

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

*In the Matter of:*

**MICHAEL ALLEN MOOREFIELD,**  
**Complainant,**

v.

**DUQUESNE LIGHT COMPANY,**  
**Respondent.**

DATE OF DEPOSIT

NOV 22 2025

**Docket No. C-2025-3057998**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

Submitted by:

**MICHAEL ALLEN MOOREFIELD**  
**Complainant / Affiant**  
**305 San Juan Drive Apt 8**  
**McKeesport Pa, 15133**

(412) 853-4474

Date: November 12, 2025

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

**Michael Moorefield,**  
Complainant,

v.

**Duquesne Light Company,**  
Respondent.

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PA PUBLIC UTILITY COMMISSION  
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**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.

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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 <sup>22nd</sup> 17 day of November 2025  
 At: McKeesport PA 15133 (City, State)

By: Michael Allen Moorefield - A  
 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: 11-22-25  
 Signature: Michael Allen Moorefield - A  
 Michael Allen Moorefield *All Rights Reserved*

**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 22nd day of November, 2025:

Sophia Al Rasheed, Esq.  
 Regulatory Counsel, IV  
 Duquesne Light Company

**DATE OF DEPOSIT**

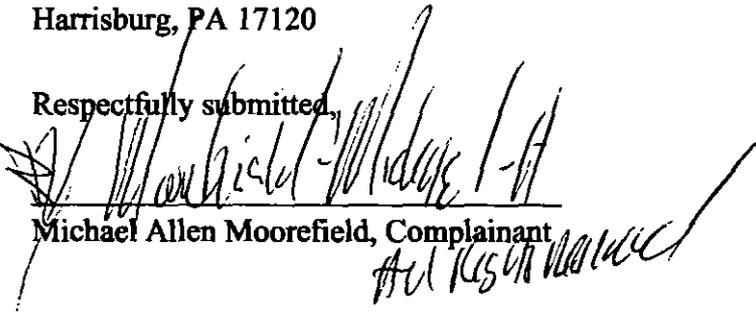
NOV 22 2025

411 Seventh Avenue, Mail Drop 15-7  
Pittsburgh, PA 15219  
Priority Express Mail Tracking No.

Priority Express Mail Tracking No.

Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Respectfully submitted,

  
Michael Allen Moorefield, Complainant

FURTHER AFFIANT SAYETH NOT.

Executed this <sup>22nd</sup> 13th day of November 2025  
At: McKeesport PA 15133 (City, State)

By: Michael Allen Moorefield  
Michael Allen Moorefield  
Complainant / Affiant  
305 San Juan Drive Apt 8  
McKeesport Pa, 15133  
(412) 853-4474

DATE OF DEPOSIT

NOV 22 2025

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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 418 227 964 US)**  
**Matthew L. Homsher, Secretary**  
**Pennsylvania Public Utility Commission**  
**Commonwealth Keystone Building, 2nd Floor 400**  
**North Street**  
**P.O. Box 3265**  
**Harrisburg, PA 17105-3265**

Respectfully Submitted,

*[Handwritten signature]*  
*[Handwritten signature]*  
*[Handwritten signature]*

**DATE OF DEPOSIT**

**NOV 22 2025**

**PA PUBLIC UTILITY COMMISSION**  
**SECRETARY'S BUREAU**



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FROM: (PLEASE PRINT) \_\_\_\_\_ PHONE (\_\_\_\_\_) \_\_\_\_\_

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

**DELIVERY OPTIONS (Customer Use Only)**

**SIGNATURE REQUIRED** Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires 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 form in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

**Delivery Options**

No Saturday Delivery (delivered next business day)  
 Sunday/Holiday Delivery Required (additional fee, where available)  
 \*Refer to USPS.com or local Post Office for availability.

TO: (PLEASE PRINT) \_\_\_\_\_ PHONE (\_\_\_\_\_) \_\_\_\_\_

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2nd Floor 400  
North Street  
P.O. Box 3265  
ZIP 17105 Harrisburg, PA 17105-3265

**PAYMENT BY ACCOUNT (If applicable)**

USPS® Corporate Acct. No. \_\_\_\_\_ Federal Agency Acct. No. or Postal Service™ Acct. No. 020675-1982

**ORIGIN (POSTAL SERVICE USE ONLY)**

1-Day  2-Day  Military  DPO

PO ZIP Code <u>17105</u>	Scheduled Delivery Date (MM/DD/YY) <u>11-25-25</u>	Postage \$ <u>0</u>
Date Accepted (MM/DD/YY) <u>11-22-25</u>	Scheduled Delivery Time <input type="checkbox"/> 6:00 PM	Insurance Fee \$ <u>0</u>
Time Accepted <u>11:11</u> <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM	Return Receipt Fee \$ _____	Live Animal Transportation Fee \$ _____
Special Handling Fee \$ <u>0</u>	Sunday/Holiday Premium Fee \$ <u>0</u>	Total Postage & Fees <b>RECEIVED</b>
Weight lbs. _____ ozs. _____	Acceptance Employee Initials _____	<b>\$NOV 24 2025</b>

**DELIVERY (POSTAL SERVICE USE ONLY)**

Delivery Attempt (MM/DD/YY) _____	Time _____	Employee Signature <b>A PUBLIC UTILITY COMMISSION</b>
Delivery Attempt (MM/DD/YY) _____	Time _____	Employee Signature <b>SECRETARY'S BUREAU</b>

- For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.
- \$100.00 Insurance Included.

**PEEL FROM THIS CORNER**

LABEL 11-B, MAY 2021

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