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File #: 205388

May 8, 2026

***VIA ELECTRONIC FILING***

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

**Re: Higinio Mendoza Jr. and Karen A. Feitt v. Duquesne Light Company**  
**Docket No. A-2024-3051871**

C-2024-3051871 MM- SEC BUR

Dear Secretary Homsher:

Attached for filing is the Reply of Duquesne Light Company to the Exceptions of Higinio Mendoza Jr. and Karen A. Feitt in the above-referenced proceedings.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/sll  
Enclosures

cc: Administrative Law Judge Jeffrey A. Watson (*via email; w/attachment*)  
Office of Special Assistants (*via email; w/attachment*)  
Certificate of Service

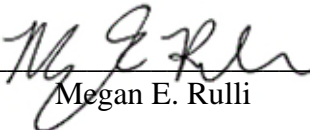
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA EMAIL AND FEDERAL EXPRESS**

Higinio Mendoza, Jr.  
Karen A. Feitt  
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Pittsburgh, PA 15202  
[technologyfm@gmail.com](mailto:technologyfm@gmail.com)

Date: May 8, 2026

  
Megan E. Rulli

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Higinio Mendoza Jr. and Karen A. Feitt,	:	
	:	
Complainants,	:	
	:	
v.	:	Docket No. C-2024-3051871
	:	
Duquesne Light Company,	:	
	:	
Respondent.	:	

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**REPLY OF DUQUESNE LIGHT COMPANY TO THE  
EXCEPTIONS OF HIGINIO MENDOZA JR. AND KAREN A. FEITT**

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Duquesne Light Company (“Duquesne Light” or the “Company”), pursuant to 52 Pa. Code § 5.535, hereby respectfully submits this Reply to the Exceptions of Higinio Mendoza Jr. and Karen A. Feitt (“Complainants”). In their Exceptions, the Complainants apparently dispute Administrative Law Judge Jeffrey A. Watson’s (the “ALJ”) well-reasoned Initial Decision (“ID”) dismissing the above-captioned Formal Complaint (“Complaint”) with prejudice.

The Complainants’ Exceptions do not conform to the Commission’s regulations because they are unnumbered and do not cite to any Conclusions of Law, nor any specific pages of the ID.<sup>1</sup> Further, it does not appear that the Complainants are actually disputing any of the findings or conclusions reached by the ALJ in the ID, as the Complainants do not include supporting reasons

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<sup>1</sup> Section 5.533(b) of the Pennsylvania Public Utility Commission’s (“Commission”) regulations provides that “[e]ach exception must be numbered and identify the finding of fact or conclusion of law to which exception is taken and cite relevant pages of the decision. Supporting reasons for the exceptions shall follow each specific exception.” 52 Pa. Code § 5.533(b).

for the Exceptions as is required by the Commission's regulations.<sup>2</sup> Instead, the Exceptions appear to deny the Commission's jurisdiction over their claims, demand that the ALJ and/or the Commission disclose various items related to purported fiduciary duties, and critique the ID's syntax.

For these reasons and as further explained below, Duquesne Light respectfully requests that the Commission deny the Complainants' Exceptions, adopt the well-reasoned ID without modification, and dismiss the Complaint with prejudice. As the ID correctly found, the Complainants failed to sustain their burden of proving that Duquesne Light violated the Public Utility Code or the Commission's regulations or orders.

## **I. INTRODUCTION AND BACKGROUND**

On October 29, 2024, Duquesne Light was served with the above-captioned Complaint, which alleged that the Complainants received a termination notice and that the Company's billing practices are fraudulent and violate certain portions of the United States Code.

On November 18, 2024, Duquesne Light timely filed an Answer and New Matter to the Complaint, admitting in part and denying in part the factual basis of the Complainants' allegations. Also on November 18, 2024, Duquesne Light filed a Preliminary Objection to the Complaint, requesting that the portions of the Complaint alleging violations of the United States Code be dismissed because the Commission lacks subject matter jurisdiction over those claims.

On December 31, 2024, the Commission issued a Motion Judge Assignment Notice, assigning the ALJ as the Presiding Officer in the above-captioned proceeding.

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<sup>2</sup> See note 1, *supra*.

On January 28, 2025, the ALJ issued an Interim Order Sustaining Preliminary Objections, which dismissed the portions of the Complaint alleging violations of the United States Code because the Commission lacks subject matter jurisdiction over those federal claims.

On March 10, 2025, the Commission issued an Initial Call-In Telephone Hearing Notice, scheduling an evidentiary hearing for April 30, 2025 before the ALJ, and the ALJ issued a Prehearing Order, confirming the date and time of the evidentiary hearing.

On April 3, 2025, Duquesne Light filed a Motion for Judgment on the Pleadings, requesting that the Complaint be dismissed because the billing allegations are barred by Section 316 of the Public Utility Code and by the doctrines of res judicata and collateral estoppel, and because the filing of the Complaint constitutes an abuse of the administrative process.<sup>3</sup>

On April 24, 2025, the ALJ issued an Interim Order denying the Company's Motion for Judgment on the Pleadings.

On October 21, 2025, the Commission issued a Further Telephonic Hearing Notice, rescheduling the evidentiary hearing for December 24, 2025.

On October 27, 2025, a Cancelled/Rescheduled Further Telephonic Hearing Notice was issued rescheduling the initial telephone hearing for January 6, 2026, and the ALJ issued a Prehearing Order on November 3, 2025.

On January 6, 2026, the evidentiary hearing was held as scheduled.

On April 21, 2026, the Complainants served the Company with their Exceptions to the ID.

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<sup>3</sup> As noted in the ID, “[t]his Complaint is the latest in a line of Complaints filed by Complainants in which Complainants claim that the bills provided by Respondent are incorrect or fraudulent,” including two prior Formal Complaints that raised the same issues as those raised this proceeding and that were dismissed. (ID at 6-7.)

Also on April 21, 2026, Duquesne Light and the Complainants were served with a letter from the Secretary of the Commission, explaining that the Secretary's Bureau had received the Complainants' Exceptions to the ID on April 21, 2026, but those Exceptions were not accompanied by a Certificate of Service and, therefore, were being provided as an enclosure to the letter. The Secretarial Letter also established May 8, 2026, as the due date for Reply Exceptions.

For the reasons explained in more detail below, the Complainants' Exceptions are without merit, and the Commission should adopt the ALJ's well-reasoned ID without modification and dismiss the Complaint with prejudice.

**II. REPLY TO EXCEPTION NO. 1 – THE ALJ CORRECTLY DISMISSED THE COMPLAINT, AND NOTHING PRESENTED IN THE COMPLAINANTS' EXCEPTIONS WARRANT DISTURBING THAT RULING<sup>4</sup>**

The ALJ correctly dismissed the Complaint with prejudice because the “Complainants failed to sustain their burden of proving that the utility billed them fraudulently, improperly, or otherwise violated the Public Utility Code.” (ID at 1; *see also* ID at 7-8; Conclusion of Law No.

4.) As the ALJ explained:

Complainant, Higinio Mendoza Jr., testified that the Company's billing practices are fraudulent and there was a billing error on the account but did not specify when or how the billing error was made or on what billing statements the alleged error appears. Complainants did not identify any specific deficiency with Complainants' bills issued by Respondent.

(ID at 7-8) (internal citations omitted). The ALJ further explained that the Complainants failed to present any evidence in support of their allegations, stating:

Although every effort was made to provide Complainants with ample opportunity to identify Commission rules or regulations that Duquesne Light violated in rendering utility service to

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<sup>4</sup> Although the Complainants failed to number their Exceptions as required by the Commission's regulations, Duquesne Light is grouping the entirety of the Exceptions into Exception No. 1 for ease of reference.

Complainants, Complainants have failed to present any facts or cite any law which would support their position.

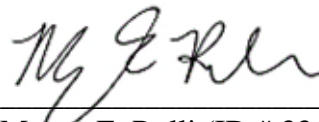
(ID at 8.) The Complainants' testimony relied on inscrutable legal theories (the gist of which apparently would relieve them of paying their account balance) and arguments that the Company's billing practices violate the rules of "quantum grammar" (a fictional linguistic canon whose relevance to utility billing the Complainants were unable to explain, much less demonstrate). (*See, e.g.,* Tr. 16-18, 57-60.) It is well-established that bald assertions, personal opinions, or perceptions, when unsubstantiated by facts, do not constitute evidence. *See Pa. Bureau of Corr. v. City of Pittsburgh*, 532 A.2d 12 (Pa. 1987). The ALJ's dismissal with prejudice is appropriate considering the Complainants' utter failure to present any cogent arguments or facts in support of their allegations that Duquesne Light's billing practices are fraudulent or in violation of the Public Utility Code or the Commission's regulations or orders. For these reasons, the ALJ properly found that the Complainants failed to sustain their burden of proof.

Moreover, to the extent that the Complainants dispute the ALJ's ruling in their Exceptions, they fail to identify any errors in the ALJ's factual findings or legal reasoning. Instead, their Exceptions appear to deny the Commission's jurisdiction over their claims and demand that the ALJ and/or the Commission disclose various items related to purported fiduciary duties. (*See generally*, Exceptions.) In fact, the Complainants only reference the ID twice throughout their Exceptions, first arguing that the ALJ's use of an electronic signature indicates sarcasm and second arguing that the ID uses incorrect syntax by failing to employ "quantum grammar." (Exceptions at 3-5.) Ultimately, it is wholly unclear what findings or conclusions in the ID the Complainants are challenging. It is well established that the Commission has jurisdiction over customer claims related to utility billing and service, and the Complainants invoked this jurisdiction by filing their Complaint. *See* 66 Pa.C.S. § 701. The ALJ made 18 Findings of Fact and four Conclusions of

Law and the Complainants do not dispute the substance of any of those determinations in their Exceptions. Although the Complainants may be unsatisfied with the outcome of their Complaint, they have provided no factual or legal basis for disturbing the well-reasoned ID. Thus, the Complainants' Exceptions should be denied.

WHEREFORE, for all the foregoing reasons, as well as those more fully explained in the well-reasoned Initial Decision of Administrative Law Judge Jeffrey A. Watson, Duquesne Light respectfully requests that the Pennsylvania Public Utility Commission: (1) deny the Exceptions filed by Higinio Mendoza Jr. and Karen A. Feitt; (2) adopt the Initial Decision without modification; and (3) dismiss the Formal Complaint at Docket No. C-2024-3051871 with prejudice.

Respectfully submitted,



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Date: May 8, 2026

Attorney for Duquesne Light Company