

11. The moving party bears the burden of showing that no genuine issue of material fact exists and that it is entitled to judgment as a matter of law. The Commission must view the record in the light most favorable to the non-moving party, giving that party the benefit of all reasonable inferences. First Mortgage Co. of Pennsylvania v. McCall, 459 A.2d 406 (Pa. Super. 1983).

12. The provision at 52 Pa. Code §5.102(c) serves judicial economy by avoiding a hearing where no factual dispute exists. If no factual issue pertinent to the resolution of the case exists, a hearing is unnecessary. Lehigh Valley Power Committee v. Pennsylvania Public Utility Commission, 563 A.2d. 557 (Pa. Cmwlth. 1989).

13. The pleadings in this case reveal that Duquesne Light is entitled to judgment as a matter of law.

14. In this case, there is no dispute as to the facts. Complainant filed the Formal Complaint to appeal a threatened termination of service for failure to pay past due amounts on her Account. After filing the Formal Complaint, Complainant thereafter voluntarily discontinued service in her name on the Account. Complainant is no longer in threat of having her service

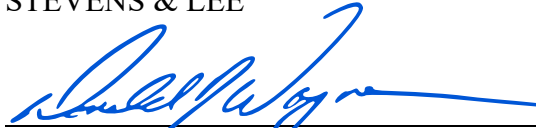
terminated or shut off for failure to pay past due amounts on the Account, thereby rendering the Formal Complaint moot.

REQUEST FOR RELIEF

WHEREFORE, for all the reasons stated herein, Duquesne Light respectfully requests that your Honorable Commission grant the within Motion and dismiss the Formal Complaint with prejudice.

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) 478-2167 / Fax: (610) 988-0846

email: donald.wagner@stevenslee.com

email: david.beane@stevenslee.com

COUNSEL FOR DUQUESNE LIGHT COMPANY

Dated: November 28, 2022

**EXHIBIT A TO
MOTION FOR JUDGMENT ON THE PLEADINGS
DUQUESNE LIGHT COMPANY
Docket No. C-2022-3035891**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

Filing this form begins a legal proceeding and you will be a party to the case. If you do not wish to be a party to the case, consider filing an informal complaint.

To complete this form, please type or print legibly in ink.

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Cinnamon Coprich

Street/P.O. Box [redacted] Apt # [redacted]

City [redacted] State Pa Zip [redacted]

County Allegheny

Telephone Number(s) Where We Can Contact You During the Day (required):

() (home) () (mobile)

E-mail Address (required): [redacted]

Utility Account Number (from your bill) [redacted]

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name

Street/P.O. Box

City State Zip

2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

Duquesne Light Company

DATE OF DEPOSIT

OCT 3 2022

Exhibit A

3. **Type of Utility Service**

Check the box listing the type of utility service that is the subject of your complaint (check only one):

- | | |
|--|---|
| <input checked="" type="checkbox"/> ELECTRIC | <input type="checkbox"/> STORM WATER |
| <input type="checkbox"/> GAS | <input type="checkbox"/> WASTEWATER/SEWER |
| <input type="checkbox"/> WATER | <input type="checkbox"/> TELEPHONE/TELECOMMUNICATIONS (local, long distance) |
| <input type="checkbox"/> STEAM HEAT | <input type="checkbox"/> MOTOR CARRIER (e.g. taxi, moving company, limousine) |

4. **Reason for Complaint**

What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. **Your complaint may be dismissed without a hearing if you do not provide specific information.**

- The utility is threatening to shut off my service or has already shut off my service.
- I would like a payment agreement.
- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.
- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.
- Other (explain).

Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

5. Requested Relief

How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.

Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.

6. Protection From Abuse (PFA)/ Domestic Violence

Has a court granted you a "Protection From Abuse" order or any other order which provides clear evidence of domestic violence against you that is currently in effect for your personal safety or welfare? The PUC needs this information to properly process your complaint so that your identity is not made public.

Note: You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.

Has a court granted a "Protection From Abuse" order or any other order for your personal safety or welfare?

- YES
- NO

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

7. Prior Utility Contact

a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?

- YES per CAI website, Appeal Form was served to complainant on 6/1/22, but Appeal form was never sent to SECOBUR. AEL 10/5/22
- NO

Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.

b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?

- YES
- NO

Note: You must contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.

- c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why.

Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.

8. Legal Representation

If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, (all required contact information). Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name _____

Street/P.O. Box _____

City _____ State _____ Zip _____

Area Code/Phone Number _____

E-mail Address _____

Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.

9. **Verification and Signature**

You must sign your complaint. Individuals filing a Formal Complaint **must** print or type their name on the line provided in the verification paragraph below and **must** sign and date this form in **ink**. If you do not sign the Formal Complaint, the PUC **will not accept it**.

Verification:

I, Cinnamon Cooperich, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).


(Signature of Complainant)

Oct. 3, 2022
(Date)

Title of authorized employee or officer (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification **must** be signed by an authorized officer or authorized employee. If the Formal Complaint is **not signed** by one of these individuals, the PUC **will not accept it**.

10. **How to File Your Formal Complaint**

Electronically. You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

Mail. Mail the completed form with your original signature and any attachments, by certified mail, priority mail, or overnight delivery to this address and retain the tracking information as proof of submission:

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

If you are appealing a BCS decision: follow the directions in the cover letter you received from the Secretary's Bureau with the formal complaint form. **ONLY** Formal complaints appealing a BCS decision can be filed by fax, email or overnight delivery to meet filing deadlines. **All other formal complaints MUST be efiled or mailed.**

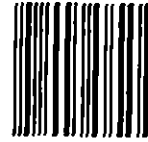
If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.

PLEASE PRINT



1007



17120

U.S. POSTAGE PAID
 PME 1-Day
 BRADDOCK, PA
 15104
 OCT 03, 22
 AMOUNT

\$27.90

R2304M114590-80

Flat Rate Envelope

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**PRIORITY
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 EXPRESS®**



EI 257 230 960 US

fix customs
 or 2976A).

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) PHONE ()

Cinnamon Corrich

DELIVERY OPTIONS (Customer Use Only)

SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

Delivery Options

- No Saturday Delivery (delivered next business day)
- Sunday/Holiday Delivery Required (additional fee, where available)
 *Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT) PHONE ()

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

- For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.
- \$100.00 insurance included.

PAYMENT BY ACCOUNT (if applicable)

USPS® Corporate Acct. No.

Federal Agency Acct. No. or Postal Service™ Acct. No.

PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

ORIGIN (POSTAL SERVICE USE ONLY)

<input checked="" type="checkbox"/> 1-Day		<input type="checkbox"/> 2-Day		<input type="checkbox"/> Military		<input type="checkbox"/> DPO	
PO ZIP Code	Scheduled Delivery Date (MM/DD/YY)	Postage		Insurance Fee		COD Fee	
15104	10/4/22	\$27.90		\$		\$	
Date Accepted (MM/DD/YY)	Scheduled Delivery Time	Return Receipt Fee		Live Animal Transportation Fee			
10/3/22	6:00 PM	\$		\$			
Time Accepted		Total Postage & Fees					
2:50 PM		27.90					
Special Handling/Fragile	Sunday/Holiday Premium Fee	Weight		Acceptance Employee initials			
\$	\$	lbs. ozs.		JD			

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)	Time	Employee Signature
	<input type="checkbox"/> AM <input type="checkbox"/> PM	
Delivery Attempt (MM/DD/YY)	Time	Employee Signature
	<input type="checkbox"/> AM <input type="checkbox"/> PM	

PEEL FROM THIS CORNER

**EXHIBIT B TO
MOTION FOR JUDGMENT ON THE PLEADINGS
DUQUESNE LIGHT COMPANY
Docket No. C-2022-3035891**

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

October 25, 2022

Via Electronic Filing

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

Re: Cinnamon Coprich v. Duquesne Light Company
Docket No. C-2022-3035891

Dear Secretary Chiavetta:

Enclosed for filing is the Answer and New Matter of Respondent, Duquesne Light Company to the above-referenced Complaint. A copy has been served on the Complainant in accordance with the attached Certificate of Service.

If you have any questions, please contact me.

Very truly yours,

STEVENS & LEE


Donald R. Wagner

Enclosure

cc: Certificate of Service

Exhibit B

Allentown • Bergen County • Bala Cynwyd • Cleveland • Fort Lauderdale • Harrisburg • Lancaster • New York
Philadelphia • Princeton • Reading • Rochester • Scranton • Valley Forge • Wilkes-Barre • Wilmington
A PROFESSIONAL CORPORATION

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CINNAMON COPRICH	:	
Complainant	:	
	:	
v.	:	Docket No. C-2022-3035891
	:	
DUQUESNE LIGHT COMPANY	:	
Respondent	:	
	:	

NOTICE TO PLEAD

To: *Cinnamon Coprich*

You are hereby notified to file a written response to the attached Answer and New Matter of Duquesne Light Company within twenty (20) days from the date of service of this notice. If you do not file a written response denying or correcting the enclosed New Matter 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 New Matter, must be filed with the Secretary of the Pennsylvania Public Utility Commission:

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You must also serve a copy of your response on the undersigned counsel for Duquesne Light Company. Failure to respond to this Answer and New Matter could result in the dismissal of your case.

STEVENS & LEE



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email: donald.wagner@stevenslee.com
email: david.beane@stevenslee.com

COUNSEL FOR DUQUESNE LIGHT COMPANY

Dated: October 25, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CINNAMON COPRICH	:	
Complainant	:	
	:	
v.	:	Docket No. C-2022-3035891
	:	
DUQUESNE LIGHT COMPANY	:	
Respondent	:	
	:	

**ANSWER AND NEW MATTER OF RESPONDENT,
DUQUESNE LIGHT COMPANY**

Pursuant to 52 Pa Code § 5.61, Duquesne Light Company (“Respondent” or “Company”), by and through its attorneys Stevens & Lee, P.C., hereby responds to the formal complaint (the “Formal Complaint”) filed by Cinnamon Coprich (“Complainant”). In support thereof, the Company avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.

4. The Company denies all material allegations in the Complaint unless specifically admitted. The Company admits that, in accordance with its Public Utility Commission (“PUC” or “Commission”) approved tariff and applicable PUC regulations, the Company has notified Complainant of its intent to shut off Complainant’s service for failure to pay past due amounts. To the extent that Paragraph 4 contains additional allegations, such allegations are denied. Duquesne Light reserves the right to address any and all allegations as may be necessary throughout the course of this proceeding.

5. As Paragraph 5 is blank, no response is required thereto. By way of further answer, even if Complainant’s Formal Complaint had included a request for a payment

arrangement, Respondent denies that Complainant is entitled to a payment arrangement because Complainant has received, and failed to adhere to, four prior payment arrangements – three from Respondent and one from the PUC. A summary of payment arrangements provided to Complainant is attached as **Exhibit A**. The Complainant did not adhere to the terms of any of the prior payment arrangements listed on **Exhibit A**.

The Respondent maintains that Complainant is responsible for the electric charges that have accrued in accordance with the Statement of Account, enclosed as **Exhibit B**. As of October 21, 2022, Complainant's account balance is \$3,729.17. The Complainant does not pay her monthly bills in full or by the due date. As of October 21, 2022, the Complainant has made only one payment on her account in 2022 – August 19, 2022 in the amount of \$300. Prior to the August 19, 2022 payment on her account, the last payment received on Complainant's account was made on September 24, 2021. See **Exhibit B**.

To the extent Paragraph 5 contains additional allegations, such allegations are denied.

6. Paragraph 6 is a statement to which no response is required.

7. (a) The Company denies that the Formal Complaint is an appeal from a decision of the Bureau of Consumer Services (“BCS”). Complainant filed an informal complaint with the BCS, #3841867, seeking a payment arrangement. The BCS issued a decision on the Complainant's informal complaint on June 2, 2022, with a level one PUC payment arrangement of budget bill plus \$55 on the then-outstanding account balance of \$3,252.69. A copy of BCS's decision on the Complainant's informal complaint #3841867, is attached hereto as **Exhibit C**. Upon information and belief, Complainant was served with an appeal form on June 1, 2022, but Complainant did not return a completed appeal form to the Secretary of the PUC.

With respect to Paragraph 7(b), Respondent admits speaking to the Complainant regarding the underlying issues of the Formal Complaint.

As Paragraph 7(c) is blank, no response is required thereto.

To the extent Paragraphs 7(a), 7(b) or 7(c) contain additional allegations, such allegations are denied.

8. As Paragraph 8 is blank, no response is required.

9. Paragraph 9 is a verification to which no response is required.

10. Paragraph 10 are Commission instructions to which no response is required.

NEW MATTER

11. Duquesne Light Company incorporates by reference the responses contained in Paragraphs 1 through 10 above as though fully set forth at length.

12. Complainant requested service in her name be discontinued on the account (the “Account”) that is the subject of the Formal Complaint as of October 17, 2022; did not provide Respondent with a forwarding mailing address; and did not express an intent of reapplying for service from Respondent. Respondent discontinued service on the Account in accordance with Complainant’s request.

13. In Paragraph 4, of her Formal Complaint, Complainant’s only averment was that the Respondent threatened to shut off her service or had already shut off her electric service. See Formal Complaint, ¶4.

14. Complainant did not ask for a payment arrangement in Paragraph 4 of her Complaint. See Formal Complaint, ¶4.

15. Complainant did not ask for any relief in her Formal Complaint. See Formal Complaint, ¶5.

16. Respondent stayed the termination of Complainant's service for failure to pay past due amounts pending the resolution of the Formal Complaint and did not shut off Complainant's service before Complainant voluntarily discontinued service in her name on the Account.

17. As Complainant voluntarily discontinued service in her name on the Account, Complainant is no longer in threat of having her service terminated or shut off for failure to pay past due amounts on the Account, thereby rendering the Formal Complaint moot.

REQUEST FOR RELIEF

WHEREFORE, for all the reasons stated herein, Respondent Duquesne Light Company respectfully requests that your Honorable Commission dismiss the Formal Complaint with prejudice.

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) 478-2167 / Fax: (610) 988-0846

email: donald.wagner@stevenslee.com

email: david.beane@stevenslee.com

COUNSEL FOR DUQUESNE LIGHT COMPANY

Dated: October 25, 2022

**EXHIBIT A TO
ANSWER OF RESPONDENT,
DUQUESNE LIGHT COMPANY**
Docket No. C-2022-3035891

DUQUESNE LIGHT COMPANY
CHRONOLOGICAL SUMMARY
OF PAYMENT ARRANGEMENTS



CINNAMON COPRICH
ACCOUNT # [REDACTED]

TYPE:	Company-Issued Payment Arrangement
INITIATION DATE:	07/26/19
ACCOUNT BALANCE:	\$448.91
TERMS:	Budget bill +\$15
COMPLIANCE:	No

TYPE:	Company-Issued Payment Arrangement
INITIATION DATE:	04/30/21
ACCOUNT BALANCE:	\$1,1715.84
TERMS:	Budget bill +\$25
COMPLIANCE:	No

TYPE:	Company-Issued Payment Arrangement
INITIATION DATE:	08/12/21
ACCOUNT BALANCE:	\$1,930.46
TERMS:	Current bill +\$78
COMPLIANCE:	No

TYPE:	PUC -Issued Payment Arrangement
INITIATION DATE:	06/02/22
ACCOUNT BALANCE:	\$3,252.69
TERMS:	BB + 55
COMPLIANCE:	No

Exhibit A

**EXHIBIT B TO
ANSWER OF RESPONDENT,
DUQUESNE LIGHT COMPANY**
Docket No. C-2022-3035891



Duquesne Light Company - Statement Of Account

Prepared: October 21, 2022

Page: 1 of 6

Account #: [REDACTED]
 Name: COPRICH,CINNAMON

Paid Deposit Amount: \$0.00
 Disputed Amount: \$0.00

Premise ID	Service Address
3961500573	[REDACTED]
6520340544	[REDACTED]

Residential

Transaction Date	Prepared Date	Transaction	Premise ID	Bill Due Date	Meter Read Date	Days in Billing Period	Meter Reading	KWh Usage	Bill, Payment, Adjustment Amount	Amount Due	Actual Amount	Account Balance
09/20/18	09/20/18	Bill - Actual	3961500573	10/11/18	09/19/18	30	14,895.77	1,313.98	\$112.00	\$112.00	\$185.15	\$928.61
09/20/18	09/20/18	CAP Discount							\$0.00	\$112.00	-\$28.00	\$900.61
10/17/18	10/17/18	Current w/payoff balance							\$788.61	\$900.61	\$0.00	\$900.61
10/17/18	10/17/18	Bill - Actual	3961500573	11/07/18	10/16/18	27	15,585.99	690.21	\$103.04	\$1,003.65	\$103.04	\$1,003.65
10/17/18	10/17/18	CAP Write-Off Billing Deficiency - Final Bill							-\$28.00	\$975.65	-\$28.00	\$975.65
05/08/19	06/20/19	Payment							-\$150.00	\$825.65	-\$150.00	\$825.65
05/21/19	06/20/19	Payment							-\$180.00	\$645.65	-\$180.00	\$645.65
05/30/19	06/20/19	Payment - Grant DEF							-\$250.00	\$395.65	-\$250.00	\$395.65
05/30/19	06/20/19	Dollar Energy Fund							-\$250.00	\$145.65	-\$250.00	\$145.65
06/20/19	06/20/19	Bill - Actual	6520340544	07/11/19	06/19/19	28	3,616.80	808.38	\$128.52	\$274.17	\$128.52	\$274.17
07/17/19	07/22/19	Late Payment Charge							\$3.43	\$277.60	\$3.43	\$277.60
07/22/19	07/22/19	Bill - Actual	6520340544	08/12/19	07/21/19	32	4,689.79	1,072.98	\$171.31	\$448.91	\$171.31	\$448.91
07/26/19	08/21/19	Payment Arrangement							-\$398.91	\$50.00	\$0.00	\$448.91
07/26/19	08/21/19	Payment							-\$50.00	\$0.00	-\$50.00	\$398.91
08/21/19	08/21/19	Bill - Actual	6520340544	09/11/19	08/20/19	30	5,669.98	980.20	\$77.00	\$77.00	\$163.98	\$562.89

Exhibit B



Duquesne Light Company - Statement Of Account

Prepared: October 21, 2022

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Residential												
Transaction Date	Prepared Date	Transaction	Premise ID	Bill Due Date	Meter Read Date	Days in Billing Period	Meter Reading	KWh Usage	Bill, Payment, Adjustment Amount	Amount Due	Actual Amount	Account Balance
09/17/19	09/22/19	Late Payment Charge							\$0.97	\$77.97	\$0.97	\$563.86
09/22/19	09/22/19	Bill - Actual	6520340544	10/14/19	09/21/19	32	6,470.05	800.07	\$77.00	\$154.97	\$136.10	\$699.96
10/21/19	10/21/19	Late Payment Charge							\$1.93	\$156.90	\$1.93	\$701.89
10/21/19	10/21/19	Bill - Actual	6520340544	11/11/19	10/20/19	29	7,259.78	789.73	\$77.00	\$233.90	\$134.56	\$836.45
11/01/19	11/19/19	Payment							-\$154.97	\$78.93	-\$154.97	\$681.48
11/18/19	11/19/19	Late Payment Charge							\$0.97	\$79.90	\$0.97	\$682.45
11/19/19	11/19/19	Bill - Actual	6520340544	12/10/19	11/18/19	29	7,935.95	676.17	\$77.00	\$156.90	\$117.05	\$799.50
12/16/19	12/19/19	Payment							-\$300.00	\$0.00	-\$300.00	\$499.50
12/19/19	12/19/19	Bill - Actual	6520340544	01/09/20	12/18/19	30	8,952.48	1,016.53	\$118.00	\$0.00	\$169.70	\$669.20
12/23/19	01/21/20	Payment - Cancel Transaction							\$300.00	\$274.90	\$300.00	\$969.20
12/23/19	01/21/20	Non-sufficient Funds Charge							\$20.00	\$294.90	\$20.00	\$989.20
01/15/20	01/21/20	Late Payment Charge							\$1.96	\$296.86	\$1.96	\$991.16
01/21/20	01/21/20	Bill - Actual	6520340544	02/11/20	01/20/20	33	9,925.04	972.56	\$118.00	\$414.86	\$164.56	\$1,155.72
02/07/20	02/19/20	Payment							-\$150.00	\$264.86	-\$150.00	\$1,005.72
02/17/20	02/19/20	Late Payment Charge							\$1.81	\$266.67	\$1.81	\$1,007.53
02/19/20	02/19/20	Bill - Actual	6520340544	03/11/20	02/18/20	29	10,900.21	975.17	\$118.00	\$384.67	\$165.54	\$1,173.07
03/17/20	03/19/20	Late Payment Charge							\$3.29	\$387.96	\$3.29	\$1,176.36
03/19/20	03/19/20	Bill - Actual	6520340544	04/09/20	03/18/20	29	12,037.33	1,137.12	\$118.00	\$505.96	\$190.92	\$1,367.28
04/03/20	04/21/20	CAP Deficiency Adjust on Res Acct - Dot not Use							-\$84.00	\$421.96	-\$84.00	\$1,283.28



Duquesne Light Company - Statement Of Account

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Residential												
Transaction Date	Prepared Date	Transaction	Premise ID	Bill Due Date	Meter Read Date	Days in Billing Period	Meter Reading	KWh Usage	Bill, Payment, Adjustment Amount	Amount Due	Actual Amount	Account Balance
04/21/20	04/21/20	Bill - Actual	6520340544	05/12/20	04/20/20	33	13,183.40	1,146.07	\$170.00	\$591.96	\$193.13	\$1,476.41
05/08/20	05/20/20	Payment							-\$100.00	\$491.96	-\$100.00	\$1,376.41
05/20/20	05/20/20	Bill - Actual	6520340544	06/10/20	05/19/20	29	14,071.21	887.81	\$170.00	\$661.96	\$152.49	\$1,528.90
06/21/20	06/21/20	Bill - Actual	6520340544	07/13/20	06/20/20	32	15,051.77	980.56	\$170.00	\$831.96	\$167.07	\$1,695.97
07/11/20	07/22/20	Payment							-\$150.00	\$681.96	-\$150.00	\$1,545.97
07/22/20	07/22/20	Bill - Actual	6520340544	08/12/20	07/21/20	31	16,299.38	1,247.61	\$170.00	\$851.96	\$209.39	\$1,755.36
08/03/20	08/20/20	Payment							-\$400.00	\$451.96	-\$400.00	\$1,355.36
08/11/20	08/20/20	Payment							-\$451.96	\$0.00	-\$451.96	\$903.40
08/20/20	08/20/20	Bill - Actual	6520340544	09/10/20	08/19/20	29	17,510.40	1,211.02	\$236.00	\$236.00	\$221.67	\$1,125.07
08/28/20	09/21/20	Payment							-\$118.00	\$118.00	-\$118.00	\$1,007.07
08/29/20	09/21/20	Payment							-\$118.00	\$0.00	-\$118.00	\$889.07
09/21/20	09/21/20	Bill - Actual	6520340544	10/12/20	09/20/20	32	18,823.04	1,312.63	\$236.00	\$236.00	\$274.62	\$1,163.69
10/12/20	10/20/20	Payment							-\$118.00	\$118.00	-\$118.00	\$1,045.69
10/13/20	10/20/20	Payment							-\$118.00	\$0.00	-\$118.00	\$927.69
10/20/20	10/20/20	Bill - Actual	6520340544	11/10/20	10/19/20	29	19,792.57	969.53	\$236.00	\$236.00	\$214.86	\$1,142.55
11/04/20	11/19/20	Payment							-\$118.00	\$118.00	-\$118.00	\$1,024.55
11/13/20	11/19/20	Payment							-\$120.00	\$0.00	-\$120.00	\$904.55
11/19/20	11/19/20	Bill - Actual	6520340544	12/10/20	11/18/20	30	21,025.15	1,232.58	\$236.00	\$234.00	\$275.80	\$1,180.35
12/21/20	12/21/20	Bill - Actual	6520340544	01/11/21	12/20/20	32	22,047.22	1,022.08	\$273.00	\$507.00	\$220.69	\$1,401.04
01/24/21	01/24/21	Bill - Actual	6520340544	02/15/21	01/24/21	35	23,346.66	1,299.44	\$273.00	\$780.00	\$248.42	\$1,649.46
02/03/21	02/22/21	Payment							-\$300.00	\$480.00	-\$300.00	\$1,349.46
02/22/21	02/22/21	Bill - Actual	6520340544	03/15/21	02/22/21	29	24,704.14	1,357.48	\$273.00	\$753.00	\$283.03	\$1,632.49
03/23/21	03/23/21	Bill - Actual	6520340544	04/13/21	03/23/21	29	25,602.79	898.66	\$273.00	\$1,026.00	\$196.23	\$1,828.72



Duquesne Light Company - Statement Of Account

Prepared: October 21, 2022

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Residential												
Transaction Date	Prepared Date	Transaction	Premise ID	Bill Due Date	Meter Read Date	Days in Billing Period	Meter Reading	KWh Usage	Bill, Payment, Adjustment Amount	Amount Due	Actual Amount	Account Balance
04/14/21	04/22/21	Payment							-\$250.00	\$776.00	-\$250.00	\$1,578.72
04/22/21	04/22/21	Bill - Actual	6520340544	05/13/21	04/22/21	30	26,209.87	607.07	\$294.00	\$1,070.00	\$137.12	\$1,715.84
04/30/21	05/23/21	Payment Arrangement							-\$987.00	\$83.00	\$0.00	\$1,715.84
05/23/21	05/23/21	Bill - Actual	6520340544	06/14/21	05/23/21	31	27,049.78	839.91	\$304.00	\$387.00	\$184.72	\$1,900.56
05/26/21	06/22/21	Payment							-\$150.00	\$237.00	-\$150.00	\$1,750.56
06/11/21	06/22/21	Payment							-\$238.00	\$0.00	-\$238.00	\$1,512.56
06/22/21	06/22/21	Bill - Actual	6520340544	07/13/21	06/22/21	30	28,100.90	1,051.12	\$304.00	\$303.00	\$227.92	\$1,740.48
07/19/21	07/22/21	Late Payment Charge							\$3.79	\$306.79	\$3.79	\$1,744.27
07/22/21	07/22/21	Bill - Actual	6520340544	08/12/21	07/22/21	30	28,944.45	843.56	\$304.00	\$610.79	\$186.19	\$1,930.46
08/12/21	08/22/21	Payment Arrangement							-\$529.79	\$81.00	\$0.00	\$1,930.46
08/12/21	08/22/21	Reconnect Fee							\$20.00	\$101.00	\$20.00	\$1,950.46
08/12/21	08/22/21	Payment							-\$101.00	\$0.00	-\$101.00	\$1,849.46
08/22/21	08/22/21	Bill - Actual	6520340544	09/13/21	08/22/21	31	29,598.46	654.00	\$336.06	\$336.06	\$147.31	\$1,996.77
09/20/21	09/21/21	Late Payment Charge							\$2.82	\$338.88	\$2.82	\$1,999.59
09/21/21	09/21/21	Bill - Actual	6520340544	10/12/21	09/21/21	30	30,221.82	623.36	\$329.77	\$668.65	\$141.02	\$2,140.61
09/24/21	10/20/21	Payment							-\$668.65	\$0.00	-\$447.15	\$1,693.46
10/20/21	10/20/21	Bill - Actual	6520340544	11/10/21	10/20/21	29	30,773.63	551.81	\$315.10	\$315.10	\$126.35	\$1,819.81
11/16/21	11/18/21	Late Payment Charge							\$2.56	\$317.66	\$2.56	\$1,822.37
11/18/21	11/18/21	Bill - Actual	6520340544	12/09/21	11/18/21	29	31,410.03	636.40	\$313.38	\$631.04	\$124.63	\$1,947.00
12/15/21	12/20/21	Late Payment Charge							\$5.09	\$636.13	\$5.09	\$1,952.09
12/20/21	12/20/21	Bill - Actual	6520340544	01/10/22	12/20/21	32	32,205.01	794.98	\$230.39	\$866.52	\$152.39	\$2,104.48



Duquesne Light Company - Statement Of Account

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Residential												
Transaction Date	Prepared Date	Transaction	Premise ID	Bill Due Date	Meter Read Date	Days in Billing Period	Meter Reading	KWh Usage	Bill, Payment, Adjustment Amount	Amount Due	Actual Amount	Account Balance
01/18/22	01/24/22	Late Payment Charge							\$7.97	\$874.49	\$7.97	\$2,112.45
01/23/22	01/24/22	Bill - Actual	6520340544	02/14/22	01/23/22	34	33,303.23	1,098.22	\$232.79	\$1,107.28	\$154.79	\$2,267.24
02/21/22	02/22/22	Late Payment Charge							\$10.88	\$1,118.16	\$10.88	\$2,278.12
02/21/22	02/22/22	Bill - Actual	6520340544	03/15/22	02/21/22	29	34,445.37	1,142.14	\$294.88	\$1,413.04	\$216.88	\$2,495.00
03/21/22	03/23/22	Late Payment Charge							\$14.56	\$1,427.60	\$14.56	\$2,509.56
03/22/22	03/23/22	Bill - Actual	6520340544	04/13/22	03/22/22	29	36,008.93	1,563.56	\$329.69	\$1,757.29	\$251.69	\$2,761.25
04/19/22	04/24/22	Late Payment Charge							\$18.68	\$1,775.97	\$18.68	\$2,779.93
04/21/22	04/24/22	Bill - Actual	6520340544	05/16/22	04/21/22	30	37,610.19	1,601.26	\$332.74	\$2,108.71	\$254.74	\$3,034.67
05/22/22	05/23/22	Bill - Actual	6520340544	06/13/22	05/22/22	31	38,490.42	880.23	\$273.18	\$2,381.89	\$195.18	\$3,229.85
05/23/22	05/23/22	Late Payment Charge							\$22.84	\$2,404.73	\$22.84	\$3,252.69
06/01/22	06/22/22	Dispute							-\$3,252.69	\$0.00	\$0.00	\$3,252.69
06/01/22	06/22/22	Current w/payoff balance							\$1,069.46	\$221.50	\$0.00	\$3,252.69
06/02/22	06/22/22	Dispute - Cancel Transaction							\$3,252.69	\$3,474.19	\$0.00	\$3,252.69
06/02/22	06/22/22	Payment Arrangement							-\$3,252.69	\$221.50	\$0.00	\$3,252.69
06/21/22	06/22/22	Bill - Actual	6520340544	07/13/22	06/21/22	30	39,241.96	751.54	\$252.99	\$474.49	\$184.55	\$3,437.24
07/19/22	07/24/22	Late Payment Charge							\$3.16	\$477.65	\$3.16	\$3,440.40
07/21/22	07/24/22	Bill - Actual	6520340544	08/15/22	07/21/22	30	40,263.53	1,021.58	\$252.99	\$730.64	\$206.88	\$3,647.28
08/12/22	08/22/22	Deposit Interest							-\$6.66	\$723.98	\$214.84	\$3,862.12
08/19/22	08/22/22	Payment							-\$300.00	\$423.98	-\$300.00	\$3,562.12
08/21/22	08/22/22	Bill - Actual	6520340544	09/12/22	08/21/22	31	41,965.14	1,701.61	\$252.99	\$676.97	\$263.05	\$3,825.17



Duquesne Light Company - Statement Of Account

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Residential												
Transaction Date	Prepared Date	Transaction	Premise ID	Bill Due Date	Meter Read Date	Days in Billing Period	Meter Reading	KWh Usage	Bill, Payment, Adjustment Amount	Amount Due	Actual Amount	Account Balance
08/22/22	08/22/22	Late Payment Charge							\$5.26	\$682.23	\$5.26	\$3,830.43
09/19/22	09/22/22	Late Payment Charge							\$8.34	\$690.57	\$8.34	\$3,838.77
09/21/22	09/22/22	Bill - Actual	6520340544	10/13/22	09/21/22	31	43,360.73	1,395.59	\$252.99	\$943.56	\$237.77	\$4,076.54
10/11/22	10/18/22	Dispute							-\$4,069.88	\$0.00	\$0.00	\$4,076.54
10/11/22	10/18/22	Current w/payoff balance							\$3,132.98	\$6.66	\$0.00	\$4,076.54
10/13/22	10/18/22	Current w/payoff balance							-\$6.66	\$0.00	\$0.00	\$4,076.54
10/17/22	10/18/22	Deposit Refund plus Interest							-\$445.40	\$0.00	-\$445.40	\$3,631.14
10/17/22	10/18/22	Bill - Actual	6520340544	11/08/22	10/17/22	26	44,396.32	1,035.59	\$208.02	\$0.00	\$208.02	\$3,839.16
10/19/22		Refund Adjustment-System							\$237.38	\$0.00	\$237.38	\$4,076.54
10/21/22		Dispute - Cancel Transaction							\$4,069.88	\$4,069.88	\$0.00	\$4,076.54
10/21/22		Current w/payoff balance							\$6.66	\$4,076.54	\$0.00	\$4,076.54
10/21/22		Refund Adjustment-System - Cancel Transaction							-\$237.38	\$3,839.16	-\$237.38	\$3,839.16
10/21/22		Billing - Cancel Transaction		11/08/22	10/17/22	26	44,396.32	1,035.59	-\$208.02	\$3,631.14	-\$208.02	\$3,631.14
10/21/22		Bill - Actual			10/17/22	26	44,396.32	1,035.59	\$98.03	\$3,729.17	\$98.03	\$3,729.17

**EXHIBIT C TO
ANSWER OF RESPONDENT,
DUQUESNE LIGHT COMPANY**
Docket No. C-2022-3035891

(w_mediation_complaint_sheet) Mediation Complaint For: Customer: COPRICH, CINNAMON - BCS #: 3841867 - ACCT #: [REDACTED]

General/Open Information	Payment Information	Prior Agreements	Final Report Information
Dispute, Holds, Notices and PUC Audit	Investigative Contacts		Closing Information

Date(s) Sent: **06/01/22** [DUQ_06012022_144100.xml](#) Double-click on file name to view...

Status: Date Closed: Closing Data Received:

Justified: Internal Justification: Reason Justified: Error Code:

Decision: Written Oral Decision Balance: Balance Date:

Lump
Requested: Awarded: Difference: Date Awarded: Service Restored:

Budget Payments	Monthly Payments
Regular: <input type="text" value="\$88.00"/> Arrears Plus: <input type="text" value="\$55.00"/> Special: <input type="text" value="\$143.00"/>	Current: <input type="text" value="\$0.00"/> Final: <input type="text" value="\$0.00"/> End: <input type="text" value="\$0.00"/>

Decision Type:

Terms:

Resolution: **LEVEL 1, BB 88.00 + 55.00 = 143.00 BEGINNING JULY 2022. WAIVE LPCS. CUSTOMER HAS AN ALTERNATE SUPPLIER AND WILL BE RESPONSIBLE FOR ADDITIONAL SUPPLIER CHARGES EACH MONTH.**

Exhibit C

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CINNAMON COPRICH	:	
Complainant	:	
	:	
v.	:	Docket No. C-2022-3035891
	:	
DUQUESNE LIGHT COMPANY	:	
Respondent	:	
	:	

VERIFICATION

I, Roxanne Morris, Supervisor of Regulatory Consumer Relations with Duquesne Light Company, verify that the answers and the factual allegations contained in the foregoing Answer and New Matter to Complaint are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsifications to authorities.



Date: October 25, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CINNAMON COPRICH	:	
Complainant	:	
	:	
v.	:	Docket No. C-2022-3035891
	:	
DUQUESNE LIGHT COMPANY	:	
Respondent	:	
	:	

CERTIFICATE OF SERVICE

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

VIA FIRST CLASS U.S. MAIL

Cinnamon Coprich

[REDACTED]
[REDACTED]

Email: [REDACTED]



Donald R. Wagner

Dated: October 25, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CINNAMON COPRICH	:	
Complainant	:	
	:	
v.	:	Docket No. C-2022-3035891
	:	
DUQUESNE LIGHT COMPANY	:	
Respondent	:	
	:	

CERTIFICATE OF SERVICE

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

VIA FIRST CLASS U.S. MAIL AND ELECTRONIC MAIL

Cinnamon Coprich
124 Miller Road
Rankin, PA 15104
Email: ccoprich@moraviahealth.com



Donald R. Wagner

Dated: November 28, 2022