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May 11, 2022

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, PA 17120

**Re: Petition to Initiate a Proceeding to Consider Issuance of a Policy Statement on
Electric Utility Rate Design for Electric Vehicle Charging
Docket No. P-2022-3030743**

Dear Secretary Chiavetta:

Duquesne Light Company (“Company”) is filing this letter in lieu of reply comments regarding ChargeVC-PA’s Petition to Initiate a Proceeding to Consider Issuance of a Policy Statement on Electric Utility Rate Design for Electric Vehicle Charging (“Petition”) filed February 4, 2022 at the above-captioned proceeding.

In its Secretarial Letter issued February 25, 2022, the Commission invited comments and reply comments from interested stakeholders. The letter provided direction to stakeholders as follows: “Before addressing the substance of this petition, the Commission seeks comments preliminarily addressing whether to initiate such a proceeding and the parameters of the proceeding, if opened.”

Accordingly, the Company filed comments on this topic April 11, 2022 which were narrowly tailored to the Secretarial Letter. However, several commenters expanded beyond addressing the question of whether the Commission should choose to initiate such a proceeding and associated parameters, to include topics such as consideration of mandatory time-varying rates for all customers, employing time of use rates for default service customers, and implementation of supplier consolidated billing, as examples.

In keeping with the Commission’s direction on the narrow scope of comments at this stage, the Company is not electing to reply to the substantive positions offered by other commenters. The Company reserves all rights in this proceeding, including the right to file a substantive response to these positions in the future, should the Commission initiate a proceeding on this topic.

If you have any questions regarding the information contained in this filing, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'L.B.' followed by a stylized flourish.

Lindsay A. Baxter
Manager, Regulatory and Clean Energy Strategy

Enclosure

cc: Joseph Cardinale (jcardinale@pa.gov)