

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TODD ELLIOTT KOGER,

Complainant

V.

C-2023-3038703

**DUQUESNE LIGHT COMPANY,
Respondent.**

MOTION TO OPEN RECORD ADD “NEW” CLAIMS

Now, the Complainant petitions to open the record and add additional retaliatory intentional acts, or alternatively, to file a supplementary complaint and have such joined with the present case C-2023-3038703.

1. On October 10, 2023, Administrative Judge Conrad A. Johnson issued an Interim Order “Closing the Record.”
2. Shortly afterwards, Respondent utility company Duquesne Light, in direct retaliation for C-2023-2038703, purposely sent an electrical overload to the Complainant's residence, resulting in property destruction.
3. Throughout the span pertinent to C-2023-3038703 (in addition to the antecedent matters C-2019-3013238 and C-2020-3020394), the complainant had become suspect “Duquesne Light, the respondent utility firm, had implemented a system to willfully inflict harm to real estate, wiring and electronic fixtures, and personal effects.”

4. Today, October 11, 2023, the Plaintiff established irrefragable proof of a deliberate action knowingly done to position the respondent utility company with the facility to inflict harm.
5. Testimony during C-2023-3038703 indicated that the events of today, when examined together with other malign actions, pointed to a desire for retribution, which confirms the accused's culpability.
6. The Duquesne Light technician today conducted an inspection of the "service meter" located at the Complainant's residence, ordered to be replaced for unexplained reasons during the pertinent time period, that was "installed without the neutral connection" connected; thus resulting in years of property damage.
7. The plaintiff advised by the Respondent company's maintenance technician inquiring "If any household appliances and large electronics had shut down without warning; "the Complainant having endured such during the relevant time.
8. The new issued discovered because Xfinity technicians detected "fire damage" to their electrical gear and the circuitry attached to the residence on two separate visits.
9. Both representatives from Respondent's company and Xfinity advised Complainant today that burning of the Xfinity equipment, and the detection of an electrical current in Xfinity wiring, served as a warning that the Complainant's residence was in immediate (the unexplained neutral connection not connected).

10. The Respondent's organization had an explicit obligation to the Complainant, and they knowingly failed to uphold it, displaying extreme recklessness and intent to cause injury - the Complainant seeks actual and punitive damages.

18 PA.C.S. § 4904 AFFIDAVIT FOR A CRIMINAL COMPLAINT

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

/s/ Todd Elliott Koger
Complainant
515 Kelly Avenue
Pittsburgh, PA 15221

CERTIFICATE OF SERVICE

The forgoing Motion for was e-filed at C-2023-3038703 and served on the forgoing, address as follows:

1. e-Filing: C-2023-3038703 Secretary, Pennsylvania Public Utility Commission, 400 North Street. Harrisburg, PA 17120
2. Administrative Law Judge, Conrad A. Johnson, 301 Fifth Avenue, Suite 220 Piatt Place, Pittsburgh, PA 15222, cojohnson@pa.gov
3. Emily M. Farah, Duquense Light Company, 411 Seventh Avenue, Pittsburgh, PA 15219, efarah@duqlight.com

/s/ Todd Elliott Koger
Complainant
515 Kelly Avenue
Pittsburgh, PA 15221