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Gary A. Jack
Assistant General Counsel

December 15, 2010

VIA OVERNIGHT MAIL

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

DEC 15 2010

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Re: Petition of Duquesne Light Company for Approval of its

Energy Efficiency and Conservation and Demand Response Plan

Docket No. M-2009-2093217

Dear Secretary Chiavetta:

Please find enclosed for filing the original and three copies of Duquesne Light Company's ("Duquesne") clarification to its proposed changes to its Energy Efficiency and Conservation and Demand Response Plan ("Plan") filed on September 15, 2010. In that filing, Duquesne requested Commission approval of two modifications to its Plan, which involve the proposed addition of new energy efficiency measures to offer to customers. These measures were described in the Attachment A as well as in a black-lined version of the Company's Plan (Attachment B) of the September 15 filing. One proposed measure was to add a Refrigerator/Freezer Replacement program for low-income customers which was described in Exhibit A, but due to a clerical error was not described in the black-lined version of the Plan in Attachment B. To correct this error, Duquesne hereby submits a black-lined version of the Low-Income program portion of the Plan for Attachment B, with the description of the Refrigerator/Freezer Replacement program for its low income customers.

In order to allow Duquesne's customers to realize the benefits of the proposed measures requested in the September 15, 2010 filing, Duquesne respectfully requests approval of the proposed modifications to its Plan contained within the September 15 filing as soon as possible, and including the revised black-line of the Low-Income Program to include Refrigerator/Freezer Replacements hereby provided.

Enclosures

cc: All Parties listed

on the Certificate of Service

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Program Description: LIEEP is an income-qualified program providing services designed to assist low-income households to conserve energy and reduce electricity costs. This program adopts the local government energy efficiency partnership strategy described in the EEC & DR Study benchmarking section for this program plan. Partnership agencies serve as the governing bodies for housing authorities. The project agreements between Duquesne and partnership agencies contain the terms to leverage local agency staff to reach, pre-screen and enroll program participants. The utility and the agency split specified program costs. The Partnership Memorandum of Understanding ("MOU") puts in place dedicated contacts and a working group structure to identify and evaluate energy efficiency project opportunities within all governmental departments and sub-agencies. A sample Public Agency MOU is provided in Study Attachment 14 of the EEC & DR Study.

Implementation Strategy: Key elements of the implementation process follow. (1) Duquesne executes a Partnership MOU with the Public Agency (2) Duquesne Light facilitates working group meetings with the public agency and jurisdictional housing authority agencies (3) The working group collaborates on the development proposed project concept papers (4) Public agency working group members obtain feedback on the proposed projects and the working group makes necessary adjustments to the concept paper (5) Duquesne prepares a project agreement and resolution for approval by the public agency governing body (6) Duquesne and the public agency implement the project plan consistent with the terms of the project agreement.

Patterned after successful programs operating in other parts of the country, a key element of the LIEEP is co-funding by Duquesne Light and the Partnership agency of energy efficiency audits and measure implementation. LIEEP will utilize local contractors and/or other survey and installation entities based on availability, cost, and quality of service. Whenever possible, LIEEP will utilize non-profit, community based organizations to perform the energy efficiency surveys and measure installation. A sample resolution, project agreement and concept paper are provided in the Study Attachment 15.

A second program is a Refrigerator or Freezer Replacement, where Duquesne Light will provide a new Energy Star refrigerator or freezer at no cost to confirmed low-income customers and remove and recycle the low-income customer's old inefficient refrigerator or freezer at no cost to the customer. This program is modeled after Duquesne Light's successful Smart Comfort program for low-income customers, and will target those low-income customers that are not eligible for Smart Comfort. Specifically, this proposed low-income energy efficiency program will target those customers who have electric usage lower than the Smart Comfort consumption floor of 500 kwh per month and will also target those customers that have not met the Smart Comfort residency requirement of living at their current address for six months.

<u>Program Risk and Risk Management Strategy</u>: All portfolios and programs are operated through Duquesne Light's PMRS. The system provides comprehensive oversight of program budgets and impacts and provides early warning regarding program under- or over-subscription. Provisions in CSP contract language provides for fund shifting from under-performing programs.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Duquesne Light Company's clarification to its proposed EE&C Plan modifications has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Dated December 15, 2010

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