

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**MIRANDA GRACE EDWARDS**

**Complainant**

**v.**

**DUQUESNE LIGHT COMPANY**

**Respondent**

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**Docket No. C-2018-3002741**

**MOTION TO STAY OF  
PROCEEDINGS**

Filed on behalf of Complainant  
Miranda Grace Edwards, Pro Se

**NOTICE TO PLEAD**

To Respondent Duquesne Light Company:

Pursuant to 52 Pa. Code § 5.103, you are hereby notified that, if you do not file a written response to the enclosed **Motion to Stay of Proceedings** of Miranda Grace Edwards within 20 days of service of this notice, a decision may be rendered against you. Any Response to the Motion to Stay of Proceedings must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to the Complainant and the Administrative Law Judge presiding over the issue.

Dated: December 20, 2019

  
\_\_\_\_\_  
Miranda Grace Edwards  
3835 Acorn Street  
Pittsburgh, PA 15207  
[msea.mdew@gmail.com](mailto:msea.mdew@gmail.com)

**E-filed with:**

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

**E-filed with:**

Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
301 5<sup>th</sup> Ave., Piatt Place, Suite 220  
Pittsburgh, PA 15222

**E-filed/Emailed to:**

Shane Miller  
Duquesne Light Company  
1500 One PPG Place  
Pittsburgh, PA 15222

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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|-------------------------------|---|----------------------------------|
| <b>MIRANDA GRACE EDWARDS</b>  | : |                                  |
| <b>Complainant</b>            | : |                                  |
| <b>v.</b>                     | : | <b>Docket No. C-2018-3002741</b> |
|                               | : |                                  |
| <b>DUQUESNE LIGHT COMPANY</b> | : |                                  |
| <b>Respondent</b>             | : |                                  |

**MOTION TO STAY OF PROCEEDINGS**

Pursuant to 52 Pa. Code § 5.103, Miranda Grace Edwards, Complainant, hereby files this **Motion to Stay of Proceedings** of Docket Number C-2018-3002741. In support of my motion, I state the following:

**I. INTRODUCTION**

In light of *William and Jean Haas, Petitioners v. Pennsylvania Public Utilities Commission, Respondent*, Docket No. 658 MD 2019 [**See Appendix A.**], which seeks to establish that Act 129 as interpreted and promulgated in regulations by the PA PUC is unconstitutional as to Pennsylvanians, which includes me and my family, it is most prudent to postpone unnecessary and costly activities of this proceeding until after the Commonwealth Court has made a ruling in the above-mentioned Petition. Both parties in this proceeding could avoid spending substantial time and resources litigating issues that might ultimately be moot.

For this reason, Miranda Grace Edwards, Complainant, respectfully requests a stay of proceedings of Docket Number C-2018-3002741 until after the Commonwealth Court's ruling on *William and Jean Haas, Petitioners v. Pennsylvania Public Utilities Commission, Respondent*, Docket No. 658 MD 2019.

## **II. ARGUMENT**

1. Expenditures and time will have been wasted in the event the Commonwealth Court rules in favor of William and Jean Haas and establishes Act 129 Act 129 of 2008, 66 Pa.C.C. § 2807(f), violates the Pennsylvania and United States Constitutions. I have no resources or time to waste, as I have a full-time job in addition to numerous family and community obligations.
2. Further, should this matter advance to final hearing, the parties in this hearing will not be hindered in the end by a delay in the proceedings. Duquesne Light Company will have ample time to produce rebuttal testimony well in advance of a hearing.
3. For these reasons, the Complainant respectfully requests the stay of proceedings in *Miranda Grace Edwards v. Duquesne Light Company*, Docket No. C-2018-3002741, be granted.

## **III. CONCLUSION**

Wherefore, Complainant, Miranda Grace Edwards respectfully requests that the Administrative Law Judge grant her Motion to Stay of Proceedings in *Miranda Grace Edwards v. Duquesne Light Company*, Docket No. C-2018-3002741.

Respectfully Submitted,

Dated: December 20, 2019

  
\_\_\_\_\_  
Miranda Grace Edwards, Complainant  
3835 Acorn Street  
Pittsburgh, PA 15207  
[msea.mdew@gmail.com](mailto:msea.mdew@gmail.com)