

DATE OF DEPOSIT

Motion to the Court Complaint F-2024-3052032

Donna L. Shawfield Bennett Complainant v. Duquesne Light Company Respondent MAR - 4 2025

Public Utilities Commission Honorable Alphonso Arnold III Presiding

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

1 The Complainant motions the court for a Summary Finding in Favor of the Complainant. The admissions to having no knowledge or information contained in Duquesne Light's Answer to Complaint, combined with the accounting information in same Answer compared to calculations in the billing documents, which Duquesne Light has admitted speak for themselves, clearly affirm the accuracy of paragraph 4 of the Complaint.

2 The Complainant further moves with the addition of the ruling of February 3, 2024, dismissing Complainants request for punitive damages from Title 13 and Title 18, to modify the relief requested in the Complaint. Complainant requests under authority of Title 66 §506. Inspection of facilities and records, the Duquesne Light account assigned in the name of Darryl Shawfield to be audited from its inception, any and all billing and accounting errors be rectified, and any and all matters of relief or restitution which are within the authority of the Public Utilities Commission be ordered by the court, also any monies accrued from a rectification of accounting be granted to this account.

3 Additionally, Complainant moves that following an audit; all documents, including findings of the audit, concerning this Complaint along with all similar complaints in the possession of and filed with the Public Utilities Commission against Duquesne Light, be filed with the District Attorney's office who has the authority to adjudicate Titles 13 and 18 of the Pennsylvania Code.

4 Title 66 § 308.1. Consumer protection and information.

(a) Informal complaints: The commission shall keep records of each informal complaint received, the matter complained of, the utility involved and the disposition and shall at least annually prepare a report on these matters.

Title 66 § 313. Joint hearings and investigations; reciprocity. The commission shall have full power and authority to make joint investigations.. § 318. Commission to cooperate with other departments.

Declaration of Service Motion Complaint F-2024-3052032

Duquesne Light Company Respondent served to Megan E Rulli email

Honorable Alphonso Arnold III Presiding served to email

Secretary Pennsylvania Public Utilities Commission served to P.U.C. E-filing

Served via US Postal service

**Honorable Alfonso Arnold III
Office of Administrative Law Judge
400 North Street
Harrisburg PA 17120**

**Megan E Rulli Esquire Post and Schell
17 North Second Street 12th floor
Harrisburg PA 17101**

**Secretary Pennsylvania Public Utilities Commission
400 North Street
Harrisburg PA 17120**

DATE OF DEPOSIT

MAR - 4 2025

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Donna L. Shawfield Bennett Complainant v. Duquesne Light Company Respondent

MAR - 4 2025

Public Utilities Commission Honorable Alphonso Arnold III Presiding

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Your honorable Sir,

I apologize for the amount of time it has taken to respond to these matters, and pray my tardiness has not prejudiced this proceeding. I apparently did not clearly state the time requested was through February, as previously filed with this body on Tue Dec 31 11:33:37 EST 2024. I have needed an extension due to the time required as a caregiver for my husband, his death, and all legal and estate matters contained within this circumstance. I additionally apologize if my formatting of this communication is incorrect, and request it be accepted as presented.

Response to the Answer of the Complaint by Duquesne Light

Donna L. Shawfield Bennett Complainant files this response to the Answer of the Complaint by Duquesne Light, for consideration as evidence by the presiding judge the Honorable Alphonso Arnold III. This response is divided by subject matter, contained in Duquesne Light's Answer to paragraph 4 of the complaint. The dollar amounts referred to concerning disputed sums by the Complainant reflect the ruling that punitive sums are not appropriate in this case.

Response

Duquesne Light's Answer starting on pg. 1 number 4, which continues through pg. 6; between pgs. 3 to 5 Duquesne Light has stated five times it either does not have knowledge or information on the subject of the returned payments in December 2023, and January 2024 or the process used during the payment procedure. Duquesne Light has no knowledge or information of the navigation of their website payment system, including what payment system actually presents financial information for payment, the algorithm used to process this task, or the default settings their website has set up to control the direction of the payment process, nor have they provided documentation in support of their denials. Title 66 § 315. Burden of proof.(c) Adequacy of services and facilities.--In any proceeding upon the motion of the commission, involving the service or facilities of any public utility, the burden of proof to show that the service and facilities involved are adequate, efficient, safe, and reasonable shall be upon the public utility.

1) On pg. 2 of the Answer from Duquesne Light they have stated that the documents attached to the complaint, which have been provided by the Complainant, speak for themselves. Pg. 2 of Answer “It is Denied that the complainant gave the correct account information for the payments attempted in December 2023, and January 2024.” Pg. 3 “Based on the Company’s investigation it appears the Complainant may have updated information on the third party payment system.” Title 52 Chapter 56 § 56.2. Definitions. Electronic remittance of payment—The electronic receipt of payment from customers to a public utility using a system administered by the public utility or a system the public utility is responsible for maintaining. Duquesne Light is responsible to maintain all the payment systems it directs customers to during the payment process of their website. Duquesne Light is responsible to investigate both their payment system, and the information their third party payment system has and uses. They have admitted they did not access all the available information for confirmation or denial as the statement is “may have”.

2) Continuing on pg. 3 Duquesne Light is without sufficient knowledge or information as to whether the returned payments were due to Charles Schwab taking over T.D. Ameritrade as alleged by the Complainant” The payments were returned because of an invalid account; the result resolves the unknown. Duquesne Light’s ignorance of the financial takeover of T.D. Ameritrade has no bearing on the facts that they not once but twice requested payment using invalid information previously in their system instead of the information provided to them during the payment processes of their website.

3) The statement continues “is without sufficient knowledge or information as to whether the complainant put the information for Schwab in the wallet section of Duquesne Light’s website in November 2023”. As Duquesne Light has stated the documents attached to the complaint speak for themselves. A screenshot of the wallet has been previously provided to both Duquesne Light and in the Complaint, it contains the information for Schwab. Additionally, as Duquesne Light stated previously on pg. 2 “Based on the Company’s investigation it appears the Complainant may have updated information on the third party payment system.” Thus, Duquesne Light has acknowledged the information for Charles Schwab was provided during the payment process.

4) On pg. 4 of Duquesne Light's Answer "Duquesne Light is without sufficient knowledge or information as to whether the Complainant was unable to make a payment greater than \$68.00 on April 2, 2024, on the company's online payment system and therefor denies the same."

Duquesne Light has acknowledged that they are uninformed as to the settings of the algorithms governing their payment website, they either do not have the knowledge to retrace the information contained in their computer ran website, or they don't have a desire to investigate further. Hence they have no basis to dispute anything provided by the Complainant concerning navigation of the payment process of said website.

5) Duquesne's Answer continuing to pg. 5 "The Company is without sufficient knowledge or information as to whether the Complainant took a screenshot of the payment information before using the submit payment button and therefor denies the same." Duquesne Light can't identify their web site page. Once again documentation has been submitted with the complaint. This denial has not provided substantive information to support its conclusion. Duquesne Light did not deny what the Complainant has stated "Once the submit button is engaged the information on the payment page i.e. the date payment is to be made, the amount, and the bank, are unable to be back paged to retrieve for a screenshot, or to be printed." Again, Duquesne Light has not provided evidence they retraced the actions performed on their website to support their denial.

On pg.1 of the Answer to the Complaint "Specifically, it is denied that the Complainant's electric service bill{s} contain incorrect or "mystery" charges and that the Complainant's account [continued to pg.2] was not accurately credited for payments made." Duquesne Light states on pg. 2 of their Answer to the Complaint, that "the service bills and documents" speak for themselves. I agree, Duquesne Light is so confident in the clarity of their billing they explained their accounting almost step by step in their Answer, but they left out some important information. Continuing to the next paragraph pg. 2 "Specifically, it is denied that there is a cumulative issue concerning accounting, mystery charges not clear in billing, incorrect assumptions of Disputed Amounts,..." Starting on pg. 2 and following to pg. 3 of this Answer to Complaint, Duquesne Light admits the disputed amount on March 19, 2024, was \$270.32. This was the basis for the complaint that was made and received in April. They admit on pg. 4 that the amount they used as disputed on April 11, 2024, was the account balance of \$187.56 not \$270.32 as acknowledged was the amount in dispute on pg. 3.

As per the April billing statement, which has previously been furnished to the court, and pg. 4 of the Answer to Complaint, the account balance owed for usage was \$187.56. The amount billed was \$109.35. A \$40.00 Miscellaneous Adjustment was subtracted from the usage account balance on pg. 1. On pg. 3 of said bill This \$40.00 is identified as a return for non-sufficient funds charges. Continuing on pg.3 of the bill \$38.65 Miscellaneous Charges was deducted from the current amount due budget billing of \$108.00 making the current budget billing \$69.35. Back to pg.1 calculating the amount due; the previous March payment due of 108.00 subtracting the \$68.00 payment adding in the \$69.35 current budget billing due is \$109.35 due. Forty dollars was subtracted from the account usage balance, \$38.65 was subtracted from the amount due, why is this not the same \$40.00 in both calculations? One is identified as a Miscellaneous Adjustment one is a Miscellaneous Charges credit are these two separate Miscellaneous items which should then be a subtraction of \$78.65, or has an unidentified \$1.35 late payment charge been added to the amount due calculation?

Title 52 Chapter 56 Subchapter B. BILLING AND PAYMENT STANDARDS § 56.15. Billing information. A bill rendered by a public utility for metered residential public utility service must state clearly the following information: (8) The amount of late payment charges, designated as such, which have accrued to the account of the customer for failure to pay bills by the due date of the bill and which are authorized under § 56.22 (relating to accrual of late payment charges).

Bill Summary	
Bill ID: 387244504178	Date Prepared: 04/03/2024
Previous Account Balance	\$183.75
Payment(s) Received as of 04/02/2024	-\$68.00
Balance Forward	\$115.75
DLC Charges	\$59.99
Supply Charges	\$51.82
Miscellaneous Adjustments	-\$40.00
NEW ACCOUNT BALANCE	\$187.56
Previous Amount Due	\$108.00
Total Payment(s) as of 04/02/2024	-\$68.00
Current Amount Due (see Page 3 for Details)	\$69.35
AMOUNT DUE BY 04/24/2024	\$109.35

Meter Reading Usage Information

Meter Number	F75540236
Present 04/03/2024 Act	44,338.7280
Prior 03/04/2024 Act	43,843.1020
Difference	495.6260
Your Meter Multiplier	1
Total kWh Used	495.6260

Current Bill Details

DLC Rate	RS-Residential Service	
Price to Compare	\$0.1046 / kWh	
DLC Charges		\$59.99
Customer Charge		\$12.50
Distribution	495.6260 kWh@ \$0.088763	\$43.99
DSIC Surcharge	4.18%	\$2.36
Pennsylvania Tax Adjustment		-\$0.21
Late Payment Charge		\$1.35
Supply Charges		\$51.82
Supply	495.6260 kWh@ \$0.082038	\$40.66
Transmission	495.6260 kWh@ \$0.022514	\$11.16
Miscellaneous Charges		-\$40.00
Non-sufficient Funds Charge		-\$40.00

Total kWh Used	495.6260	Service Charges	\$71.81
-----------------------	-----------------	------------------------	----------------

Current Amount Due Detail

Budget Detail	
DLC Budget	\$55.00
Supply Budget	\$53.00
Miscellaneous Charges	-\$38.65
Subtotal	\$69.35

On pg. 4 of Answer Duquesne Light admits to receiving \$188.00 after ‘suspending’ \$187.56 the account balance for usage. They further say that this left an over payment balance of \$79.56 carried over to May. According to my calculator \$188.00 subtract \$109.35 equals \$78.65. In the footnote of this same pg.4 Duquesne Light states the \$0.44 overpayment from the \$188.00 payment in April is now added to the \$79.56 carry over to May as an \$80.00 credit in June. How mathematically is there both a \$0.44 overpayment of the account balance, and an overpayment of \$79.56 to be credited on two bill cycles from the same \$188.00 used to pay \$187.56?

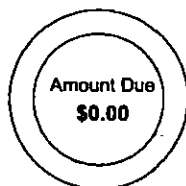
Continuing on pg. 4 of the Answer from Duquesne Light, the May bill which has been previously furnished to the court clearly shows no payment due. It shows the Previous Account Balance [usage] \$187.56, Payments Received \$188.00, Balance Forward -\$0.44. It identifies below this in the Current Balance calculation the disputed [or ‘suspended’] amount of -\$187.56 an active account balance of -\$188.00 [not -\$0.44] subtracting the DLC charges \$34.16 and Supply charges \$24.03 the Current Balance is -\$129.81, or monies being held by Duquesne Light not owed to them. It also shows under the Amount Due calculation Previous Amount Due \$187.56 [Not the \$109.35 shown in the April bill], Total Payments \$188.00, Current Amount due -\$79.56 as the final balance due not as a carried over credit as stated on pg.4 in Duquesne Light’s Answer. The calculation for the amounts shown in the balance due section by my calculator is

\$187.56 subtract \$188.00= -\$0.44 then subtract -79.56 = -\$80.00. On pg. 3 of said bill it shows \$187.56 was applied as a credit towards the budget billing of \$108.00, hence the \$79.56 owed to this account on the first page.

If the \$187.56 is ignored as a 'suspended' amount as shown in the Current Balance calculations, the Previous Amount due in the Amount Due calculation should be \$109.35 April's budget billing due, subtract payment of \$188.00 equals -\$78.65. The actual budget billing amount owed for May should have been \$108.00 minus \$78.65 April's budget overpayment, equals \$29.35 due as the budget billing. However, if April's payment of \$188.00 paid off the 'suspended' balance of \$187.56, leaving -\$0.44 to be carried over as a credit as shown in the Balance Forward calculation, and in the Amount Due calculation, also stated in the pg.4 footnote, the budget billing of \$107.56 should be due in May. The May bill pg. 3 shows \$187.56 as a credit to the billing not suspended, nor ignored, but subtracted.

According to Webster's Dictionary: "suspend: to hold in an undetermined or undecided state awaiting further information." As reflected in the May bill pg. 1 \$187.56 is disputed according to Duquesne Light's Answer this means suspended, and it is not used in the New Account Balance Calculations. The \$187.56 was subtracted from the budget billing on pg. 3, not suspended, and not due to be paid. Therefore, the bill and footnote reflection of the payment of \$188.00 creating an overpayment of \$0.44 from a 'suspended' balance due, followed by the bill noting \$188.00 [not -\$0.44], as a payment credited labeled Active Account Balance ignoring April's budget billing due, in New Account Balance calculations, leaves questions as to how said payment was actually applied, and the veracity of the entire calculation process of this May bill.

Bill Summary



Bill ID: 387393524945 Date Prepared: 05/02/2024

Previous Account Balance	\$187.56
Payment(s) Received as of 04/22/2024	-\$188.00
Balance Forward	-\$0.44
Disputed Charges	-\$187.56
Active Account Balance	-\$188.00
DLC Charges	\$34.16
Supply Charges	\$24.03
NEW ACCOUNT BALANCE	-\$129.81

Previous Amount Due	\$187.56
Total Payment(s) as of 04/22/2024	-\$188.00
Current Amount Due (see Page 3 for Details)	-\$79.56
AMOUNT DUE BY 05/23/2024	\$0.00

Verizon Center

Meter Reading Usage Information

Meter Number	F75540236	
Present	05/02/2024 Act	44,568.5740
Prior	04/03/2024 Act	44,338.7280
Difference		229.8460
Your Meter Multiplier		1
Total kWh Used		229.8460

Current Bill Details

DLC Rate	RS-Residential Service	
Price to Compare	\$0.1046 / kWh	
DLC Charges		\$34.16
Customer Charge		\$12.50
Distribution	229.8460 kWh@ \$0.088763	\$20.40
DSIC Surcharge	4.18%	\$1.38
Pennsylvania Tax Adjustment		-\$0.12
Supply Charges		\$24.03
Supply	229.8460 kWh@ \$0.082038	\$18.86
Transmission	229.8460 kWh@ \$0.022514	\$5.17

Total kWh Used	229.8460
-----------------------	-----------------

Service Charges	\$58.19
------------------------	----------------

Current Amount Due Detail

Budget Detail	
DLC Budget	\$55.00
Supply Budget	\$53.00
Miscellaneous Charges	-\$187.56
Subtotal	-\$79.56

The Answer continues to the June bill, which the court has been provided, staying on pg. 4. Duquesne Light states in the footnote that "The complainant had an additional \$0.44 credit on the account that was added to the previous credit of \$79.56 " this is now an \$80.00 credit carried forward in the text of the Answer pg.4, and labeled Previous Amount Due as an overpayment credit in the Amount Due calculations on the June bill. The \$79.56 overpayment credit was garnered from the \$187.56 credit in the May bill. The \$0.44 credit was from the overpayment of the \$187.56 usage account balance in April.

The June bill further notes a Previous Account Balance of \$57.75, adding to it the amount of use from June, the usage account balance is now \$110.57 owed. The May account balance reflected an overpayment, or owed to the account balance of \$129.81, the May usage was \$58.19. Where did the May overpayment go, and where did the \$57.75 come from? Additionally, a \$80.00 credit labeled Previous Amount Due is shown in the Amount Due section, why is there A Previous Account Balance of \$57.75 in the usage account balance at all, when a credit of \$80.00 previously overpaid is shown? The June usage was \$52.82, the noted \$80.00 Previous Amount due credit paid this amount with an additional \$27.18 in credit to the usage account.

Title 52 Chapter 56 Subchapter B. BILLING AND PAYMENT STANDARDS § 56.14.

Previously unbilled public utility service. When a public utility renders a make-up bill for

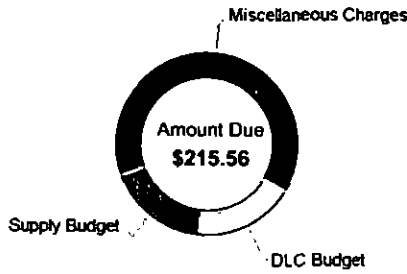
previously unbilled public utility service which accrued within the past 4 years resulting from public utility billing error, meter failure, leakage that could not reasonably have been detected or loss of service, or four or more consecutive estimated bills and the make-up bill exceeds the otherwise normal estimated bill for the billing period during which the make-up bill is issued by at least 50% or at least \$50, whichever is greater: (1) The public utility shall explain the bill to the customer and make a reasonable attempt to amortize the bill.

The \$187.56 which was used to create the \$80.00 credit, noted as an overpaid balance due in both the text and footnote in the Answer pg.4, is no longer 'suspended'. It is now a miscellaneous charge added onto pg. 3 of the June bill. However, the billing and payment history preceding June reflect that there is no outstanding amount billed unpaid, and in fact by the accounting on the June bill, and contained in both the text and the footnote on pg. 4 of their Answer Duquesne Light still owes this account \$80.00.

The May bill reflects the April payment of \$188.00 paid the account balance of \$187.56, with \$0.44 to spare, as does the footnote on pg.4 of the Answer. This payment would have also paid the entirety of the April budget billing with \$78.65 to spare if not credited to the entire account balance. The May bill also reflects an overpayment of \$79.56 after subtracting the May budget billing from the \$187.56 used as a credit, this is included as a \$80.00 credit on the June bill.

Had the \$187.56 actually been suspended the most that can be owed from the accounting of previous billing is \$29.35 for the May budget billing, as the payment in April overpaid the budget billing amount billed by \$78.65. There is no documentation in the billing which reflects that a balance of \$187.56 is owed to Duquesne Light, with or without a 'suspended' account balance. In fact, the June \$80.00 credit reflects that there is no money owed from May, and the \$187.56 was an appropriate credit to the account, as the remainder is still credited as an overpayment.

Bill Summary



Bill ID: 387312785921 **Date Prepared: 06/03/2024**

Previous Account Balance	\$57.75
Payment(s) Received	\$0.00
Balance Forward	\$57.75
DLC Charges	\$31.64
Supply Charges	\$21.18
NEW ACCOUNT BALANCE	\$110.57
Previous Amount Due	-\$80.00
Total Payment(s)	\$0.00
Current Amount Due (see Page 3 for Details)	\$295.56
AMOUNT DUE BY 06/24/2024	\$215.56

Meter Reading Usage Information

Meter Number	F75540236
Present 06/03/2024 Act	44,771.1010
Prior 05/02/2024 Act	44,568.5740
Difference	202.5270
Your Meter Multiplier	1
Total kWh Used	202.5270

Current Bill Details

DLC Rate	RS-Residential Service	
Price to Compare	\$0.1053 / kWh	
DLC Charges		\$31.64
Customer Charge		\$12.50
Distribution	189.8691 kWh@ \$0.088763	\$16.85
Distribution	12.6579 kWh@ \$0.089463	\$1.13
DSIC Surcharge	4.18%	\$1.27
Pennsylvania Tax Adjustment		-\$0.11
Supply Charges		\$21.18
Supply	189.8691 kWh@ \$0.082038	\$15.58
Supply	12.6579 kWh@ \$0.081229	\$1.03
Transmission	189.8691 kWh@ \$0.022514	\$4.27
Transmission	12.6579 kWh@ \$0.024048	\$0.30

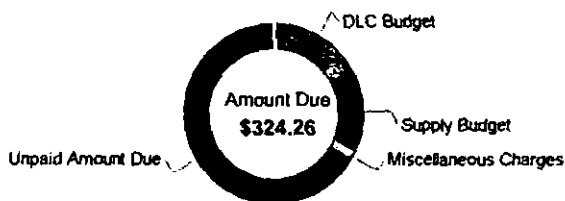
Total kWh Used	202.5270	Service Charges	\$52.82
-----------------------	-----------------	------------------------	----------------

Current Amount Due Detail

Budget Detail	
DLC Budget	\$55.00
Supply Budget	\$53.00
Miscellaneous Charges	\$187.56
Subtotal	\$295.56

On page 5 of the Answer from Duquesne Light they continue to the July bill. The bill was \$324.26 as broken down in their Answer. Duquesne Light also states the account balance owed for July was \$168.54, this is \$155.72 less than the amount billed, which they 'suspended' because of a complaint disputing the \$187.56 added in June, and questioning the uncredited payment from June of 166.00, a total of \$353.56. The amount of \$168.54 neither encompasses the amount billed in July, the carryover of \$215.56 from June when the complaint was filed, the actual complaint disputed amount of \$187.56 nor matches the missing payment of \$166.00, referenced in the text of pg.4 of their Answer. In order to clarify the July billing, the June bill needs to be clarified as to why there is an \$80.00 Previous Amount Due credit and a \$57.75 Previous Account Balance owed. Further, why the \$129.81 credit from the May account balance

did not carry over to June. The June account balance carried over to July needs to be addressed before the accounting in July can even begin.



Bill ID: 387161455459 Date Prepared: 07/02/2024

Previous Account Balance	\$110.57
Payment(s) Received	\$0.00
Balance Forward	\$110.57
DLC Charges	\$35.47
Supply Charges	\$22.50
NEW ACCOUNT BALANCE	\$168.54

Previous Amount Due	\$215.56
Total Payment(s)	\$0.00
Current Amount Due (see Page 3 for Details)	\$108.70
AMOUNT DUE BY 07/23/2024	\$324.26

Meter Reading Usage Information

Meter Number	F75540236
Present 07/02/2024 Act	44,984.8030
Prior 06/03/2024 Act	44,771.1010
Difference	213.7020
Your Meter Multiplier	1
Total kWh Used	213.7020

Current Bill Details

DLC Rate	RS-Residential Service	
Price to Compare	\$0.1053 / kWh	
DLC Charges		\$35.47
Customer Charge		\$12.50
Distribution	213.7020 kWh@ \$0.089463	\$19.12
DSIC Surcharge	4.01%	\$1.27
Pennsylvania Tax Adjustment		-\$0.12
Late Payment Charge		\$2.70
Supply Charges		\$22.50
Supply	213.7020 kWh@ \$0.081229	\$17.36
Transmission	213.7020 kWh@ \$0.024048	\$5.14

Total kWh Used	213.7020	Service Charges	\$57.97
-----------------------	-----------------	------------------------	----------------

Current Amount Due Detail

Budget Detail	
DLC Budget	\$55.00
Supply Budget	\$51.00
Miscellaneous Charges	\$2.70
Subtotal	\$108.70

Additionally, on pg. 5 continuing to pg.6 Duquesne Light characterizes their July 1, 2024, letter previously furnished to the court, which begins:

Your electric bill is now past due. We encourage you to promptly pay your overdue bill to ensure there isn't an interruption in your service. If you have already paid, thank you for your payment.

as a Past Due reminder and not a shut off warning. They continue on pg.6 to admit that there is an overpayment in November of \$414.25. How this has any bearing to the letter sent in July is unknown, except for showing that the Complainant in this matter continues to make payments. It also shows Duquesne Light's billing has provided the account an overage which Duquesne Light is holding interest free.

Title 52 Chapter 56 § 56.12. Meter reading; estimated billing; customer readings.

8) Budget billing. A gas, electric and steam heating public utility shall provide its residential customers, on a year-round rolling enrollment basis, with an optional billing procedure which averages estimated public utility service costs over a 10-month, 11-month or 12-month period to eliminate, to the extent possible, seasonal fluctuations in public utility bills. The public utility shall review accounts at least three times during the optional billing period. At the conclusion of the budget billing year, a resulting reconciliation amount exceeding \$100 but less than \$300 shall be, at the request of the customer, amortized over a 6-month period. Reconciliation amounts exceeding \$300 shall be amortized over at least a 12-month period at the request of the customer. Shorter amortization periods are permissible at the request of the customer.

Duquesne Light is correct in the statement the documents speak for themselves. The comparison of the actual information on the bill documents as compared to the accounting explanations in their Answer to Complaint of how to navigate the bills. The admittance of knowingly substituting account balances due in place of sums stated as in dispute clearly speaks to their unclear and deceptive accounting and billing practices. The admittance of having no knowledge or information concerning navigation of their payment system, and the use a third party payment system they do not maintain speaks to the inadequate, and inefficient administering of their payment process.

Declaration of Service Addendum Complaint F-2024-3052032

Duquesne Light Company Respondent served to Megan E Rulli email

Honorable Alphonso Arnold III Presiding served to email

Secretary Pennsylvania Public Utilities Commission served to P.U.C. E-filing

Served via US Postal service

Honorable Alfonso Arnold III
Office of Administrative Law Judge
400 North Street
Harrisburg PA 17120

Megan E Rulli Esquire Post and Schell
17 North Second Street 12th floor
Harrisburg PA 17101

DATE OF DEPOSIT

MAR - 4 2025

Secretary Pennsylvania Public Utilities Commission
400 North Street
Harrisburg PA 17120

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

To all concerned parties,
I have been unable to access the interim order sent to my e-mail since receipt February 26, 2025, and am having similar issues accessing the e-file site to file these documents electronically.

In order to insure a timely receipt, I am now using the U.S. Postal service to insure delivery of these documents.

Thank you for your consideration,
Donna L. Shawfield Bennett

DATE OF DEPOSIT

MAR - 4 2025

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

B Donna L. Bennett
2700 Omar St.
Chesapeake, VA 23324

MAH 04, 2025
17120
RDC 03 0 Lb 3.10 Oz \$9.70
S2324E501422-04

RECEIVED

MAR - 7 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Secretary
Pennsylvania Public Utilities Commission
400 North Street
Harrisburg PA 17120

