



**December 30, 2015**

Via E-Filing

Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Petition of Duquesne Light Company For Approval of its Act 129 Phase III Energy Efficiency and Conservation Plans, Docket No. M-2015-2515375**

*Letter in Lieu of Comments submitted by The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)*

Dear Secretary Chiavetta:

On December 12, 2015, the Pennsylvania Public Utility Commission (Commission) published notice in the Pennsylvania Bulletin [45 Pa.B. 7078] of Duquesne Light Company's Petition for Approval of its Phase III EE&C Plans, which was filed with the Commission on November 25, 2015, and docketed at the captioned docket number. The notice published in the Pennsylvania Bulletin provided a period of twenty days for parties to submit comments to the proposed plans.

Duquesne's Plan has been referred to the Office of Administrative Law Judge and assigned to Administrative Law Judge Katrina L. Dunderdale for hearings and referral to the Commission for a decision. On December 15, 2015, ALJ Dunderdale issued an order setting the prehearing conference date and requesting prehearing memoranda by January 5, 2016 at 12pm. On December 17, 2015, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a Petition to Intervene. CAUSE-PA will be filing a Prehearing Memorandum in this proceeding concurrent with the filing of this letter.

A prehearing conference is scheduled to be held on Wednesday, January 6, 2016 at which time a litigation schedule, including a schedule for the exchange of evidence and testimony, is expected to be established. CAUSE-PA intends to file Direct Testimony and fully participate in the litigated proceeding. As such, rather than detail the issues at length here, CAUSE-PA submits this brief letter in lieu of more formal comments.

In its Final Implementation Order issued June 18, 2015, the Commission declared the following with regard to the low-income offerings of each of the Electric Distribution Companies:

The Commission . . . will retain the 5.5% low-income savings target for the EDCs with the following modification. Savings counted towards the 5.5% target **may only come from specific low-income programs or low-income verified participants in multifamily housing programs.** Savings from non-low-income programs will not be counted for compliance.

**The Commission believes that low-income savings should primarily come from measures that are directly provided to low-income households.** Thus far in Phase II, a substantial portion of the low-income savings is coming from the contribution of low-income customers who are identified during random surveys as participants in upstream lighting programs. While the low-income savings are verified by a SWE-approved evaluation method, there are shortcomings in this method. Random customers are asked a series of questions that allow them to self-identify their income levels and number of household occupants, but there is no further verification of their low-income status. It was the Commission's intent to allow savings to be counted from the upstream lighting programs because it was reasonable to believe that there would be some low-income customers who would participate. It was not, however, the Commission's intent to have that program be the primary contributor in meeting the low-income carve-out.

Energy and Conservation Program, Docket No. M-2014-242864, Implementation Order (June 18, 2015), at 69-70 (emphasis added).

Through its testimony, CAUSE-PA will address whether Duquesne's proposed Phase III Plan appropriately meets the standards set by the Commission as well as the statutory requirements contained in Act 129 itself. Specifically, CAUSE-PA will address the following:

- Whether Duquesne's proposed programs and identified measures within those programs satisfy the requirements of Act 129 and Commission Orders.
- Whether projected savings come from specific low-income programs or low-income verified participants in multifamily housing programs, and whether Duquesne's multifamily housing programs are sufficiently designed to reach and impact low income households regardless of whether they reside in multifamily buildings that are individually-metered/tenant paid or master-metered/owner-paid.

- Whether Duquesne’s Plan properly focuses on direct-install measures for low-income customers as required by the Commission’s Implementation Order.
- Whether the Duquesne Plan includes measures that provide long-lasting savings that will positively impact the high energy burden borne by low-income customers.
- Whether the delivery of measures to low-income households is appropriately coordinated with other low income bill assistance and energy efficiency and conservation programming operating within the Duquesne service territory.
- Whether the delivery of plan measures is appropriately coordinated between Conservation Service Providers (CSPs) serving low-income populations, and with CSPs serving the general population.

In addition to these specific issues, CAUSE-PA reserves the right to raise additional issues that may arise as more data and information becomes available throughout the course of this proceeding.

Because the Notice filed in the Pennsylvania Bulletin requires the filing of comments or responsive pleadings within 20 days of its publication, CAUSE-PA is filing this Letter in Lieu of Comments to inform the Commission of its intent to fully participate in the captioned proceeding through the filing of testimony and briefing. CAUSE-PA will not be filing more specific comments separately from the testimony of its witness.

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



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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :  
for Approval of its Act 129 Phase III :  
Energy Efficiency and Conservation Plan : Docket No.: M-2015-2515375

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served copies of the **Letter in Lieu of Comments of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA)** as set forth below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA EMAIL and/or FIRST CLASS MAIL**

**The Honorable Katrina L. Dunderdale**  
**Administrative Law Judge**

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**Dated: December 30, 2015**

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