



Sophia Al Rasheed
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July 11, 2025

VIA ELECTRONIC FILING

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

**Re: Tanya Rouse v. Duquesne Light
Docket No. C-2025-3054429**

Dear Secretary Homsher:

Attached for filing please find the Motion of Duquesne Light Company to Dismiss the Formal Complaint of Tanya Rouse for Lack of Jurisdiction in the above-referenced proceeding. Copies are being provided as indicated in the Certificate of Service. Should you have any questions please contact me.

Respectfully submitted,

Sophia Al Rasheed

Sophia Al Rasheed
PA ID #325196

SAR/clk
Enclosure
CC: 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):

FIRST CLASS MAIL

Tanya Rouse
1954 Amato Drive
Apt B-24
N. Versailles, PA 15137

Date: July 11, 2025



Sophia Al Rasheed

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rouse, Tanya,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. F-2025-3054429
	:	
Duquesne Light Company,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO DISMISS **WITHIN TEN (10) DAYS FROM SERVICE HEREOF OR A JUDGMENT MAY BE ENTERED AGAINST YOU. YOUR RESPONSE IS TO BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOU REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.**

Sophia Al Rasheed

Sophia Al Rasheed
ID # 325196
Regulatory Counsel, IV
Duquesne Light Company
411 Seventh Ave
Mail Drop 15-7
Pittsburgh, PA 15219

Phone: 412-393-6505
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Date: July 11, 2025

Attorney for Duquesne Light Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rouse, Tanya,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. F-2025-3054429
	:	
Duquesne Light Company,	:	
	:	
Respondent.	:	

**MOTION OF DUQUESNE LIGHT COMPANY
TO DISMISS THE COMPLAINT OF TANYA ROUSE
FOR LACK OF JURISDICTION**

TO ADMINISTRATIVE LAW JUDGE KATRINA DUNDERDALE:

Duquesne Light Company (“Duquesne Light” or the “Company”) files, pursuant to Section 5.103 of Pennsylvania Public Utility Commission’s (“Commission” or “PUC”) regulations, 52 Pa. Code § 5.103, this Motion to Dismiss the Complaint of Tanya Rouse (“Complainant”), due to the lack of the Commission’s jurisdiction over the subject matter of this Complaint. In support of its Motion, Duquesne Light states as follows:

I. INTRODUCTION

1. The Company was served with the above-referenced Complaint of Complainant (“Complaint”) on April 4, 2025. In the Complaint, Tanya Rouse alleges that incorrect charges are on her bill.

2. On April 24, 2025, the Company filed and served its Answer and New Matter on the Complainant (“Answer”). In the Answer, the Company denied incorrect charges on the bill,

noting that the Complainant's bills are based on actual meter reads. Additionally, in its the Answer, the Company submitted that a meter test was conducted at Complainant's Service address and tested within PUC limits on February 27, 2025.

3. The Complainant did not respond to the Company's Answer.

4. On May 19, 2025, as a debtor for the Complainant, the Company discovered that the Complainant filed for a Chapter 7 Voluntary Petition for Bankruptcy ("Petition for Bankruptcy").

5. The Complainant filed her Petition for Bankruptcy with the U.S. Bankruptcy Court for the Western District of Pennsylvania on May 15, 2025, under Docket No. 25-21262-CMB.

6. Upon notice of the filing of Complainant's Petition for Bankruptcy, all amounts owed prior to May 15, 2025 were placed in a separate account in Complainant's name and the account balance reset at \$0.00.

7. The Complaint does not allege any wrongdoing by Duquesne Light regarding post-petition amounts accrued by the Complainant.

8. On April 29, 2025, an Initial Telephonic Hearing Notice was issued by the PUC and served upon both the Complainant and the Company, notifying both Parties that an Initial Hearing was scheduled before the Administrative Law Judge Katrina Dunderdale on Wednesday, June 25, 2025 at 10:00 AM.

9. The Company contacted the Complainant on May 15, 2025, June 20, 2025, and June 23, 2025 to discuss the Complainant's Petition for Bankruptcy but was unable to meaningfully converse with the Complainant on any of those occasions. During the call on June 23, 2025, the Company further notified the Complainant that the hearing would take place on June 25, 2025.

10. An Initial Hearing was held on June 25, 2025. The undersigned counsel attended the Initial Hearing representing Duquesne Light. The Complainant failed to appear at the hearing.

11. During the Initial Hearing, Duquesne Light moved to dismiss the Complaint for Complainant's failure to appear and due to Ms. Rouse's pending Petition for Bankruptcy.

12. On June 25, 2025, the Company was served with a letter from the Complainant requesting to reschedule the Hearing because the Complainant's phone stopped working.

II. LEGAL STANDARD

13. The Commission must act within, and cannot exceed, its jurisdiction. City of Pittsburgh v. Pa. Public Utility Comm'n, 157 Pa.Super. 595, 43 A.2d 348 (1945).

14. Under 11 U.S.C. § 362, a petition for bankruptcy “operates as a stay, applicable to all entities” including:

(1) “the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title.

11 U.S.C. §362(1).

15. As indicated by the filing date of her Complaint, Complainant's allegations against the Company solely pertain to pre-petition debts issued before the Petition for Bankruptcy.

16. Accordingly, the dispute in Complainant's Complaint is within the jurisdiction of the Bankruptcy Court, against which Duquesne Light Company is stayed from acting upon.

17. The Commission has routinely ruled that it lacks jurisdiction over charges accrued prior to the filing of Bankruptcy. Sullins v. PPL Electric Utilities Corp., Docket No. C-2014-2422681(Order entered August 28, 2014) (*internal citations omitted*).

III. MOTION TO DISMISS FOR LACK OF JURISDICTION

18. Duquesne Light respectfully requests that the Administrative Law Judge grant the Motion to Dismiss the Complaint as the Commission lacks subject matter jurisdiction over the instant Complaint.

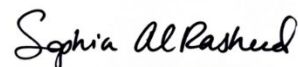
19. Duquesne Light submits that a rescheduled hearing would constitute a commencement or continuation of an administrative proceeding against the debtor for debt that existed prior to the commencement of the Complainant's bankruptcy proceeding. Such action regarding pre-petition debt would be in violation of the automatic stay, 11 U.S.C. §362(1).

20. The amount in dispute in Complainant's Complaint is a claim to be adjudicated by the Bankruptcy Court and for which the Commission no longer retains jurisdiction.

IV. CONCLUSION

For the reasons set forth above, Duquesne Light Company respectfully requests that the Complaint of Tanya Rouse be dismissed with prejudice.

Respectfully submitted,



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ID # 325196
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Date: July 11, 2025

Attorney for Duquesne Light Company

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VERIFICATION

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



Roxanne Morris

Date: July 11, 2025