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Gary A. Jack
Assistant General Counsel

February 3, 2012

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

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Re: Duquesne Light Company
Consumer Education Plan for 2012
Docket No. I-2012-

Dear Secretary Chiavetta:

Enclosed for filing are an original and three copies of Duquesne Light Company's Petition for an amendment to the Company's existing Consumer Education Plan. Copies have been served upon those parties in the Company's original Consumer Education Plan 2008-2012 and, additionally, the Bureau of Investigation and Enforcement.

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

Respectfully submitted,

Gary A. Jack
Assistant General Counsel

Enclosure

c: Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Duquesne Light Company
Consumer Education Plan for 2012

Docket No. I-2012-_____

PETITION FOR MODIFICATION OF DUQUESNE LIGHT COMPANY

I. INTRODUCTION

Pursuant to 66 Pa. C.S. Section 703(g) and Section 5.41 of the Commission's Rules of Administrative Practice and Procedure, Duquesne Light Company ("Duquesne" or "Company") hereby petitions the Pennsylvania Public Utility Commission ("Commission") for an amendment to the Company's existing Consumer Education Plan. The Commission previously approved a Consumer Education Plan for Duquesne on June 6, 2008 in Docket No. M-2008-2032278. The Commission has ordered, recommended or proposed additional consumer education requirements in connection with its Retail Markets Investigation proceeding, Docket No. I-2011-2237952. The Commission has also ordered consumer education requirements through its Reconsideration Order on Eligible Customer Lists, Docket No. Docket No. M-2010-2183412. Those orders require (or will require in the near future) additional consumer education communications to Duquesne customers that are not currently contained within the Duquesne Consumer Education Plan. Duquesne hereby requests approval to amend its previous Consumer Education Plan filing to include those costs in its 2012 budget and therefore permit recovery of the reasonable costs to implement those requirements through its Consumer Education Surcharge.

II REQUEST

1. By Secretarial Letter dated Dec 15, 2011 in the Retail Markets Investigation proceeding, the Commission directed specified EDCs, including Duquesne, to produce and mail a postcard to residential and small commercial and industrial customers no later than February 29, 2012. Additionally, it appears that the subject Retail Markets Investigation will result in two more mailings to these same customers about choice and shopping.¹ One is a tri-fold brochure mailing and the second is a company-issued letter for the purpose of intending to foster customer participation in the competitive retail electricity market in Pennsylvania. The costs of printing and mailings these three customer communications by Duquesne are currently estimated and budgeted to be: \$130,000 for the postcard; \$215,000 for the company letter, and \$165,000 for the tri-fold brochure mailing.
2. By reconsideration order dated November 15, 2011 regarding Eligible Customer Lists (“ECL”), the Commission required a mailing to all customers advising them of their election rights with regard to releasing their account information to EGSs pursuant to the Eligible Customer Lists.² That mailing is required to be made by the end of the first quarter of 2012. The estimated cost to produce, mail, provide for return postage for customers, and process this new and required customer inquiry to all customers is \$525,000.
3. Duquesne currently has a Consumer Education Surcharge that will provide for full and current cost recovery of these expenditures along with the other

¹ Such two additional mailings were included within the Commission’s Tentative Order dated December 16, 2011 on intermediate work plans.

² Docket No: M-2010-2183412 et al.

consumer education costs previously approved. That Surcharge was approved by Final Order dated August 21, 2008 in Docket No. M-2008-2032278, to recover the costs of consumer education.³ The next regularly scheduled consumer education surcharge filing for Duquesne is March 30, 2012.

Duquesne would, after approval of this proposed modification, include these additional costs noted herein in the surcharge for recovery beginning June 1, 2012 for a one year period ending May 31, 2013.

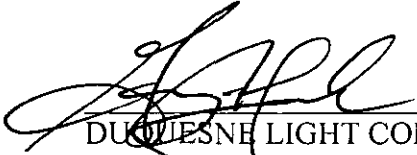
- 4 Duquesne requests that to the extent costs are incurred for the retail markets consumer education requirements in 2012 and beyond, that the Commission approve recovery of these additional costs through Duquesne's Consumer Education Surcharge. The recovery would only be for Consumer Education costs and not other costs. Currently, the exact dates for the implementation of all the consumer education requirements from the Commission's Retail Markets Investigation have not been finalized, and Duquesne believes it is likely that some of those costs could be incurred in 2013.

III CONCLUSION

Duquesne Light Company requests the Commission grant this Petition and issue an order amending Duquesne's Consumer Education Plan to incorporate the required retail market consumer education proposed costs and the ECL proposed costs in a total amount of an estimated and budgeted amount of \$1,035,000 and to recover the actual costs of implementing the same through its existing Consumer Education Surcharge beginning June 1, 2012.

³ The initial tariff compliance filing was approved by Secretarial Letter dated November 14, 2008 in Docket No. M-2008-2032278.

Respectfully Submitted,



DUQUESNE LIGHT COMPANY

By Counsel:

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Duquesne Light Company :
Consumer Education Plan for 2012 : Docket No. I-2012-_____
:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Duquesne Light Company's Petition for an amendment to the Company's existing Consumer Education Plan 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

Lauren Lepkoski, Esquire
Office of Small Business Advocate
300 North Second Street – Suite 1102
Harrisburg, PA 17101

PA PUC – Bureau of Investigation and
Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Christine Hoover, Esquire
Office of Consumer Advocate
555 Walnut Street – 5th Floor
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Harry Geller, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101



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Dated: February 3, 2012