



**Michael Zimmerman**  
Senior Counsel, Regulatory

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

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

September 30, 2020

**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: 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 in the above-captioned proceeding, please find the *Joint Stipulation of Duquesne Light Company, Natural Resources Defense Council, Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, the Office of Consumer Advocate and the Office of Small Business Advocate*, addressing issues related to the Company's Electric Vehicle Time of Use rate proposal.

Should you have any questions, please feel free 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  
Hon. Deputy Chief ALJ Mark A. Hoyer

## 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  
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)

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)

Norris McLaughlin, P.A.  
John F. Lushis, Jr.  
James Laskey  
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*

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*

Office of Small Business Advocate  
Sharon E. Webb  
Steven C. 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)

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

Hawke McKeon & Sniscak, LLP  
Todd S. Stewart  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*On behalf of EGS Parties*

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*

Barbara Alexander Consulting, LLC  
Barbara R. Alexander  
83 Wedgewood Drive  
Winthrop, ME 04364  
[barbalexand@gmail.com](mailto:barbalexand@gmail.com)  
[barbalex@ctel.net](mailto:barbalex@ctel.net)  
*On behalf of OCA*

Phillips Lytle, LLP  
Gregory L. Peterson  
201 West Third Street  
Suite 205  
Jamestown, NY 14701-4907  
[gpeterson@phillipslytle.com](mailto:gpeterson@phillipslytle.com)  
*On behalf of StateWise*

Phillips Lytle, LLP  
Thomas F. Puchner  
30 South Pearl Street  
Albany, NY 12207  
[tpuchner@phillipslytle.com](mailto:tpuchner@phillipslytle.com)  
*On behalf of StateWise*

Phillips Lytle, LLP  
Kevin C. Blake  
125 Main Street  
Buffalo, NY 14203  
[Kblake@phillipslytle.com](mailto:Kblake@phillipslytle.com)  
*On behalf of StateWise*

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

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

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)

Fair Shake Environmental Legal Services

Emily Collins

Andrew J. Karas

647 E. Market Street

Akron, OH 44304

[ecollins@fairshake-els.org](mailto:ecollins@fairshake-els.org)

[akaras@fairshake-els.org](mailto:akaras@fairshake-els.org)

*On behalf of NRDC*

Applied Economics Clinic

Elizabeth Stanton

Joshua Castigliero

1012 Massachusetts Avenue

Arlington, MA 02476

[liz.stanton@aeclinic.org](mailto:liz.stanton@aeclinic.org)

[joshua.castigliero@aeclinic.org](mailto:joshua.castigliero@aeclinic.org)

*On behalf of MAREC Action*

Hon. Mark A. Hoyer

Deputy Chief Administrative Law Judge

Piatt Place Downtown

301 Fifth Avenue #220

Pittsburgh, PA 15222

[mhoyer@pa.gov](mailto:mhoyer@pa.gov)

Date: September 30, 2020



---

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)

**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 :

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**JOINT STIPULATION OF**

**DUQUESNE LIGHT COMPANY,  
NATURAL RESOURCES DEFENSE COUNCIL,  
THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY  
EFFICIENCY IN PENNSYLVANIA,  
THE OFFICE OF CONSUMER ADVOCATE, AND  
THE OFFICE OF SMALL BUSINESS ADVOCATE**

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Duquesne Light Company (“Duquesne Light” or the “Company”), the Natural Resources Defense Council (“NRDC”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (together, Stipulating Parties) by their respective counsel, hereby enter into a Joint Stipulation with regard to the captioned proceeding as follows:

The Stipulating Parties agree to the implementation of the Company’s Electric Vehicle Time of Use (EV-TOU) Pilot Program as proposed by the Company at Paragraphs 47-53 of the *Petition of Duquesne Light Company for Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025*, with the following modifications:

- a. Prior to filing its next Default Service Plan (DSP X), the Company will provide a report on the EV-TOU Pilot Program. The report will include:
  - i. Customer enrollment levels by customer class (i.e., residential, small commercial, small industrial, medium commercial, and medium industrial) and enrollment levels of confirmed low-income customers and multi-unit residential buildings
  - ii. Net customer bill impacts as compared to non-TOU rate, by customer classes identified in a.i. above

- iii. Net energy usage shifted from on-peak hours (for those customers for whom the Company has sufficient historical usage data)
  - iv. Number of customers on the EV-TOU rate who elected to install a separate Duquesne Light meter for their EV charging facilities
- b. Customer Education:
- i. Prior to implementing the EV-TOU Pilot Program, the Company will provide parties with draft educational materials and solicit their feedback for consideration.
  - ii. The Company's educational materials will include, as applicable:
    - I. Information on the EV-TOU rates and its benefits
    - II. Discussion of the 200kW threshold for C&I customers, including recognition that customers whose demands exceed 200kW are not eligible for the EV-TOU rate but are instead eligible for hourly price service under Rider No. 9.
    - III. Discussion of customer protections and assistance programs for Residential customers
    - IV. Referral to DLC's online bill estimate tool for Residential customers
    - V. Express recognition that the EV-TOU rate may not be the least-cost option for all customers
    - VI. The option, and potential benefits, for customers to elect to separately meter their EV load on the EV-TOU rate
- c. The Company's costs of outreach and education associated with the EV-TOU Pilot Program shall be allocated and recovered per the Company's initial proposal, as described in Duquesne Light St. No. 4 and Exhibit DBO-5.
- d. The Company will annually reset the EV-TOU supply rate factors as part of its tariff supplements updating Default Service Supply rates.
- e. The Company will convene one collaborative meeting with the parties around the midpoint of DSP IX to discuss the EV-TOU Pilot Program implementation and results available to date. The collaborative meeting will include discussion of EV-TOU rates for mass transit and fleet EVs.

**WHEREFORE**, the Stipulating Parties, by their respective counsel, respectfully submit that this Joint Stipulation is in the public interest, and request that it be approved without modification.

Respectfully Submitted,

*Counsel for Duquesne Light Company*



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Tishekia E. Williams  
Michael Zimmerman  
Emily Farah  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[efarah@duqlight.com](mailto:efarah@duqlight.com)

*Counsel for Coalition for Affordable Utility  
Services and Energy Efficiency in  
Pennsylvania*

---

Elizabeth Marx  
John Sweet  
Ria Pereira  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

*Counsel for Natural Resources Defense  
Council*

---

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

Fair Shake Environmental Legal Services  
Emily Collins  
Andrew J. Karas  
647 E. Market Street  
Akron, OH 44304  
[ecollins@fairshake-els.org](mailto:ecollins@fairshake-els.org)  
[akaras@fairshake-els.org](mailto:akaras@fairshake-els.org)

*Counsel for Office of Consumer Advocate*

---

David Evrard  
Assistant Consumer Advocate  
Aron Beatty  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

*Counsel for The Office of Small Business Advocate*

---

Sharon Webb  
Steven C. Gray  
Office of Small Business Advocate  
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)



**WHEREFORE**, the Stipulating Parties, by their respective counsel, respectfully submit that this Joint Stipulation is in the public interest, and request that it be approved without modification.

Respectfully Submitted,

*Counsel for Duquesne Light Company*

---

Tishekia E. Williams  
Michael Zimmerman  
Emily Farah  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[efarah@duqlight.com](mailto:efarah@duqlight.com)

*Counsel for Coalition for Affordable Utility  
Services and Energy Efficiency in  
Pennsylvania*

---

Elizabeth Marx  
John Sweet  
Ria Pereira  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

*Counsel for Natural Resources Defense  
Council*

/s/ Mark C. Szybist

---

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

Fair Shake Environmental Legal Services  
Emily Collins  
Andrew J. Karas  
647 E. Market Street  
Akron, OH 44304  
[ecollins@fairshake-els.org](mailto:ecollins@fairshake-els.org)  
[akarass@fairshake-els.org](mailto:akarass@fairshake-els.org)

*Counsel for Office of Consumer Advocate*

---

David Evrard  
Assistant Consumer Advocate  
Aron Beatty  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

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*Counsel for Natural Resources Defense Council*

---

Tishekia E. Williams  
Michael Zimmerman  
Emily Farah  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[efarah@duqlight.com](mailto:efarah@duqlight.com)

---

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

Fair Shake Environmental Legal Services  
Emily Collins  
Andrew J. Karas  
647 E. Market Street  
Akron, OH 44304  
[ecollins@fairshake-els.org](mailto:ecollins@fairshake-els.org)  
[akaras@fairshake-els.org](mailto:akaras@fairshake-els.org)


*Counsel for Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania*

*Counsel for Office of Consumer Advocate*

---

Elizabeth Marx  
John Sweet  
Ria Pereira  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

---

  
David Evrard  
Assistant Consumer Advocate  
Aron Beatty  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

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---

Tishekia E. Williams  
Michael Zimmerman  
Emily Farah  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[efarah@duqlight.com](mailto:efarah@duqlight.com)

*Counsel for Coalition for Affordable Utility  
Services and Energy Efficiency in  
Pennsylvania*



---

Elizabeth Marx  
John Sweet  
Ria Pereira  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

*Counsel for Natural Resources Defense  
Council*

---

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

Fair Shake Environmental Legal Services  
Emily Collins  
Andrew J. Karas  
647 E. Market Street  
Akron, OH 44304  
[ecollins@fairshake-els.org](mailto:ecollins@fairshake-els.org)  
[akaras@fairshake-els.org](mailto:akaras@fairshake-els.org)

*Counsel for Office of Consumer Advocate*

---

David Evrard  
Assistant Consumer Advocate  
Aron Beatty  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
[devrard@paoca.org](mailto:devrard@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

*Counsel for The Office of Small Business Advocate*

/s/ Sharon E. Webb

---

Sharon Webb  
Steven C. Gray  
Office of Small Business Advocate  
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)