

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michael Moorefield,
Complainant,

v.

Duquesne Light Company,
Respondent.

DATE OF DEPOSIT

NOV 13 2025

PA Public Utility Commission
Secretary's Bureau

Docket No. C-2025-3057998

November 12, 2025

**COMPLAINANT'S RESPONSE AND AFFIDAVIT OF TRUTH TO
RESPONDENT'S ANSWER**

Comes now the Complainant, Michael Allen Moorefield, in proper person (sui juris), who respectfully submits this Response and Affidavit of Truth to the Answer filed by Duquesne Light Company ("Respondent") and states the following for the record:

I. RESPONSE AND CONVERSION OF DENIALS INTO INTERROGATORIES

12. 1. Respondent has denied all material allegations relating to the mishandling of billing, remittance coupons, and credits due to the Complainant. Interrogatory No. 1: Please identify and produce all accounting and remittance records showing the original destination and processing location of each payment remittance coupon or bearer bond received from the Complainant from June 2023 to present.
13. 2. Respondent denies that remittance coupons were sent to or processed through Bank of New York Mellon. Interrogatory No. 2: Does Duquesne Light maintain any financial, custodial, or trust account with The Bank of New York Mellon? If yes, state the account's purpose, type, and relationship to Duquesne Light's bond or securities activity.
14. 3. Respondent denies any credits were withheld or unaccounted for. Interrogatory No. 3: Provide a full accounting ledger showing all credits, debits, and adjustments made to Complainant's account for payments made between June 2023 and October 2025.

15. 4. Respondent denies that the \$833.00 payment was processed by Mellon Bank. Interrogatory No. 4: Identify the bank routing and transaction trace used for the \$833.00 payment on or about September 22, 2025, including the initial depository institution. Along with where the Priority Express mailed Remittance coupon for \$833.00 went?
16. 5. Respondent denies any interest was earned on this payment. Interrogatory No. 5: Provide the policy or internal control statement verifying whether Duquesne Light or any of its agents accrue or earn interest on consumer payments prior to crediting accounts.
17. 6. Respondent denies any connection to securitization or third-party use of customer payments. Interrogatory No. 6: Identify whether Duquesne Light Company has entered into any trust indenture, bond issuance, or securitization agreement under which The Bank of New York Mellon serves as Indenture Trustee, including the corresponding SEC or PUC filings.
18. 7. Respondent denies that Complainant's payments constitute negotiable instruments. Interrogatory No. 7: Does Duquesne Light endorse, deposit, or transmit customer remittance coupons for financial settlement, securitization, or credit enhancement purposes? Provide documentation of such processes.

II. AFFIDAVIT OF TRUTH

19. 1. That Duquesne Light Company issues billing statements containing remittance coupons, which constitute negotiable instruments or payment orders, bearing the customer's account number and payment amount.
20. 2. That said remittance coupons and/or payments are sent to The Bank of New York Mellon, which acts as the Indenture Trustee for Duquesne Light Company, as evidenced by publicly filed bond indenture documents and financial disclosures. Along with proof on certified returned mail green cards. That are addressed to Duquesne Light Company. However returned stamped "BNY MELLON".
21. 3. That Duquesne Light Company, by and through said trustee, converts and securitizes the coupons as bonds or credit instruments, but fails to properly credit the corresponding value to the Complainant's customer account.
22. 4. That the Complainant has documentary proof showing remittance coupons being processed and transmitted through Duquesne Light's billing remittance system.
23. 5. That Duquesne Light Company has continuously denied all allegations without producing verifiable records showing the disposition of remittance instruments or accounting for their post-processing value.
24. 6. That such denials create material disputes of fact which can only be resolved by full discovery and audit of all accounts managed by Duquesne Light Company and its trustee.

25. 7. That this affidavit is made in good faith, for the purpose of establishing the truth and ensuring a just administrative process under the Pennsylvania Public Utility Commission.

FURTHER AFFIANT SAYETH NOT.

Executed this 12 day of November 2025

At: McKeesport PA (City, State)

By:

Michael Allen Moorefield

Michael Allen Moorefield *All Rights Reserved*
Complainant / Affiant

305 San Juan Drive Apt 8

McKeesport, Pa 15133

(412)853-4474

VERIFICATION

I, the undersigned, verify that the statements made in this document are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Date: 11-12-25

Signature: Michael Allen Moorefield

Michael Allen Moorefield

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response and Affidavit of Truth was served upon the following via Priority Express Mail, postage prepaid, this ___ day of November, 2025:

Sophia Al Rasheed, Esq.
Regulatory Counsel, IV
Duquesne Light Company
411 Seventh Avenue, Mail Drop 15-7
Pittsburgh, PA 15219
Priority Express Mail Tracking No.

FURTHER AFFIANT SAYETH NOT.

Executed this 13th day of November 2025

At: McK PA (City, State)

By:

Michael Allen Moorefield

Complainant / Affiant

305 San Juan Drive Apt 8

McKeesport Pa, 15133

(412) 853-4474

V. PRAYER FOR RELIEF

Complainant respectfully requests that the Pennsylvania Public Utility Commission:

1. Deny Duquesne Light's Preliminary Objections in their entirety;
2. Order full discovery and audit of all consumer remittance instruments handled by or on behalf of Duquesne Light and The Bank of New York Mellon;
3. Compel Duquesne Light to properly credit all remittance coupons and related funds to the Complainant's account;
4. Grant such other relief deemed just and proper.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response in Opposition and Affidavit of Truth was served via Priority Mail Express, postage prepaid, this 13 day of November 2025, upon:

Sophia Al Rasheed, Esq.

Regulatory Counsel, IV

Duquesne Light Company

411 Seventh Avenue, Mail Drop 15-7

Pittsburgh, PA 15219

Priority Express Mail Tracking No. (EI 418 227 955 US)

Priority Express Mail Tracking No. (EI 418 227 947 US)

Pennsylvania Public Utility Commission

Commonwealth Keystone Building

400 North Street

Harrisburg, PA 17120

Respectfully Submitted,

*Michael J. McDevitt
PA 12/15/11/12/13/14/15/16/17/18/19/20/21/22/23/24/25*

DATE OF DEPOSIT

NOV 13 2025

**PA Public Utility Commission
Secretary's Bureau**

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Michael Allen Moorefield II
305 San Juan Drive, Apt 8
McKeesport, PA 15133

PAYMENT BY ACCOUNT (If applicable)

USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

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SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Purchases the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

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 Sunday/Holiday Delivery Required (additional fee, where available)
*Refer to USPS.com® or local Post Office™ for availability.

PO ZIP Code **17105** Scheduled Delivery Date (MM/DD/YYYY) **11-14-25** Postage \$ **0**

Date Accepted (MM/DD/YYYY) **11-12-25** Scheduled Delivery Time 9:00 PM Insurance Fee \$ **0** COD Fee \$ **0**

Time Accepted **11:11** AM PM Return Receipt Fee \$ **0** Live Animal Transportation Fee \$ **0**

Special Handling/Fee \$ **0** Sunday/Holiday Premium Fee \$ **0** Total Postage & Fees \$ **0**

Weight Flat Rate Employee Initials **RECEIVED**

NOV 19 2025

TO: (PLEASE PRINT) PHONE ()

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg, 2nd Fl 400
North Street
PO Box 3265
Harrisburg, PA
17105-3265

DELIVERY (POSTAL SERVICE USE ONLY) **PA PUBLIC UTILITY COMMISSION**

Delivery Attempt (MM/DD/YYYY) Time AM PM Employee Initials **SECRETARY'S BUREAU**

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