



Michael Zimmerman
Counsel, Regulatory

411 Seventh Avenue
Mail drop 15-7
Pittsburgh, PA 15219

Tel: 412-393-6268
mzimmerman@duqlight.com

February 13, 2019

Via Electronic Filing

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

**Re: Duquesne Light Company – Supplement No. 195 to Tariff Electric - PA P.U.C. No. 24
Docket No.**

Dear Secretary Chiavetta:

Enclosed for filing, please find redline and final versions of Duquesne Light Company's ("Duquesne Light" or the "Company") Supplement No. 195 to Tariff Electric - PA. P.U.C. No. 24. Supplement No. 195 would update the Company's existing Rule No. 18.1 – Electric Vehicle Charging to reflect the Commission's Final Policy Statement Order entered November 8, 2018, at Docket No. M-2017-2604382, *Policy Statement on Third Party Electric Vehicle Charging-Resale/Redistribution of Utility Service Tariff Provisions*. Supporting documentation, comprising a Statement of Reasons and applicable information required under 52 Pa. Code § 53.52, is also enclosed. Should you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Michael Zimmerman/cxo".

Michael Zimmerman
Counsel, Regulatory

Enclosure

Cc: Certificate of Service

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):

FIRST-CLASS MAIL

Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Dated: February 13, 2019

Michael Zimmerman / *ckp*

Michael Zimmerman, Esquire
Duquesne Light Company
411 Seventh Avenue, 15-7
Pittsburgh, PA 15219
Phone: 412-393-6268
Email: mzimmerman@duqlight.com



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY

411 Seventh Avenue
Pittsburgh, PA 15219

Richard Riazzi
President and Chief Executive Officer

ISSUED: February 13, 2019

EFFECTIVE: March 15, 2019

Issued in compliance with the Pennsylvania Public Utility Commission's *Policy Statement on Third Party Electric Vehicle Charging-Resale/Redistribution of Utility Service Tariff Provisions* Final Policy Statement Order, entered November 8, 2018, at Docket No. M-2017-2604382, and published in the Pennsylvania Bulletin on February 2, 2019, at 49 Pa.B. 466.

NOTICE

THIS TARIFF SUPPLEMENT REVISES AN EXISTING RULE

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF

CHANGE

Rules and Regulations

Measurement and Use of Service

18.1 Electric Vehicle Charging

Seventh Revised Page No. 23

Cancelling Sixth Revised Page No. 23

Pursuant to the Pennsylvania Public Utility Commission's Order issued November 8, 2018, at Docket No. M-2017-2604382, language has been added to reflect the statement of policy that third party electric vehicle charging stations are not subject to the pricing requirements of 66 Pa.C.S. § 1313.

RULES AND REGULATIONS - (Continued)**MEASUREMENT AND USE OF SERVICE - (Continued)**

18. REDISTRIBUTION All electric energy shall be consumed by the customer to whom the Company supplies and delivers such energy, except that (1) the customer owning and operating a separate office building, and (2) any other customer who, upon showing that special circumstances exist, obtains the written consent of the Company may redistribute electric energy to tenants of such customer, but only if such tenants are not required to make a specific payment for such energy.

This Rule shall not affect any practice undertaken prior to June 1, 1965. See Rule No. 41 for special requirements for residential dwelling units in a building.

18.1 ELECTRIC VEHICLE CHARGING Electricity sales by a person, corporation or other entity, not a public utility, owning and operating an electric vehicle charging facility for the sole purpose of recharging an electric vehicle battery for compensation are not construed to be sales to residential consumers and therefore do not fall under the pricing requirements of 66 Pa.C.S. § 1313. Further, for purposes of third party-owned electric vehicle charging stations, charging the electric vehicle shall not be considered redistribution as defined in Rule No. 18 - Redistribution. Electric vehicles are defined as any vehicle licensed to operate on public roadways that are propelled in whole or in part by electrical energy stored on-board for the purpose of propulsion. Types of electric vehicles include, but are not limited to, plug-in hybrid electric vehicles and battery electric vehicles. Electric vehicle charging stations shall be made in accordance with the Company's "Electric Service Installation Rules," a copy of which may be found at www.duquesnelight.com. The station must be designed to protect for back flow of electricity to the Company's electrical distribution circuit as required by Company rules. The Company shall not be liable for any damages associated with operation of the charging station. For stations dedicated solely for the purpose of charging electric vehicles wherein a third party owns the charger and allows an electric vehicle owner to use their facility to charge an electric vehicle, the owner of the charging facility shall notify the Company at least one hundred twenty (120) days in advance of the planned installation date and may be required to install metering for the station as determined by the Company. The third party owner of the station shall be responsible for all applicable Tariff rates, fees and charges. For such installations, the electric vehicle owner shall be responsible for all fees imposed by the owner of the station for charging the electric vehicle.

(C)

19. CONTINUITY AND SAFETY The Company will use all reasonable care to provide safe and continuous delivery of electricity but shall not be liable for any damages arising through interruption of the delivery of electricity or for injury to persons or property resulting from the use of the electricity delivered.

BILLS AND NET PAYMENT PERIODS

20. BILLING The Company will render a bill monthly for electric service.

20.1 BILLING OPTIONS Customers who elect to purchase their electricity from an Electric Generation Supplier ("EGS") may choose: (1) Consolidated Billing and receive a single bill from the Company that includes Company charges and EGS charges; or (2) Separate Billing and receive one bill from the Company for Company charges and a second bill from the EGS for EGS charges. The customer's billing option will be communicated to the Company by the EGS, in accordance with the provisions contained in the Company's Supplier Tariff.

20.2 SUMMARY BILLING The Company may, at its discretion and upon customer request, provide Summary Bills in lieu of individual bills to qualifying customers. Summary Bills shall include an abridged summary of electric service usage and charges associated with each meter location. The Company may remove a customer from Summary Billing at its option or at the customer's request.

For the purpose of determining whether to provide Summary Billing, the Company may consider, among other factors, whether the read and due dates of the multiple meter locations allow for Summary Billing without adversely affecting the timely payment of bills, and whether Summary Billing would have an adverse financial impact on the Company.



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

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DUQUESNE LIGHT COMPANY

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DUQUESNE LIGHT COMPANY
Responses to 52 Pa. Code 53.52(a)
Supplement No. 195 to Tariff Electric - PA. P.U.C. No. 24

§ 53.52. Applicability; public utilities other than canal, turnpike, tunnel, bridge and wharf companies.

(a) Whenever a public utility, other than a canal, turnpike, tunnel, bridge or wharf company files a tariff, revision or supplement effecting changes in the terms and conditions of service rendered or to be rendered, it shall submit to the Commission, with the tariff, revision or supplement, statements showing all of the following:

(1) The specific reasons for each change.

Response: Rule No. 18.1 Electric Vehicle Charging is being revised per the Pennsylvania Public Utility Commission's *Policy Statement on Third Party Electric Vehicle Charging-Resale/Redistribution of Utility Service Tariff Provisions* Final Policy Statement Order published in the Pennsylvania Bulletin on February 2, 2019, at Docket No. M-2017-2604382. Language has been added to reflect the statement of Commission policy that third party electric vehicle charging stations, as described in § 69.3501(b), are excluded from the pricing requirements of 66 Pa.C.S. § 1313.

(2) The total number of customers served by the utility.

Response: 600,247 as of January 31, 2019.

(3) A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.

Response: The proposed change would have no impact on customer bills.

(4) The effect of the change on the utility's customers.

Response: The proposed change would have no effect on customers. The proposed change may enhance awareness and provide clarity.

(5) The direct or indirect effect of the proposed change on the utility's revenue and expenses.

Response: The proposed change would have no effect on the Company's revenue or expenses.

(6) The effect of the change on the service rendered by the utility.

Response: The proposed change would not alter the service rendered by the Company.

- (7) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each. This subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308 (relating to voluntary changes in rates).**

Response: The change is being made consistent with the Pennsylvania Public Utility Commission's Final Policy Statement Order, entered November 8, 2018, at Docket No. M-2017-2604382.

- (8) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308.**

Response: No studies were conducted by the Company to draft the proposed change.

- (9) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.**

Response: No customer polls were taken in regard to the proposed change.

- (10) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.**

Response: The Company will post Supplement No. 195 to Tariff No. 24 under the Pending Tariff Supplements section at www.duquesnelight.com.

Upon Commission approval, the Company will incorporate Supplement No. 195 into Tariff No. 24 and post an updated Tariff No. 24 and Tariff History to the appropriate areas on the website.

- (11) FCC, FERC or Commission orders or rulings applicable to the filing.**

Response: This filing is made pursuant to the Pennsylvania Public Utility Commission's *Policy Statement on Third Party Electric Vehicle Charging-Resale/Redistribution of Utility Service Tariff Provisions*, Final Policy Statement Order entered November 8, 2018, at Docket No. M-2017-2604382, and published in the Pennsylvania Bulletin on February 2, 2019, at 49 Pa.B. 466.

**DUQUESNE LIGHT COMPANY
SUPPLEMENT NO. 195 TO TARIFF ELECTRIC - PA. P.U.C. NO. 24**

STATEMENT OF REASONS

A. Introduction

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby submits this Statement of Reasons in support of Supplement No. 195 to Tariff Electric - PA. P.U.C. No. 24 (“Supplement No. 195”) of the Company’s Retail Electric Tariff. In Supplement No. 195, Duquesne Light proposes to amend Rule No. 18.1 – Electric Vehicle Charging, pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) Order entered November 8, 2018, at Docket No. M-2017-2604382.

For the reasons discussed below, approval of Supplement No. 195 is proper and in the public interest. Attached to this filing is the supporting data required by 52 Pa. Code § 53.52(a) as well as clean and red-line versions of Supplement No. 195 to the Company’s Tariff Electric No. 24.

B. Background

On November 8, 2018, the Commission entered its *Final Policy Statement Order* at Docket No. M-2017-2604382, *Policy Statement on Third Party Electric Vehicle Charging – Resale/Redistribution of Utility Service Tariff Provisions* (“EV Policy Statement”). The EV Policy Statement is designed to encourage clarity in electric distribution companies’ (“EDCs”) tariff rules regarding electric vehicle (“EV”) charging stations. The EV Policy Statement adopts 52 Pa. Code §§ 69.3501 and 69.3502, which respectively establish the Commission’s statements of policy that: (1) non-utilities’ ownership and operation of EV charging stations are not subject to the pricing requirements

of 66 Pa.C.S. § 1313 (regarding price limits on sales of electricity to residential customers); and (2) EDCs should update their retail tariffs to reflect the statement of policy at § 69.3501, and provide instructions for when and how prospective EV charging station owners should contact the EDC prior to installation. The EV Policy Statement also shortened the standard comment period applicable to such tariff updates from 60 days to 30 days. The EV Policy Statement became effective upon its publication in the Pennsylvania Bulletin on February 2, 2019, at 49 Pa.B. 466.

C. Proposed Rule Change

The Company proposes the enclosed change to its existing Rule No. 18.1 – Electric Vehicle Charging to reflect the Commission’s statements of policy in the EV Policy Statement. To conform to 52 Pa. Code § 69.3501, the proposed change would add a brief statement clarifying that EV charging stations are not subject to the pricing requirements of 66 Pa.C.S. § 1313. Rule No. 18.1 already conforms to 52 Pa. Code § 69.3502, because it requires prospective EV charging station owners to contact the Company at least 120 days in advance of the planned installation date, at which point the Company would work with the prospective owner to ensure that the EV charging station would be consistent with the Company’s electrical installation rules (see Rule No. 6).¹

¹ Though not required under the EV Policy Statement, the Company also maintains an “Electric Vehicles” page on its website (see <https://www.duquesnelight.com/energy-money-savings/electric-vehicles>), which is in part designed to further expand customer awareness of the Company’s EV programs and standards.

D. Conclusion

For the reasons stated above, Duquesne Light Company respectfully requests that the Commission approve Supplement No. 194 to the Company's Tariff Electric - PA. P.U.C. No. 24, without modification, and that Supplement No. 195 be permitted to become effective on March 15, 2019.