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Tishekia Williams
Senior Counsel, Regulatory

July 25, 2014

VIA Electronic Filings

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**Re: Duquesne Light Company Universal Service and Energy Conservation Plan for
2014-2016 Submitted in Compliance with 52 Pa. Code §54.74
Docket No. M-2013-2350946**

Dear Secretary Chiavetta:

Pursuant to the Pennsylvania Public Utility Commission's ("Commission") Final Order entered on March 6, 2014 in the above referenced docket, Duquesne Light Company ("Duquesne Light" or "Company") is required to implement certain modifications to its 2014-2016 Universal Service and Energy Conservation Plan ("2014-2016 USECP") in July 2014. By this letter, the Company is requesting an extension from July 2014 until December 1, 2014 to implement certain billing related changes to its Customer Assistance Program ("CAP").

Among other things, the Commission's Final Order, pages 55-57, required the Company to:

1. Apply customer payments made in excess of the requested CAP amount due to future "ask to pay" amounts;
2. Calculate customers CAP credits as the difference between the customers regular budget amount and CAP discount payment, and apply the CAP credits on a monthly basis until completely exhausted;
3. Discontinue the process of automatically recertifying CAP customers who make 9 monthly payments in a 12 month period. Duquesne Light will use receipt of a LIHEAP grant to automatically recertify a household for CAP only if the income requirements for LIHEAP and CAP are the same;
4. Apply Dollar Energy grants received for CAP customers to past and current "ask to pay" amounts.

As indicated in the Company's Amended 2014-2016 USECP, these items are scheduled to be completed with the implementation of the Company's new Customer Care and Billing

System (“CC&B”), which has been postponed. Accordingly, the Company requests an extension to implement items listed above. Duquesne Light believes that the extension is in the public interest because implementing interim solutions for a 4 month period would result in increased costs to customers, and require the Company to redirect needed resources from the CC&B implementation to the interim solution thereby risking further delays.

The Pennsylvania Office of Consumer Advocate (“OCA”) and the Coalition for Affordable Utility Service and Energy Efficiency (“CAUSE-PA”) were the only two parties to file comments in Duquesne Light’s 2014-2016 USECP. I am authorized by counsel for the OCA and CAUSE-PA to state that neither party objects to this request. Duquesne Light will provide updates regarding the status of implementation to the Commission and interested parties on or about August 31, 2014 and October 31, 2014.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tishkia Williams', with a long horizontal flourish extending to the right.

Tishkia Williams
Sr. Counsel, Regulatory

Cc: Louise Fink Smith, Law Bureau
Joe McGee, Bureau of Consumer Services
Christy Appleby, Office of Consumer Advocate
Patrick Cicero, CAUSE-PA