



411 Seventh Avenue  
16<sup>th</sup> Floor  
Pittsburgh, PA 15219

Tel 412-393-1541  
Fax 412-393-1418  
gjack@duqlight.com

**Gary A. Jack**  
Assistant General Counsel

July 1, 2010

**VIA ELECTRONIC FILING**

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

**Re: Petition of Duquesne Light Company for Approval of Default Service Plan  
for the Period January 1, 2011 through May 31, 2013,  
Docket No: P-2009-2135500**

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Dear Secretary Chiavetta:

Enclosed for electronic filing, please find the comments of Duquesne Light Company in the above-referenced proceeding. Copies will be provided as indicated on the certificate of service.

If you have any questions, please contact me.

Sincerely yours,

Gary A. Jack  
Assistant General Counsel

Enclosures

c: Honorable John H. Corbett, Jr.  
Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company for :  
Approval of Default Service Plan for the : Docket No. P-2009-2135500  
Period January 1, 2011 through May 31, 2013 :

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COMMENTS OF  
DUQUESNE LIGHT COMPANY

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Duquesne Light Company (“Duquesne”) files these Comments in response to the Opinion and Order entered June 21, 2010 (“June 21 Order”) in the above-referenced proceeding.

**I. Background**

On October 9, 2009, the Duquesne filed a Petition with the Pennsylvania Public Utility Commission (“Commission”) seeking approval of a Default Service Plan. In the Petition, Duquesne requested approval of its proposed plan to provide default service to its customers from January 1, 2011 through May 31, 2013. After several settlement conferences among the parties, a settlement in principle (the “Settlement”) of all issues was achieved. The Commission approved the Settlement and solicited comments with respect to whether Duquesne Light should be required to provide a customer list as was provided in the PPL Order entered October 22, 2009. (PPL Electric Utilities Corporation Retail Markets, Docket No. M-2009-2104271.)

The Settlement provided that Duquesne would provide Commission licensed Electric Generation Suppliers (“EGSs”) monthly updates to Duquesne’s customer list on its EGS website, subject to the Commission’s customer privacy and protection rules.<sup>1</sup> The Settlement further provided for the right of small and medium commercial and industrial customers to opt out of the

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<sup>1</sup> June 21 Order at 5.

release of customer information in its new customer packet. In the PPL proceeding, the Commission directed PPL to release, for each customer account, the following information: (1) Customer name; (2) Account number; (3) Rate class and sub-class; (4) Service address; and (5) Billing address. Telephone numbers and/or historical billing data were allowed to be restricted from release by customers.

## **II. Comments**

Duquesne has no objection to implementing the same standards regarding release of customer information and providing the same customer information to EGSs as the Commission directed in the PPL order. Duquesne confirms that it would permit customers to opt out of providing historical billing data and telephone number consistent with the Commission customer privacy and protection rules. Rather than amend the Settlement, however, with all the concurrent complications, Duquesne recommends that this proposed commitment be addressed outside of the Settlement parameters. As such, Duquesne could agree to this modification unilaterally.

Duquesne believes that residential customers should be able to restrict the release of their service addresses, as opposed to billing addresses, for privacy reasons. Some customers do not want their service addresses released to others for security and protective reasons. This proposed exclusion of service address would only be imposed if the customer so elected. If the customer did not express such a desired exclusion, the information would be provided to others by Duquesne. Additionally, although not requested for comment, and understanding in most residential customer cases the service address and the billing address is the same, Duquesne feels that if a customer does not want their billing address released as well, the Commission should allow the customer's request to be honored.

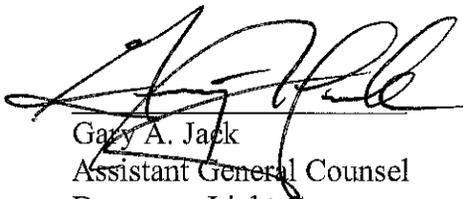
If changes are directed by the PUC to the Duquesne customer lists, Duquesne proposes that it notify all of its customers of the changes in writing and provide to them an opportunity for an opt-out.

Finally, although specific comments were not requested on this issue, Duquesne reaffirms its commitment to provide all draft consumer education materials to the Commission's Office of Communications, as well as the Office of Consumer Advocate and the Office of Small Business Advocate, for review and comment prior to being finalized.

WHEREFORE, Duquesne is agreeable to implementing the same standards regarding the release of customer information and providing a customer list as noted in the PPL order and recommends that addresses should be an item that a customer should be able to elect to have excluded from distribution.

Respectfully Submitted,

Duquesne Light Company



Gary A. Jack  
Assistant General Counsel  
Duquesne Light Company  
411 Seventh Avenue, 16-4  
Pittsburgh, PA 15219  
(412) 393-1541 (phone)  
(412) 393-1418 (fax)  
[gjack@duqlight.com](mailto:gjack@duqlight.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DUQUESNE LIGHT COMPANY	:	
Petition of Duquesne Light Company for	:	Docket No. P-2009-2135500
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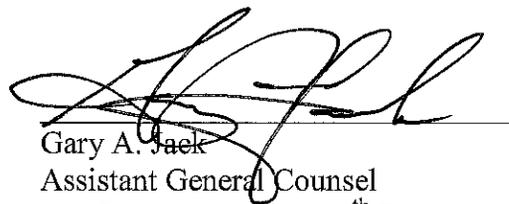
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the comments 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**

Sharon E. Webb, Esquire Office of Small Business Advocate Suite 1102, Commerce Building 300 North Second Street Harrisburg, PA 17101 Phone: (717) 783-2525 Fax: (717) 783-2831 <a href="mailto:swebb@state.pa.us">swebb@state.pa.us</a>	Charles Daniel Shields, Esquire PA Public Utility Commission Office of Trial Staff 400 North Street, 2 <sup>nd</sup> Floor Commonwealth Keystone Building P.O. Box 3265 Harrisburg, PA 17105-3265 Phone: (717) 783-6151 Fax: (717) 772-2677 <a href="mailto:chshields@state.pa.us">chshields@state.pa.us</a>
Aron J. Beatty, Esquire Jennedy S. Johnson, Esquire Jessica J. Horner, Esquire Office of Consumer Advocate 555 Walnut Street 5 <sup>th</sup> Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048 Fax: (717) 783-7152 <a href="mailto:abeatty@paoca.org">abeatty@paoca.org</a> <a href="mailto:jjohnson@paoca.org">jjohnson@paoca.org</a> <a href="mailto:jhorner@paoca.org">jhorner@paoca.org</a>	Pamela C. Polacek, Esquire Shelby A. Linton-Keddie, Esquire Carl J. Zwick, Esquire McNeese, Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 Phone: (717) 232-8000 Fax: (717) 237-5300 <a href="mailto:ppolacek@mwn.com">ppolacek@mwn.com</a> <a href="mailto:skeddie@mwn.com">skeddie@mwn.com</a> <a href="mailto:czwick@mwn.com">czwick@mwn.com</a>
Theodore S. Robinson, Esquire Citizen Power 2121 Murray Avenue Pittsburgh, PA 15217 Phone: (412) 421-7029 Fax: (412) 421-6162 <a href="mailto:Robinson@citizenpower.com">Robinson@citizenpower.com</a>	Gary A. Jeffries, Esquire Dominion Retail, Inc. 501 Martindale Street, Suite 400 Pittsburgh, PA 15212-5817 Phone: (412) 237-4729 Fax: (412) 237-4782 <a href="mailto:Gary.A.Jeffries@dom.com">Gary.A.Jeffries@dom.com</a>

<p>Christopher A. Lewis, Esquire  Christopher R. Sharp, Esquire  Melanie J. Tambolas, Esquire  Blank Rome LLP  One Logan Square  130 North 18<sup>th</sup> Street  Philadelphia, PA 19103-6998  Phone: (215) 569-5450  Fax: (215) 832-5450  <a href="mailto:Lewis@blankrome.com">Lewis@blankrome.com</a>  <a href="mailto:Sharp@blankrome.com">Sharp@blankrome.com</a>  <a href="mailto:Tambolas@blankrome.com">Tambolas@blankrome.com</a></p>	<p>Mark Hayden, Esquire  FirstEnergy Solutions  76 South Main Street  Akron, OH 44308  Phone: (330) 761-7735  Fax: (330) 384-3875  <a href="mailto:haydenm@firstenergycorp.com">haydenm@firstenergycorp.com</a></p>
<p>Todd S. Stewart, Esquire  Hawke McKeon &amp; Sniscak LLP  100 North Tenth Street  P.O. Box 1778  Harrisburg PA 17105  Phone: (717) 236-1300  Fax: (717) 236-4841  <a href="mailto:tsstewart@hmslegal.com">tsstewart@hmslegal.com</a></p>	<p>Brian R. Greene, Esquire  SeltzerGreene, PLC  707 East Main Street, Suite 1025  Richmond, VA 23219  Phone: (804) 672-4542  Fax: (804) 672-4540  <a href="mailto:bgreene@seltzergreene.com">bgreene@seltzergreene.com</a></p>
<p>Renardo L. Hicks, Esquire  Judith D. Cassel, Esquire  Stevens &amp; Lee  17 North Second Street  16<sup>th</sup> Floor  Harrisburg, PA 17101  Phone: (717) 255-7364  Fax: (610) 988-0851  <a href="mailto:rlh@stevenslee.com">rlh@stevenslee.com</a></p>	



Gary A. Jack  
Assistant General Counsel  
411 Seventh Avenue, 16<sup>th</sup> Floor  
Pittsburgh, PA 15219  
412-393-1541 (phone)/412-393-1418 (fax)  
[gjack@duqlight.com](mailto:gjack@duqlight.com)

Dated July 1, 2010