



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Michael W. Gang

mgang@postschell.com
717-612-6026 Direct
717-731-1985 Direct Fax
File #: 150740

March 25, 2013

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Duquesne Light Company for Approval of Default Service Plan for the Period June 1, 2013 Through May 31, 2015 - Letter Comments to the Tentative Order on Reconsideration, Docket No. P-2012-2301664

Petition of PECO Energy Company for Approval of its Default Service Program II, Docket No. P-2012-2283641

Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Default Service Programs, Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669 and P-2011-2273670

Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan, Docket No. P-2012-2302074

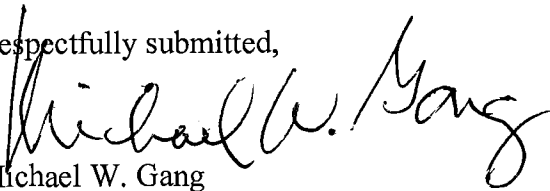
Dear Secretary Chiavetta:

On March 14, 2013, the Pennsylvania Public Utility Commission ("Commission") issued a Tentative Order on Reconsideration ("*Tentative Order*") providing notice to major electric distribution companies ("EDCs") that the Commission tentatively planned to postpone implementation of EDCs' Retail Opt-In Programs ("Opt-In Programs") in order to permit the EDCs' Standard Offer Customer Referral Programs ("SO Programs") to move forward on their own. The Commission indicated that it would revisit the Opt-In Program after it has an opportunity to consider the ongoing results of the SO Programs. The Commission further directed EDCs to immediately postpone the implementation of the Opt-In Programs, pending the Commission's reconsideration. The Commission requested Comments to the *Tentative Order* by March 25, 2013.

Rosemary Chiavetta, Secretary
March 25, 2013
Page 2

Through this Letter, Duquesne Light Company ("Duquesne Light" or the "Company") provides its Comments in response to the *Tentative Order*. Duquesne Light has worked diligently with parties and developed a consensus Opt-In Program and cost recovery plan that was submitted on March 11, 2013 at Docket No. P-2012-2301664. Nevertheless, the Company understands and respects the Commission's decisions as set forth in the *Tentative Order* and offers no exception to this. Duquesne Light will continue to work with the Commission to promote customer choice in the Commonwealth.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael W. Gang". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael W. Gang
on Behalf of
Duquesne Light Company

MWG/skr

cc: Certificate of Service
Office of Special Assistants

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have 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 E-MAIL AND FIRST CLASS MAIL

Charles Daniel Shields, Senior Prosecutor
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265
E-mail: chshields@pa.gov
Phone: 717-783-6151

Sharon E. Webb, Esquire
Assistant Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
E-mail: swebb@pa.gov
Phone: 717-783-2525

Jennedy S. Johnson, Esquire
David T. Evrard, Esquire
Assistant Consumer Advocates
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
E-mail: jjohnson@paoca.org
DEvrard@paoca.org
Phone: 717-783-5048

Todd S. Stewart, Esquire
William E. Lehman, Esquire
Hawke, McKeon & Sniscak LLP
100 N. 10th Street
PO Box 1778
Harrisburg, PA 17101
E-mail: tsstewart@hmslegal.com
welehman@hmslegal.com
Phone: 717-236-1300
*Counsel for Dominion Retail, Inc. and
Interstate Gas Supply, Inc.*

Vincent A. Parisi
IGS Energy
6100 Emerald Parkway
Dublin, OH 43016
E-mail: vparisi@IGSEnergy.com
Phone: 614-659-5055

Gary A. Jeffries, Esquire
Assistant General Counsel
Dominion Retail, Inc.
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817
E-mail: Gary.A.Jeffries@dom.com
Phone: 412-237-4729

Charles E. Thomas, III, Esquire
Thomas T. Niesen, Esquire
Thomas, Long, Niesen & Kennard
212 Locust Street, Suite 500
PO Box 9500
Harrisburg, PA 17108-9500
E-mail: cet3@thomaslonglaw.com
tniesen@thomaslonglaw.com
Phone: 717-255-7600
*Counsel for Noble Americas Energy
Solutions LLC*

Brian J. Knipe, Esquire
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101-1357
E-mail: brian.knipe@bipc.com
Phone: 717-237-4820
*Counsel for FirstEnergy Solutions
Corp.*

Amy M. Klodowski, Esquire
FirstEnergy Solutions Corp.
800 Cabin Hill Drive
Greensburg, PA 15601
E-mail: aklodow@firstenergycorp.com
Phone: 724-838-6765

Brian R. Greene, Esquire
Greene Hurlocker, PLC
707 East Main Street
Suite 1025
Richmond, VA 23219
E-mail: bgreene@greenehurlocker.com
Phone: 804-672-4542
*Counsel for Retail Energy Supply
Association*

Victor P. Stabile, Esquire
Dilworth Paxton LLP
112 Market Street, 8th Floor
Harrisburg, PA 17101
E-mail: vstabile@dilworthlaw.com
Phone: 717-236-4812, Ext. 101
*Counsel for Retail Energy Supply
Association*

Patrick M. Cicero, Esquire
Harry S. Geller, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
E-mail: pciceropulp@palegalaid.net
hgellerpulp@palegalaid.net
Phone: 717-236-9486, Ext. 202
*Counsel for Coalition for Affordable
Utility Service and Energy Efficiency
In Pennsylvania*

Stephen L. Huntoon, Esquire
NextEra Energy Resources, LLC
801 Pennsylvania Avenue, N.W., Suite 220
Washington, DC 20001
E-mail: shuntoon@nexteraenergy.com
Phone: 202-349-3348
*Counsel for NextEra Energy Services
Pennsylvania LLC and NextEra Energy
Power Marketing, LLC*

Pamela C. Polacek, Esquire
Teresa K. Schmittberger, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
E-mail: ppolacek@mwn.com
tschmittberger@mwn.com
Phone: 717-232-8000
*Counsel for Duquesne Industrial
Intervenors*

Theodore S. Robinson, Esquire
Citizen Power Inc.
2121 Murray Avenue
Pittsburgh, PA 15217
E-mail: robinson@citizenpower.com
Phone: 412-421-7029

Divesh Gupta, Esquire
Assistant General Counsel
Constellation Energy Group, Inc.
100 Constellation Way, Suite 500C
Baltimore, MD 21202
E-mail: divesh.gupta@constellation.com
Phone: 410-470-3158

David I. Fein, Esquire
Vice President, State Government
Affairs, East
Exelon Corporation
10 S. Dearborn Street, 47th Floor
Chicago, IL 60603
E-mail: david.fein@exeloncorp.com
Phone: 312-394-2116

Amy Hamilton, Esquire
Director, Market Initiatives
Exelon Corporation
300 Exelon Way
Kennett Square, PA 19348
E-mail: amy.hamilton@exeloncorp.com
Phone: 610-765-6933

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720-T
St. Louis, MO 63105
E-mail: excel.consulting@sbcglobal.net
Phone: 314-725-2511
Consultant for OSBA

VIA E-MAIL ONLY

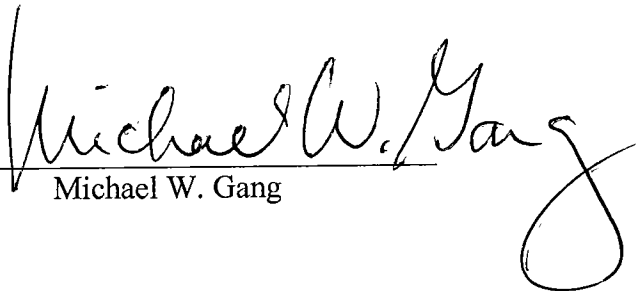
abakare@mwn.com
abeatty@paoca.org
adecusatis@morganlewis.com
aduke@rhoads-sinon.com
anthony.gay@exeloncorp.com
atubbs@postschell.com
barbalex@ctel.net
bbingaman@firstenergycorp.com
cappleby@paoca.org
carwright@pa.gov
cmincavage@mwn.com
cshultz@eckertseamans.com
ctunilo@paoca.org
cvasudevan@morganlewis.com
d.vollero@ycswa.com
dasmus@pa.gov
dclearfield@eckertseamans.com
dlawrence@paoca.org
dmacgregor@postschell.com
dodell@eckertseamans.com
egannon@paoca.org
elanza@eckertseamans.com
ElatiehM@ugicorp.com
etriscari@pa.gov

jamcnelly1@arippa.org
Jeanne.dworetzky@Exeloncorp.com
jnorton@eckertseamans.com
kkulak@morganlewis.com
kmickens11@verizon.net
lechambon@comcast.net
lrc@stevenslee.com
mag@stevenslee.com
matthewagen@postschell.com
mhassell@postschell.com
noel.trask@exeloncorp.com
perussell@pplweb.com
pwoodyard@wges.com
rballenger@clsphila.org
rdk@indecon.com
rmatz@pa.gov
rstrickler@gslsc.com
sbruce@mwn.com
sdebroff@rhoads-sinon.com
sgranger@pa.gov
sgray@pa.gov
ssp@bwilleylaw.com
Stephen.bennett@exeloncorp.com
Tchryssikos@washgas.com

tgadsden@morganlewis.com
tgiesler@firstenergycorp.com
tjsniscak@hmslegal.com
tmccloskey@paoca.org

tmullooly@foley.com
tstiles@foley.com
ttran@clsphila.org
vkaranrikas@mwn.com

Date: March 25, 2013


Michael W. Gang