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David J. Barton
Attorney At Law

August 8, 2023

VIA ELECTRONIC FILING

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

**RE: Kathleen A. Plumb v. Duquesne Light Company
Docket No. C-2023-3041181**

Dear Secretary Chiavetta:

Enclosed for filing please find Complainant's Motion to Continue Hearing in the above referenced matter. A copy has been served in accordance with the attached Certificate of Service.

Should you have any questions, please feel free to contact me.

Very truly yours,

BENTZ LAW FIRM, P.C.



David J. Barton

DJB/lah

Enclosures

cc: Certificate of Service
Administrative Law Judge Mary D. Long
Emily M. Farah, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen A. Plumb	:	
	:	
v.	:	Docket No. C-2023-3041181
	:	
Duquesne Light Company	:	

MOTION TO CONTINUE HEARING

TO THE OFFICE OF THE ADMINISTRATIVE LAW JUDGE:

Kathleen A. Plumb, Complainant, requests that the hearing currently scheduled for September 7, 2023, be continued, and in support thereof avers as follows:

1. Complainant filed her formal complaint with the Commission on or about June 8, 2023.
2. Complainant engaged the undersigned counsel on August 4, 2023.
3. Prior to the time Complainant was represented she served an informal request for documents and information upon Respondent Duquesne Light Company.
4. Duquesne Light thereafter filed a Motion for Protective Order.
5. The Administrative Hearing Judge denied Duquesne Light's Motion on July 31, 2023.
6. In order to gather evidence and prepare for the hearing, Complainant needs time to marshal evidence, including time to serve more detailed and particular discovery, receive responses, and, potentially serve a second set of information should any additional areas of relevant inquiry be suggested by Duquesne Light's initial discovery responses.

7. Complainant anticipates propounding its first discovery requests on Duquesne Light forthwith.

8. Counsel for Duquesne Light Company, Emily Farah, has consented to this motion.

REQUEST FOR RELIEF

9. Complainant respectfully requests that the Administrative Law Judge continue the hearing in this matter for 60 to 90 days, to permit Complainant to obtain evidence, through discovery and otherwise, needed to prepare for the hearing.

/s/ David J. Barton

David J. Barton
Attorney I.D. No. 81271

Dated: August 8, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kathleen A. Plumb

v.

Duquesne Light Company

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:
:
:
:

Docket No. C-2023-3041181

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code §1.54 (relating to serve by a participant).

Administrative Law Judge Mary D. Long
malong@pa.gov

Emily M. Farah, Esquire
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219
efarah@duqlight.com

/s/ David J. Barton

David J. Barton

Attorney I.D. No. 81271

Dated: August 8, 2023