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Gary A. Jack
Assistant General Counsel

March 31, 2010

VIA ELECTRONIC FILING

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**Re: Duquesne Light Company Universal Service and Energy Conservation Plan
for 2011-2013**
Docket No: M-2010-2161220

Dear Secretary McNulty:

Enclosed for filing and approval are one original (1) and three (3) copies of an amendment to Duquesne Light Company's proposed Universal Service and Energy Conservation Plan for the period 2011 through 2013. On March 24, 2010, the OTS filed a letter recommending an annual recertification process for CAP customer eligibility in accordance with applicable requirements. Duquesne agrees with the OTS recommendation. Accordingly, Duquesne Light hereby amends its plan to require the applicable annual recertification. Attachment A shows the redline changes to page 5 of the proposed Plan. Attachment B is the clean copy of the amendment reflecting the change for annual recertification. Duquesne requests incorporation of this amendment in its filing and approval of the plan.

If you have any questions, please feel free to contact me. Thank you for your assistance with this matter.

Sincerely Yours,

Gary A. Jack
Assistant General Counsel

Enclosure

c: Certificate of Service

- All customers would remain in the program for as long as they are income qualified and fulfilling their payment obligations. They would not be removed from the program because of the length of time they had been on it or because they no longer had an arrearage.
 - All electric heat customers must complete a Smart Comfort (LIURP) visit before enrollment in CAP. The residency requirement for Smart Comfort will be waived for these customers.
 - All residential service customers who own their home and have a base load usage in excess of 500 kWh per month must complete a Smart Comfort visit before enrollment in CAP. The residency requirement for Smart Comfort will be waived for these customers.
 - All residential service customers who are renters, have a base load usage in excess of 500 kWh per month, and have resided at the premise for at least 6 months must complete a Smart Comfort visit before enrollment in CAP.
 - Customers enrolled in the CAP program must select suppliers based on the lowest available cost option in order to maintain the greatest bill affordability level.
 - CAP customers whose baseload usage exceeds 500kWh after time of enrollment and who have not had a Smart Comfort (LIURP) visit within the last seven years must complete a Smart Comfort visit
 - Customers who report a \$0 household income at time of enrollment will be “temporarily” enrolled in the program. The customer’s income status will be reviewed after a 3-6 month period. After such a time period the account will be considered for default with the reasoning that no one can sustain a household with \$0 income for that duration and that CAP was designed to assist customers who are not able to pay their electric bill in full rather than not at all.
 - Continue to explore collaborative CAP enrollment with gas utility companies in Duquesne Light’s service territory.
 - Continue to explore bilateral exchange of customer information between the Department of Welfare and Duquesne Light Company.
 - ~~Adopt a procedure to r~~Re-certify a CAP customer’s account on an annual basis at least once every 2 years requesting updated household residents and verification of household income.
- Termination and default
 - Customers who miss a CAP payment will be contacted by Duquesne representatives who are dedicated to placing outbound calls and reminded that the payment is immediately due. This dedicated phone campaign will also impress upon the customer the great benefits provided by the CAP program.
 - Customers who miss a CAP payment will also be reviewed by the CAP agency to provide additional encouragement to maintain their CAP agreement.
 - If payment is not received within five business days of attempted contact, the collection process will begin.
 - During the collection process, a customer must pay all of their missed CAP payments to maintain their program status.

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 - Continue to explore collaborative CAP enrollment with gas utility companies in Duquesne Light’s service territory.
 - Continue to explore bilateral exchange of customer information between the Department of Welfare and Duquesne Light Company.
 - Recertify a CAP customer’s account on an annual basis
- Termination and default
 - Customers who miss a CAP payment will be contacted by Duquesne representatives who are dedicated to placing outbound calls and reminded that the payment is immediately due. This dedicated phone campaign will also impress upon the customer the great benefits provided by the CAP program.
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PENNSYLVANIA PUBLIC UTILITY COMMISSION

DUQUESNE LIGHT COMPANY :
Universal Service and Energy : Docket No. M-2010-2161220
Conservation Plan for 2011-2013 :

CERTIFICATE OF SERVICE

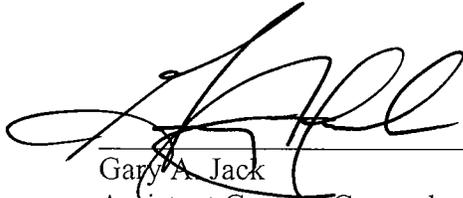
I hereby certify that a true and correct copy of an Amendment to the Proposed Universal Service and Energy Conservation Plan for 2011-2013 of Duquesne Light Company in the above-referenced proceeding has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA FIRST CLASS MAIL AND/OR E-MAIL

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Dated March 31, 2010