



Duquesne Light
Our Energy...Your Power

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Counsel

June 8, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105

**Re: Petition of Duquesne Light Company for Approval of a Default Service Plan for the
Period June 1, 2017 to May 31, 2021
Docket No. P-2016-2543140**

Dear Secretary Chiavetta:

Duquesne Light Company hereby submits the enclosed Prehearing Conference Memorandum in the above-referenced matter in compliance with the Pre-Hearing Order issued on May 23, 2016 by Administrative Law Judge Conrad A. Johnson.

Please feel free to contact me with any questions or concerns.

Respectfully Submitted,

Adrienne D. Kurtanich
Counsel, Regulatory

Enclosure

cc: Certificate of Service
Honorable Conrad A. Johnson

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
for Approval of a Default Service Plan : Docket No. P-2016-2543140
for the Period June 1, 2016 to May 31, 2021 :

**PREHEARING CONFERENCE MEMORANDUM OF
DUQUESNE LIGHT COMPANY**

TO ADMINISTRATIVE LAW JUDGE CONRAD A. JOHNSON:

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 Conrad A. Johnson (“the ALJ”) on May 23, 2016 for the above-captioned proceeding.

On May 2, 2016, 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, 2017 to May 31, 2021.

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, and (4) Large C&I customers. 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 default service customers through fixed-price full requirements contracts with three month terms. Duquesne Light proposes to continue to procure supplies for Large C&I default service customers through the

day-ahead PJM energy market prices. The Company proposes several changes to Large C&I default service for HPS customers. Duquesne Light proposes to simplify the structure and administration for HPS customers, to conduct an RFP to supply HPS customers, and to decrease the threshold for HPS from ≥ 300 kW to ≥ 200 kW beginning on June 1, 2019. Additionally, Duquesne Light also proposes to allow CAP shopping with customer protections.

On May 23, 2016 the ALJ issued a Prehearing Conference Order scheduling a Prehearing Conference on June 10, 2016 at 10:00 a.m.

On May 26, 2016, NextEra Power Marketing, LLC filed a Petition to Intervene and a Prehearing Memorandum.

On May 31, 2016, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), through its counsel at the Pennsylvania Utility Law Project, filed a Petition to Intervene.

On June 6, 2016, Noble Americas Energy Solutions LLC filed its Petition to Intervene.

Also on June 6, 2016, the Bureau of Investigation and Enforcement filed its Notice of Appearance.

The Office of Small Business Advocate filed its Notice of Intervention, Answer, Public Statement and Notice of Appearance on June 6, 2016.

The Office of Consumer Advocate filed its Answer, Notice of Intervention and Public Statement on June 6, 2016.

A Notice of Appearance, Petition for Intervention and Prehearing Memorandum were filed on behalf of Exelon Generation Company, LLC on June 6, 2016.

Finally, on June 6, 2016, the Retail Energy Supply Association (“RESA”) filed a Notice of Appearance, Petition to Intervene, Prehearing Memorandum and a Motion for Admission *Pro Hac Vice* in this proceeding.

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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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, and addresses Duquesne Light’s Default Service obligations.
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 Duquesne Light’s Time of Use (“TOU”) program.

Neil S. Fisher
Principal
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 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 associated tariff modifications, and also the unbundling of default service costs from base distribution rates.

Marcie L. Morrison
Director, Customer Engagement
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219

Ms. Morrison addresses the implementation of proposed retail market initiatives.

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:

Other Parties Direct Testimony	July 14, 2016
Rebuttal Testimony	August 11, 2016
Surrebuttal Testimony	August 23, 2016
Oral Rejoinder	August 30, 2016
Hearings in Harrisburg	August 30, 2016 – September 1, 2016
Main Briefs	September 22, 2016
Reply Briefs	October 7, 2016

Duquesne Light will work with the parties to attempt to develop a mutually agreeable schedule.

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 on the Administrative Law Judge 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 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 or fax service on the due date will satisfy the “in-hand” requirement, where service is immediately followed by a hard copy sent by first-class mail.

Duquesne Light is not aware of any discovery issues in this proceeding. In addition, Duquesne Light is willing to participate in informal discovery with the other parties.

VI. PROTECTION OF CONFIDENTIAL INFORMATION

If necessary, Duquesne Light will timely submit an appropriate Motion for 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 8, 2016

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).

VIA FIRST CLASS MAIL

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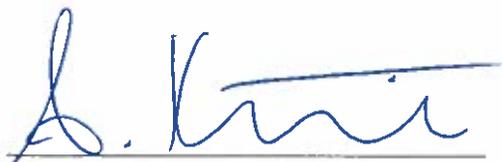
Date: June 8, 2016

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