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April 10, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Carly Lapiers v. Interstate Gas Supply, LLC; Docket No. C-2025-3059273;
**MOTION TO DISMISS OF INTERSTATE GAS SUPPLY, LLC D/B/A IGS
ENERGY**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion to Dismiss of Interstate Gas Supply, LLC d/b/a IGS Energy to Formal Complaint of Carly Lapiers in the above-captioned docket. A copy of the Motion has been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a horizontal line. The signature is stylized and somewhat abstract.

Todd S. Stewart
*Counsel for Interstate Gas Supply, LLC
d/b/a IGS Energy*


TSS/jld
Enclosure
cc: Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL

Carly Lapiers
207 Hand Street
Jessup, PA 18434
carlyangeli@gmail.com

A handwritten signature in blue ink, appearing to read 'Todd S. Stewart', is written over a horizontal line.

Todd S. Stewart

DATED: April 10, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

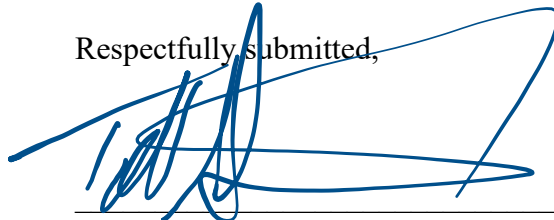
CARLY LAPIERS,	:
Complainant,	:
	: Docket No. C-2025-3059273
v.	:
	:
INTERSTATE GAS SUPPLY, LLC,	:
Respondent.	:

NOTICE TO PLEAD

TO: Carly Lapiers
207 Hand Street
Jessup, PA 18434
carlyangeli@gmail.com

Pursuant to 52 Pa. Code §5.101, you are hereby notified that a written response to the enclosed Motion to Dismiss the Complaint, must be filed within ten (10) days from service of this notice, with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Interstate Gas Supply, LLC d/b/a IGS Energy.

Respectfully submitted,



Todd S. Stewart, Attorney ID No. 75556
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*Counsel for Interstate Gas Supply, LLC
d/b/a IGS Energy*

DATED: April 10, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CARLY LAPIERS,	:	
Complainant,	:	
	:	Docket No. C-2025-3059273
v.	:	
	:	
INTERSTATE GAS SUPPLY, LLC,	:	
Respondent.	:	

**MOTION OF INTERSTATE GAS SUPPLY, LLC
TO DISMISS THE FORMAL COMPLAINT
OF CARLY LAPIERS**

NOW COMES, Interstate Gas Supply, LLC (“IGS”), by and through its counsel, HMS Legal LLP, and hereby moves to dismiss the Formal Complaint of Carly Lapiers (“Complainant”) pursuant to 52 Pa. Code §5.101. In support thereof, IGS submits as follows:

I. MOTION TO DISMISS

1. On or about December 11, 2025, Complainant submitted a Formal Complaint against Interstate Gas Supply, LLC d/b/a IGS Energy, regarding the installation of a residential solar panel system at her residence by IGS Solar.

2. On January 5, 2026, IGS Energy answered the Formal Complaint.

3. Also on January 5, 2026, the IGS filed a Preliminary Objection requesting that the Complainant’s Formal Complaint be dismissed. IGS contends that the Commission lack jurisdiction in this matter, that the Complaint should be dismissed for legal insufficiency because

the relief requested is not available before the Commission, and because the Complaint does not state a claim upon which relief can be granted.

4. On January 15, 2026, Complainant responded to the Preliminary Objections and claimed that there is a factual dispute as to whether IGS is the proper party because it is the parent company of IGS Solar and quality of service issues.

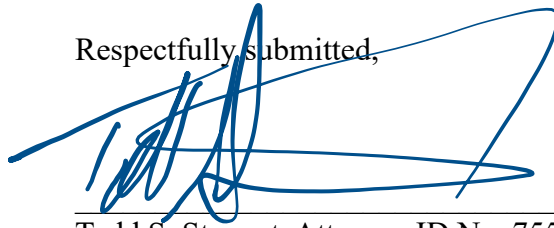
5. By Interim Order entered March 19, 2026, Presiding Administrative Law Judge Marta Guhl, declined to address the preliminary objections and instead required Complainant to clarify her factual allegations in an Amended Complaint to be filed and served no later than April 8, 2026.

6. Complainant did not serve counsel for IGS with any documents though the date of this Motion, nor has she filed anything with the Commission, according to the Commission's publicly available docket.

7. The Complaint should be dismissed for at least two reasons in addition to those stated in the Preliminary Objections. First, the Complainant has failed to comply with the express requirements of Judge Guhl's March 19, 2026 Order that required an amended Complaint to be filed no later than April 8, 2026. Second, without the amendments, as the Order on the Preliminary Objection's makes clear, there is no basis to deny the arguments raised in the Preliminary Objections. The PUC does not regulate solar installations, or the contracts for such services and without any allegation to the contrary, the Complaint is not justiciable by the Commission. There is no allegation that IGS Energy, an entity regulated only as an EGS and NGS in Pennsylvania, in its regulated role could have or did take any action to violate the Commission's Regulations, orders or the Public Utility Code and so there is no claim to provide a basis for which the Commission is authorized to hear the Complaint.

8. Accordingly, for the reasons stated herein and those stated in IGS' Preliminary Objections, the Formal Complaint should be dismissed with prejudice.

Respectfully submitted,



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*Counsel for Interstate Gas Supply, LLC
d/b/a IGS Energy*

DATED: April 10, 2026