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File #: 2267/158273

May 30, 2014

***VIA ELECTRONIC FILING***

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, 2015 through May 31, 2017 - Docket No. P-2014-2418242**

Dear Secretary Chiavetta:

Enclosed for filing is the Prehearing Conference Memorandum of Duquesne Light Company for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Anthony D. Kanagy', is written over a circular stamp or mark.

Anthony D. Kanagy

ADK/jl  
Enclosures

cc: Honorable Katrina L. Dunderdale  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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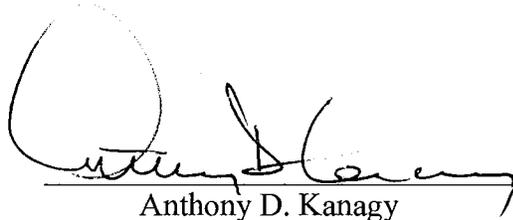
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*Exelon Generation Company, LLC*

Date: May 30, 2014



Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :  
For Approval of Default Service Plan :  
For The Period June 1, 2015 : Docket No. P-2014-2418242  
Through May 31, 2017 :

**PREHEARING CONFERENCE MEMORANDUM  
OF DUQUESNE LIGHT COMPANY**

**TO ADMINISTRATIVE LAW JUDGE KATRINA L. DUNDERDALE:**

**I. INTRODUCTION**

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby submits this Prehearing Conference Memorandum pursuant to the Prehearing Conference Order issued by Administrative Law Judge Katrina L. Dunderdale (the “ALJ”) on May 7, 2014, in the above-captioned proceeding.

On April 24, 2014, Duquesne Light filed the above-captioned Petition with the Pennsylvania Public Utility Commission (“Commission”). Therein, Duquesne Light requests Commission approval for a Default Service Plan for the period from June 1, 2015 through May 31, 2017. In the Default Service Plan, Duquesne Light proposes to continue separate default supply procurements for: (1) Residential and Lighting customers, (2) Small Commercial and Industrial (“C&I”) customers with monthly metered demands less than 25 kW, (3) Medium C&I customers with monthly metered demands equal to or greater than 25 kW and less than 300 kW, and (4) Large C&I customers with monthly metered demands equal to or greater than 300 kW.

Duquesne Light proposes to continue to procure supplies for Residential and Lighting, Small C&I and Medium C&I default service customers through fixed-price full requirements

contracts with varying terms for each class. However, Duquesne Light proposes to ladder contracts for Residential and Lighting customers on a six-month basis, which will allow default service supply rates to change every six months as compared to once per year under the currently effective plan. Duquesne Light also proposes to transition Medium C&I default service customers from six-month supply contracts to three-month supply contracts. These changes to the Residential and Medium C&I procurement plans are designed to make default service rates more responsive to market changes during the default service period. Duquesne Light proposes to continue to procure supplies for Large C&I default service customers through the day-ahead spot market.

The Company proposes to revise its Standard Offer Customer Referral Program (“SOP”) effective June 1, 2015, to more closely align with SOPs offered by other electric distribution companies in Pennsylvania. The primary change to the SOP is to provide for enrollment of customers by a third-party vendor.

Duquesne Light also proposes to offer a Time-of-Use (“TOU”) Program. Duquesne Light proposes to acquire electric supply for TOU customers from electricity generation suppliers through a competitive Request for Proposal process.

On May 7, 2014, the ALJ issued a Prehearing Conference Order notifying parties that a telephonic prehearing conference will be held on June 2, 2014 at 9:00 a.m.

On May 12, 2014, the Office of Consumer Advocate filed a Notice of Intervention, Public Statement and Answer to the Company’s Petition.

On May 15, 2014, the Office of Small Business Advocate filed a Notice of Intervention, Public Statement, Answer, Verification and Notice of Appearance.

On May 19, 2014, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania filed a Petition to Intervene and Answer. Also on May 19, 2014, FirstEnergy Solutions Corp. filed a Petition to Intervene.

On May 20, 2014, the Bureau of Investigation and Enforcement filed a Notice of Appearance.

On May 23, 2014, Noble Americas Energy Solutions LLC and Citizens for Pennsylvania's Future ("PennFuture") filed Petitions to Intervene.

On May 27, 2014, Duquesne Industrial Intervenors and NextEra Energy Power Marketing, LLC filed Petitions to Intervene.

On May 29, 2014, Retail Energy Supply Association ("RESA") and Exelon Generation Company, LLC filed Petitions to Intervene. RESA also filed a Motion for *Pro Hac Vice* of Brian R. Greene.

## II. COUNSEL

Duquesne Light will be represented in the above-referenced proceeding by the following counsel:

Michael W. Gang (ID # 25670)  
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Duquesne Light's counsel are authorized to receive copies of all documents served in this proceeding. In addition, Duquesne Light agrees to receive service of documents electronically in this proceeding.

### III. WITNESSES AND ISSUES

Duquesne Light's interpretation of the issues in this proceeding is set forth in the direct testimony and exhibits that the Company filed with its Default Service Petition. The names, addresses and area of testimony for each witness that presented testimony are provided below:

David B. Bordo Vice President – Strategy & External Affairs Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219	Statement No. 1	Policy Considerations and Overview of the Plan and Proposed TOU Program
James Habberfield Forecasting and Procurement Supervisor Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219	Statement No. 2	Power Procurement, Act 129 Requirements and TOU Program Summary
Neil S. Fisher Principal The NorthBridge Group 30 Monument Square, Suite 105 Concord, MA 01742	Statement No. 3	Overall Retail Access Program by the Company, Procurement Plan Design, and Act 129 Requirements
William V. Pfrommer Senior Manager, Rates and Tariff Services Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219	Statement No. 4	Rate Design, Time-of-Use Rates, Cost Recovery and Tariff Changes
Michele R. Sandoe Vice President of Customer Care Duquesne Light Company 411 Seventh Avenue, MD 15-1 Pittsburgh, PA 15219	Statement No. 5	Customer Choice Communication Program, including TOU customer Communications, Standard Offer Customer Referral Program, and Status of Customer Assistance Program Customer Shopping and Portability

The subject matters listed above, as further supported by the testimony and exhibits, represent Duquesne Light's statement of the issues on this proceeding. Further definition of the issues will be developed by the parties during the course of this proceeding. Duquesne Light reserves the right to call additional witnesses to present testimony on additional issues and subject matters that may arise during the course of this proceeding.

#### **IV. SCHEDULE**

Duquesne Light proposes the following schedule for this proceeding:

Other Parties Direct Testimony	July 8, 2014
Rebuttal Testimony	August 1, 2014
Surrebuttal Testimony	August 15, 2014
Hearing (including oral rejoinder)	August 26-28, 2014
Main Briefs	September 15, 2014
Reply Briefs	September 30, 2014

Duquesne Light will continue to work with parties to attempt to develop a mutually agreeable schedule. Duquesne Light notes that PennFuture has requested that hearings begin on August 25, 2014. Duquesne Light is willing to agree to this request subject to the agreement of the ALJ and the parties.

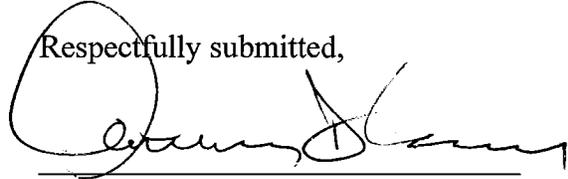
#### **V. SETTLEMENT**

Duquesne Light is willing to enter into settlement discussions with all parties on all issues in this proceeding.

**VI. DISCOVERY**

Duquesne Light is not aware of any discovery issues in this proceeding. Duquesne Light is willing to participate in informal discovery discussions with parties.

Respectfully submitted,



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Date: May 30, 2014

Attorneys for Duquesne Light Company