



Duquesne Light

Our Energy...Your Power

411 Seventh Avenue
16th Floor
Pittsburgh, PA 15219

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

Gary A. Jack
Assistant General Counsel

August 2, 2011

VIA E-FILING

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

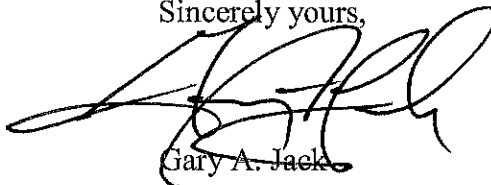
**Re: Petition of Duquesne Light Company
For Approval of a Time-of-Use Plan
Docket No. P-2009-2149807**

Dear Secretary Chiavetta:

Please find enclosed for filing Duquesne Light Company's Petition to Modify the Supplemental Filing Schedule in the above-referenced proceeding.

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

Sincerely yours,



Gary A. Jack

Enclosures

cc: All Parties listed
on the Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Duquesne Light Company's Petition to Modify the Supplemental Filing Schedule 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):

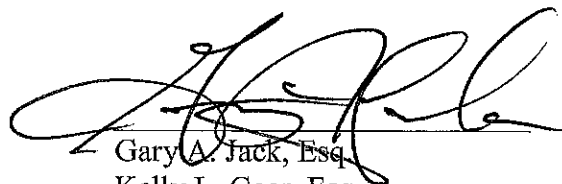
VIA FIRST-CLASS MAIL AND/OR E-MAIL

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
555 Walnut Street
Harrisburg, PA 17101-1923
(717) 783-5048
(717) 783-7152 (fax)
devrard@paoca.org
tmccloskey@paoca.org

Charles Daniel Shields, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 787-1976
(717) 772-2677
chshields@state.pa.us

Sharon E. Webb, Esquire
Office of Small Business Advocate
1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
swebb@state.pa.us

Dated August 2, 2011



Gary A. Jack, Esq.
Kelly L. Geer, Esq.
Duquesne Light Company
411 Seventh Avenue, 16th Floor
Pittsburgh, PA 15219
412-393-1541 (phone)/412-393-1418 (fax)
gjack@duqlight.com
kgeer@duqlight.com

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company :
For Approval of a Time-of-Use Plan :
Docket No. P-2009-2149807

PETITION TO MODIFY SUPPLEMENTAL FILING SCHEDULE

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Duquesne Light Company (“Duquesne” or “Company”) hereby files this Petition, pursuant to the Commission’s Order in the above-referenced docket, seeking modification of the supplemental filing schedule.¹ In support of this Petition, Duquesne states as follows:

Background

1. On December 28, 2009, Duquesne Light Company filed a Petition seeking approval of a Time-of-Use (“TOU”) Rate and Real Time Pricing Plan (“TOU Plan”).

The Company’s TOU Plan as filed presented a broad outline and general description of Duquesne’s intentions with regard to the research, development, and implementation of its TOU program, including proposed pilot programs. Duquesne also committed to making supplemental filings with the Commission as it continues to develop a more detailed plan.

2. On June 23, 2010, the Commission entered an Order approving the TOU Rate and Real Time Pricing Plan, subject to certain modifications (“TOU Order”). The Commission directed the Company to adhere to a filing schedule to ensure that Duquesne

¹ The Commission directed Duquesne to make certain supplemental filings in this proceeding. See *Petition of Duquesne Light Company for Approval of a Time-of-Use Plan*, Docket No. P-2009-2149807, Order entered June 23, 2010 at 10.

continues to meet its ongoing commitment to develop the details of its proposed TOU Plan and pilot programs, and to file those details for Commission review.

3. The Commission directed the Company to adhere to the following filing schedule:

By September 30, 2011, Duquesne was directed to file the following information:

- a. Description and design of its first two pilot programs, TOU-1 and TOU-2, along with all supporting research and market data.
- b. Proposed customer availability for TOU-1 and TOU-2.
- c. Proposed rate design for TOU-1 and TOU-2.
- d. Proposed tariffs incorporating TOU-1 and TOU-2.
- e. Proposed customer educational materials relating to TOU-1 and TOU-2.

By September 30, 2012, Duquesne shall file information to include, but not be limited to, the following:

- a. Summary of the results of its first two pilot programs, TOU-1 and TOU-2.
- b. Description and design of its third pilot program, TOU-3, along with all supporting research and market data.
- c. Proposed customer availability for TOU-3.
- d. Proposed rate design for TOU-3.
- e. Proposed tariffs incorporating TOU-3.
- f. Proposed customer educational materials relating to TOU-3.

By September 30, 2013, Duquesne shall file information to include, but not be limited to, the following:

- a. Summary of the results of all three of its pilot programs, TOU-1, TOU-2, and TOU-3.

- b. Description and design of its full TOU program, including proposed TOU rates available to all customers with smart meters, along with all supporting research and market data.
- c. Proposed tariffs incorporating all applicable TOU rates.
- d. Proposed customer educational materials relating to its full TOU program.

(TOU Order at 10-11.)

4. The Commission noted that if Duquesne finds it cannot provide the Commission with the requested information by the dates indicated, the Company may request that the schedule be modified. (TOU Order at 10.)

Duquesne's Progress to Date

5. Duquesne has enrolled more than 1400 customers for its pilot programs. Approximately 1300 customers are enrolled in a time of week pilot program, TOU-1, and approximately 100 customers are enrolled in a time of day pilot program, TOU-2.

6. The summer months of June through September are the key months to evaluate program design and customer behavior. The Company is currently collecting baseline usage data on the above-referenced pilot program customers, for the period of June 2011-September 2011. The Company will evaluate changes in customer usage for the period June 2012 – September 2012 relative to baseline data. After initial deployment of smart meters, the Company will evaluate customer response to its third pilot program June 2013 – September 2013.

7. The Company is conducting research on these pilot participants through a demographic survey, phone surveys, and focus groups and will continue to do so through

September 2012. Duquesne has also developed a communication and research plan, which is essential to the success of the TOU Plan.

Request for a Modification to the Supplemental Filing Schedule

8. The results of the market research and focus groups will not be available until after September 30, 2011 since this is the ending date of data collection for 2011. These results are essential to finalize the time of week program design and to design the time of day rates that will become effective June 1, 2012. Similarly, the results of additional research and customer response to these programs will not be known until after the end of data collection of September 30, 2012 for that year.

9. Because of the timing of the availability of results of much of the research, and to allow time to analyze the baseline data and customer response to these programs, Duquesne is requesting a modified schedule. The Company requests to defer the filing date for the reports from September 30 until November 30 of each year. This delay will ensure that the Company has adequate time to analyze the research data and compile the findings for Commission review.


10. The delay will have no impact on the start date for the proposed program design, nor the start date for the pricing that results from the pilot programs. Additionally, the delay will have no impact on cost to the customers.

11. Duquesne believes extending the filing date until November 30 of each year will have no effect on the Commission's ability for review and approval of the program design and rate design that will eventually support offering TOU rates to all customers once full deployment of smart meters begins in 2014.


WHEREFORE, Duquesne Light Company respectfully requests approval of a modification of the Supplemental Filing Schedule to extend the September 30 report deadlines until November 30 for each year of 2011-2013. Duquesne thanks the Commission for its time and attention to this matter.

Respectfully submitted,

Duquesne Light Company



William V. Pfrommer



Gary A. Jack, Esq.
Kelly L. Geer, Esq.
411 Seventh Avenue
Pittsburgh, PA 15219
Tel 412.393.1541
Fax 412.393.1418
gjack@duqlight.com
kgeer@duqlight.com

Counsel for Duquesne Light

Dated: August 2, 2011

VERIFICATION

I, William Pfrommer, state that I am authorized to make this Verification on behalf of Duquesne Light Company, being a Manager of Rates for the Company, and that the facts set forth above are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to penalties relating to unsworn falsification.

8/2/11

Date:

William Pfrommer