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November 21, 2018

Ms. Sasha Oberheim Pennsylvania Public Utility Commission Commonwealth Keystone Building, 2nd Floor 400 North Street Harrisburg, Pennsylvania 17120

Re: Prepare Now Campaign - 2018

Dear Commission:

This letter is in response to the correspondence sent to Richard Riazzi, regarding the Commission's "Prepare Now" campaign and our consideration of certain actions to help payment troubled customers prepare for high heating bills associated with the winter heating season.

Duquesne Light Company (the "Company" or "Duquesne Light") is well aware of the harsh winter weather that consumers in our service territory normally experience. With this in mind, Duquesne Light will continue to focus on ensuring that all income qualified households are provided information and easy access to all available assistance programs such as the Customer Assistance Program (CAP), the Low Income Home Energy Assistance Program (LIHEAP), Dollar Energy Fund, Low Income Usage Reduction Program (LIURP) and budget billing.

In the letter from the Commission, the Company is requested to consider certain actions with respect to the upcoming winter heating season. The following is the Company's response to each of those action items with respect to the 2018-2019 winter heating season:

Item 1 Efforts to Link Consumers to Programs. The Company promotes its assistance programs such as CAP, the Customer Assistance Referral Evaluation Program (CARES), Smart Comfort (LIURP), LIHEAP, and the Hardship Fund administered by Dollar Energy, by distributing Universal Service brochures, maintaining information concerning Universal Services on Duquesne Light's website, posting energy assistance program links to Twitter and Facebook throughout November, providing informational factoids on the Interactive Voice Response (IVR) phone system, devoting a special Fall edition of the Service Line customer newsletter on these topics, initiating outbound call campaigns to provide referrals to CAP and mailing informational bill inserts to residential customers and LIHEAP applications to those who qualify. Over 10,100 letters were sent to low income customers who received a LIHEAP grant during the last program year to inform them of current guidelines and requirements. LIHEAP applications are mailed to those who qualify and have electric heat service and those who request an application. Currently, seven CAP offices offer accessibility to Universal Service programs by appointment or for walk-ins. Customers are also afforded the opportunity to enroll in CAP via phone. Further, Duquesne Light Customer Service Representatives provide information and individual referrals to all customers who potentially qualify for Universal Services. Duquesne Light continues to partner

with the United Way 2-1-1 Center in Western Pennsylvania. Their resource navigators educate customers on Duquesne Light's Universal Services Programs. The United Way 2-1-1 website additionally offers up-to-date educational information on Duquesne Light's programs. As in years past, Duquesne Light will publicize the United Way's "Text 2-1-1 for LIHEAP Assistance" promotion. Customers can text "211LIHEAP" to 898-211. A link to access the 2018-2019 LIHEAP application is returned via text message as well as an invitation to text 2-1-1 for other assistance needs. Lastly, Duquesne Light educates community based organizations on energy assistance programs through on-going meetings as well as annual conferences and events, such as "Be Utility Wise" to make sure they are able to provide the most up-to-date information to consumers. Duquesne Light continues to use a vanity URL that leads customers directly to the programs offered by Universal Services, duquesne Light.com/CAP.

<u>Item 2 Referrals to CAP</u>. The Company refers all low income customers seeking a payment agreement to CAP. The assistance information is readily available via scripts that have been provided to our Customer Care Representatives. Currently, Duquesne Light's CAP has approximately 35,920 customers participating. By partnering with the Watt Choices Energy Conservation Program, Duquesne Light promotes education and referrals to CAP at many community events. In addition, Duquesne Light continues to automatically solicit customers receiving a LIHEAP grant, inviting them to enroll in Duquesne Light's CAP via the mail and phone. As noted previously, Duquesne Light has supported the United Way's 2-1-1 Center in Western Pennsylvania to promote and refer eligible customers to this program.

<u>Item 3 Restoration for First Time CAP Enrollment</u>. Duquesne Light waives the security deposit for customers who are confirmed eligible for CAP. LIHEAP and Dollar Energy Fund grants are also accepted in lieu of customer payments to restore service. Duquesne Light would consider restoring electric service to low-income customers upon their enrollment in Duquesne's CAP for the first time, on a case-by-case basis.

<u>Item 4 Flexibility on Payment Arrangement</u>. Although Duquesne Light follows Chapter 14 guidelines for payment arrangements, the Company allows for flexibility when determining the amount of any restoration payment needed for a CAP or low-income customer. Duquesne Light also takes into account, on a case-by-case basis, any assistance the customer may have received, changes in circumstances, extended illness of ratepayer or member of the household, and/or increased household size and associated expenses.

Items 5 and 6 Donations to Utility Hardship Funds. In celebration of its 35-year partnership with the Dollar Energy Fund, Duquesne Light Company is bringing its Larger Than Light mission to life this giving season by encouraging customers to donate to neighbors in need, through the Dollar Energy Fund organization. To encourage donations from Friday, November 16 through Tuesday, November 27 (#GivingTuesday), DLC will be leveraging its social media platforms to highlight testimonials of DLC customers and local Pittsburghers who have received help from the organization, along with statistics that display the impact it has had on our region since its inception.

The Company encourages all customers to contribute to the Hardship Fund via on-line and automatic payments. The United Way Campaign featured the Dollar Energy Fund. Duquesne Light held company fundraisers and contributed or raised monies for the Hardship Fund. Duquesne Light continues its commitment to support Dollar Energy Fund's "Warmathon," as a Primary Utility Partner, which generates additional donations for our Hardship Fund. In addition this year Duquesne Light will participate in the 94.5 3WS Winter Warm Up Request-A-Thon in November and the Cool Down For Warmth and the Bowls for Warmth Soup events in January. In an effort to raise up to \$15,000 in donations for Dollar Energy Fund as part of its 2018 Power It Forward initiative, DLC will donate \$5 for every social media engagement on the Company's Facebook page or Twitter channel on November 17. Proceeds from the sale of the Company's "Wattley Doll" also benefit the Hardship Fund. The doll is sold via https://takewattleyhome.com/.

<u>Item 7 Limits on Terminations for Low-Income During Cold Weather.</u> During the winter heating season, the Company limits terminations of confirmed low-income customers and gives these customers the opportunity to maintain electric service. In addition, a Cold Weather Injury Prevention (CWIP) Campaign reached out to

2,366 customers who had electric service disconnected since during 2018 and have not had their electric service restored. This was done through the mail and Auto-dialers.

Item 8 Deposits, Fees and Charges and Restoration of Service. Duquesne Light ensures that requests for security deposits are not barriers to establishing or restoring electric service to CAP or low-income customers. Customers not eligible for CAP, but who are confirmed low income, are exempt from deposits. All other residential customers, not in CAP or confirmed low, are given security deposits payable over 90 days. Additionally, late payment charges are waived for all CAP participants.

Item 9 Combination of Payments to Restore Service. LIHEAP, CRISIS, and Dollar Energy are accepted as substantially sufficient funds to reconnect CAP or low-income customers with the requirements that the customer also makes some additional restoration payments that are determined on a case-by-case basis.

Item 10 Providing Information on Home Heating Safety and Repairs to Heating Systems. Duquesne Light promotes and communicates to applicable customers the use of both LIHEAP and the Pennsylvania Weatherization Program to assist customers with emergency repairs to furnaces and heating systems.

Item 11 Budget Billing and Third Party Notification Forms. The Company posts information on its website that encourages all customers to enroll in budget billing and the third-party notification process. Duquesne Light also promotes budget billing in the Service Line customer newsletter.

Item 12 Providing Information on Energy Conservation. Communications occur with customers about energy costs, wise use of energy, weatherization programs and conservation measures, even though only approximately 5% of Duquesne Light's residential customers utilize electricity as their primary heating source. Duquesne Light's Energy Efficiency/Watt Choices program provides customers with a wide range of energy efficiency and conservation measures, cost saving offers and educational brochures. Additionally, the Watt Choices program supports the Universal Services Programs by including educational material in energy efficiency kits provided to customers. Energy Conservation advice also can be readily found on our website.

As in prior years, Duquesne Light is supportive of the Commission's "Prepare Now" campaign and will continue our efforts to ensure that vulnerable residential customers are aware of the programs and resources

that are available to them during the winter heating season.

Vice President, Customer Service

Cc: Rich Riazzi, President & CEO Jessica Rock, Vice President, Communications and Corporate Citizenship Katie Scholl, Director, Customer Experience Michael Selep, Manager, Universal Services