

I, Michael Dalton, am submitting this written response to the objection presented by Duquesne Light Company via their counsel, Donald R. Wagner, in their Objections and Responses to Request for Production of Documents, which was emailed to me on May 10, 2023. Hereinafter, "DLC" will refer to Duquesne Light Company and will also apply to counsel's statements made on their behalf.

DLC's Cover Letter and Certificate of Service were posted on PUC's Document Search on May 11, 2023.

DLC has withheld the tenant's account information prior to August 16, 2022, the date on which I was designated to be an authorized representative. Before releasing information, DLC is requiring a letter of authorization from the tenant who held the account.

DLC's has acknowledged on page 3 of their April 12 Answer and New Matter that, "Complainant is listed as an authorized representative on the First Floor Unit's electric account." Note the use of present tense.

During a 2022 phone conversation with a DLC customer service representative concerning the tenant's account statement, I was provided with explanations concerning charges, payments and late payment fees which occurred in the account prior to August 16, 2022. That is how I became aware of discussions between the tenant and DLC concerning the Dollar Energy Fund program, which have been referenced in my May 2 response to DLC.

My formal complaint to PUC provided copies of an account statement for the tenant's account which included transactions that pre-dated the August 16 authorization.

As an authorized representative for the tenant's account, I had been provided access to account information prior to the date of authorization and believe that I continue to be entitled to all account records. DLC's refusal to provide information prior to the authorization date is a deviation from past practice.

A letter of authorization, signed by the tenant, is included as part of this response. I expect to receive all account information, as authorized.

Sincerely,

A handwritten signature in black ink that reads "Michael S. Dalton". The signature is written in a cursive style with a large, prominent initial "M".

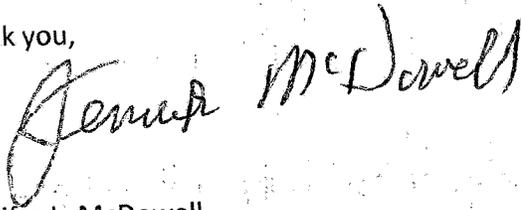
Michael S. Dalton

May 15, 2023

To whom it may concern,

I authorize Duquesne Light Company to provide to Michael Dalton all records for my former account at 103 Railroad Avenue in Carnegie, PA (Account 1895-531-321).

Thank you,

A handwritten signature in cursive script that reads "Jennifer L. McDowell". The signature is written in black ink and is positioned above the printed name.

Jennifer L. McDowell

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MICHAEL S DALTON

Complainant

v.

DUQUESNE LIGHT COMPANY

Respondent

Docket No. F-2023-3039207

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Reply 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

Email: donald.wagner@stevenslee.com



Michael S. Dalton

Dated: May 17, 2023