

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE OF DEPOSIT

In the Matter of:

MICHAEL ALLEN MOOREFIELD,
Complainant,

NOV 13 2025
PA Public Utility Commission
Secretary's Bureau

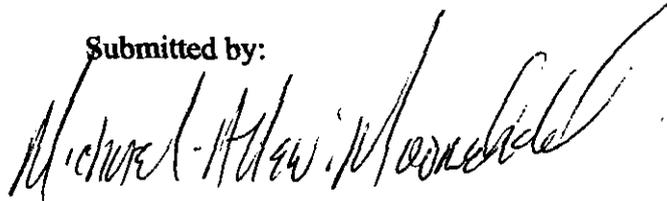
v.

DUQUESNE LIGHT COMPANY,
Respondent.

Docket No. C-2025-3057998

**RESPONSE IN OPPOSITION TO PRELIMINARY OBJECTIONS
AND AFFIDAVIT OF TRUTH**

Submitted by:

A handwritten signature in black ink that reads "Michael Allen Moorefield". The signature is written in a cursive style with a large, sweeping initial 'M'.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michael Moorefield,
Complainant,

v.

Duquesne Light Company,
Respondent.

Docket No. C-2025-3057998

**COMPLAINANT'S RESPONSE IN OPPOSITION TO RESPONDENT'S
PRELIMINARY OBJECTIONS AND AFFIDAVIT OF TRUTH**

Comes now the Complainant, Michael Allen Moorefield, in proper person (sui juris), who respectfully submits this Response in Opposition to the Preliminary Objections filed by Duquesne Light Company ("Respondent") and states the following undeniable facts for the record:

I. INTRODUCTION

Complainant, Michael Allen Moorefield, submits this Response opposing Duquesne Light Company's Preliminary Objections filed November 6, 2025. Respondent's objections and denials are false and misleading, intended to evade the factual and legal issues surrounding improper billing, remittance coupon processing, and consumer credit misapplication. This Response is supported by sworn affidavit of truth and documentary evidence.

II. RESPONSE TO PRELIMINARY OBJECTIONS

- A. The Complaint Properly States a Claim Within the Jurisdiction of the Commission

Respondent falsely asserts that the PUC lacks jurisdiction over alleged billing and accounting violations. The Complainant's claims fall directly under the PUC's oversight authority regarding billing accuracy, service obligations, and account crediting pursuant to Title 66 Pa. C.S. § 1501.

- **B. The Request for Account Credit Is Not a Claim for Damages**

Complainant does not seek monetary damages but correction of billing and remittance credits unlawfully withheld. Respondent's claim that this is outside Commission jurisdiction is untrue. Credit misapplication is a consumer billing issue within PUC authority.

- **C. Respondent's Blanket Denials Lack Specificity and Supporting Evidence**

Duquesne Light Company has denied all allegations without providing a single ledger, remittance record, or trustee statement. Such unsupported denials violate 52 Pa. Code § 5.61(b)(2). The absence of documentation confirms Respondent's concealment of remittance coupon activity routed through The Bank of New York Mellon.

III. UNDENIABLE CONSUMER FACTS

1. Duquesne Light Company is a regulated public utility under PUC jurisdiction.
2. Complainant is an active customer billed monthly by Duquesne Light.
3. Each billing statement includes a remittance coupon bearing identifying account information.
4. Remittance coupons and payments are processed through financial channels connected to The Bank of New York Mellon, Duquesne Light's Indenture Trustee.
5. Duquesne Light benefits from remittance instruments as credit or bond enhancements but fails to credit their full value to customer accounts.
6. Failure to apply credits properly violates Pennsylvania's billing accuracy and consumer protection standards.

IV. AFFIDAVIT OF TRUTH

7. All denials and preliminary objections by Duquesne Light are false and misleading.
8. Duquesne Light transmits consumer remittance coupons through Bank of New York Mellon, its indenture trustee.
9. Documentary evidence confirms Complainant's payments were received and processed by Duquesne Light's billing system and Mellon channels.
10. Respondent failed to provide an accounting of remittance coupon disposition or application of funds.
11. This affidavit is made under penalty of perjury pursuant to 18 Pa. C.S. § 4904.

FURTHER AFFIANT SAYETH NOT.

Executed this 13th 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

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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. (BI 418 227 947 US)

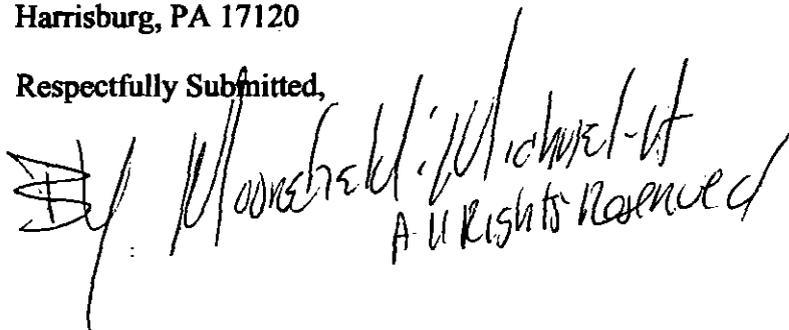
Pennsylvania Public Utility Commission

Commonwealth Keystone Building

400 North Street

Harrisburg, PA 17120

Respectfully Submitted,

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

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Time Accepted 11:11	<input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	Return Receipt Fee \$ 0
Special Handling/Fragile \$ 0	Sunday/Holiday Premium Fee \$ 0	Live Animal Transportation Fee \$ 0
Weight lbs. ozs.	Acceptance Employee Initials	Total Postage & Fees \$ 0

TO: (PLEASE PRINT) PHONE ()

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg, 20th Fl
North Street
PO Box 3265
Harrisburg, PA
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17105-3265

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