



Duquesne Light
Our Energy...Your Power

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March 25, 2014

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via Overnight Mail

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 N Street, 2nd Floor – 1 North
Harrisburg, PA 17120

RE: Proposed Rulemaking: Standards for Changing a Customer's Electricity
Generation Supplier *L - 2014-2409383*

Dear Secretary Chiavetta:

Enclosed for filing please find Duquesne Light Company's Comments on the Commission's Proposed Rulemaking for Standards for Changing a Customer's Electricity Generation Supplier.

Sincerely,

Robert H. Hoaglund II
Attorney for Duquesne Light Company

RHH/plg

Enclosure

cc: Certificate of Service
RA-OCMO@pa.gov

MAR 25 2014

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Proposed Rulemaking: Standards :
Standards For Changing a Customer's : Docket No. L-2014-2409383
Electricity Generation Supplier :

COMMENTS OF DUQUESNE LIGHT COMPANY

I. Introduction

On March 18, 2014, the Pennsylvania Public Utility Commission ("Commission") issued a Secretarial Letter ("Secretarial Letter") in the above captioned docket informing jurisdictional Electric Distribution Companies ("EDCs"), the Office of Consumer Advocate ("OCA") and the Office of Small Business Advocate ("OSBA") that the Commission intends to promulgate a rulemaking which will amend existing Regulations at 52 Pa. Code, Chapter 57 to direct EDCs to accelerate switching time frames through off-cycle meter reads in a fashion that will permit Pennsylvania retail electric customers to switch suppliers within three (3) days or less. Specifically, the Commission is seeking comments regarding the proposed changes, the practicality of implementing the proposed changes within six-months of their effective date and the costs of doing so. Duquesne Light Company ("Duquesne Light" or the "Company") appreciates the opportunity to comment on the proposed changes to the regulations.

II. General Comments Regarding the Proposed Rulemaking

Duquesne Light generally supports the Commission's efforts to further reduce the time it takes for consumers to switch between suppliers or between suppliers and default service. The recent impacts on consumers of wholesale electricity market volatility and the potential for similar volatility to occur in the future necessitate the need for accelerated switching to occur. Duquesne Light appreciates the Commission's desire to modify existing time frames to allow customers to more quickly switch suppliers in the future.

While the Company generally supports the Commission's overall objectives, the Company is seeking clarification with respect to the proposed rulemaking and to explain certain information technology constraints on the Company's ability to implement off-cycle switching capability in the time frames set forth in the Secretarial Letter. With the Company's customer care and billing system going live in July of 2014, the Company will not be able to implement the rulemaking as quickly as requested by the Commission, as further described below. Moreover, the Company has provided cost estimates to implement the proposed regulations, a recommendation as to how it would recover such costs, and certain changes to the draft rulemaking herein.

The proposed modifications to the Standards for Changing a Customer's Electricity Generation Supplier Regulations is a change to the EDC model that switches will occur on monthly meter read dates upon which EDCs have built their systems, developed their processes, and trained their employees. Therefore, to effectuate this wholesale change to information technology, business processes, and people, the opportunity to switch off-cycle must become a foundational part of the new EDC model, integral with the development of advanced meters and applicable to all switching scenarios. To this end and to the extent feasible, the Company recommends a thorough and inclusive off-cycle switching development process and a well-planned and controlled release of subsequent system modifications.

The Company is also concerned that the proposed rulemaking eliminates customer protections involving slamming and a customer's right to change their mind. Presently, 52 Pa Code §57.173 provides that upon receipt of notification from an EGS that a customer has requested a switch:

the EDC shall send the customer a confirmation letter noting the proposed change of EGS. This letter shall include notice of a 10-

day¹ waiting period in which the order may be canceled before the change of the EGS takes place. The notice shall include the date service with the new EGS will begin unless the customer contacts the EDC to cancel the change. The 10-day waiting period shall begin on the day the letter is mailed. The letter shall be mailed by the end of the next business day following the receipt of the notification of the customer's selection of an EGS.

In the Commission's proposed rulemaking, the customer would not receive notice of the proposed switch until after it has been completed. Providing a notice to the customer after the switch has occurred without giving the customer an opportunity to prevent the change from occurring may lead to customer frustration and dissatisfaction with the supplier choice process. Additionally, this process may result in an increase in canceled bills and reconciliations. Accordingly, Duquesne Light recommends that the regulation be modified to require EGSs to send a letter notifying the customer of the pending switch within 24 hours of enrolling the customer. This will help ensure that customers are aware of the switch before it occurs. Finally, the Company believes that at least three (3) business days are required for the Company to switch a customer.

III. Specific Comments Regarding the Proposed Rulemaking

With respect to proposed rulemaking, the Company has attached to this document a mark-up with its proposed revisions and comments. The proposed changes are further described below.

Section 57.172(1)

Language was added to advise the customer of possible termination fees similar to Subsection (2) in Section 57.172 as this is also applicable in the scenarios described in this section. In addition, the Company requests clarification as to what the last sentence in this

¹ This has been recently changed to 5-days per Commission Order.

section means, in what context it would apply, and examples of “Commission-approved programs” that may be applicable.

Section 57.173(1)

The Company proposes to remove some of the customer consent language in this section because once the 3-day rescission period ends, the customer is switched and no further consent would then be required. The language as written suggested that additional consent may be needed beyond the customer’s initial consent to procure supply service from the EGS which should have taken place at the time the customer contacts the EGS to request a change in electric supply service.

Additionally, the Company recommends either removal of the language “to initiate the switch on a future date . . . specified by the customer” or clarifying the language such that the EGS is required to hold pending switches until the time of the requested date to initiate service. *This is consistent with current practice and would prevent the Company from either prematurely effectuating the switch or “rejecting” it outright because all enrollments are processed based on the date that they are received.*

Section 57.173(2)

The Company added the language at the end of this section in an attempt to capture all possible switching scenarios. The Company would also like to clarify that no notice is required when a customer changes product with the same EGS. Finally and as stated above, the Company believes that the EGS should notify the customer after the enrollment so customers are aware of the switch.

Section 57.174

Duquesne Light proposes modifications to the language to clarify that the change should be made within three (3) business days. The Company will not be able to effectuate a switch within three (3) calendar days given the limitations provided by PJM Interconnection, LLC (“PJM”). Duquesne Light is required to upload each EGS’s aggregate Network Service Peak Load (“NSPL”) to PJM on a 36-hour business day-ahead schedule. The NSPL is an important transmission charge determinant. PJM calculates the total Network Integration Transmission Service (“NITS”) charge to each EGS based on the NSPL and the NITS rate for the Duquesne Light zone. This charge, along with other ancillary charges, is sent to every supplier in the weekly and monthly PJM invoices.

It is also important to note that no reconciliation exists within PJM for NSPL uploads. As such, if a switch is effectuated within three (3) calendar days as opposed to business days, an EGS may be charged for the capacity for this customer’s load although the load is no longer served by that EGS. Even with the technology changes proposed to adopt off-cycle switching, the Company would be unable to accommodate a switch within three (3) calendar days given the PJM restrictions.

Section 57.175

Duquesne Light does not believe this section should be removed. Other sections such Sections 57.172, 57.173, 57.174 include references to “a person authorized to act on the customer’s behalf” or an “authorized party.” Without this section, there is no definition or direction regarding formal notification to the EDC that a third party has been authorized by the customer to make these types of decisions. However, the Company recognizes that by including Section 57.175, only the EDC has record of these authorized persons. Therefore, if it is the

Commission's intent that only the customer can initiate an EGS product switch with an EGS, then this section should be deleted as well as the other references in the above-mentioned sections. Otherwise, the Company recommends that the Commission include language that this authorization be provided to the supplying EGS when the customer initiates a contact with an EGS for a Selected EGS Product.

Section 57.177(2) new

The Company requests clarification as to the applicability of this section and a further explanation of how it applies to default service providers.

Section 57.178(2) new

Duquesne Light appreciates the need to maintain records of customer switching transactions. However, the Company believes that the record retention request should be consistent with the record maintenance provisions in 52 Pa Code § 56.202.² Moreover, if it was the Commission's intent that the Company maintains telephone call records for three years, this would require substantial additional storage costs.

IV. Implementation Timeline

Duquesne Light cannot implement off-cycle switching in the six (6) month timeframe proposed in the Secretarial Letter due to current system development commitments and projects already underway at the Company. Therefore, the Company is requesting an implementation date in June of 2015. Duquesne Light is in the process of implementing a new customer care and billing system that is scheduled to go live in July of 2014. This is a massive undertaking by the Company and it will, among other things, become the platform upon which Duquesne Light's

² A public utility shall preserve for a minimum of 4 years written or recorded disputes and complaints, keep the records accessible within this Commonwealth at an office located in the territory served by it and make the records available for examination by the Commission or its staff. 52 Pa Code §56.202.

advanced meters will operate. The incorporation of technology necessary to permit off-cycle switching would delay the new system's go-live date. Delays to the planned "go live" would have significant costs and delay the Company's ability to deploy fully functional advanced meters because the new customer care and billing system is foundational technology. Further, it would also delay the Company's next time-of-use pilot program, which will be described in detail in the Company's next default service filing.

Specifically, Duquesne Light has several matters approved, pending before the Commission, or filings that are currently contemplated (such as its default service plan) which have or will propose June, 2015 in-service dates for programs that are based on the July, 2014 "go live" date. These include modifications to its Universal Services Programs, inclusion of *supplier information on EDC bills, implementation of Seamless Moves and Instant Connects*, implementation of a time-of-use program, and improvements to its Standard Offer Program. In addition, deployment of smart meters and the technology to ensure their effectiveness is beginning this year. All of these regulatory initiatives require information technology modifications to the Company's systems.

When developing the estimated implementation timeframe, Duquesne Light considered whether the use of additional contractors to support the internal and external information technology resources already on-site would expedite implementation of off-cycle switching. Unfortunately, it will not. Beginning May, 2014, the Company will cease modifications to its new customer care and billing system and concentrate all efforts on this new system deployment. Following "go live," the Company will enter a period of "hyper care." This means that there can be no modifications or changes to the new system for a period of three to six months and all developers and testers will be supporting the resolution of day-to-day matters. Duquesne Light

learned from other utilities across the country who implemented similar systems that this hyper care period is critical to ensuring system stability. Moreover, the hiring of new or additional personnel would further complicate the situation as they would not be experienced with the technology, would require training, and would not be able to use the existing resources that will be focused on stabilizing the new system.

However, the Company recognizes the Commission's request for an expeditious implementation of off-cycle switching capability. To this end, Duquesne Light proposes the following approach to achieve the most expeditious development of off-cycle switching given the previously explained information technology limitations. Due to the period of hyper care explained above, the starting point for this effort would be October, 2014 or three (3) months after the Company's July, 2014 "go live" date.

Duquesne Light proposes to bill on-cycle and switch off-cycle. Under the proposed rulemaking, there is no limit to the amount of switches a customer can make in a given bill cycle. However, the Company is proposing to permit up to three (3) switches per bill cycle for all customers except for customers with summary bills and bills for services such as billboards, municipalities, and streetlights, and up to two (2) switches per bill cycle for accounts with concurrent bills. This proposal solves two fundamental concerns. First, it addresses the immediate issue which prompted this accelerated rulemaking procedure by allowing customers the opportunity to switch suppliers quickly especially if they are faced with supply charges that are not to their satisfaction. Second, it is essential to the Company's development of an accelerated off-cycle solution in a timely manner. Currently, Duquesne Light effectuates approximately 9000 switches per month. The Company proposes that the Commission permit Duquesne Light to have a process that allows for limited switches per bill cycle. If the Company

was required to allow more switches a month than discussed above, then the Company would be required to redesign its bills and address the physical limitations of its bill print operations. This is particularly important for the recommended proposal as switches per cycle beyond the recommendation stated above would cause the bill to extend beyond the current four-page design.

Under this proposal, the Company estimates that it will take nine (9) months from October, 2014 or until June, 2015 to fully implement and test an off-cycle switching solution that meets the minimum requirements in the proposed rulemaking. Again, it is important to note that this proposal is predicated on the assumption that the EDC will make the switch within three (3) business days of receiving electronic notice as described in the comments above.

Additionally, Duquesne Light anticipates that a waiver of the requirement³ regarding the number of corrected bills may be necessary. In Section 57.174(2), the Commission proposes that an estimated meter read or a customer-provided meter read are acceptable alternatives for instances where the EDC does not have advanced or automated metering capability. Assuming these account for approximately 20% of the Company's meter reads under the off-cycle switching three-day requirement, Duquesne Light anticipates an increase in the number of reconciliations with EGSs and reconciliations with customers that will ultimately result in cancel/rebills. Furthermore, if the EDC is ultimately required to cancel the switch after receipt of the notification described in Section 57.173(2), a new bill or a corrected bill may be issued.

Finally, the Company has considered the impacts of the Commission's recent Tentative Order in Docket No. M-2014-2401345 recommending the inclusion of the EGS's logo on the

³ This requirement arose in response to the Customer Service Performance Report and the metrics the Company is required to meet for meter readings, complaints, calls answered in less than 30 seconds, etc. With the increase this past year, some leniency should be provided to EDCs for variable rate issues or an expected increase to Company numbers should be justified.

bill; the expansion of bill messaging space allotted to EGSs; and the inclusion of a Shopping Information Box. In its comments under that docket, Duquesne Light stated that it could implement the proposed modifications as described for most bills by June 1, 2015 or within six (6) months from an Order, and more extensive bill redesigns such as bills for service provided to billboards, municipalities, and streetlights could be incorporated by January of 2016.

This proposed rulemaking on off-cycle switching addressed in these comments impacts these timelines and conversely, the space constraints that would be introduced by the “Joint Bill” Tentative Order would cause delays in implementing off-cycle switching. The timelines proposed in these off-cycle switching comments assume that the Company has the full use of the space currently on its bills and in compliance with current regulations. If additional bill changes are required, the bills could extend beyond the current four pages, but this would require additional cost and timing considerations.

V. Costs of Implementing the Proposed Changes and Cost Recovery

Duquesne Light estimates that cost of implementing the technological and system changes for accelerated switching and off-cycle switching are approximately \$10M. The Company expects that most of these costs are capital related. Additionally, the Company’s Customer Care organization which includes its call center, supply service center, meter reading, billing and payment processing, and credit and collections departments, would incur additional staffing and other operations and maintenance expenses if these changes were accelerated before final deployment of advanced meters. These back office expenses in the Customer Care organization for training, billing adjustments, and additional full time employees over the five (5) year period from the implementation of a final order in this proceeding to the final

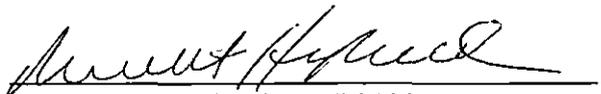
deployment of smart meters are estimated to be approximately \$4M of expenses. Thus, the total estimated costs for the Company's proposal are approximately \$14M.

Duquesne Light is concerned about cost recovery for these additional capital and operational expenses. The Secretarial Letter states that "[c]ost recovery for implementation is anticipated to be addressed in each EDC's next base rate proceeding." The Company requests that the Commission's Final Order on this matter provide that EDCs are entitled to full and current recovery of all associated costs. Because the Company believes that off-cycle switching is one of the customer benefits directly related to smart meter implementation, the Company is requesting that costs be recovered in the Company's Smart Meter Surcharge or another charge that allows for full and current cost recovery.

VI. Conclusion

Duquesne Light appreciates the opportunity to comment on this important rulemaking and respectfully asks that the Commission consider its comments.

Respectfully submitted,



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ANNEX A
 TITLE 52. PUBLIC UTILITIES
 PART I. PUBLIC UTILITY COMMISSION
 Subpart C. FIXED UTILITY SERVICE
 CHAPTER 57. ELECTRIC SERVICE
 Subchapter M. STANDARDS FOR CHANGING A CUSTOMER'S ELECTRICITY
 GENERATION SUPPLIER

§ 57.171. Definitions.

The following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise:

Act—The Electricity Generation Customer Choice and Competition Act, 66 Pa.C.S. § § 2801—2812.

Customer—A purchaser of electric power in whose name a service account exists with either an EDC or an EGS. In addition, the term includes all persons authorized to act on a customer's behalf.

Default Service Provider—As defined by 66 Pa. C.S. § 2803.

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EDC—Electric distribution company—An electric distribution company as defined in section 2803 (relating to definitions).

EGS—Electric generation supplier—A supplier as defined in section 2803 of the act.

Current EGS Product – the EGS product applicable to the customer at the time of the customer contact.

Selected EGS Product – the EGS product that the customer wants for its new electric supply service.

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§ 57.172. Customer contacts with the EDC.

(1) When a customer or a person authorized to act on the customer's behalf orally contacts the EDC to request a **switch from the Current EGS Product or Default Service Provider to a new Selected EGS Product**, the EDC shall notify the customer that the EGS offering the **Selected EGS Product** shall be contacted directly by the customer to initiate the change and that the customer may be subject to a financial penalty associated with terminating service with the Current EGS Product. **This requirement does not apply in the context of a Commission-approved program that requires the EDC to initiate a change in EGS service.**

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(2) When a customer or person authorized to act on the customer's behalf orally contacts the Default Service Provider to request a switch from the Current EGS Product to default service, the Default Service Provider shall notify the customer that there may be a financial penalty associated with terminating service with the Current EGS Product. Subsequent to this notice and given express oral consent from the customer, the Default Sservice Provider shall enroll the customer onto default service.

§ 57.173. Customer contacts an EGS to request a change in electric supply service[with EGSs].

When [a contact occurs between]a customer or a person authorized to act on the customer's behalf [and]contacts an EGS to request a **switch from** [a change of]the **Current EGS Product or Default Service Provider to a new Selected EGS Product**, [upon receiving direct oral confirmation or written authorization from the customer to change the EGS, the contacted EGS shall]the following actions shall be taken by the EGS offering the Selected EGS Product and the customer's EDC:

(1) The EGS offering the Selected EGS Product shall [N]notify the EDC of the customer's EGS selection at the end of the 3-business day rescission period provided in § 54.5(d) (relating to disclosure statement for residential and small business customers), to either initiate the switch or to initiate the switch on a future date specified by the customer. If the customer cancels or does not consent to the switch during the 3-business day hold or other delay is given by the customer, then the EGS offering the Selected EGS Product shall notify the EDC by the end of the next business day following receipt of the customer's consent.

(2) Upon receipt of this notification, or notification that the customer has authorized a switch to default service, the EDC shall send the customer a confirmation letter noting the change of EGS or Selected EGS Product, or the switch to default service. [This letter shall include notice of a 10-day waiting period in which the order may be canceled before the change of the EGS takes place.]The notice shall include the date service with the new Selected EGS Product or default service will begin[unless the customer contacts the EDC to cancel the change. The 10-day waiting period shall begin on the day the letter is mailed]. The letter shall be mailed by the end of the next business day following the receipt of the notification of the customer's selection of an EGS, a new Selected EGS Product or the switch to default service.

§ 57.174. Time[frame requirement.

(1) When a customer or authorized party has provided the EGS offering the Selected EGS Product with oral confirmation or written authorization to [change]select the new EGS[s] product or move from default service, or a customer or authorized party has provided the current EGS with oral confirmation or written authorization to return the customer to default service, consistent with electric data transfer and exchange standards, the EDC shall

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Comment [A1]: Please see comment in Company's written comment
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make the change [at the beginning of the first feasible billing period]within 3 business days
[10-day waiting period]of the receipt by the EDC of the electronic enrollment transaction.

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(2) The EDC shall obtain a meter read to effectuate the switch of EGS service within the time period provided for in paragraph (1). In instances where the EDC does not have advanced or automated metering capability, the EDC shall obtain an actual meter read, use an estimated meter read or use a customer-provided meter read. In instances where estimates are used, the estimated meter read shall be updated when an actual meter read is obtained to reflect the customer's actual usage through the customer's normal meter read cycle.

* * * * *

§ 57.175. Persons authorized to act on behalf of a customer.

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A customer may identify persons authorized to make changes to the customer's account. To accomplish this, the customer shall provide the EDC with a signed document identifying by name those persons who have the authority to initiate a change of the customer's EGS.

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§ 57.176.]Valid written authorization.

* * * * *

§ 57.17[7]6. Customer dispute procedures.

* * * * *

§ 57.17[8]7. Default service provider.

(1) This subchapter does not apply when the customer's service is discontinued by the EGS and subsequently provided by the default service provider because no other EGS is willing to provide service to the customer.

(2): This subchapter does apply when the customer elects to receive service from the default service provider.

Comment [A2]: Please see comment in the Company's written comments

§ 57.17[9]8. Record maintenance.

(1) Each EDC and each EGS shall preserve all records relating to unauthorized change of EGS disputes for 3 years from the date the customers filed the dispute. These records shall be made available to the Commission or its staff upon request.

(2) The default service provider shall retain all records relating to situations as described in § 57.172(2) for 3 years from the date of the customer contact with the default service provider. These records shall be made available to the Commission or its staff upon request.

Comment [A3]: Please see comment in the Company's written comments

* * * * *

MAR 25 2014

CERTIFICATE OF SERVICE

L-2014-2409383

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I hereby certify that a true and correct copy of Duquesne Light Company's Comments on the Commission's Proposed Rulemaking for Standards for Changing a Customer's Electricity Generation Supplier 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).

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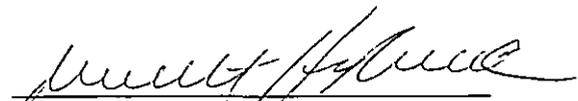
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Viridian Energy PA, LLC
64 North Main Street
Norwalk, CT 06854

Xoom Energy Pennsylvania, LLC
11208 Statesville Rd.
Huntersville, NC 18201

Office of Small Business Advocate
1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101



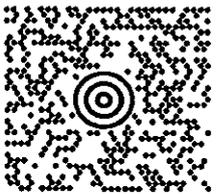
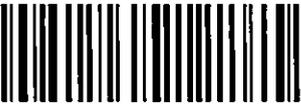
Robert H. Hoaglund II
Assistant General Counsel
Duquesne Light Company
411 Seventh Avenue, 16-1
Pittsburgh, PA 15222
412-393-1058
rhoaglund@duqlight.com

Date: March 25, 2014

UPS CampusShip: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
 2. **Fold the printed sheet containing the label at the line so that the entire shipping label is visible.**
Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
 3. **GETTING YOUR SHIPMENT TO UPS**
UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.
Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
Hand the package to any UPS driver in your area.
Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.
- Customers with a Daily Pickup**
Your driver will pickup your shipment(s) as usual.

FOLD HERE

ROBERT HOAGLUND II 412-393-1058 DUQUESNE LIGHT 411 SEVENTH AVE PITTSBURGH PA 15219		0.0 LBS LTR	1 OF 1
SHIP TO: SECRETARY ROSEMARY CHIAVETTA PA PUBLIC UTILITY COMMISSION 400 NORTH STREET COMMONWEALTH KEYSTONE BUILDING HARRISBURG PA 17120-0200			
	PA 171 9-20 		
UPS NEXT DAY AIR		1	
TRACKING #: 1Z A5V 029 01 9278 2201			
			
BILLING: P/P			
Cost Center: 006			
<small>CS 16.1.04</small>		<small>WNTES0 48.0A 01/2014</small>	
			

RECEIVED

MAR 25 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU