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MAY 15 2014

PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**ANSWER OF THE**  
**OFFICE OF SMALL BUSINESS ADVOCATE**

Pursuant to 52 Pa. Code §5.61(a), the Office of Small Business Advocate (“OSBA”) files this Answer to the Petition of Duquesne Light Company (“Duquesne” or “Company”) for Approval of Default Service Plan for the Period June 1, 2015 through May 31, 2017 (“Petition”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on April 24, 2014, and avers the following in support thereof:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Duquesne proposes to acquire electricity for customers in the Residential and Lighting classes primarily through 12-month, laddered full requirements, load following contracts. *See* Petition, para. 6 and 7. Except for Lighting customers, Duquesne would acquire electricity to serve non-residential default service customers with maximum peak demands of less than 25 kW through 12-month, laddered full-requirements, load-following contracts. *See* Petition, para. 20 and 21. Duquesne would acquire electricity to serve non-residential default service customers with maximum peak

demands of equal to or greater than 25 kW but less than 300 kW through three month, non-laddered, full-requirements, load-following contracts. *See* Petition, para. 28-29.

Duquesne would continue serving default customers with maximum peak demands of 300 kW or higher through day ahead hourly spot pricing which the same service currently offered to Large C&I customers under the Company's current DSP VI Plan. *See* Petition, para. 35.

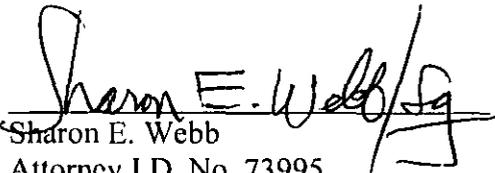
3. Duquesne would conduct separate procurements for Small Commercial and Industrial ("C&I") customers and Medium C&I customers. Small C&I customers have maximum peak demands of less than 25 kW while Medium C&I customers have maximum peak demands of at least 25 kW but less than 300 kW. *See* Petition, para. 21 and 29.

4. Duquesne also would impose a cap on the number of Residential and Small C&I tranches awarded to the same wholesale supplier. Duquesne has proposed to remove the supplier load cap for Medium C&I solicitations. *See* Petition, para. 38.

5. The OSBA agrees that Duquesne should acquire default service electricity for Small C&I customers through full-requirements, laddered load-following contracts. The OSBA also agrees that Duquesne should impose a load cap on Small C&I solicitations. However, the OSBA reserves the right to comment on the details of these, and other, provisions of Duquesne's Petition after the OSBA has had the opportunity to engage in discovery.

WHEREFORE, the Office of Small Business Advocate respectfully requests the Commission to direct the Office of Administrative Law Judge to hold hearings on Duquesne's default service plan and prepare a Recommended Decision.

Respectfully submitted,

  
Sharon E. Webb  
Attorney I.D. No. 73995  
Assistant Small Business Advocate

For: John R. Evans  
Small Business Advocate

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Date: May 15, 2014

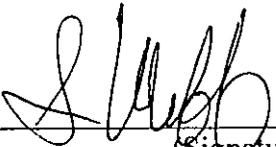
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**Petition of Duquesne Light Company for** :  
**Approval of Default Service Plan for the** : **Docket No. P-2014-2418242**  
**Period June 1, 2015 Through May 31, 2017** :

**VERIFICATION**

I, Sharon E. Webb, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: May 15, 2014

  
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(Signature)

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