

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                           |
|---|---|---------------------------|
| <b>Pennsylvania Public Utility<br/>Commission</b> | : | Docket No. R-2018-3000124 |
|   | : |                           |
|   | : |                           |
| <b>v.</b>   | : |                           |
|   | : |                           |
|   | : |                           |
| <b>Duquesne Light Company</b>                     | : |                           |

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**PETITION TO INTERVENE OF NATURAL RESOURCES DEFENSE COUNCIL**

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Pursuant to 52 Pa. Code §§ 5.71, et seq., Natural Resources Defense Council (“NRDC”) hereby files this Notice of Intervention in the above captioned proceeding, and in support of its intervention states as follows:

1. NRDC is an environmental organization and not-for-profit corporation with more than 1.4 million members, including more than 16,000 in Pennsylvania and more than 1,600 in Duquesne’s service area. Since 1970, NRDC’s attorneys, scientists, and other environmental specialists have worked to protect the world’s natural resources, public health, and the environment. NRDC’s top institutional priority is building an equitable clean energy future, among other things through the increased use of energy efficiency, renewable energy, and renewables-based transportation electrification, with the ultimate goal of reducing air pollution from the combustion of fossil fuels.

2. Pending the entry of appearance by other counsel, NRDC will be represented in this matter by:

Mark C. Szybist, Esq.  
(PA ID 94112)  
1152 15<sup>th</sup> St. NW, Suite 300

Washington, DC 20005  
Telephone: (202) 289-2422  
E-Mail: mszybist@nrdc.org

3. Pursuant to 52 Pa. Code § 1.54(b)(3), NRDC consents to the electronic service of all documents upon counsel at the e-mail address stated above.

4. On March 28, 2018, Duquesne filed a request for a base rate increase of approximately \$133.8 million. According to the Commission's April 19 Order in this matter, if the request is approved, the total bill for an average residential customer using 600 kilowatt-hours would increase 8.82 percent, while the total bills for average commercial and industrial customers would increase 2.92 percent and 2.32 percent, respectively.

5. NRDC expects that numerous issues will be raised in this case that affect the interests of NRDC's members and NRDC's institutional goals of expanding the use of energy efficiency, renewable energy, and the electrification of transportation in Duquesne's service area.

6. NRDC has expended organizational resources in Pennsylvania to expand the use of energy efficiency, renewable energy, and transportation electrification in Pennsylvania. Among other things, NRDC is a partner in Energy Efficiency for All, a partnership that seeks to provide energy efficiency benefits to low-income persons who live in multifamily homes in Pennsylvania, as well as a partner in the City Energy Project (CEP), a joint project of NRDC and the Institute for Market Transformation that seeks to create healthier and more prosperous American cities by improving the energy efficiency of buildings. The City of Pittsburgh, which is within Duquesne's service area, is a participant in Phase II of CEP.

7. NRDC's interests in this proceeding are unique from and not adequately represented by other parties.

8. NRDC intends to participate in this matter concerning such matters as affect the interest of its members and its institutional interests, including but not limited to its interests as a partner in EEFA and CEP. NRDC reserves the right to raise and address issues raised by Duquesne's request that are not specifically identified in this petition, as well as additional issues raised by other parties.

**WHEREFORE**, NRDC respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,

/s/ Mark C. Szybist  
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Date: May 2, 2018

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**VERIFICATION**

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I verify that the facts contained in the foregoing pleading are true and accurate to the best of my knowledge and that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter.

/s/ Mark Szybist  
Mark Szybist, Esquire