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June 10, 2020

Via Electronic Filing

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

**Re: Petition of Duquesne Light Company For Approval of Default Service Plan For The
Period June 1, 2021 through May 31, 2025
Docket No. P-2020-3019522**

Dear Secretary Chiavetta,

Enclosed for filing, please find a copy of the Prehearing Conference Memorandum of Duquesne Light Company in the above-captioned proceeding. Copies will be provided as indicated on the Certificate of Service. Please feel free to contact me with any questions, comments, or concerns.

Best Regards,

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

Michael Zimmerman

Enclosures

cc: Hon. Mark A. Hoyer
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):

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*On behalf of
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On behalf of Duquesne Light Company

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Date: June 10, 2020



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company	:	
For Approval of Default Service Plan	:	Docket No. P-2020-3019522
For The Period of June 1, 2021	:	
Through May 31, 2025	:	

**PREHEARING CONFERENCE MEMORANDUM OF
DUQUESNE LIGHT COMPANY**

TO ADMINISTRATIVE LAW JUDGE MARK A. HOYER:

I. INTRODUCTION AND BACKGROUND

Duquesne Light Company (“Duquesne Light” or “Company”) hereby submits this Prehearing Conference Memorandum in compliance with the Prehearing Conference Order issued by Administrative Law Judge Mark A. Hoyer (“the ALJ”) on April 30, 2020, for the above-captioned proceeding.

On April 20, 2020, Duquesne Light filed the above-captioned petition with the Pennsylvania Public Utility Commission (“Commission”) requesting approval for a Default Service Plan for the period of June 1, 2021 through May 31, 2025 (“DSP IX” “Default Service Plan” or “Plan”).

In the Default Service Plan, Duquesne Light proposes to continue separate default supply procurements for: (1) Residential and Lighting customers, (2) Small Commercial and Industrial (“C&I”) customers, (3) Medium C&I customers with demands under 200 kW (“Medium C&I <200kW”), and (4) Medium C&I customers with demands equal to or greater than 200 kW and Large C&I customers (collectively, “HPS-Eligible”). Duquesne Light proposes to procure supplies for Residential and Lighting and Small C&I customers through the combination of twelve (12) and twenty-four (24) month fixed price, full requirements, laddered contracts. Duquesne

Light will continue to supply Medium C&I <200kW default service customers through fixed-price full requirements supply contracts with three month terms from third-party suppliers with no laddering. Duquesne Light proposes to continue to procure supply for HPS-Eligible default service customers through the day-ahead PJM energy market prices. Duquesne Light proposes to continue the current structure and administration for HPS customers, to conduct an RFP to supply HPS customers, and to preserve the demand threshold for HPS at ≥ 200 kW.

In the Default Service Plan, Duquesne Light also proposes to (1) create an Electric Vehicle Time-of-Use Pilot Program (“EV-TOU”) for Residential, Small C&I and Medium C&I <200kW customers who own or lease an EV or who operate EV charging infrastructure at the service location; (2) allow customers participating in the Company’s Customer Assistance Program (“CAP”) to purchase supply from EGSs, subject to certain protections (“CAP Shopping”), provided that there are sufficient EGSs that are willing to serve CAP customers; (3) use a third-party vendor to administer the Company’s Standard Offer Customer Referral Program (“SOP”); and (4) enter into a long-term Solar Power Purchase Agreement to support a utility-scale solar project in Pennsylvania, preferably in Duquesne Light’s service area.

On April 30, 2020, the ALJ issued a Prehearing Conference Order scheduling a Telephonic Initial Prehearing Conference on Friday, June 12, 2020 at 10:00 a.m. Duquesne Light intends to call into the initial prehearing conference.

On April 30, 2020, Calpine Retail Holdings, LLC (“Calpine”) filed a Petition to Intervene.

On April 30, 2020, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), filed a Petition to Intervene through its counsel at the Pennsylvania Utility Law Project.

On May 1, 2020, Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc., Vistra Energy Corp., Engie Resources LLC, WGL Energy, and Direct Energy Services, LLC (collectively, “EGS Parties”), filed a Petition to Intervene.

On May 19, 2020, EGS Parties filed a Prehearing Memorandum.

On May 20, 2020, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention and Answer.

On May 22, 2020, the Office of Consumer Advocate (“OCA”) filed a Notice of Intervention and Answer.

On June 2, Calpine filed a Motion for Admission *Pro Hac Vice* of James H. Laskey.

On June 3, 2020, StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania (collectively, “StateWise”) filed a Petition to Intervene and Motions for Admission *Pro Hac Vice* of Thomas F. Pucher and Kevin C. Blake.

On June 5, 2020, the following entities filed Petitions to Intervene: MAREC Action (“MAREC”); ChargePoint, Inc.; the Natural Resources Defense Council (“NRDC”); and Solar United Neighbors of Pennsylvania (“SUN-PA”). NRDC also filed an Answer on June 5, 2020.

On June 8, 2020, Calpine and CAUSE-PA each filed a Prehearing Memorandum.

On June 9, 2020, the Company filed an Answer to the Petition to Intervene of SUN-PA.

Also on June 9, 2020, the Commission’s Bureau of Investigation & Enforcement (“I&E”) filed a Notice of Appearance and Prehearing Memorandum.

II. SERVICE OF DOCUMENTS

Counsel for Duquesne Light is authorized to receive service of all documents in this matter. Counsel for Duquesne Light, together with their contact information, is listed below.

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Counsel for Duquesne Light request to be served via electronic communication where practicable.

III. WITNESSES AND ISSUES

Duquesne Light interprets the issues in this proceeding to be those addressed in the direct testimony and exhibits filed with its Default Service Plan. The list below delineates the witnesses to testify in this proceeding and their respective subject matters:

Witness	Subject Matter
C. James Davis Director of Rates, Energy Procurement, and Federal/RTO Affairs Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219	Mr. Davis introduces other witnesses, provides an overview of the Default Service Plan, addresses Duquesne Light's Default Service obligations, and proposes the structure of a Solar Power Purchase Agreement program.
John Peoples Manager, Energy Supply Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219	Mr. Peoples addresses power procurement methods, the consistency of these methods with Act 129, and changes to the Supplier Master Agreement ("SMA") template.

Scott G. Fisher
Partner
The NorthBridge Group
30 Monument Square, Suite 105
Concord, Massachusetts 01742

Mr. Fisher addresses the models used by Duquesne Light, how the Plan supports competitive markets and provides the least cost to customers over time, and the consistency of the Plan with Act 129.

David B. Ogden
Manager, Rates and Tariff Services
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219

Mr. Ogden addresses changes to the default service rates; the default service supply rates for the proposed EV-TOU program, reconciliation and recovery processes; and the associated tariff modifications.

Katherine M. Scholl
Director, Customer Experience
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219

Ms. Scholl addresses the implementation of proposed retail market initiatives, including CAP Shopping, the EV-TOU Pilot Program, and changes to the SOP.

The subject matters listed above, as further supported by the testimony and exhibits, represent Duquesne Light's statement of the issues on this proceeding. Further definition of the issues will be developed by the parties during the course of this proceeding. Duquesne Light reserves the right to call additional witnesses to present testimony on additional issues and subject matters that may arise during the course of this proceeding.

IV. PROCEDURAL SCHEDULE

Duquesne Light proposes the following schedule:

Non-Company Parties' Direct Testimony	July 17, 2020
Rebuttal Testimony	August 14, 2020
Surrebuttal Testimony	August 28, 2020
Rejoinder Outlines	September 4, 2020
Evidentiary Hearing	September 9, 2020
Main Briefs	September 30, 2020

Duquesne Light has been in communication with the parties in an effort to develop a mutually agreeable schedule. As of the filing of this Prehearing Memorandum, no parties have indicated objection to the schedule proposed above.

V. DISCOVERY

Duquesne Light proposes the following modifications to the Commission's procedural rules regarding discovery for the remainder of the proceeding:

1. Answers to written interrogatories shall be served in-hand within ten (10) calendar days of service.
2. Objections to interrogatories shall be communicated orally within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing within five (5) days of service of the interrogatories.
3. Motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) calendar days of service of the written objections.
4. Answers to motions to dismiss objections and/or answering of interrogatories shall be filed within three (3) calendar days of service of such motions.
5. Rulings over such motions shall be issued, if possible, within seven (7) calendar days.
6. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
7. Answers to on-the record data requests shall be served in-hand within seven (7) calendar days of the requests.

8. Duquesne Light proposes that any discovery served after 12 Noon on a Friday or the day before a holiday will be deemed to have been served on the following business day for purposes of tracking due dates.
9. Duquesne Light proposes that all discovery due dates be “in-hand” and that electronic service on the due date will satisfy the “in-hand” requirement. Hard copy service of discovery responses will not be required.

Duquesne Light has communicated these proposed discovery rule modifications to the parties. As of the filing of this Prehearing Memorandum, no party has indicated objection to these proposed modifications.

Duquesne Light has been engaged in discovery in this proceeding, and is not aware of any discovery issues to date.

VI. PROTECTION OF CONFIDENTIAL INFORMATION

Duquesne Light intends to timely submit an appropriate Motion for Protective Order. Duquesne Light intends to collaborate with the parties in an effort to develop the proposed Protective Order.

VII. SETTLEMENT

Though there have not yet been any formal settlement discussions, Duquesne Light is willing to enter settlement discussions with all parties on all issues in this proceeding.

Respectfully submitted,



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Date: June 10, 2020