



June 8, 2020

Via E-File

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120

Re: Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Docket No. P-2020-3019522

Prehearing Memorandum of CAUSE-PA

Dear Secretary Chiavetta,

Attached for filing, please find a Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) in the above referenced matter.

An electronic copy of this filing will be circulated in accordance with the attached Certificate of Service, and consistent to the Commission's March 20 Emergency Order at Docket M-2020-3019262.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA

A handwritten signature in blue ink, appearing to read "Elizabeth R. Marx", is written over a horizontal line.

Elizabeth R. Marx, Esq.
717-710-3825 (direct)
267-240-3089 (cell)
emarxpulp@palegalaid.net

CC: Per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company for :
Approval of a Default Service Program for the : Docket No. P-2020-3019522
Period of June 1, 2021 through May 31, 2025 :

**Prehearing Memorandum of the Coalition for Affordable Utility Services
and Energy Efficiency in Pennsylvania**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, hereby submits this Prehearing Memorandum pursuant to the April 30, 2020 Prehearing Conference Order of Deputy Chief Administrative Law Judge Mark A. Hoyer.

I. History of the Proceeding

On April 20, 2020, Duquesne Light Company (“Duquesne” or “the Company”) filed a Petition for Approval of their Default Service Programs of the period commencing June 1, 2021 through May 31, 2025 (Petition).

On April 30, 2020, CAUSE-PA filed a Petition to Intervene.

On April 28, 2020, the Commission issued a Pre-Conference Hearing Notice, scheduling a pre-hearing conference for Friday, June 12, 2020 before Deputy Chief Judge Hoyer.

On April 30, 2020 Deputy Chief Judge Hoyer issued a Prehearing Conference Order requiring parties to service a Prehearing Conference Memorandum on or before Wednesday, June 10, 2020.

II. Issues to be Addressed

While CAUSE-PA is still reviewing Duquesne's Petition, it has identified the following issues presented by the filing which affect its members:

- a. Duquesne's proposed EV-TOU Pilot (Duquesne Petition at 47-53);
- b. Duquesne's proposed Solar PPA (Duquesne Petition at 54-58);
- c. Duquesne's proposed Standard Offer Customer Referral Program ("SOP")
(Duquesne's Petition at 18-19);
- d. Duquesne's Customer Assistance Program ("CAP") Customer Shopping proposal
(Duquesne Petition at 19-21).

CAUSE-PA asserts that each of these matters must be thoroughly reviewed through discovery and a hearing to ensure that the Company's low-income customers are not harmed and the programs are in the public interest. CAUSE-PA anticipates that additional issues may arise as a more comprehensive review of the Company's filing is undertaken, discovery is conducted, and other parties present evidence and testimony.

CAUSE-PA reserves the right to present evidence on any issues contained in Duquesne's filing that were not otherwise specifically identified above, as well as those issues raised by other parties. Any and all evidence presented by CAUSE-PA will be directed so as to ensure that low-income customers are adequately protected in the continued provision of default service.

I. Witnesses

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional or substitute witness as may be warranted upon proper notice to the Presiding Officer and the parties:

Harry S. Geller, Esquire
118 Locust Street

Harrisburg, PA 17101
717-576-2282
hgellerpulp@palegalaid.net

Mr. Geller will address the issues identified above, as well as the other issues that may arise in the course of this proceeding.

II. Discovery

In light of the compressed time-frame for litigation, CAUSE-PA supports a shortened-10 day timeframe for responses to discovery in this proceeding and other standard discovery modifications that we understand will be proposed by Duquesne Light and the Office of Consumer Advocate in their respective Prehearing Conference Memoranda.

III. Settlement

CAUSE-PA is ready and willing to work with the other parties to reach a full or partial settlement of the litigated issues, and encourages parties to engage in settlement discussions early in the proceeding.

IV. Service on CAUSE-PA

Counsel for CAUSE-PA has an e-filing account and accepts electronic service from the Commission. Service on CAUSE-PA by the parties to this proceeding may be made on its attorneys at the Pennsylvania Utility Law Project as follows:

Elizabeth R. Marx, Esq.
Ria Pereira, Esq.
John W. Sweet, Esq.
PENNSYLVANIA UTILITY LAW PROJECT
118 Locust Street
Harrisburg, PA 17101
Tel.: 717-236-9486
Fax: 717-233-4088
pulp@palegalaid.net

CAUSE-PA will accept e-service of all documents until the Commission's March 20 Emergency Order is lifted. Thereafter, we request that parties serve one hard copy in addition to e-service.

V. Litigation Schedule

CAUSE-PA is actively working with the parties in an attempt to reach a mutually agreeable litigation schedule in this proceeding. CAUSE-PA respectfully requests approval for our witness to appear telephonically for hearings in this proceeding.

VI. Public Input Hearing

CAUSE-PA supports public input hearings in this proceeding. The issues this proceeding are of grave import to the affordability and accessibility of electric service in Duquesne's service territory, and should be open to public comment to help inform the Commission's decision in this proceeding.

VII. Representation at Prehearing Conference

CAUSE-PA will be represented at the telephonic Prehearing Conference by Elizabeth R. Marx.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum, and requests that it be entered into the record of this proceeding.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



Elizabeth R. Marx, Esq., PA ID: 309014
John W. Sweet, Esq. PA ID: 320182
Ria M. Pereira, Esq., PA ID: 316771
118 Locust Street
Harrisburg, PA 17101
Tel.: 717-236-9486 / Fax: 717-233-4088
pulp@palegalaid.net

June 8, 2020


CERTIFICATE OF SERVICE

I hereby certify I have on this day served copies of the **Prehearing Memorandum of CAUSE-PA** in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) and consistent with the Commission's March 16 Emergency Order at Docket M-2020-3019262.

VIA EMAIL

Honorable Mark A. Hoyer Deputy Chief Administrative Law Judge Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2 nd Floor Harrisburg, PA 17120 mhoyer@pa.gov	Tishekia E. Williams, Esq. Michael Zimmerman, Esq. Emily Farah, Esq. Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219 twilliams@duqlight.com mzimmerman@duqlight.com efarah@duqlight.com
Michael W. Gang, Esq. Anthony D. Kanagy, Esq. Post & Schell, PC 17 North Second Street, 12 th Floor Harrisburg, PA 17101-1601 mgang@postschell.com akanagy@postschell.com	Aron Beatty, Esq. David Evrard, Esq. Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923 abeatty@paoca.org devrard@paoca.org
Sharon Webb, Esq. Office of Small Business Advocate 555 Walnut Street, 1 st Floor Harrisburg, Pennsylvania 17101 swebb@pa.gov	Richard Kanaskie, Esquire Scott Granger, Esq. Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission PO Box 3265 Harrisburg PA 17105-3265 rkanaskie@pa.gov sgranger@pa.gov
John F. Lushis, Jr., Esq. Norris McLaughlin, PA 515 West Hamilton Street, Suite 502 Allentown, PA 18101 jlushis@norris-law.com	Todd S. Stewart, Esq. Hawke McKeon and Sniscak, LLP 100 North 10 th Street Harrisburg, PA 17101 tsstewart@hmslegal.com
Gregory Peterson, Esq. Phillips Lytle, LLP 201 West Third Street, Suite 205 Jamestown, NY 14701 gpeterson@phillipslytle.com	Charles E. Thomas, Jr., Esq. Thomas, Niesen & Thomas, LLC 212 Locust Street, Suite 302 Harrisburg, PA 17101 cthomasjr@tntlawfirm.com

<p>Mark Szybist, Esq. Natural Resources Defense Council 1152 15th Street, NW Suite 300 Washington, DC 20005 mszybist@nrdc.org</p>	<p>Henry McKay Solar United Neighbors of Pennsylvania 327 Whipple Street Pittsburgh, PA 15218 henry@solarunitedneighbors.org</p>
<p>James M. Van Nostrand, Esq. Keyes & Fox LLP 275 Orchard Dr. Pittsburgh, PA 15228 jvannostrand@keyesfox.com</p>	<p>James Laskey, Esq. Norris McLaughlin, PA 400 Crossing Blvd, 8th Floor Bridgewater, NJ 08807 jaskey@norris-law.com</p>
<p>Thomas F. Puchner, Esq. Omni Plaza 30 South Pearl Street Albany, NY 12207-1537 tpuchner@phillipslytle.com</p>	



Elizabeth R. Marx, Esq.
Pennsylvania Utility Law Project
Counsel for CAUSE-PA
118 Locust Street, Harrisburg, PA 17101
717-710-3825 / emarxpulp@palegalaid.net

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