



COMMONWEALTH OF PENNSYLVANIA

October 14, 2016

**E-FILED**

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

**Re: Petition of Duquesne Light Company for Approval of its  
Long-Term Infrastructure Improvement Plan; Petition of Duquesne Light  
Company for Approval of a Distribution System Improvement Charge  
Docket No. P-2016-2540046**

Dear Secretary Chiavetta:

I am delivering for filing today the Prehearing Memorandum, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding. I respectfully request that a copy of any documents filed in this case be shared as well with our Witness at the address below.

Mr. Brian Kalcic  
Excel Consulting  
225 S. Meramec Avenue- Suite 720-T  
St. Louis, MO 63105  
(314) 725-2511 / (314) 725-2022 – Fax  
[excel.consulting@sbcglobal.net](mailto:excel.consulting@sbcglobal.net)

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon E. Webb".

Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID No. 73995

*Enclosures*

cc: Brian Kalcic  
Parties of Record

**BEFORE THE PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

<b>Petition of Duquesne Light Company for Approval of its Long-Term Infrastructure Improvement Plan</b>	:	
	:	
	:	
	:	<b>Docket No. P-2016-2540046</b>
<b>Petition of Duquesne Light Company for Approval of a Distribution System Improvement Charge</b>	:	
	:	
	:	

**PREHEARING MEMORANDUM  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

**I. INTRODUCTION**

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to the above-captioned proceeding.

Representing the OSBA in this matter is Assistant Small Business Advocate Sharon E. Webb. Please address all correspondence in this matter as follows:

Sharon E. Webb  
Assistant Small Business Advocate  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, Pennsylvania 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
[swebb@pa.gov](mailto:swebb@pa.gov)

## II. FILING BACKGROUND

On or about April 15, 2016, the Duquesne Light Company (“Duquesne” or “Company”) initiated the above-captioned proceeding by filing with the Commission a petition for approval of a default service plan for the period of June 1, 2017, through May 31, 2021 (“Petition”). Duquesne subsequently filed for approval of a DSIC on May 26, 2016.

Notice of the Petition was published in the May 21, 2016 issue of the Pennsylvania Bulletin. The Notice in the Pennsylvania Bulletin set a deadline for protests, answers or interventions of June 6, 2016. Consistent with the requirements set forth in the Pennsylvania Bulletin the OSBA filed an Answer, Notice of Intervention, Public Statement, and a Notice of Appearance on June 6, 2016.

## III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Brian Kalcic  
Excel Consulting  
Suite 720-T  
225 S. Meramec Avenue  
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On September 15, 2016, the Pennsylvania Public Utility Commission (“Commission”) approved the Petition of Duquesne for approval to establish a distribution system improvement charge (“DSIC”) and a long-term infrastructure improvement plan (“LTIP”). In the Opinion and Order entered September 15, 2016, the Commission noted that several issues that had been

raised during the DSIC/LTIIP proceeding would be reserved for decision at an adjudicated hearing. These issues were primarily those raised by the Office of Consumer Advocate and certain other parties.

The Commission, on October 6, 2016, entered a Prehearing Conference Order setting October 17, 2016 as the date for a Prehearing Conference on these issues, and directing the parties to serve a Prehearing Memorandum no later than October 14, 2016. This Prehearing Memorandum is being served in accordance with that Order.

The OSBA, while an active party to the proceeding which gave rise to this new chapter in this DSIC/LTIIP case, did not raise nor support any of the issues that were carved out of the proceeding below for adjudication here. However, due to the fact that this is still part of the proceeding to which the OSBA is a party, the OSBA will fully participate in the matter to assure that the interests of Pennsylvania's small business customers are protected.

**IV. SERVICE OF DOCUMENTS**

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA **and the OSBA witness identified above**. In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party. Service by electronic mail only is not acceptable.

**V. SETTLEMENT**

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

**VI. HEARING AND BRIEFING SCHEDULE**

The OSBA will cooperate with the other parties to develop a procedural schedule.

In light of the Governor's commitment to reduce the operating budget of Commonwealth Offices, the OSBA respectfully requests that the evidentiary hearings take place in Harrisburg.

Respectfully submitted,



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Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID # 73995

Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
(717) 783-2525  
(717) 783-2831 (fax)

Dated: October 14, 2016

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Duquesne Light Company** :  
**for Approval of its Long-Term** :  
**Infrastructure Improvement Plan** :  
: **Docket No. P-2016-2540046**  
**Petition of Duquesne Light Company for** :  
**Approval of a Distribution System** :  
**Improvement Charge** :

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (unless other noted below) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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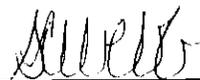
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DATE: October 14, 2016



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