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October 16, 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: Linda Slick v. Duquesne Light
Docket No. C-2025-3057693**

Dear Secretary Homsher:

Attached for filing please find the Preliminary Objections of Duquesne Light Company to the Complaint of Linda Slick in the above-referenced proceeding. Copies are being provided as indicated in the Certificate of Service. Should you have any questions please contact me.

A handwritten signature in black ink that reads "Sophia Al Rasheed". The signature is written in a cursive, flowing style.

Sophia Al Rasheed

PA ID #325196

SAR/clk

Enclosure[s]

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):

VIA ELECTRONIC MAIL

Linda Slick
2200 Broadway Avenue, 2nd Floor
Pittsburgh, PA 15216
15216SLICK@GMAIL.COM

Date: October 16, 2025



Sophia Al Rasheed

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Linda Slick,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3057693
	:	
Duquesne Light Company,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.101, YOU MAY FILE AN ANSWER TO THE ENCLOSED PRELIMINARY OBJECTIONS WITHIN TEN (10) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PRELIMINARY OBJECTION MUST 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.

Sophia Al Rasheed

Sophia Al Rasheed
ID # 325196
Regulatory Counsel, IV
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Pittsburgh, PA 15219
Phone: 412-393-6505
salrasheed@duqlight.com

Date: October 16, 2025

Attorney for Duquesne Light Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Linda Slick,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3057693
	:	
Duquesne Light Company,	:	
	:	
Respondent.	:	

**PRELIMINARY OBJECTIONS OF
DUQUESNE LIGHT COMPANY TO THE COMPLAINT OF
LINDA SLICK**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code § 5.101, Duquesne Light Company files the following Preliminary Objections to the Formal Complaint (“Complaint”) of Linda Slick (“Complainant”). Pursuant to §§ 5.61, 5.62, and 5.101(d) of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) regulations, Duquesne Light Company (“Duquesne Light” or the “Company”) filed an Answer and New Matter on this same date. The Company respectfully requests that the Formal Complaint of Linda Slick be dismissed.

In support thereof, Duquesne Light 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. On September 26, 2025, Duquesne Light was served with the above-captioned Formal Complaint filed by the Complainant.

3. Duquesne Light Company herein files these Preliminary Objections to the Complaint. For the reasons set forth below, Duquesne Light Company respectfully requests that the Complaint be dismissed in its entirety pursuant to 52 Pa. Code §5.101(a).

II. LEGAL STANDARD.

4. Pursuant to the Commission's regulations, preliminary objections in response to a pleading may be filed on several grounds, including:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa. Code § 5.101(a) (emphasis added).

5. In ruling on preliminary objections, the Presiding Officer must accept as true all well-pled allegations of material facts as well as all inferences reasonably deducible therefrom. *Stilp v. Cmwth.*, 910 A.2d 775, 781 (Pa. Cmwth. 2006) (citing *Dep't of Gen. Servs. v. Bd. of Claims*, 881 A.2d 14 (Pa. Cmwth. 2005)). However, the Presiding Officer need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or expressions of opinion. *Stanton-Negley Drug Co. v. Dep't of Pub. Welfare*, 927 A.2d 671, 673 (Pa. Cmwth.

2007). For preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery, and any doubt must be resolved in favor of the non-moving party. *Stilp*, 910 A.2d at 779 (Pa. Commw. Ct. 2006).

III. PRELIMINARY OBJECTIONS

A. **Insufficient Specificity of Pleading.** The Complainant has not alleged any wrongdoing against Duquesne Light Company.

6. Duquesne Light incorporates by reference Paragraphs 1 through 5 as if fully set forth herein.

7. The Complaint fails to state a claim for which relief can be granted because the Complaint fails to show that Duquesne Light Company violated the Public Utility Code, any PUC regulation or order, or Duquesne Light Company's Tariff.

8. As relief, the Complainant asks the Commission to review the Company's current rate structure. (Complaint ¶ 5).

9. Complainant does not allege that the Company has deviated from its Commission-approved Tariff or that it inappropriately has applied its rates.

10. Complainant offers no explanation supporting the allegation that rates are unjust or unreasonable. Complainant only offers a conclusory statement stating that rates are unjust and unreasonable. (Complaint ¶¶ 4, 5).

11. Complainant's Complaint is directed to the Commission, rather than Duquesne Light Company.

12. The Complaint fails to allege that Duquesne Light Company violated any Public Utility Code, Commission regulation or order, or Duquesne Light's Tariff.

B. Legal Insufficiency of Pleading. Complainant's Complaint is barred by the Filed-Rate Doctrine.

13. Duquesne Light incorporates by reference Paragraphs 1 through 12 as if fully set forth herein.

14. The Complainant's sole request for relief requests that the Commission review Duquesne Light Company's current rate structure.

15. Duquesne Light Company's filed Supplement No. 71 to the Company's Tariff Electric- Pa. P.U.C. No. 24 on March 20, 2024. See PUC Docket R-2024-3046523. By Order issued November 7, 2024, the Commission approved Duquesne Light's revised tariff supplement, after extensive litigation and input from stakeholders. Complainant did not participate in this proceeding.

16. Pursuant to the Filed-Rate Doctrine, a party cannot collaterally attack a rate that has been established and deemed reasonable by an agency, such as the Commission. *Am. Tel. & Tel. Co. v. Cent. Off. Tel., Inc.*, 524 U.S. 214 (1998).

17. Accordingly, the Company respectfully requests that the Complaint be dismissed for failure to state a claim upon which relief may be granted.

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I. CONCLUSION

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission grant these Preliminary Objections.

Respectfully submitted,



Sophia Al Rasheed
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411 Seventh Ave
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Date: October 16, 2025

Attorney for Duquesne Light Company