

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

**TODD ELLIOTT KOGER, SR., AND
ELLIOTT-TODD PARKER KOGER
COMPLAINANT(S)**

V.

**C-2024-3049627 and
C-2025-3054190**

**DUQUESNE LIGHT COMPANY
RESPONDENT**

COMPLAINANT(S)' FIRST REQUEST FOR SUBPOENAS

Both Elliott-Todd Parker Koger and Todd Elliott Koger, Sr., Complainants, pursuant to 66 Pa.C.S. § 331(d) and 52 Pa. Code §§ 5.421–5.423, and respectfully moves this Honorable Commission to issue subpoenas compelling the attendance of the following witnesses and to produce all tangible things identified during discovery at the evidentiary hearings scheduled for **December 8 and 10, 2025**, in the above-captioned matter:

1. Darryl Honick

Senior Operator Duquesne Light Company 469 Hershey Road Penn Hills, PA 15235

Mr. Honick will testify regarding his service visit to the Complainants' Service Address on October 11, 2023, including his observations of the entrance cable, meter outlet, voltage testing, amperage readings on a third-party ground, and corrective action taken to tighten the customer-side neutral connection. He will also testify regarding the division of ownership between customer and Company facilities.

2. Thomas Johnson

Distribution Regulation Technician Duquesne Light Company 469 Hershey Road Penn Hills, PA 15235

Mr. Johnson will testify regarding his April 2025 investigation at the Service Address, including voltage monitoring between April 9 and April 17, 2025, and his findings that no abnormal voltage or Company facility issues were observed.

3. Carolyn Cingel

Claims Specialist Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219

Ms. Cingel will testify regarding the Company's claims process, the absence of any damage claim submissions prior to April 2025, and her handling of the Complainants' April 2025 claim, including the denial based on ownership of the meter base neutral connection.

4. Roxanne Morris

Supervisor, Regulatory Consumer Relations Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219

Ms. Morris will testify regarding the billing and payment history on the Complainants' account, including energy assistance grants, referrals, CAP enrollment, termination notices, collections activity, and payment agreements.

5. Diane Lloyd

Supervisor, AMI Field Services Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219

Ms. Lloyd will testify regarding Company visits to the Service Address on July 29 and August 14, 2024, including the erroneous assignment of trouble tickets, the issuance of a shut-off notice in error, and the subsequent cancellation of related work orders.

6. Stephanie Gillespie

Customer Programs Associate Duquesne Light Company 411 Seventh Avenue
Pittsburgh, PA 15219

Ms. Gillespie will testify regarding the Complainants' CAP enrollment, the Smart Comfort Visit requirement, the refusal of access to the Service Address, and the Company's attempts to schedule the visit prior to CAP default.

7. Megan E. Rulli, Esq.

Associate, Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101

Attorney Rulli is counsel of record for Duquesne Light Company and may be called to testify regarding representations made in discovery, correspondence, and procedural matters relevant to the Complainants' claims.

LEGAL BASIS

1. Under **66 Pa.C.S. § 331(d)** and **52 Pa. Code § 5.421**, the Commission or presiding officer may issue subpoenas to compel the attendance of witnesses and the production of documents.
2. Service of subpoenas shall be made in accordance with **52 Pa. Code § 5.422**, including tender of witness fees and mileage.

3. Enforcement of subpoenas, if necessary, may be sought through the **Commonwealth Court of Pennsylvania** pursuant to **52 Pa. Code § 5.423**.

RELIEF REQUESTED

WHEREFORE, Complainant respectfully requests that this Honorable Commission issue subpoenas compelling the attendance of the above-listed witnesses at the evidentiary hearings scheduled for **December 8 and 10, 2025**, and grant such other relief as may be just and proper.

Respectfully submitted,

/s/ Todd Elliott Koger, Sr., Complainant, Pro Se

/s Elliott-Todd Parker Koger, Complainant, Pro Se

Dated: October 25, 2025

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

TODD ELLIOTT KOGER, SR., AND
ELLIOTT-TODD PARKER KOGER
COMPLAINANT(S)

V.

C-2024-3049627 and
C-2025-3054190

DUQUESNE LIGHT COMPANY
RESPONDENT

PROPOSED ORDER

AND NOW, on this the _____ day of _____, 2025, this matter, upon consideration of Complainant's Motion to Compel Witnesses, and pursuant to the authority granted under 66 Pa.C.S. § 331(d) and 52 Pa. Code §§ 5.421–5.423, it is hereby **ORDERED** as follows:

1. The Motion to Compel Witnesses is **GRANTED**.
2. The Secretary of the Commission, or the Presiding Administrative Law Judge, shall issue subpoenas compelling the attendance and testimony of the following witnesses at the evidentiary hearings scheduled for **December 8 and 10, 2025** in the above-captioned matter:
 - **Darryl Honick**, Senior Operator, Duquesne Light Company, 469 Hershey Road, Penn Hills, PA 15235.
 - **Thomas Johnson**, Distribution Regulation Technician, Duquesne Light Company, 469 Hershey Road, Penn Hills, PA 15235.
 - **Carolyn Cingel**, Claims Specialist, Duquesne Light Company, 411 Seventh Avenue, Pittsburgh, PA 15219.

- **Roxanne Morris**, Supervisor, Regulatory Consumer Relations, Duquesne Light Company, 411 Seventh Avenue, Pittsburgh, PA 15219.
 - **Diane Lloyd**, Supervisor, AMI Field Services, Duquesne Light Company, 411 Seventh Avenue, Pittsburgh, PA 15219.
 - **Stephanie Gillespie**, Customer Programs Associate, Duquesne Light Company, 411 Seventh Avenue, Pittsburgh, PA 15219.
 - **Megan E. Rulli, Esq.**, Associate, Post & Schell, P.C., 17 North Second Street, 12th Floor, Harrisburg, PA 17101.
3. Failure of any witness to comply with the subpoena may result in enforcement proceedings before the **Commonwealth Court of Pennsylvania** pursuant to **52 Pa. Code § 5.423**.

BY THE COMMISSION:

Administrative Law Judge

_____ J.

Dated: _____

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Elliott-Todd Parker Koger

/s/ Todd Elliott Koger

(412) 758-4510

PROOF OF SERVICE

Both Elliott-Todd Parker Koger and Todd Elliott Koger, Sr., certify that on this the 25th day of October 2025, served the following on:

Megan E. Rulli, 17th North Second Street 12th Floor, Harrisburg, PA 17101

/s/ Elliott-Todd Parker Koger

/s/ Todd Elliott Koger

(412) 758-4510