

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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January 21, 2014

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

RE: Duquesne Light Company Petition for
Approval and Modification of its 2014-2016
Universal Service and Energy Conservation
Plan
Docket No. M-2013-2350946

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Reply Comments in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in black ink that reads "Christy M. Appleby". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824

Enclosures

cc: Joseph Magee, Bureau of Consumer Services (BCS)
Louise Fink-Smith, Law Bureau
Cyndi Page, Office of Communications
Office of Administrative Law Judge
Office of Special Assistants
Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company Universal Service	:	
And Energy Conservation Plan For	:	Docket No. M-2013-2350946
2014-2016 Submitted In Compliance With	:	
52 Pa. Code §§ 54.74	:	

REPLY COMMENTS
OF THE
OFFICE OF CONSUMER ADVOCATE

The Office of Consumer Advocate (OCA) files these Reply Comments pursuant to the Pennsylvania Public Utility Commission's (Commission) directive in the Tentative Order entered on December 19, 2013 at the above-referenced docket.

I. INTRODUCTION

On February 28, 2013, Duquesne Light Company (Duquesne or Company) filed the above-captioned Universal Service and Energy Conservation Plan (USECP or Plan) for 2014 through 2016, in accordance with the Commission's regulations at 52 Pa. Code §§ 54.74-54.78, relating to electric universal service and energy conservation requirements. Subsequently, on June 28, 2013, Duquesne filed a Petition for Approval and Modification of its 2014-2016 Plan ("Amended Plan") pursuant to the Commission's Order entered on January 25, 2013 regarding Duquesne's Petition for Approval of a Default Service Program and Procurement Plan for the period June 1, 2013 through May 31, 2015 at Docket No. P-2012-2301664 and the implementation of a Customer Assistance Program (CAP) Shopping Plan. On December 19, 2013, the Commission entered its Tentative Order on the Plan which requested Comments from interested parties. Pursuant to the Tentative Order, on January 8, 2014, the OCA, Duquesne, and

the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) filed Comments.

On August 2, 2013, Duquesne also filed Supplement No. 81 to Tariff Electric – Pa. P.U.C. No. 24 at Docket No. R-2013-2372129, seeking a distribution rate increase. On January 16, 2014, all but one of the parties to the proceeding filed the Joint Petition for Approval of Non-Unanimous Settlement (Settlement) which addressed universal service issues including an increase to the maximum CAP credit and an increase to the annual number of Low Income Usage Reduction Program (LIURP) visits and the LIURP budget raised by CAUSE-PA in its Comments. CAUSE-PA and the OCA are both signatories to the Settlement. The OCA submits that the Settlement resolves these issues and that the Settlement resolution should be incorporated into Duquesne’s Plan when it is approved.

The OCA responds to the Comments of CAUSE-PA as follows:

II. COMMENTS

The OCA responds to two issues raised by CAUSE-PA’s Comments: (1) that the maximum that the CAP credit should be increased and (2) that the annual number of LIURP visits should be increased.

A. Maximum CAP Credit

In its Comments, CAUSE-PA requests that the maximum CAP credit be increased for non-heating and heating CAP customers. Comments at 11-12. Duquesne’s maximum CAP credit is currently set at \$560 for non-heating CAP customers and \$1400 for heating accounts. Id. CAUSE-PA recommends that the maximum CAP credit amounts are too low and that the maximum CAP credit levels should be increased and keyed to a set standard, such as relevant energy prices and inflation. Id. at 12. CAUSE-PA also references the Commission’s proposed

increase to maximum CAP credit levels to \$700 for non-heating customers and \$1800 for electric heating customers in the Commission's Final Investigatory Order proceeding at Docket No. M-00051923. The Commission to date has not adopted or implemented the proposed increases to the maximum CAP credit levels.

As noted above, on January 16, 2014, the parties, including the OCA and CAUSE-PA, filed the Joint Petition for Approval of Non-Unanimous Settlement (Settlement) at Docket No. R-2013-2372129 in order to resolve Duquesne's distribution rate increase filing. Included in the Settlement are increases to the maximum CAP credit from the current \$560 to \$700 for non-heating CAP customer accounts and from the current \$1400 to \$1800 for electric heating accounts. The OCA supports the Settlement's proposed maximum CAP credit increase as discussed in the OCA's Statement in Support to the Settlement filed in Docket No. R-2013-2372129. The OCA submits that the Settlement commitment, once approved, should be reflected in Duquesne's Plan.

B. Proposed Increase To The LIURP Annual Targets And Budget

In its Comments, CAUSE-PA proposes to increase the number of households targeted for LIURP treatment from the current 2,555 households per year to approximately 3,100-3,700 households per year. CAUSE-PA Comments at 16. CAUSE-PA also proposes an increase in the overall LIURP budget from \$1,363,600 per year for the period of 2014-2016 to a maximum of \$1,975,800. Id.

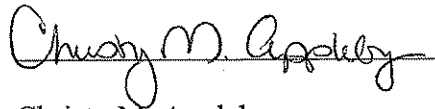
As noted above, last week, on January 16, 2014, the parties, including the OCA and CAUSE-PA, filed the Settlement at Docket No. R-2013-2372129 in order to resolve Duquesne's distribution rate increase filing. Included in the Settlement is an increase to the number of households targeted for LIURP treatment from 2,555 households per year to 3,100 households

per year and the corresponding budget to meet the LIURP commitments. The OCA supports the Settlement's proposed increase to the annual target of LIURP households targeted for treatment and the corresponding budget to meet these commitments as discussed in the OCA's Statement in Support to the Settlement filed in Docket No. R-2013-2372129. The OCA submits that the Settlement commitments, once adopted, should be reflected in Duquesne's Plan.

III. CONCLUSION

WHEREFORE, the Office of Consumer Advocate respectfully requests that Duquesne's Universal Service and Energy Conservation Plan be approved in accordance with the Tentative Order, with the OCA's December 19, 2013 Comments, and the OCA's Reply Comments here.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

Duquesne Light company Petition for :
Approval and Modification of its 2014- : Docket No. M-2013-2350946
2016 Universal Service and Energy :
Conservation Plan :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Reply Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21st day of January 2014.

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