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Megan E. Rulli

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File #: 211983

August 12, 2025

***VIA ELECTRONIC FILING***

Matthew Homsher, 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 Homsher:

Attached please find the Answer of Duquesne Light Company to the Complainants' Motion for Adverse Inference, Interim Relief, and Referral ("Motion for Sanctions") 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

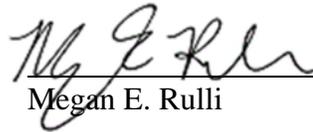
**CERTIFICATE OF SERVICE**

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 Sr. and Elliott-Todd Parker Koger  
515 Kelly Avenue  
Pittsburgh, PA 15221  
[kogerfriend@gmail.com](mailto:kogerfriend@gmail.com)

Dated: August 12, 2025

  
\_\_\_\_\_  
Megan E. Rulli

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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

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**ANSWER OF DUQUESNE LIGHT COMPANY  
TO THE COMPLAINANTS’  
MOTION FOR ADVERSE INFERENCE, INTERIM RELIEF, AND REFERRAL**

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Pursuant to 52 Pa. Code § 5.371(b), Duquesne Light Company (“Duquesne Light” or the “Company”), by and through its attorneys, hereby files this Answer to the Complainants’ Motion for Adverse Inference, Interim Relief, and Referral (“Motion for Sanctions”) of Todd Elliott Koger, Sr. and Elliot-Todd Parker Koger (“Complainants”). As explained herein, Administrative Law Judge Jeffrey A. Watson (the “ALJ”) should deny the Complainants’ Motion for Sanctions in its entirety because the Complainants: (1) failed to clearly request records related to the alleged July 29 and August 14, 2024, service visits in their original request for production; (2) made no

attempt to informally resolve their discovery dispute before seeking the extreme remedy of sanctions; and (3) failed to demonstrate that they have been prejudiced in any way by the Company's initial response to the discovery request at issue.

In support of its Answer, Duquesne Light states as follows:

**I. INTRODUCTION**

1. On July 11, 2025, the ALJ issued an Interim Order Establishing Initial Litigation Schedule that, *inter alia*, established a discovery deadline of October 31, 2025 in this proceeding.

2. Also on July 11, 2025,<sup>1</sup> the Complainants served Complainants Set I on Duquesne Light via email. A true and correct copy of Complainants Set I is attached as **Appendix A**.

3. On July 21, 2025, Duquesne Light timely served its Objections to Complainants Set I. Specifically, Duquesne Light objected to Requests for Production Nos. 3, 4, and 5 and Interrogatories Nos. 2 and 10.

4. On July 28, 2025, the Complainants served their Motion to Compel Production of Discovery. In their Motion to Compel, the Complainants clarified that they were not seeking privileged materials but argued that the information sought is relevant to the claims raised in their Complaints. (*See, e.g.*, Motion to Compel at 4-5.)

5. On August 1, 2025, Duquesne Light served its Answers to all but one of the requests contained in Complainants Set I. The Company's service of these Answers was without wavier of its objections, in the interest of compromise and administrative efficiency and based on clarifications made in the Complainants' Motion to Compel.

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<sup>1</sup> The Complainants served their discovery via email received at 6:26 PM on Thursday, July 10, 2025. Because the discovery responses were served after 4:30 PM, they are deemed to have been served on July 11, 2025. *See* 52 Pa. Code § 1.56(a)(5).

6. On August 4, 2025, Duquesne Light served its Answer to the Complainants' Motion to Compel.

7. On August 5, 2025, the Complainants served their First Set of Requests for Admissions. A true and correct copy of the Complainants' First Set of Requests for Admissions is attached hereto as **Appendix B**.

8. The Complainants' Motion to Compel, which includes the discovery request at issue in the instant Motion for Sanctions, remains pending as of the date of this Answer.

9. Under 52 Pa. Code § 5.371(a), the Commission or a presiding officer can impose discovery sanctions if: (1) “[a] party fails to appear, answer, file sufficient answers, file objections, make a designation or otherwise respond to discovery requests, as required under this subchapter”; or (2) “[a] party deponent or an officer or managing agent of a party refuses to obey or induces another to refuse to obey an order of a presiding officer respecting discovery, or induces another not to appear.” *Id.*

10. For the reasons stated below, Duquesne Light respectfully requests that the ALJ deny the Complainants' Motion for Sanctions.

## **II. THE COMPLAINANTS' MOTION FOR SANCTIONS SHOULD BE DENIED**

11. The Complainants' Motion for Sanctions for the alleged insufficiency of a single request for production should be denied because the Complainants: (1) failed to clearly request records related to the alleged July 29 and August 14, 2024, service visits in their original request for production; (2) made no attempt to informally resolve their discovery dispute before seeking the extreme remedy of sanctions; and (3) failed to demonstrate that they have been prejudiced in any way by the Company's initial response to the discovery request at issue.

12. Here, the Complainants base their request for sanctions on unfounded allegations that the Company insufficiently responded to their Request for Production No. 3 (“RPD No. 3”)

of the Complainants' First Set of Requests for Production of Documents and Things, which asked Duquesne Light to produce the following:

3. All field books, hard-copy service logs, work orders, inspection checklists, emergency audit reports, and handwritten notes generated by Duquesne Light employees or its contractors relating to the electrical condition at the Koger residence on October 11, 2023, or any subsequent inspection/repair.

13. The Complainants' request for sanctions based on the Company's response to RPD No. 3 should be denied for several reasons.

14. First, sanctions are not warranted because the Complainants have never propounded discovery explicitly requesting Company records related to alleged service visits on July 29 and August 14, 2024. See Appendices A and B.

15. The Company reasonably interpreted RPD No. 3 to refer to records related to the October 11, 2023, service visit and any subsequent service visits investigating those same issues and provided responsive records on August 1, 2025.

16. Now, through their Motion for Sanctions, the Complainants apparently expand the scope of their original request to encompass any Company visits to the service address made since October 11, 2023, regardless of whether they were undertaken to address the service concerns raised in the instant Complaints.

17. The Company should be afforded the basic opportunity to respond to the Complainants' new, specific request before sanctions are considered. The Company should not be sanctioned for the lack of clarity in the Complainants' original discovery request, which did not identify the dates now placed at issue.

18. The Company is currently investigating and compiling any responsive records related to the July 29 and August 14, 2024, shut off notices attached to the Complainants' Motion

for Sanctions, and any other service visits conducted since October 11, 2023, and will supplement its response to RPD No. 3 accordingly. In an effort to expedite the discovery process, the Company will supplement its response to RPD No. 3 by August 15, 2025. However, the Company maintains that because the Complainants are active customers of Duquesne Light, they have had contacts with the Company since October 11, 2023, which are not encompassed within the original scope of RPD No. 3, and which may not be directly relevant to the instant proceedings.

19. Second, sanctions are not warranted because the Complainants made no attempt to resolve this issue informally before requesting the extreme relief of sanctions. The Complainants did not contact the Company prior to filing their Motion for Sanctions to either clarify the scope of their request, inquire about the records they perceived were missing, or serve additional discovery seeking records related to the alleged July 29 or August 14, 2025, service visits, despite clearly possessing records of their own related to those dates. *See* Complainants' Attachments to the Motion for Sanctions.

20. Instead, the Complainants now completely mischaracterize the Company's response to RPD No. 3 and its participation in the discovery process generally, making a bad faith request for sanctions based on unfounded assertions that the Company has "knowingly withheld crucial 'Trouble Shooting Inspections'" from production or has a pattern of withholding documentation. Complainants' Motion for Sanctions at 3. These accusations are baseless considering the Company's good faith responses to the discovery served to date and should be disregarded entirely.

21. Third, sanctions are unwarranted because the Complainants have not demonstrated any prejudice to their case as a result of this discovery dispute, especially considering the Company's commitment to promptly supplement its response to RPD No. 3.

22. The Complainants have ample opportunity to propound additional discovery in this proceeding, as the discovery deadline of October 31, 2025, is more than two months away. The Complainants have offered no explanation as to why a supplemental response cannot cure any perceived discovery defect and have not even attempted to fill any alleged gap in information with additional discovery seeking the records at issue in their Motion for Sanctions.

23. Given the Company's good faith effort to respond fully to the Complainants' original request and its commitment to supplement its response to RPD No. 3 by August 15, 2025, as well as the Complainants' unwillingness to resolve this discovery issue informally, sanctions are completely unwarranted in this instance. Sanctions are an extreme remedy that should only be awarded in limited scenarios, such as when a party intentionally attempts to impede discovery, refuses to respond to discovery requests, or fails to comply with a discovery order issued by the presiding officer or the Commission.

24. Because the Complainants have failed to demonstrate any sanctionable conduct all requested relief should be denied.

25. The Company notes that the Complainants make a variety of inappropriate factual allegations that are wholly unrelated to the current discovery dispute, apparently because they disagree with the Company's responses to certain other discovery requests. These allegations should be disregarded completely, as they are factual issues in dispute in this proceeding that can only be decided through the presentation of evidence at hearings.

26. It is also unclear which provisions of the Commission's regulations the Complainants rely on for support for their request for an adverse inference or emergency relief, as the cited provisions refer to procedures requesting a stay of proceedings and petitions for reconsideration from actions of the staff, respectively. *See* 52 Pa. Code §§ 5.363 and 5.44. To the

extent that the Complainants seek an adverse inference related to visits to the service address on the dates at issue, for the reasons stated above, the request is unwarranted and should be denied. To the extent that the Complainants seek interim emergency relief, the Complainants have failed to demonstrate that such relief is warranted, considering the Complainants have not been prejudiced by the Company's initial response to RPD No. 3 and the Company has committed to supplementing its response by August 15, 2025.

27. The Complainants also have failed to provide any legal or factual justification for their request to involve the Commission's Bureau of Investigation and Enforcement in a routine discovery dispute that they made no attempt to resolve informally. This too is an extreme and unwarranted request that should be denied.

28. For all these reasons, the Complainants' Motion for Sanctions and their requests for relief based thereon should be denied.

29. Finally, the Company respectfully requests that any additional discovery motions filed in this proceeding be required to include documentation demonstrating that the moving party attempted in good faith to resolve the issue informally prior to filing.<sup>2</sup>

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<sup>2</sup> This request is in line with the Interim Order Establishing Initial Litigation Schedule ("Interim Order") issued by the ALJ on July 11, 2025, which requires that all motions to compel must include certification from the party, or its counsel if represented, of the efforts undertaken to resolve the discovery dispute informally. *See* Interim Order at 5.

**III. CONCLUSION**

For the reasons set forth above, Duquesne Light Company respectfully requests that Administrative Law Judge Jeffrey A. Watson deny the Motion for Adverse Inference, Interim Relief, and Referral of Todd Elliott Koger, Sr. and Elliot-Todd Koger, as set forth above.

Respectfully submitted,



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Harrisburg, PA 17101-1601

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Fax: 717-731-1985

mrulli@postschell.com

Date: August 12, 2025

Attorney for Duquesne Light Company

# **APPENDIX A**

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Todd Elliott Koger, Sr.  
and Elliot-Todd Parker Koger**

**v.**

**C-2024-3049627**

**Duquesne Light Company**

**Todd Elliott Koger, Sr.  
and Elliot-Todd Parker Koger**

**v.**

**C-2025-3054190**

**Duquesne Light Company**

**Complainants' First Set of Requests for Production of Documents and Things**

Pursuant to 52 Pa. Code § 5.321 and 231 Pa. Code § 4007.3, Complainants Todd Elliott Koger, Sr., and Elliott-Todd Parker Koger hereby request that Duquesne Light Company produce the following tangible things for inspection and copying within the time frame prescribed by the Administrative Law Judge's procedural schedule and the PUC's rules of practice. Please provide the records in electronic format (PDF) via email to kogerfriend@gmail.com. I welcome any clarifications you may need to process this request and would appreciate your response within the mandated time required by law.

1. Any and all physical devices, components, or assemblies removed from the Koger residence's service connection or meter base during or after the October 11, 2023 electrical event, including but not limited to meter sockets, neutral buss bars, grounding straps, and terminal lugs.
2. All original photographs, video recordings, slides, negatives, audio recordings, and physical copies of sketches or diagrams depicting the service equipment, meter base, neutral connection, and surrounding premises taken by Duquesne Light personnel, contractors, or agents from January 1, 2023, to the present.

3. All field books, hard-copy service logs, work orders, inspection checklists, emergency audit reports, and handwritten notes generated by Duquesne Light employees or its contractors relating to the electrical condition at the Koger residence on October 11, 2023, or any subsequent inspection/repair.
4. All tangible materials (USB drives, CDs, DVDs, memory cards, flash drives, tapes, or binders) containing investigation reports, test data sheets, calibration records, or laboratory analyses performed on equipment or conductors at the Koger site.
5. All hard-copy correspondence, letters, internal memoranda, and interoffice mailings regarding the Koger family's "Total Loss" claim (including the November 7, 2023 claim submission and any follow-up) and any drafts or attachments thereof.
6. Any physical copies of CLEAResult Smart Comfort visit refusal notices or related documentation indicating grounds for declining inspection of the Koger residence.
7. All tangible promotional or training materials, bulletins, or manuals that describe Duquesne Light's procedures for preserving evidence or handling property damage claims under Section 1501 of Title 66.

**/s/ Todd Elliott Koger, Sr.**

**/s/ Elliott-Todd Parker Koger**

(412) 758-4510

[kogerfriend@gmail.com](mailto:kogerfriend@gmail.com)

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Todd Elliott Koger, Sr.  
and Elliot-Todd Parker Koger**

**v.**

**C-2024-3049627**

**Duquesne Light Company**

**Todd Elliott Koger, Sr.  
and Elliot-Todd Parker Koger**

**v.**

**C-2025-3054190**

**Duquesne Light Company**

**Complainants' First Set of Interrogatories**

Pursuant to 52 Pa. Code § 5.321 and 231 Pa. Code § 4007.3, Complainants Todd Elliott Koger, Sr., and Elliott-Todd Parker Koger hereby request that Duquesne Light Company provide sworn answers to the following interrogatories within the time frame prescribed by the Administrative Law Judge's procedural schedule and the PUC's rules of practice.

Please provide the records in electronic format (PDF) via email to kogerfriend@gmail.com. I welcome any clarifications you may need to process this request and would appreciate your response within the mandated time required by law.

1. State the date, time, and method by which Duquesne Light first received notice—oral or written—of the October 11, 2023 incident at the Koger residence, and identify the individual(s) who logged or recorded that notice.

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2. Describe in detail the procedures, search parameters, keywords, custodians, and databases searched in formulating the statement in Megan Rulli's April 3, 2025 correspondence that "there's no documentation for the Koger family's damage claim."

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3. Identify every Duquesne Light employee, supervisor, contractor, or agent who inspected, tested, or otherwise examined the Koger service equipment on October 11, 2023, including each person's title, employer, role in the inspection, and any written reports they authored.

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4. Detail all physical adjustments, repairs, tightening, or alterations performed on the meter base, neutral connection, or other service components at the Koger residence from October 11, 2023, through the date of your responses, specifying who performed each action, the date, and the reason for the work.

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5. Explain the testing protocols, equipment used, calibration schedules, and criteria for passing/failing that Duquesne Light applied when evaluating the meter base, neutral conductor, or grounding system at the Koger property.

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6. Identify all communications (including dates, participants, and mediums) between Duquesne Light and CLEAResult concerning the Koger residence, and describe the reasons CLEAResult cited for refusing to perform a Smart Comfort inspection.

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7. Provide a narrative of Duquesne Light's policies and procedures for preserving evidence and maintaining original condition of utility property when a customer submits a claim for property damage under Section 1501.

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8. Describe all internal risk assessments, hazard analyses, or management approvals (by name and date) concerning the decision not to immediately remediate the “ongoing electrical arc” or “no neutral connection” condition discovered on October 11, 2023.

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9. List every payment, credit, hardship grant, or settlement offer extended by Duquesne Light to the Koger family in connection with the October 11, 2023 event, including the date, amount, and form of each transaction.

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10. Identify all other complaints, incidents, claims, or field reports logged by Duquesne Light from January 1, 2020, through present that involve meter base defects, neutral connection failures, or electrical arcs in your service territory, stating for each the customer name (or account number), date, and resolution.

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I certify the truthfulness of all of the information identified in the Brief and stand ready to provide further sworn testimony and documentation as required. I submit this statement under penalties of 18 Pa. C.S. § 4904, attesting that all facts provided herein are true and correct to the best of our knowledge, information, and belief, and that we are prepared to prove these facts at hearing. \_\_\_\_\_ DATED: \_\_\_\_\_

**/s/ Todd Elliott Koger, Sr.**

**/s/ Elliott-Todd Parker Koger**

(412) 758-4510

[kogerfriend@gmail.com](mailto:kogerfriend@gmail.com)

# **APPENDIX B**

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Todd Elliott Koger, Sr.  
and Elliot-Todd Parker Koger**

**v. C-2024-3049627**

**Duquesne Light Company**

**Todd Elliott Koger, Sr.  
and Elliot-Todd Parker Koger**

**v. C-2025-3054190**

**Duquesne Light Company**

**Complainants' First Set of Requests for Admissions**

Pursuant to 52 Pa. Code § 5.350, Complainants Todd Elliott Koger, Sr. and Elliott-Todd Parker Koger hereby submit the following Requests for Admission to Duquesne Light Company.

These requests pertain to matters within the scope of general discovery, including statements or opinions of fact or law, and the genuineness or authenticity of documents, and are based on information identified by Duquesne Light Company's witnesses with knowledge and first-hand information related to the October 11, 2023 emergency service call to the Koger Family home.

**DEFINITIONS:**

- **"Service Address" refers to 515 Kelly Avenue, Pittsburgh, PA 15221.**
- **"October 11, 2023 Incident" refers to the electrical event at the Service Address on October 11, 2023, which prompted a service call and subsequent actions by Duquesne Light personnel.**
- **"Customer-Side Equipment" refers to all conductors and connections on the load side of the meter, including the meter base, neutral buss bars, grounding straps, and terminal lugs, which are the customer's property and maintenance obligation.**

• "PUC Regulations" refers to 52 Pa. Code provisions and the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1501 et seq..

• "Duquesne Light Personnel" refers to Duquesne Light Company employees, supervisors, contractors, or agents.

**REQUESTS FOR ADMISSION:**

1. Admit that on October 11, 2023, Duquesne Light Company's Senior Operator, Darryl Honick, removed the meter cover and physically tightened the customer-side neutral connection in the meter base at the Service Address.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

2. Admit that the meter base at the Service Address, and all connections on the load side of the meter within it, including the neutral connection, are explicitly identified by Duquesne Light Company as being "owned and maintained by" the customer, not Duquesne Light Company.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

3. Admit that 52 Pa. Code § 56.32 prohibits Duquesne Light Company from tightening, repairing, or otherwise touching any customer-owned wiring or connections downstream of the meter.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

4. Admit that Duquesne Light Company's tariff (e.g., Electric Pa. P.U.C. No. 1, Rule 6) incorporates 52 Pa. Code § 56.32, thereby disclaiming responsibility and lacking authority to perform maintenance or alterations on customer-side wiring, including neutral connections.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

5. Admit that the action of Duquesne Light Company's Senior Operator, Darryl Honick, in tightening the customer-side neutral connection at the Service Address on October 11, 2023, constituted unauthorized physical manipulation of customer-owned electrical infrastructure.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

6. Admit that Duquesne Light Company's Senior Operator, Darryl Honick, when performing the action described in Request for Admission No. 1, was acting in the course and scope of his employment with Duquesne Light Company.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

7. Admit that Duquesne Light Company does not possess records detailing the specific training materials, manuals, or bulletins provided to Darryl Honick, or similar field personnel, that explicitly describe the prohibition on tightening, repairing, or otherwise touching customer-owned wiring or connections downstream of the meter, as stipulated by 52 Pa. Code § 56.32 and its own tariff, prior to October 11, 2023.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

8. Admit that Duquesne Light Company's internal communications confirm that the Koger family "did file an online claim as he received the response but it was not received by the claims department. Not sure why?", as stated in an email from Carolyn Cingel dated April 3, 2025.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

9. Admit that the internal communication referenced in Request for Admission No. 8 contradicts the statement made by Megan Rulli on April 3, 2025, that "there's no documentation for the Koger family's damage claim."

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

10. Admit that the Duquesne Light Company's troubleshooting report and notes from October 11, 2023, specifically logged the issue as "customer neutral loose" and recorded that it was "tighten[ed] up" as "perm repairs."

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

11. Admit that the tightening of the loose customer-side neutral connection on October 11, 2023, by Duquesne Light Personnel had the potential to alter or obscure evidence relevant to the electrical condition at the Service Address and any subsequent legal claim.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

12. Admit that any and all physical evidence relevant to the electrical condition "loose customer-side neutral connection" on October 11, 2023, is no longer available, as per the intentional acts of a Duquesne Light employee.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

13. Admit that Duquesne Light Company was aware of the Koger family's "Total Loss" claim related to the October 11, 2023 Incident through documented communications with its legal representatives as early as November 7, 2023, and continuing through June 18, 2024, and August 14, 2024.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

14. Admit that the Duquesne Light Company's internal claims report, dated July 31, 2025 (File No. G23-10-0020-000), includes notes from Carolyn Cingel stating, "Spoke with Darrel Konick on 4/4/25 who responded to the trouble call. ... Checked meter, found neutral in meter base loose. Told customer, can get electrician or he can tighten it up and see what happens. Did favor and tightened neutral."

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

15. Admit that the action of Duquesne Light Company's Senior Operator, Darryl Honick, in tightening the customer-side neutral connection as a "favor" to the customer, as noted in Duquesne Light's internal claims report, aligns with the Complainants' "strict liability" assertion that Duquesne Light Personnel unlawfully "touched" their property.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

**INSTRUCTIONS:** Each Request for Admission must be answered separately and fully in writing, under oath. If any request is denied in whole or in part, specify which portions are admitted and which are qualified or denied, along with the specific reasons for such denial. Objections must state the precise basis. Failure to serve an answer or objection within the time frame prescribed by the Administrative Law Judge's procedural schedule and PUC's rules of practice will result in the automatic admission of each matter requested. Matters admitted are conclusively established for all purposes in this proceeding

**/s/ Todd Elliott Koger, Sr.**  
**/s/ Elliott-Todd Parker Koger**  
(412) 758-4510  
kogerfriend@gmail.com