



411 Seventh Avenue  
15<sup>th</sup> Floor  
Pittsburgh, PA 15219

Tel: 412-393-1482  
Fax: 412-393-5711  
akurtanich@duqlight.com

**Adrienne D. Kurtanich**  
Counsel

September 12, 2016

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SEP 12 2016

**VIA OVERNIGHT MAIL**

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Duquesne Light Company Universal Service and Energy Conservation Three Year Plan 2017-2019 Submitted in Compliance with 52 Pa. Code §§ 54.74; Docket No. M-2016-2534323**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Duquesne Light Company ("Duquesne Light") is an original copy of Duquesne Light's reply comments in the proceeding referenced above. These reply comments are being filed pursuant to the Tentative Order entered on August 11, 2016 in the above referenced proceeding.

Should you have any questions, please do not hesitate to contact me at 412-393-1482.

Respectfully Submitted,

Adrienne D. Kurtanich  
Counsel, Regulatory

Enclosure

cc: Certificate of Service  
Louise Fink-Smith, Esquire (via email)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Duquesne Light Company :  
Universal Service and Energy :  
Conservation Three Year Plan 2017-2019 : Docket No. M-2016-2534323  
Submitted in Compliance with :  
52 Pa. Code §§ 54.74 :

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**TENTATIVE ORDER**

SEP 12 2016

**REPLY COMMENTS OF DUQUESNE LIGHT COMPANY**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**I. BACKGROUND & INTRODUCTION**

On March 16, 2016, Duquesne Light Company ("Duquesne Light" or "Company") filed its Universal Service and Energy Conservation Plan ("Plan") for 2017 through 2019 for approval with the Pennsylvania Public Utility Commission ("PUC" or "Commission"). On August 11, 2016, the Commission entered a Tentative Order at the above referenced docket tentatively approving Duquesne Light's proposed Plan. The Commission provided interested parties the opportunity to submit comments regarding the Tentative Order, including but not limited to the Commission's requests for clarification and discussion contained therein. In its Tentative Order, the Commission directed Duquesne Light to address thirteen (13) points of discussion and clarification in its comments.

The Commission provided that comments on these points of discussion and clarification are due twenty (20) days after the date of entry of the Tentative Order, and reply comments are due ten (10) days thereafter. Duquesne Light appreciates the Commission's thorough efforts in reviewing the Company's Plan and in providing observations and points requiring clarification. The Company submitted the comments in accordance with the Commission's directives on August 31, 2016. The Office of Consumer Advocate ("OCA") and the Coalition for Affordable

Utility Services and Energy Efficiency in Pennsylvania ("CAUSE- PA") also submitted comments in response to the Commission's Tentative Order. The purpose of these reply comments are to address the comments submitted by OCA and CAUSE-PA, which are organized by topic below.

**II. COMMENTS**  
**A. APPROVAL PROCESS**

CAUSE-PA commented that Commission should change its process for approval of the Plan and use the full litigation process or alternatively allow additional time for comments. Duquesne Light does not agree with CAUSE-PA that the Commission's process for approval is in any way deficient and should be altered. Duquesne Light has provided the Commission, more specifically, the Bureau of Consumer Services ("BCS"), with information sufficient to evaluate the plan. As there are no material issues of fact at issue, the hearing and otherwise extended approval process requested by CAUSE-PA is unnecessary. The current approval process allowing for comments and reply comments provides adequate due process and could be construed as a "paper hearing" though not officially named as such. Prior case law supports that as there are no material issues of fact in dispute that a "paper hearing" provides adequate due process and is legally sufficient.<sup>1</sup> CAUSE-PA's request for a further hearing should therefore be denied.

**B. IDENTIFICATION**

CAUSE-PA suggested that Duquesne Light should accept additional forms of alternative identification for all Universal Service programs when a customer declines to provide a social security number upon enrollment. Duquesne Light has in the past and continues to believe that government issued identification provides a sufficient alternative for programs administered by

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<sup>1</sup> Diamond Energy, Inc. v. Pennsylvania Public Utility Commission, 653 A.2d 1360 (1995).

the Company. However, the Company has concerns regarding a point raised by CAUSE-PA which requested that the Company accept identification provided by foreign governments (e.g., driver's license issued by a foreign government, a passport issued by a foreign country, etc.) or any other non-government entity (e.g., employee identification, student identification, identification issued by a check cashing store, etc.).

The Hardship Fund is administered by Dollar Energy Fund ("DEF"), which has its own identification requirements. As a result, with Duquesne Light has inquired with DEF as to whether alternative forms of identification could be accepted, the Company does not have the ultimate ability to accept additional forms of identification for this program run by DEF. Duquesne Light continues to believe that government issued identification is appropriate as alternative identification for its Company administered Universal Services programs, including its Customer Assistance Program ("CAP").

#### **C. ARREARAGE FORGIVENESS**

As noted its comments, OCA requested clarification as to arrearage forgiveness within the Plan. The Company provides arrearage forgiveness to its CAP customers provided the payments received satisfy the amount of the bill that was issued. Additionally, CAP customers have the opportunity to receive "catch up forgiveness" when they make payments on prior past due bills.

#### **D. LIHEAP AUTO-ENROLLMENT AND RECERTIFICATION**

In their comments, both CAUSE-PA and OCA noted questions and concerns related to the auto-enrollment of LIHEAP customers in CAP. OCA highlighted the importance of education for auto-enrolled customers as arrearage forgiveness is only available once. As a point of clarification, customers receive forgiveness on payments made to satisfy bills issued and may

receive “catch up forgiveness” on prior bills upon payment. As mentioned in its comments filed on August 31, 2016, auto-enrolled customers will be provided with the same educational materials that other CAP customers receive in order to allow for auto-enrolled customers to understand the benefits and responsibilities of CAP as well as to learn about the Company’s other Universal Service programs. Examples of benefits of CAP provided in the welcome packet and planned brochures are as follows: reduced monthly payments based upon income, arrearage forgiveness over a specified period of time, referrals to other community resources, etc. Examples of responsibilities of CAP customers also provided therein include: paying monthly CAP payment by due date, applying for energy assistance grants when available, participating in a Smart Comfort audit, accepting weatherization measures if qualified, updating income and household information with the Company if any change in income, number of members in the household, or residence.

OCA stated that “[u]ntil the CAP customer affirmatively certifies for CAP, the OCA submits that Section 1405(c) of the Public Utility Code should not technically apply. Under Section 1405(c) of the Public Utility Code, the customer otherwise would likely be ineligible for a payment arrangement. 66 Pa. C.S. § 1405(c)”.<sup>2</sup> Duquesne Light respectfully disagrees with this position.

As mentioned earlier and in the Company’s comments, the auto-enrolled customers will also receive education materials regarding the benefits and obligations of CAP (e.g., billing discount, arrearage forgiveness, updating income information, etc.) enabling them to make an informed decision regarding their participation in CAP. Under the Plan, when customers are auto-enrolled in CAP, they receive a distinct and immediate benefit as they are auto-enrolled at eight-five percent of their budget bill. The fifteen percent discount as well as arrearage

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<sup>2</sup> OCA at 5. Footnote 3.

forgiveness are tangible benefits which are only available to CAP participants. Under Section 1405(c), Commission issued payment arrangements are strictly prohibited when customers are billed at CAP rates.<sup>3</sup> Any other interpretation is a clear violation both the spirit and letter of the statute.

The Commission strives to provide customers with the best payment arrangements available, which in these instances are those offered to customers by participating in CAP. Auto-enrolled customers are receiving CAP benefits up until they either certify their information or leave the program and should not be treated differently from other CAP customers. As the auto-enrolled customers receive immediate financial benefit upon enrollment, they should not be permitted to receive an additional payment arrangement established by the Commission. Should an auto-enrolled customer wish to obtain a payment arrangement established by the Commission rather than remain in CAP, that customer may notify the Company that he or she wishes to opt-out of CAP. Once the customer opts out of CAP, he or she would then be eligible for a payment arrangement established by the Commission. Thus, allowing a customer to receive a payment arrangement established by the Commission would be a clear violation of the plain language statute as well as creating an inequitable result by providing a customer receiving a CAP benefit with an additional payment arrangement not available to other CAP customers.

CAUSE-PA also requested that Duquesne Light provide the following additional information related to auto-enrollment:

- “How many auto-enrolled CAP customers respond to requests for income information within 1 month of auto-enrollment? Within 2 months of auto-enrollment? Within 6 months of auto-enrollment?”
- How many auto-enrolled CAP customers have requested to opt-out of the program?
- How many auto-enrolled CAP customers were removed from CAP after failure to submit income information within 6 months of auto-enrollment?

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<sup>3</sup> 66 Pa. C.S. § 1405(c).

- How many auto-enrolled CAP customers were removed for failure to submit income information within 6 months, but later re-enrolled in CAP?<sup>4</sup>

Further, CAUSE-PA asked that the Commission require the Company to provide the above mentioned data for customers who were auto-enrolled in CAP over the last two plans and further discuss this information with its newly formed Income Eligible Advisory Committee to make a recommendation as to how to proceed in future iterations of its Plan. CAUSE-PA alternatively requested that the above mentioned information be made available at this docket allowing parties who have filed comments and additional comment period to respond to the data.

Duquesne Light neither tracks these data points nor agrees that this information is necessary in order for the Commission to render a decision on this proposed Plan. Compiling the volume of information and allowing for another iteration of comments as requested by CAUSE-PA would be unduly burdensome, not relevant at this juncture, and would delay the process. The burden to the Company to provide this information would not only be time consuming, but it would also result in increased costs which would therefore result in increased program budgets. Should the Commission require the Company to provide this information, the Company requests additional time to comply with such a requirement. Duquesne Light would also need to reevaluate program budgets and would require a supplemental filing subsequent to such budget evaluation. Additionally, CAUSE-PA requested that the information be provided and discussed at a meeting of the Company's newly formed Income Eligible Advisory Committee ("IEAC"), which is a pilot program. As the IEAC is a pilot program, the frequency and recurrence of the meetings are uncertain; hence use of the IEAC would not be an appropriate forum to analyze such data if it were available.

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<sup>4</sup> CAUSE-PA at 7.

CAUSE-PA also commented that auto-enrolled customers opting out of enrollment in CAP should not be subject to a requirement to pay back benefits received prior to opting out. As a point of clarification, there are no penalties assessed to customers' accounts for choosing to opt out of CAP. The original amounts of arrearages, if any, will be owed by the customer. However, any benefits received by customers prior to opting out will not be added to the customers' account balances after opting out of CAP. The information provided in the CAP welcome packet will explain the responsibilities of the auto-enrolled customers should they opt out of CAP.

CAUSE-PA also expressed concern that customers that are automatically recertified in CAP upon LIHEAP grants should receive additional notices and education to alert them to update their household income. Customers automatically recertified in CAP will receive the same information that all CAP customers receive. Specifically, Duquesne Light will mail these customers a welcome letter explaining CAP. The Company also plans to develop a brochure to send to customers highlighting the benefits and responsibilities of all Universal Services programs. CAUSE-PA also requested that the Company provide the following additional information related to CAP customers recertified through the receipt of LIHEAP grants:

- "How many CAP customers are recertified automatically each year as a result of their receipt of LIHEAP?"
- Of the customers who are automatically recertified:
  - How many were at or below 50% FPL? 51-100% FPL? 101-150% FPL?
  - How many are on a fixed income which is not subject to regular adjustments? (ex: Social Security / Disability)
- What program savings are achieved through auto-reenrollment?"<sup>5</sup>

The Company does not actively track the above requested data and providing it prior to Commission decision would be burdensome and could delay the approval process. However, if

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<sup>5</sup> CAUSE-PA at 11.

the Commission required the Company to provide the any of the above information, Duquesne Light specifically disagrees that reporting program savings related to auto-recertification provides any added benefit. The auto-enrollment process has been in existence for quite some time and as such, there is no baseline to use for an avoided cost analysis. The Company recovers actual costs subject to reconciliation. Should the Commission require Duquesne Light to provide any of such information, the Company would require additional time to comply and may need to adjust program budgets accordingly hence necessitating a supplemental filing upon evaluation of the request.

#### **E. CAP STAY-OUT PROVISION**

OCA requested additional information as to the reasons for imposing a stay-out provision as well as what a customer needs to do to cure a default. The stay-out provision exists to prevent customers from entering and exiting CAP when other options are seemingly more preferable, such as when seasonal fluctuations occur, encouraging customers to conserve usage, etc. The Company avers that the stay-out only applies in the event that a customer does not take action to cure a default. The ways in which individual customers cure defaults depend specifically on the reason(s) for their individual defaults. Examples of ways that customers can cure defaults include but are not limited to paying the CAP catch-up amount, completing a Smart Comfort home audit, completing recertification, etc. In order to cure a default, the customer may either contact the Company or the Community Based Organization ("CBO") depending on the required corrective action.

CAUSE-PA opined that certain CAP customers should not be subject to the stay-out provision (e.g., seniors living in low-income housing and customers that wish to shop with an electric generation supplier ("EGS")). The Company does not agree that these categories of

customers should not be subject to the stay-out provision. Customers leave CAP voluntarily for a variety of reasons that are outside of the Company's control. These customers are subject to the stay-out provision and exceptions should not be arbitrarily created as CAUSE-PA suggests. Additionally, as CAUSE-PA noted in its comments, the issue of CAP shopping is being addressed in the Company's petition for its Default Service Plan that is presently before this Commission at Docket No. P-2016-2543140, and as such it is not appropriate to address CAP shopping in any form as part of the proceeding at hand. CAUSE-PA stated that it is not clear whether the stay-out provision applies to all default categories or only to CAP customers that were terminated. As a point of clarification, the stay-out provision applies to all default categories.

CAUSE-PA noted that CAP customers defaulting for curable reasons should be able to re-enter CAP by paying only the past due CAP amounts. It is the Company's practice for these customers to only pay the CAP catch-up amounts in order to re-enter CAP. CAUSE-PA further recommended that the Commission request additional information prior to imposing a stay-out provision. Duquesne Light does not believe that any additional information is required at this time and such a request would delay the approval process beyond that already on record. As such, this request should be rejected.

OCA noted concerns related to the stay-out provision and customers being removed from CAP after fourteen days. The Company addressed this question from the Commission's Tentative Order in its comments. To reiterate, customers are not penalized in any way for not paying within fourteen days of their bill due date and would not be subject to the stay-out provision should they in full pay within thirty days. As mentioned previously, CAP customers may have a curable default. In those cases, the customer may cure the default and re-enter CAP.

Moreover, even if CAP customers are found to be in default, they always have the option to appeal the default. The customer may appeal the default through various means including calling a CAP agent at a CBO, contacting the Company either by phone or online, etc.

**F. ADJUSTMENT OF INCOME RESULTING FROM INCOME INFORMATION PROVIDED TO BCS IN THE INFORMAL COMPLAINT PROCESS**

Both OCA and CAUSE-PA expressed concerns related to the Company's Plan utilizing income information provided to BCS by customers during the complaint process in order to update their income, which may result in customers being over-income for CAP. Please note the number of customers that are removed from CAP due to income provided to BCS in the informal complaint process is de minimus. The Company is willing to affirmatively contact these customers to confirm their income prior to defaulting them from CAP.

CAUSE-PA also requested the Company to further identify all sources of information that it uses to update income information and provide additional details related to the dispute process for customers removed from CAP for increases in income. Aside from income information provided to the Company by the customer initially or during recertification, the Company only relies upon income information provided by the customer to the BCS and Bankruptcy Courts. As with all types of default, the customer may appeal the default and in this instance provide updated income information. CAUSE-PA also requested that Duquesne Light.

**G. MINIMUM BILL**

OCA noted in its comments that the Plan does not include a minimum bill amount. The Company will include the minimum bill in its plan. As noted in its comments, Duquesne Light requires a minimum bill of fifteen dollars for residential customers and forty dollars for residential heating customers.

## **H. HARDSHIP FUND**

CAUSE-PA opined that Duquesne Light's requirement that a customer must pay one hundred and fifty dollars in the last ninety days or make three consecutive payments undermines the Hardship Fund. CAUSE-PA further averred that the Plan should be amended to include contextual and fact specific language that would provide for exceptions to these payment requirements. Duquesne Light disagrees that these assertions and amendments are necessary. The payment requirement, when satisfied, shows that the customer made good faith payments prior to applying for the Hardship Fund. CAUSE-PA further avers that the Company should create exceptions for customers that have excusable reasons for their inability to make payments on their electric bill. Duquesne Light strongly disagrees with the creation of arbitrary exceptions. Creating exceptions results in inequity among low-income customers and also results in difficult and burdensome program administration.

## **I. SMART COMFORT/LIURP**

In its comments, OCA questioned the status of a CAP customer's enrollment while satisfying the requirement of completing a Smart Comfort visit prior to enrollment in CAP. While a Smart Comfort visit must be completed as a requirement of enrollment in CAP, the customer's CAP enrollment status is neither delayed nor impacted by the requirement to have a Smart Comfort visit. When a customer applies for CAP, a review of the customer's usage is conducted at that time. If the customer's usage necessitates a Smart Comfort visit at the time the customer CAP enrollment, the CAP agent will contact a LIURP scheduler to schedule a home audit. The customer is actually enrolled in CAP though the customer may be removed from CAP if customer fails to complete the requisite Smart Comfort audit (e.g., customer cancels Smart comfort audit or refuses to participate in the audit). Notably, there is not a significant lag

time between when the customer completes a CAP application and when the Smart Comfort audit is completed. A customer's account is evaluated for high usage at the time the Company receives the completed CAP application, if the account registers on a Company high usage report, and during the annual recertification process. Customers auto-enrolled in CAP due to receipt of LIHEAP grants are subject to the same Smart Comfort requirements as all other CAP customers.

CAUSE-PA also identified certain questions and concerns related to Smart Comfort audits. CAUSE-PA requested clarification as to what constitutes the refusal of a Smart Comfort/LIURP audit. Refusal is defined for the purposes of this plan as the unwillingness of a customer to participate in the audit for reasons other than safety or landlord refusal. All refusals are reviewed by Duquesne Light to evaluate the cause of the refusal and then remove the customer from CAP if necessary. If the Company determines that the refusal meets one of the above mentioned exceptions, the customer will not be defaulted from CAP. However, if the refusal was not deemed to be justified, the customer will immediately be removed from CAP.

A customer defaulted from CAP for failure to complete a Smart Comfort audit may dispute the default in the same ways as a customer would dispute any other default. Customers defaulted from CAP for failing to complete a home audit would also be subject to the stay-out period. CAUSE-PA further asserts that customers do not know that the home audit is a requirement of CAP and accordingly should not be subject to the stay-out provision. Duquesne Light disagrees with this statement. All CAP customers are notified of this requirement upon enrollment and are reminded about the home audit requirement and its scheduling through multiple media (e.g., speaking with CAP agent, CAP welcome packet, brochure, etc.). The home audits are scheduled Monday through Saturday between 9:00 am and 1:30 pm. If those times do

not accommodate the customer, special arrangements may be made for an 8:00 am or 5:30 pm appointment.

CAUSE-PA also asserted that the Commission should require Duquesne Light to replace CFLs with LEDs. To reiterate, Duquesne Light plans to replace CFLs with LEDs in 2018. CAUSE-PA also commented that Duquesne Light's LIURP contractors should have the ability to provide ancillary remediations and incidental repairs in order to complete the LIURP jobs. As noted in its comments, Duquesne Light does allow its contractors to provide ancillary and incidental repairs necessary to complete LIURP jobs.

CAUSE-PA stated that the Company's heating jobs have decreased drastically since 2012 without explanation and that weatherization and more intensive measures are rarely provided to LIURP recipients. In actuality, in 2015, four hundred and ninety-nine heating jobs were completed whereas only two hundred and ten were completed in 2012. This trend represents an increase in the number of heating jobs of over two hundred percent since 2012. In Duquesne Light's service territory, only a small proportion of customers, less than five percent, have electric heat. For this reason, the Company's LIURP program is a baseload usage weatherization program. However, the sharp increase in heating jobs in 2015 was the result of intensive marketing to landlords of buildings with income eligible tenants and the subsequent willingness of those landlords to participate in the program.

CAUSE-PA also commented that Duquesne Light did not include targets for heating and baseload jobs and/or installed measures in the Plan. Though no specific targets are included or required, Duquesne Light endeavors to complete heating and baseload jobs and/or installed measures based upon customer demand and available funding.<sup>6</sup> Additionally, LIURP spending and projected job completion numbers are provided to the Commission annually on or around

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<sup>6</sup> 52 Pa. Code § 54.74(b).

March 1<sup>st</sup>. CAUSE-PA also recommended that the Company coordinate its LIURP services with other utilities in its service territory and report to the Commission on its coordination efforts. As mentioned previously, Duquesne Light's Income Eligible Advisory Committee is a newly formed committee which is being tested as a pilot program.

#### **J. CAP BUDGET BILLING**

CAUSE-PA opined that it is unclear as to how the Company deals with a budget bill true-up calculation for CAP customers and whether these customers are billed or credited an additional amount when this calculation occurs and that the Company should provide additional information about how budget billing interacts with CAP. The customers are not billed or credited for any additional amounts during the course of a normal annual budget account reconciliation. Any additional amounts or credits are incorporated into the customers' future budget amounts.

#### **K. ENERGY BURDEN**

The Company plans to more thoroughly evaluate energy burden in preparation for its next triennial plan and incorporate the results into the design of CAP at that time. However, Duquesne Light has evaluated cursory preliminary data and believes that the majority of its CAP customers have an energy burden in line with Commission guidelines. The Company continuously seeks to improve and will evaluate energy burden more thoroughly in the future.

#### **L. CARES**

CAUSE-PA questioned the program details for CARES. CARES has been fully integrated within the initial CAP enrollment. The vast majority of the CARES appointments stem from the CAP intake. Customers are also referred to CARES by other organizations such

as other utilities, Catholic Charities, etc. CAUSE-PA also questioned the decline in the number of CARES visits per year. Duquesne Light changed the manner in which it counts CARES visits, which led to the perceived decline in numbers. CAUSE-PA also requested additional program processes and procedures to be provided with additional time for program review. Duquesne Light disagrees and believes that compiling and providing such information would be inefficient and unnecessarily slow the Commission's approval process of this Plan.

#### **M. NEEDS ASSESSMENT**

CAUSE-PA suggested that the Company's number of confirmed low-income customers has declined and that Duquesne Light does not adequately request income information and thus is undercounting confirmed low-income customers. Duquesne Light's customers are only considered confirmed low income once they verify their income (e.g., through a CAP application). The Company can then waive a security deposit, once the customer has notified Duquesne Light of its low-income status and then verified his or her income. The Company believes its counts of confirmed low-income are accurate and there is no further need for the Commission to investigate the counts or its methodology for soliciting low-income customers for its Universal Services programs.

#### **N. PROGRAM BUDGETS**

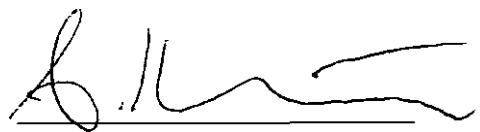
CAUSE-PA recommends that Duquesne Light's program budgets, policies and procedures for identifying low-income customers be investigated as its levels of confirmed are low and the program budgets should be recalculated after the Commission's investigation. As explained above, the Company only considers a customer as confirmed low-income if the customer has verified his or her income. An investigation of the projected budgets for the Company's Universal Service programs is unnecessary, would further delay the approval

process, and would not provide relevant data as the Company cannot count low-income customers that it is unaware.

### III. CONCLUSION

Duquesne Light appreciates the opportunity to provide comments related to the Tentative Order for its proposed Plan for the years 2017 through 2019 as well as the opportunity to address the questions and concerns of OCA and CAUSE-PA. The Company believes that the clarifications requested in the Tentative Order combined with the responses provided herein will aid in the overall comprehension of the Plan and the provision of services for the programs discussed therein. Duquesne Light has set forth a sensible and functional Plan that with the Commission's requested clarifications, balance the needs of the Company as well as those of all residential customers with those in need of the programs provided for within the Plan. Accordingly, the Company requests that the Commission approve the Plan as submitted.

Respectfully Submitted,



Adrienne D. Kurtanich, Esquire  
Counsel  
PA I.D. No. 92078  
Duquesne Light Company  
411 Seventh Avenue, 15-7  
Pittsburgh, PA 15219  
(412) 393-1482  
[akurtanich@duqlight.com](mailto:akurtanich@duqlight.com)

Date: September 12, 2016

**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. §1.54 (relating to service by a participant).

**VIA FIRST CLASS MAIL AND/OR E-MAIL**

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor West  
P.O. Box 3265  
Harrisburg, PA 17105-3265

James Farley  
Joseph Magee  
Sarah Dewey  
Bureau of Consumer Services  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2nd Floor, G-M East  
Harrisburg, PA 17120

Patrick Cicero  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101

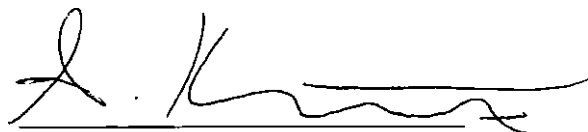
Office of Small Business Advocate  
Suite 1102, Commerce Building  
200 North Street  
Harrisburg, PA 17101-1923

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SECRETARY'S BUREAU

Date: September 12, 2016



Adrienne D. Kurtanich, Esquire  
Counsel  
Duquesne Light Company  
411 Seventh Avenue, 16-1  
Pittsburgh, PA 15222  
412-393-1482  
[akurtanich@duqlight.com](mailto:akurtanich@duqlight.com)

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