



**Michael Zimmerman**  
Senior Counsel, Regulatory

411 Seventh Avenue  
Mail drop 15-7  
Pittsburgh, PA 15219

Tel: 412-393-6268  
mzimmerman@duqlight.com

December 22, 2022

**Via Electronic Filing**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

**Re: Duquesne Light Company - Default Service Plan IX  
Time-Of-Use Annual Report  
Docket No. P-2020-3019522**

Dear Secretary Chiavetta:

Enclosed for filing, please find an original copy of Duquesne Light Company's ("Duquesne Light" or the "Company") 2021-2022 Time-Of-Use Annual Report. Should you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Michael Zimmerman".

Michael Zimmerman  
Senior Counsel, Regulatory

Enclosures

Cc: 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):

### ELECTRONIC MAIL

Bureau of Investigation & Enforcement  
Scott B. Granger  
Richard Kanaskie  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265  
[sgranger@pa.gov](mailto:sgranger@pa.gov)  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Office of Small Business Advocate  
Sharon Webb  
Steve Gray  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)  
[sgray@pa.gov](mailto:sgray@pa.gov)

Office of Consumer Advocate  
David T. Evrard  
Aron J. Beatty  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[DEvrard@paoca.org](mailto:DEvrard@paoca.org)  
[ABeatty@paoca.org](mailto:ABeatty@paoca.org)

Pennsylvania Utility Law Project  
Elizabeth R. Marx  
John Sweet  
Ria Pereira  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*On behalf of CAUSE-PA*

Norris McLaughlin, P.A.  
John F. Lushis, Jr.  
515 W. Hamilton Street  
Suite 502  
Allentown, PA 18101  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)  
[jaskey@norris-law.com](mailto:jaskey@norris-law.com)  
*On behalf of*  
*Calpine Retail Holdings, LLC*

Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Excel Consulting  
Brian Kalcic  
225 S. Meramac Avenue  
Suite 720-T  
St. Louis, MO 63105  
[Excel.consulting@sbcglobal.net](mailto:Excel.consulting@sbcglobal.net)  
*On behalf of OSBA*

Post & Schell, P.C.  
Michael W. Gang  
Anthony D. Kanagy  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101  
[mgang@postschell.com](mailto:mgang@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
*On behalf of Duquesne Light Company*

Keyes & Fox LLP  
James M. Van Nostrand  
275 Orchard Drive  
Pittsburgh, PA 15228  
[jvannostrand@keyesfox.com](mailto:jvannostrand@keyesfox.com)  
*On behalf of ChargePoint*

StateWise Energy PA LLC & SFE Energy  
Gregory L. Peterson  
201 West Third Street  
Suite 205  
Jamestown, NY 14701-4907  
[gpeterson@phillipslytle.com](mailto:gpeterson@phillipslytle.com)

Thomas, Niesen & Thomas, LLC  
Charles E. Thomas, Jr.  
212 Locust Street, Ste 302  
Harrisburg, PA 17101  
[cthomasjr@tntlawfirm.com](mailto:cthomasjr@tntlawfirm.com)  
*On behalf of MAREC Action*

MAREC Action  
Bruce Burcat  
P.O. Box 385  
Camden, DE 19934  
[Marec.org@gmail.com](mailto:Marec.org@gmail.com)

Fair Shake Environmental Legal Services  
Andrew J. Karas  
647 E. Market Street  
Akron, OH 44304  
[akaras@fairshake-els.org](mailto:akaras@fairshake-els.org)  
*On behalf of NRDC*

Natural Resources Defense Council  
Mark C. Szybist  
Kathy Harris  
1152 15<sup>th</sup> Street, Suite 300  
Washington, DC 20005  
[mszybist@nrdc.org](mailto:mszybist@nrdc.org)  
[KHarris@nrdc.org](mailto:KHarris@nrdc.org)

Date: December 22, 2022



---

Michael Zimmerman  
Duquesne Light Company  
411 Seventh Avenue, 15-7  
Pittsburgh, PA 15219  
Phone: 412-393-6268  
Email: [mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)



Time-of-Use Program Annual Report  
June 1, 2021 through May 31, 2022

December 22, 2022

## Background

On June 1, 2021, Duquesne Light Company (“DLC” or “Company”) launched its Electric Vehicle Time-of-Use Pilot default service supply rate program (“EV TOU Pilot”) for residential, small commercial and industrial (“C&I”) and medium C&I customers with less than 200 kW<sup>1</sup> of demand who use default service supply. The Company’s EV TOU Pilot was approved by the Pennsylvania Public Utility Commission (“Commission”) on January 14, 2021, at docket no. P-2020-3019522, as part of the Company’s Default Service Plan IX (“DSP IX”).<sup>2</sup>

Pursuant to Act 129 of 2008,<sup>3</sup> the Company submits this Annual Report assessing the EV TOU Pilot for the period June 1, 2021 through May 31, 2022.

## Overview

As previously noted, the Company’s EV TOU Pilot began on June 1, 2021. The EV TOU Pilot is an optional time-of-use default supply service rate available to eligible customers. To be eligible for the EV TOU Rate, a residential, small C&I or medium C&I customer with demand less than 200 kW must own or lease an EV or operate EV charging infrastructure at the service location. Customers who are eligible for hourly priced service (“HPS”), or those who participate in the Customer Assistance Program (“CAP”), virtual meter aggregation or budget billing are not eligible for the EV TOU rate. Participating customers

---

<sup>1</sup> Duquesne Light customers with demands less than 200kW are eligible for default supply under the Company’s tariffed Rider No. 8 – Default Supply Service. The Company evaluates a customer’s twelve (12) most recent months of monthly billing demand of the preceding year. If the customer’s average monthly billing demand is greater than or equal to 200 kW, the customer will become eligible for default service under Rider No. 9 – Day Ahead Hourly Price Service.

<sup>2</sup> See *Petition of Duquesne Light Company for Approval of its Default Service Plan for the Period from June 1, 2021 through May 31 2025*, Opinion and Order, Docket No. P-2020-3019522, entered Jan. 14, 2021. The Order included approval of the EV-TOU Stipulation, which required, among other things, DLC to file a report prior to its next DSP filing that includes information regarding customer enrollments, bill impacts, energy usage shifts and customer installation of separate meters for EV charging. The EV-TOU Stipulation also provided for stakeholder review and feedback on EV-TOU Pilot customer education materials and required DLC to convene a collaborative meeting around the midpoint of DSP IX to discuss the EV-TOU Pilot Program implementation, results to-date and rates for mass transit and fleet EVs.

<sup>3</sup> 66 Pa. C.S. § 2807(f)(5) (“ . . . The default service provider shall submit an annual report to the [time-of-use rate and real-time] price programs and the efficacy of the programs in affecting energy demand and consumption and the effect on wholesale market prices.”)

may withdraw from the EV TOU Pilot at any time without penalty, but may not re-enroll for a period of twelve months thereafter.

Participating customers receive EV TOU service for the entire usage served by their smart meter. Customers are charged different supply rates for Peak, Off-Peak and Super Off-Peak<sup>4</sup> time periods as follows:

<b>Schedule</b>	<b>Time Period</b>
Peak	1 p.m. – 9 p.m.
Off-Peak	6 a.m. – 1 p.m. 9 p.m. – 11 p.m.
Super Off-Peak	11 p.m. – 6 a.m.

The Company obtains default service supply for EV TOU customers through the same products that provide default service supply for the respective customer classes.

The Company determines the EV TOU supply rates for each time period by modifying the adjusted wholesale price for each class using rate class factors that are based in part upon hourly locational marginal prices for energy, respective energy consumption patterns and capacity requirements. The Company annually resets the EV TOU supply rate factors as part of its tariff supplements updating Default Service Supply Rates effective June 1<sup>st</sup> of each year.

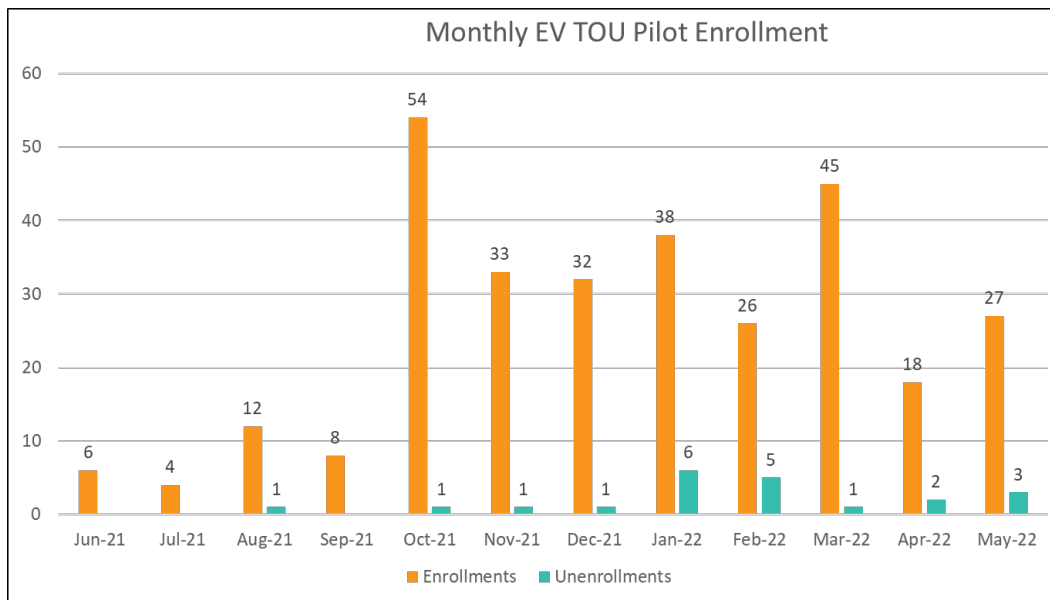
## **Customer Participation**

---

<sup>4</sup> DLC's initial DSP IX filing included the terms "On-Peak," "Shoulder" and "Off-Peak" for the EV-TOU time periods. In its Supplement No. 23 replacement pages, DLC amended the period names to "Peak," "Off-Peak" and "Super Off-Peak" for consistency with other utilities' terminology and customer preference. See *Duquesne Light Company – Tariff Electric – PA P.U.C. No. 25; Supplement No. 23 Replacement Pages and Request for Waiver of 60-Day Notice Period*, Docket No. P-2020-3019522, submitted Apr. 28, 2021. The Commission served, at this docket, a Secretarial Letter on May 11, 2021, approving the replacement pages.

Eligible customers were able to enroll in the EV TOU Pilot beginning June 1, 2021. As of May 31, 2022, 280 residential, one small C&I and one medium C&I customers were enrolled, including 57 residential customers also participating in net metering. Twenty-one participants withdrew from the program during this period. Please find a breakdown of monthly enrollments and unenrollments below.

Figure 1: New Monthly EV TOU Pilot Enrollments and Unenrollments



### Customer Outreach Summary

DLC conducts periodic customer outreach and education regarding the EV TOU pilot through a variety of efforts, including emails and website updates. In all communications, DLC encourages customers to compare the EV TOU rate with the standard default service rates and with supply offerings from electricity generation suppliers, including on its EV TOU webpage for residential customers at: <https://www.duquesnelight.com/energy-money-savings/electric-vehicles/wholehome-ev-rate> and for commercial customers here: <https://www.duquesnelight.com/energy-money-savings/electric-vehicles/business-ev-rate>.

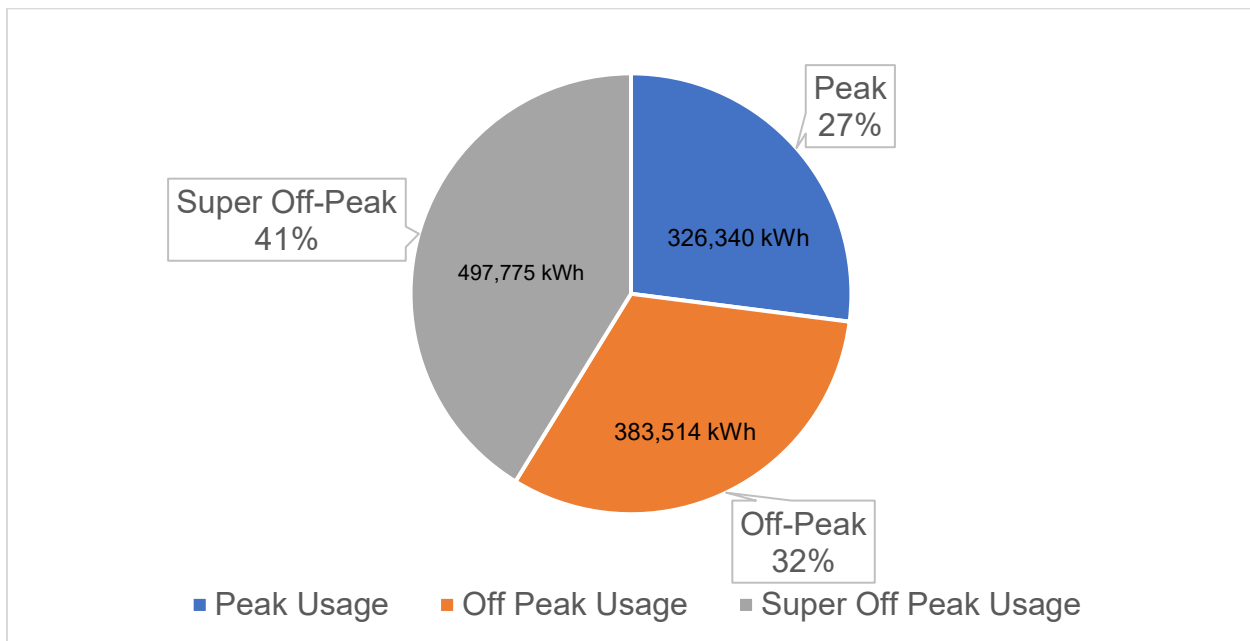
In October 2021, DLC launched a Rate Advisor Tool, an online tool residential customers can use to help determine if the EV TOU rate is right for them at

<https://ev.duquesnelight.com/rates/>. Using the Rate Advisor, customers can compare the EV TOU rate with DLC’s standard default service rate and electric generation supplier rates to estimate bill impacts. The Rate Advisor was used by customers nearly 1,400 times from its launch through May 31, 2022.

### Consumption Impacts

DLC evaluated the proportion of energy that was consumed during each TOU pricing period. During this reporting period, 73% of EV TOU participants’ usage occurred during the super off-peak and off-peak periods, with 41% of consumption occurring during the super off-peak period and 32% occurring during off-peak period respectively.

Figure 3: EV TOU Customers’ Energy Usage by TOU Pricing Period



DLC compared the share of utilization by time-of-use period by month for EV TOU customers and EV driving customers who were not enrolled in EV TOU.<sup>5</sup> As shown in Figures 4 and 5, customers enrolled in the EV TOU rate used a much larger share of electricity during the super off-peak period, as compared to EV driving customers who

<sup>5</sup> EV driving customers were identified from customers who had registered their EV with the Company.



were not enrolled in EV TOU. This is especially evident starting in November 2021, after the increase in enrollment in October 2021, with an average difference of 14%.

The Company also compared the EV TOU participants' usage profile to that of EV owners who did not participate in the EV TOU program. If EV TOU customers had used electricity at the same time period rates as non-enrolled EV driving customers, DLC estimates an additional 104,877 kWh would have been consumed during the peak period, and an additional 41,082 would have been consumed during the off-peak period. Instead, these 145,960 kWh were consumed during the super off-peak period. See Figures 4 and 5 below. This suggests that there may be a correlation between EV TOU participation and proportionally lower peak electricity consumption.

Figure 4: Share of Total Utilization by TOU Time Period and Month for EV TOU Enrolled Customers

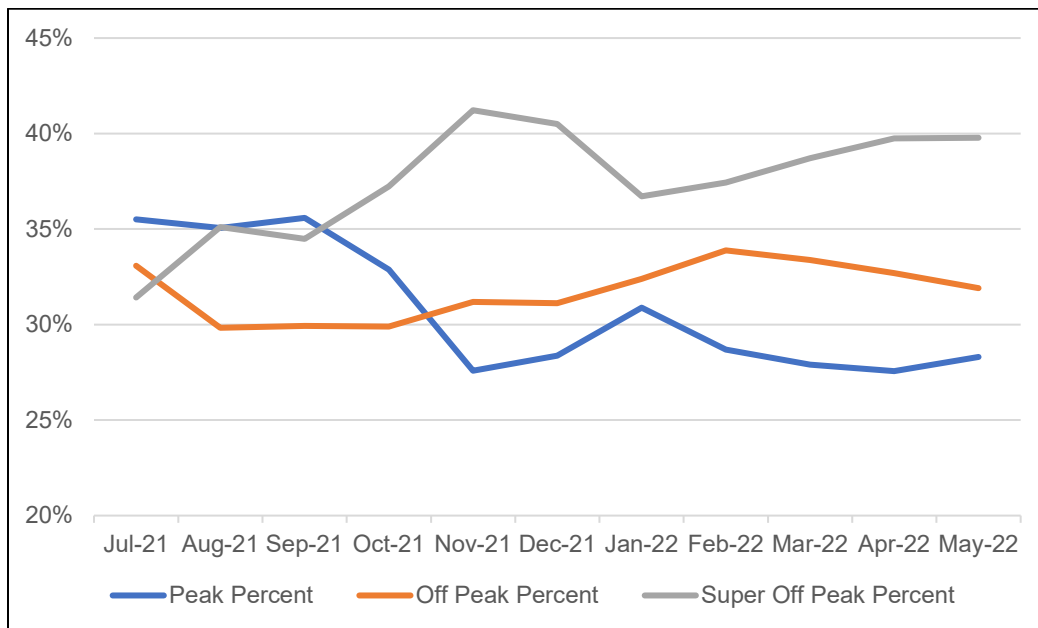
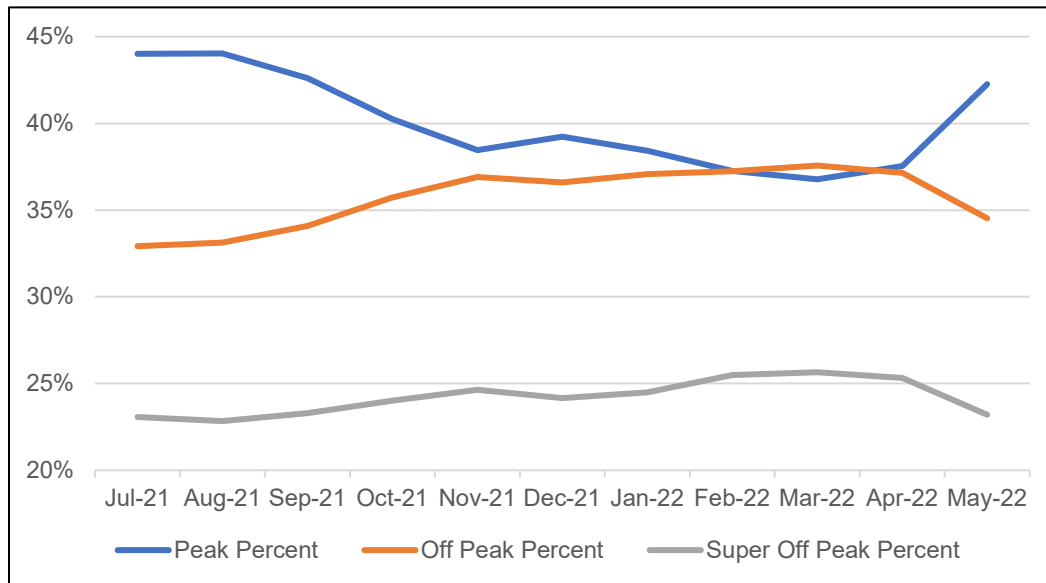


Figure 5: Share of Total Utilization by TOU Time Period and Month for Non-EV TOU enrolled customers with EVs



The average per-bill savings over DLC’s standard default service rate for the customers enrolled in EV TOU as of May 31, 2022, was \$8.76.<sup>6</sup>

### Demand Impacts

Duquesne Light saw no material impact to customer usage and pricing in the wholesale market. Relative to the Company’s total system loads, the total electric usage from TOU participants was too low to yield measurable impacts.

### Wholesale Market Price Effects

The Company believes that any load shift from Peak hours to Off-peak hours attributable to the EV TOU program did not impact the locational marginal price (“LMP”) for the Duquesne Light zone. Relative to the Company’s total system loads, the total electric usage from TOU participants was too low to yield measurable impacts.

<sup>6</sup> Data includes through May 2022. Billing data for December 2021 is excluded from the analysis because of data issues due to a rate change implemented at that time.