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File #: 211983

April 17, 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: Todd Elliott Koger, Sr. and Elliot-Todd Parker Koger v. Duquesne Light Company
Docket No. C-2024-3049627**

**Todd Elliott Koger, Sr. and Elliot-Todd Parker Koger v. Duquesne Light Company
Docket No. C-2025-3054190**

Dear Secretary Chiavetta:

Attached please find the Motion to Consolidate of Duquesne Light Company for the above-referenced proceedings. Copies are being provided per the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/dmc
Attachment

cc: The Honorable Jeffrey A. Watson (*via email; w/attachment*)
Certificate of Service

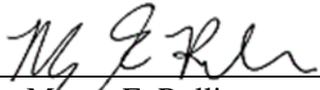
CERTIFICATE OF SERVICE

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

Todd Elliott Koger and Elliott-Todd Parker Koger
515 Kelly Avenue
Pittsburgh, PA 15221
kogerfriend@gmail.com

Dated: April 17, 2025



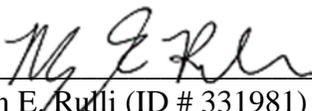
Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Todd Elliott Koger, Sr. and Elliot-Todd Parker Koger	:	
	:	
	:	Docket No. C-2024-3049627
	:	
v.	:	
	:	
Duquesne Light Company	:	
Todd Elliott Koger, Sr. and Elliot-Todd Parker Koger	:	
	:	
	:	Docket No. C-2025-3054190
	:	
v.	:	
	:	
Duquesne Light Company	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE, UNLESS THE PERIOD OF TIME IS OTHERWISE FIXED BY THE COMMISSION OR THE PRESIDING OFFICER. YOUR ANSWER SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.



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Date: April 17, 2025

Attorney for Duquesne Light Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Todd Elliott Koger, Sr. and Elliot-Todd Parker Koger	:	
	:	
v.	:	Docket No. C-2024-3049624
	:	
Duquesne Light Company	:	
Todd Elliott Koger, Sr. and Elliot-Todd Parker Koger	:	
	:	
v.	:	Docket No. C-2025-3054190
	:	
Duquesne Light Company	:	

**MOTION TO CONSOLIDATE OF
DUQUESNE LIGHT COMPANY**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby moves to consolidate the above-captioned matters pursuant to 52 Pa. Code § 5.81. The Company requests that the proceedings be consolidated for purposes of discovery, hearings, and adjudication because they raise overlapping issues of fact and law.

As explained herein, these proceedings involve two complaints filed by Todd Elliot Koger, Sr. and Elliot Todd Parker Koger (“Complainants”) against Duquesne Light. The respective Formal Complaints filed at Docket Nos. C-2024-3049627 (“First Complaint”) and C-2025-3054190 (“Second Complaint”) involve electric service to the same account and address, and raise service allegations arising out of the same alleged incident. Therefore, in the interests of administrative efficiency and judicial economy, the Company believes that these matters should be consolidated.

In support of this Motion, the Company states as follows:

I. BACKGROUND

1. Duquesne Light is a “public utility,” an “electric distribution company,” and a “default service provider” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

2. Duquesne Light was electronically served with the above-captioned Formal Complaints on June 20, 2024, and March 26, 2025. The issues raised in the Formal Complaints include allegations that a loose neutral discovered at the service address on October 11, 2023, continues to pose a safety concern and is preventing their enrollment in the Company’s Customer Assistance Program (“CAP”).

II. MOTION TO CONSOLIDATE

3. The Company herein respectfully requests that the First and Second Complaints be consolidated for the purposes of discovery, litigation, and disposition because they raise common issues of law and fact.

4. Both Complaints concern electric service at the same service address to the same electric service account. (First Complaint ¶ 1; Second Complaint ¶ 1.)

5. In both Complaints, the core issue the Complainants allege is that a loose neutral discovered during a service visit on October 11, 2023, poses an ongoing safety concern at their service address and is preventing their enrollment in CAP. (First Complaint ¶¶ 4-5; Second Complaint ¶¶ 4-5).

6. In both Complaints, the Complainants request a payment agreement, among other relief. (First Complaint ¶ 4; Second Complaint ¶ 4).

7. If these cases were to proceed independently and not be consolidated, there would be substantial overlapping issue of law and fact in the cases.

8. Therefore, it would be a misuse of administrative and judicial resources to litigate these matters separately when they raise common issues of fact and law and involve the same Complainants.

9. Thus, the consolidation of these proceedings will promote the efficient use of the time and resources of the parties and the Commission.

10. It is Duquesne Light's understanding that the Complainants oppose the request to consolidate the two Complaints.

11. However, in addition to the benefit of judicial economy, consolidating the two Complaints would avoid inconsistent findings of facts and incompatible resolutions if the two Complaints were heard and decided separately.

12. For these reasons, the Company respectfully requests that these proceedings be consolidated for purposes of discovery, litigation, and disposition.

III. CONCLUSION

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission enter an order consolidating the Formal Complaint proceedings at C-2024-3049627 and C-2025-3054190 for purposes of discovery, litigation, and disposition.

Respectfully submitted,



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Date: April 17, 2025

Attorney for Duquesne Light Company