
Megan E. Rulli

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File #: 209479

March 11, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pete Bandhu v. Duquesne Light Company
Docket No. C-2024-3052041

Dear Secretary Chiavetta:

Attached for filing is the Motion to Compel of Duquesne Light Company for Responses to Discovery Propounded on Pete Bandhu (“Complainant”) – Set I in the above-referenced proceeding.

Respectfully submitted,



Megan E. Rulli

MER/dmc
Attachment

cc: The Honorable Emily DeVoe (*via email; w/attachment*)
William Bercik (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

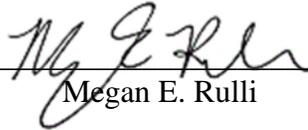
I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL AND FIRST-CLASS MAIL

Pete Bandhu
633 Smithfield Street
Pittsburgh, PA 15222
prasadbandhu@gmail.com

Pete Bandhu
834 Washington Road
Pittsburgh, PA 15228
prasadbandhu@gmail.com

Date: March 11, 2025



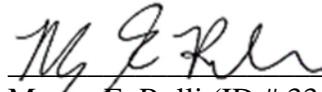
Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pete Bandhu,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3052041
	:	
Duquesne Light Company,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.



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Date: March 11, 2025

Attorney for Duquesne Light Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pete Bandhu,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3052041
	:	
Duquesne Light Company,	:	
	:	
Respondent.	:	

**MOTION OF DUQUESNE LIGHT COMPANY TO
COMPEL RESPONSES TO
DISCOVERY PROPOUNDED ON PETE BANDHU – SET I**

TO ADMINISTRATIVE LAW JUDGE EMILY I. DEVOE:

Pursuant to 52 Pa. Code §§ 5.342(g) and 5.349(d), Duquesne Light Company (“Duquesne Light” or the “Company”) hereby files this Motion to Compel Responses to Discovery Propounded on Pete Bandhu (“Complainant”) – Set I. In support of its Motion, Duquesne Light states as follows:

I. INTRODUCTION

1. On November 11, 2024, the Company was served with the above-captioned Complaint filed by Pete Bandhu via Secretarial Letter from the Commission (“Bandhu Complaint”). In the Bandhu Complaint, Mr. Bandhu alleges that he was improperly denied service by Duquesne Light and requested that service be restored at 633 Smithfield Street, Pittsburgh, PA 15222 (“Service Address”).

2. On December 2, 2024, Duquesne Light timely filed an Answer to the Bandhu Complaint, admitting in part and denying in part the factual basis of Mr. Bandhu’s allegations.

3. On November 27, 2024, the Company was served with a Complaint filed by Shane Tracy via Secretarial Letter from the Commission at Docket No. C-2024-3052319 (“Tracy Complaint”). In the Tracy Complaint, Mr. Tracy alleges that he was improperly denied service by Duquesne Light for the same Service Address and also requests that service be restored.

4. On December 17, 2024, Duquesne Light timely filed an Answer and New Matter to the Tracy Complaint, admitting in part and denying in part the factual basis of Mr. Tracy’s allegations.

5. On December 4, 2024, the Commission issued an Initial Call-In Telephonic Hearing Notice, scheduling an evidentiary hearing for the Bandhu Complaint for 10:00 AM on February 10, 2025, before Administrative Law Judge Emily I. Devoe (the “ALJ”).

6. On December 5, 2024, the ALJ issued a Prehearing Order confirming the date and time of the evidentiary hearing for the Bandhu Complaint.

7. On January 17, 2025, Duquesne Light served Interrogatories and Requests for Production of Documents on the Complainant – Set I, Questions 1 through 6 (“Duquesne Light to Complainant Set I”) via email and first-class mail.¹ A true and correct copy of Duquesne Light to Complainant Set I is attached hereto and marked as **Appendix A**.

8. Pursuant to the Commission’s regulations, objections to Duquesne Light to Complainant Set I were due on or before January 27, 2025, and responses were due on or before February 6, 2025.

¹ Simultaneously with Duquesne Light to Complainant Set I, the Company served its Requests for Admission – Set I on Pete Bandhu (“Requests for Admission”). The Company never received objections or responses to the Requests for Admission, either under the original or the extended deadline for responding. Per 52 Pa. Code § 5.350(c), “[t]he matter is admitted unless, within 20 days after service of the request, the party to whom the request is directed answers or makes an objection to the matter, signed by the party or by his attorney.” As such, the Complainant has waived his right to object to the Requests for Admission and the Company is not seeking responses to the Requests for Admission, as the matters therein have been admitted due to the Complainant’s failure to objection and/or respond. *See id.*

9. The Complainant never served any objections to Duquesne Light to Complainant Set I by January 27, 2025.

10. On January 27, 2025, the ALJ issued an Interim Order scheduling a Prehearing Conference at the dockets for both the Bandhu and Tracy Complaints to determine whether the two cases should be consolidated, considering the overlapping facts and issues raised in both Complaints.

11. On February 10, 2025, the Prehearing Conference was held as scheduled. Attorney William Bercik appeared on behalf of Pete Bandhu. Mr. Tracy did not attend the Prehearing Conference and no attorney appeared on his or Panther Pitt's behalf.²

12. During the Prehearing Conference, the ALJ extended the deadline for responses to Duquesne Light to Complainant Set I to March 3, 2025, and directed counsel for Duquesne Light to provide Attorney Bercik with a copy of Duquesne Light to Complainant Set I.

13. Also during the Prehearing Conference, the ALJ directed Attorney Bercik to enter his appearance on behalf of Pete Bandhu at the above-captioned docket, and Attorney Bercik represented that he would do so. As of the date of this Motion, Attorney Bercik has not entered his appearance at the above-captioned docket.

14. Counsel for Duquesne Light provided Attorney Bercik with a copy of Duquesne Light to Complainant Set I via email on February 10, 2025, as instructed. A true and correct copy of the email providing Attorney Bercik with Duquesne Light to Complainant Set I is attached hereto and marked as **Appendix B**.

² During the Prehearing Conference, Attorney Bercik indicated that he was familiar with Mr. Tracy but had not been engaged to represent him before the Commission. To date, Attorney Bercik has not entered his appearance at the Tracy Complaint docket, nor has any attorney entered an appearance at the docket.

15. Duquesne Light received no objections to Duquesne Light to Complainant Set I under either the original February 6, 2025, deadline or the March 3, 2025, extended deadline.

16. On March 4, 2025, Counsel for Duquesne Light emailed Attorney Bercik to inquire about the status of the responses to Duquesne Light to Complainant Set I, in an attempt to resolve this discovery dispute. A true and correct copy of this email is attached hereto and marked as **Appendix C**. Attorney Bercik never responded to that email and it was not returned as undeliverable.

17. The Complainant has had more than 50 days to provide his answers to Duquesne Light to Complainant Set I, which were served on January 17, 2025.

18. To date, the Complainant has provided no responses to Duquesne Light to Complainant Set I.

II. MOTION TO COMPEL

19. Duquesne Light respectfully requests that the ALJ compel responses to Duquesne Light to Complainant Set I, Nos. 1 through 6.

20. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of whether the information sought “relates to the claim or defense of the party seeking discovery or to the claim or defense of another party.” *Id.*

21. Objections to interrogatories are due within 10 days of the service date. 52 Pa. Code § 5.342(e).

22. Here, Duquesne Light served its first set of interrogatories on January 17, 2025, via email and first-class mail. Consequently, any objections to Duquesne Light to Complainant Set I were due on or before January 27, 2025.

23. The Complainant did not object to any question in Duquesne Light to Complainant Set I on or before January 27, 2025.

24. Neither did the Complainant serve any objections to Duquesne Light to Complainant Set I after the deadline to respond was extended by the ALJ to March 3, 2025.

25. Therefore, the Complainant has waived the right to object to these interrogatories and must provide answers to them. *See* 52 Pa. Code §§ 5.342(a)(4) (stating that a party must “[a]nswer each interrogatory fully and completely unless an objection is made”).

26. In addition, the interrogatories propounded by Duquesne Light are highly relevant to the issues to be decided in this case, including the Complainant’s claim that the Company has denied him service, is improperly conditioning restoration of service on the payment of certain past due balances for prior accounts, and is discriminating against him as a minority business owner.

A. DUQUESNE LIGHT TO COMPLAINANT-I-1 AND I-2

27. Duquesne Light to Complainant-I-1 and I-2 request the following:

Duquesne Light to Complainant-I-1

Please provide a detailed description of 633 Smithfield Street, Pittsburgh, Pennsylvania 15222 (the “Service Address”), including the number of floors, apartments, retail spaces, and Duquesne Light meters.

Duquesne Light to Complainant-I-2

Please identify every lessee, renter, and occupant of the Service Address between January 1, 2020 and January 17, 2024. For each individual or entity identified, please:

(a) Describe in detail your relationship to that individual or entity.

- (b) Provide the dates of occupancy.
- (c) Please provide all Documents relied upon in responding to subparts (a) through (b).

28. Question 1 simply asks the Complainant to provide a description of the Service Address. Similarly, Question 2 requests information regarding the use and occupancy of the Service Address for the last 4 years. To the extent the Complainant is making claims that he is the owner of the Service Address and a small business owner who requires electric service to be restored, a description of the Service Address and its past and current uses are important information for the Company to review and understand.

29. Importantly, the Company terminated service to the Service Address on November 7, 2024, after an individual contacted the Company stating that service was fraudulently established under the name Paris Navy LLC. The Complainant called the Company to request service be restored in his name the next day, on November 8, 2024. (*See* Duquesne Light Answer ¶ 4.) As such, Duquesne Light seeks a description of the past and current uses of the Service Address to understand whether the Complainant or some other individual/entity was fraudulently receiving service under the name Paris Navy LLC prior to November 7, 2024.

30. These basic questions about the Service Address are critical to responding to the Complainant's claim that the Company improperly conditioned the restoration of service with the requirement to pay a security deposit, certain past due balances for accounts associated with the Complainant, and a reconnect fee. (*See* Complaint ¶¶ 4-5; Duquesne Light Answer ¶ 4.) Without answers, Duquesne Light and its witnesses would not be fully prepared to respond to all of the Complainant's allegations at the hearing.

31. Duquesne Light must receive a full and complete response to this interrogatory in sufficient time before an evidentiary hearing so that the Company can prepare and respond to the Complainant's allegations.

32. Therefore, the Complainant should be compelled to provide complete responses that provide all of the requested information.

B. DUQUESNE LIGHT TO COMPLAINANT-I-3 TO I-5

33. Duquesne Light to Complainant-I-3 to I-5 request the following:

Duquesne Light to Complainant-I-3

Please identify all businesses in which you are a member, officer, or have any ownership interest in, which operate in the state of Pennsylvania. For each business please identify:

- (a) The nature of your business interest (for example, member, officer, owner).
- (b) The mailing address of the business.
- (c) The operating address of the business.
- (d) Whether the business has ever received electric service from Duquesne Light Company. If so, please provide the electric service account number and service address associated with the account.
- (e) The date your interest in the business began.
- (f) The date your interest in the business ended, if applicable.
- (g) Please provide all Documents relied upon in responding to subparts (a) through (f).

Duquesne Light to Complainant-I-4

Please describe in detail any ownership interest (for example, owner, member, officer) you have or ever had in the following entities:

- (a) Paparazzi Entertainment, LTD.
- (b) Smithfield Holdings, Inc.
- (c) Sahanah Rest, Inc.

- (d) Armored Coyotes, LLC.
- (e) Panther Pitt Bar and Grill LLC.
- (f) Panther Pitt Oakland.
- (g) Shane Tracy Enterprises Inc.
- (h) 633 Smithfield LLC.
- (i) Please provide all Documents relied upon in responding to subparts (a) through (h).

Duquesne Light to Complainant-I-5

Please describe in detail your relationship to the following entities:

- (a) Paparazzi Entertainment, LTD.
- (b) Smithfield Holdings, Inc.
- (c) Sahanah Rest, Inc.
- (d) Armored Coyotes, LLC.
- (e) Panther Pitt Bar and Grill LLC.
- (f) Panther Pitt Oakland.
- (g) Shane Tracy Enterprises Inc.
- (h) 633 Smithfield LLC.
- (i) Please provide all Documents relied upon in responding to subparts (a) through (h).

34. Question 3 asks the Complainant to identify his business interests within the state of Pennsylvania, while Questions 4 and 5 ask the Complainant to identify his relationship to specific entities that have received service from Duquesne Light at the Service Address or other business entities associated with the Complainant or Shane Tracy.³ Inquiries into the Complainant's business ventures and past accounts with Duquesne Light are relevant and

³ For the reasons explained more fully in Section II.C, *infra*, the Company is also seeking information related to Shane Tracy to better understand the relationship between Mr. Bandhu and Mr. Tracy.

reasonably calculated to lead to the discovery of admissible evidence because Mr. Bandhu has placed into issue in this case whether he should be held responsible for the payment of certain past due balances for accounts associated with him and/or his business ventures. (*See* Complaint ¶¶ 4-5; Duquesne Light Answer ¶ 4.)

35. Duquesne Light is entitled to payment for the service it provides⁴ and seeks information to rebut the Complainant's claims that he is not responsible for certain outstanding balances. The Company also seeks this information to determine the Complainant's relationship to other businesses that: (1) have or had active accounts with Duquesne Light and have been connected with the Complainant through account histories; (2) are associated with Pete Bandhu or Shane Tracy (*see* Section II.B, below) through public sources; or (3) have applied for or received service at the Service Address at issue.

36. These questions are critical to responding to the Complainant's claims that the Company has improperly required him to pay the outstanding balances for certain of these entities in order to restore service to the Service Address. (*See* Complaint ¶¶ 4-5; Duquesne Light Answer ¶ 4.)

37. These questions will also help the Company understand whether the Complainant is responsible for additional outstanding balances related to other electric service accounts and to establish whether the Complainant has a history of applying for service under new business names to avoid payment for service previously provided.

⁴ "By law, a public utility is entitled to receive payment for the service it provides. Otherwise, unpaid bills are included in the utility's uncollectible expenses, which all of its remaining customers must pay." Nichole Mecum v. UGI Penn Natural Gas, Inc., Docket No. C-2008-2014170, 2008 Pa. PUC LEXIS 600, *7 (Initial Decision dated Oct. 2, 2008), became final without further Commission action (Order entered January 15, 2009) (internal citations omitted).

38. Without answers, Duquesne Light and its witnesses would not be fully prepared to respond to all of the Complainant's issues at the hearing and present its own case in rebuttal.

39. Duquesne Light must receive a full and complete response to these interrogatories in sufficient time before an evidentiary hearing so that the Company can prepare and respond to the Complainant's allegations.

40. Therefore, the Complainant should be compelled to provide complete responses that provide all of the requested information.

C. DUQUESNE LIGHT TO COMPLAINANT-I-6

41. Duquesne Light to Complainant-I-6 requests the following:

Please describe in detail the relationship between yourself and Shane Tracy, including any and all business affiliations between yourself and Shane Tracy.

42. In Question 6, Duquesne Light has merely asked the Complainant to describe his relationship to Shane Tracy, an individual who filed a nearly identical Complaint to Mr. Bandhu's at Docket No. C-2024-3052319, related to the alleged denial of service at the same Service Address. Given the similarities of their claims, Duquesne Light seeks to understand the relationship between Mr. Bandhu and Mr. Tracy to determine whether they are business partners or otherwise in privity with each other.

43. "Privity is broadly defined as 'mutual or successive relationships to the same right of property, or such an identification of interest of one person with another as to represent the same legal right.'" *Hillgartner v. Port Auth.*, 936 A.2d 131, 140 (Pa. Cmwlth. 2007) (quoting *Montella v. Berkheimer Assocs.*, 690 A.2d 802, 804 (Pa. Cmwlth. 1997)). "Typically, the same loss, the same measure of damages, and the same or nearly identical issues of fact and law are involved." *Id.* (internal quotation marks omitted).

44. To the extent that Mr. Bandhu and Mr. Tracy are business partners or are otherwise in privity with each other, they are not entitled to two bites out of the same apple simply by filing two separate Complaints, which are nearly identical and were filed mere days apart from each other.

45. Further, if Mr. Tracy and Mr. Bandhu are business partners or otherwise in privity with each other, then the cases should be consolidated “for the sake of judicial economy, as well as to avoid inconsistent findings of fact and incompatible resolutions if the two Complaints were heard and decided separately.” (Interim Order, p. 6.)

46. Considering the similarity between the two Complaints and the allegations raised therein, Duquesne Light reasonably seeks to understand the relationship between the two complainants, and specifically to understand whether they are business partners or engaged in joint business ventures.

47. Thus, the Company is entitled to discovery of such basic and relevant information and the Complainant should be compelled to respond.

III. SANCTIONS

48. Upon the motion of a party, the presiding officer may make an appropriate order for sanctions if a party fails to answer or otherwise respond to a discovery request or refuses to obey an order of the presiding officer respecting discovery. *See* 52 Pa. Code § 5.371(a).

49. In ruling upon a motion for sanctions, the presiding officer may, among other things, issue: (1) “[a]n order that the matters regarding which the questions were asked, the character or description of the thing or land, the contents of the paper, or other designated fact shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order”; (2) [a]n order refusing to allow the disobedient party to support or oppose designated claims or defenses, or prohibiting the party from introducing in evidence designated documents, things or testimony”; and (3) “[a]n order striking out pleadings or parts thereof, staying further proceedings until the order is obeyed, or entering a judgment against the disobedient party or individual advising the disobedience.” *Id.* § 5.372(a)(1)-(3).

50. If the Complainant fails to provide full and complete responses to Duquesne Light’s discovery requests, Duquesne Light will be deprived of a reasonable opportunity to prepare for an evidentiary hearing and respond to the Complainant’s claims.

51. Accordingly, the Company respectfully requests that if the Complainant fails to produce the information and documents responsive to Duquesne Light to Complainant Set I, Nos. 1 through 6, then the Complainant should be barred from litigating the corresponding claim(s).

52. For example, if the Complainant fails to identify his ownership interest and/or relationship to the businesses listed in Questions 5 and 6, then the Complainant would be precluded from litigating claims that the Company is improperly conditioning the provision of service on the payment of outstanding balances related to prior accounts in those entities’ names.

53. Finally, to the extent that this Motion is granted and the Complainant fails to answer fully Duquesne Light to Complainant Set I, or otherwise comply with the ALJ’s order, Duquesne Light intends to file an appropriate motion pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a) to dismiss the Complaint with prejudice.

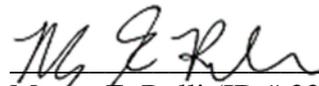
54. The Commission has regularly dismissed customer complaints with prejudice due to the complainant's failure to answer discovery in compliance with the presiding administrative law judge's orders granting motions to compel.⁵

⁵ See, e.g., *Carol Sojda & Carol Lutzkanin v. Metropolitan Edison Co.*, Docket No. C-2017-2638350, pp. 7-8 (Jan. 9, 2019), *adopted*, Docket No. C-2017-2638350 (Order entered Mar. 28, 2019); *Kimberly Beckmann v. Metropolitan Edison Co.*, Docket No. C-2017-2613702, pp. 7-10 (Jan. 31, 2019), *adopted*, Docket No. C-2017-2613702 (Order entered Apr. 11, 2019); *Darlene Stanton v. Pennsylvania Electric Co.*, Docket No. C-2018-3001144, pp. 6-11 (May 10, 2019), *adopted*, Docket No. C-2018-3001144 (Order entered July 11, 2019); *Diana Cook v. West Penn Power Co.*, Docket No. C-2018-3003051, pp. 6-10 (May 1, 2019), *adopted*, Docket No. C-2018-3003051 (Order entered July 11, 2019); *Kyle M. Denlinger v. PPL Electric Utilities Corp.*, Docket No. C-2018-3005721, pp. 4-11 (Aug. 16, 2019), *adopted*, Docket No. C-2018-3005721 (Order entered Sept. 26, 2019); *Robert B. Poole v. PPL Electric Corp.*, Docket No. C-2018-3005848, pp. 5-11 (Sept. 12, 2019) (Initial Decision), *adopted*, Docket No. C-2018-3005848 (Order entered Oct. 23, 2019); *Mary Toleno v. PPL Electric Utilities Corp.*, Docket No. C-2019-3007821, pp. 4-10 (Sept. 23, 2019) (Initial Decision), *adopted*, Docket No. C-2019-3007821 (Order entered Nov. 7, 2019); *Kyle A. Toffey v. PPL Electric Utilities Corp.*, Docket No. C-2019-3006931, pp. 4-11 (Oct. 7, 2019) (Initial Decision), *adopted*, Docket No. C-2019-3006931 (Order entered Nov. 21, 2019); *Patrick & Sharon Malcolm v. PPL Electric Utilities Corp.*, Docket No. C-2018-3005902, pp. 5-11 (Nov. 6, 2019) (Initial Decision), *adopted*, Docket No. C-2018-3005902 (Order entered Dec. 27, 2019); *Frances Demianczyk v. PPL Electric Utilities Corp.*, Docket No. F-2019-3008596, pp. 5-11 (Oct. 22, 2019), *adopted*, Docket No. F-2019-3008596 (Order entered Dec. 13, 2019); *Janet Fitz v. PPL Electric Utilities Corp.*, Docket No. C-2018-3006048, pp. 5-11 (Nov. 19, 2019) (Initial Decision), *adopted*, Docket No. C-2018-3006048 (Order entered Dec. 30, 2019); *Mark Pauli Kleeman v. PPL Electric Utilities Corp.*, Docket No. C-2019-3010235, pp. 5-9 (Nov. 20, 2019) (Initial Decision), *adopted*, Docket No. C-2019-3010235 (Order entered Dec. 31, 2019).

IV. CONCLUSION

For the reasons set forth above, Duquesne Light Company respectfully requests that Administrative Law Judge Emily I. DeVoe grant this Motion to Compel Responses to Discovery and direct Pete Bandhu to answer fully Duquesne Light to Complainant Set I, as described above within three (3) days from the date of the order.

Respectfully submitted,



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Date: March 11, 2025

Attorney for Duquesne Light Company

APPENDIX A

Interrogatories and Requests for Production of Documents Propounded by Duquesne Light Company on Pete Bandhu – Set I

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pete Bandhu,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3052041
	:	
Duquesne Light Company,	:	
	:	
Respondent.	:	

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
DUQUESNE LIGHT COMPANY ON
PETE BANDHU – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, Duquesne Light Company (“Duquesne Light”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Pete Bandhu (“Complainant”) – Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written,

recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party’s attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party’s own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party’s inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party’s answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. “Formal Complaint” means the Formal Complaint filed by Pete Bandhu at Docket No. C-2024-3052041.

19. “Service Address” means 633 Smithfield Street, Pittsburgh, Pennsylvania 15222.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
PETE BANDHU – SET I**

DLC to Complainant-I-1

Please provide a detailed description of 633 Smithfield Street, Pittsburgh, Pennsylvania 15222 (the “Service Address”), including the number of floors, apartments, retail spaces, and Duquesne Light meters.

DLC to Complainant-I-2

Please identify every lessee, renter, and occupant of the Service Address between January 1, 2020 and January 17, 2024. For each individual or entity identified, please:

- (a) Describe in detail your relationship to that individual or entity.
- (b) Provide the dates of occupancy.
- (c) Please provide all Documents relied upon in responding to subparts (a) through (b).

DLC to Complainant-I-3

Please identify all businesses in which you are a member, officer, or have any ownership interest in, which operate in the state of Pennsylvania. For each business please identify:

- (a) The nature of your business interest (for example, member, officer, owner).
- (b) The mailing address of the business.
- (c) The operating address of the business.
- (d) Whether the business has ever received electric service from Duquesne Light Company. If so, please provide the electric service account number and service address associated with the account.
- (e) The date your interest in the business began.
- (f) The date your interest in the business ended, if applicable.
- (g) Please provide all Documents relied upon in responding to subparts (a) through (f).

DLC to Complainant-I-4

Please describe in detail any ownership interest (for example, owner, member, officer) you have or ever had in the following entities:

- (a) Paparazzi Entertainment, LTD.
- (b) Smithfield Holdings, Inc.
- (c) Sahanah Rest, Inc.
- (d) Armored Coyotes, LLC.
- (e) Panther Pitt Bar and Grill LLC.
- (f) Panther Pitt Oakland.
- (g) Shane Tracy Enterprises Inc.
- (h) 633 Smithfield LLC.
- (i) Please provide all Documents relied upon in responding to subparts (a) through (h).

DLC to Complainant-I-5

Please describe in detail your relationship to the following entities:

- (a) Paparazzi Entertainment, LTD.
- (b) Smithfield Holdings, Inc.
- (c) Sahanah Rest, Inc.
- (d) Armored Coyotes, LLC.
- (e) Panther Pitt Bar and Grill LLC.
- (f) Panther Pitt Oakland.
- (g) Shane Tracy Enterprises Inc.
- (h) 633 Smithfield LLC.
- (i) Please provide all Documents relied upon in responding to subparts (a) through (h).

DLC to Complainant-I-6

Please describe in detail the relationship between yourself and Shane Tracy, including any and all business affiliations between yourself and Shane Tracy.

APPENDIX B

**February 10, 2025, Email Serving Copy of Duquesne Light
to Complainant – Set I on Attorney Bercik**

Caley, Danielle

From: Rulli, Megan
Sent: Monday, February 10, 2025 6:27 PM
To: pwilliambercik@cs.com
Subject: Pete Bandhu v. Duquesne Light Company - Docket No. C-2024-3052041 - Discovery Requests of Duquesne Light Company
Attachments: Pete Bandhu v. Duquesne Light Company - Docket No.msg; Pete Bandhu v. Duquesne Light Company - Docket No.msg

Attorney Bercik,

As a follow-up to the Prehearing Conference held earlier today in the above referenced proceeding, please find attached the discovery requests as originally served on Mr. Bandhu on January 17, 2025. As discussed, Duquesne Light has agreed to an extension for responses until March 3, 2025.

If you would like to further discuss your client's Complaint, I can be reached at the cell phone number below. I will note that I am in hearings from tomorrow through Thursday (Feb. 11-13), so have limited availability this week.

Thank you,

Megan E. Rulli
Associate
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101

717-612-6012 (Phone)
717-472-0466 (Cell)
717-731-1985 (Fax)
MRulli@PostSchell.com

APPENDIX C

**March 4, 2025, Email To Attorney Bercik Seeking Responses
to Duquesne Light to Complainant - Set I**

Caley, Danielle

From: Rulli, Megan
Sent: Tuesday, March 4, 2025 11:16 AM
To: pwilliambercik@cs.com
Subject: RE: Pete Bandhu v. Duquesne Light Company - Docket No. C-2024-3052041 - Discovery Requests of Duquesne Light Company
Attachments: Pete Bandhu v. Duquesne Light Company - Docket No.msg; Pete Bandhu v. Duquesne Light Company - Docket No.msg

Good morning, Attorney Bercik,

I am writing regarding the discovery requests served in the Bandhu Complaint proceeding. As you know, we agreed to extend the due date to respond until yesterday, March 3, 2025.

Please also advise when Duquesne Light can expect responses to its outstanding Interrogatories and Requests for Production of Documents, which are attached. Please note that the due date to respond to the Requests for Admission has passed, so those facts are considered admitted pursuant to 52 Pa. Code Section 5.350. However, the Company is still seeking responses to its Interrogatories and Requests for Production of Documents.

Thank you,

Megan E. Rulli
Associate
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101

717-612-6012 (Phone)
717-472-0466 (Cell)
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To: pwilliambercik@cs.com
Subject: Pete Bandhu v. Duquesne Light Company - Docket No. C-2024-3052041 - Discovery Requests of Duquesne Light Company

Attorney Bercik,

As a follow-up to the Prehearing Conference held earlier today in the above referenced proceeding, please find attached the discovery requests as originally served on Mr. Bandhu on January 17, 2025. As discussed, Duquesne Light has agreed to an extension for responses until March 3, 2025.

If you would like to further discuss your client's Complaint, I can be reached at the cell phone number below. I will note that I am in hearings from tomorrow through Thursday (Feb. 11-13), so have limited availability this week.

Thank you,

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