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June 9, 2017

VIA OVERNIGHT MAIL

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Duquesne Light Company Petition for Reconsideration Nunc Pro Tunc of
Energy Efficiency and Conservation Program Compliance Order
Docket Nos. M-2012-2289411 and M-2012-2334399**

Dear Secretary Chiavetta:

On June 1, 2017, Duquesne Light Company ("Duquesne Light" or the "Company") received a data request from the Bureau of Technical Utility Services dated May 25, 2017 ("Data Request"), concerning Duquesne Light's Petition for Reconsideration Nunc Pro Tunc, or in the alternative, Petition Regarding Initial Determination, filed April 26, 2017, in the above-captioned proceedings.

Enclosed please find Duquesne Light's narrative responses to the Data Request, along with two **CONFIDENTIAL** Excel worksheets comprising supporting documentation. Because these Excel worksheets contain information pertaining to customer identities, addresses, and/or energy consumption, Duquesne Light respectfully requests that they be excluded from the public file.

Respectfully Submitted,

Michael Zimmerman
Counsel, Regulatory

Enclosures
Cc: Joseph M. Sherrick

**PENNSYLVANIA PUBLIC UTILITY COMMISSION
BUREAU OF TECHNICAL UTILITY SERVICES**

Data Request Form

Docket Nos.: M-2012-2289411 and M-2012-2334399

Date Request Submitted: May 25, 2017

Requesting From: Duquesne Light Company

Requesting Individual: Joseph M. Sherrick

Requests:

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This Data Request is a follow-up to Duquesne Light Company's Petition Duquesne Light Company Petition for Reconsideration Nunc Pro Tunc of Energy Efficiency and Conservation Program Compliance Order dated April 26, 2017. Specifically, the Bureau of Technical Utility Services seeks clarification of Duquesne Light Company's calculation of Act 129 Phase II low-income excess savings of 3,266 MWh.

1. Please explain how Duquesne Light Company calculated or determined that 96 percent of the total Phase II multi-family kWh savings are attributable to the low income sector. Please provide all supporting worksheets and data used to perform this calculation.

Company Response: Prior to enrolling in the program, each multi-family building's decision-maker (i.e., its manager or owner) was required to affirm that most or all of the households residing in the building met the program's low-income requirement (i.e., had annual household incomes at or below 150% of federal poverty guidelines). This affirmation was memorialized in a participation agreement signed by each building decision-maker.

Navigant, a Duquesne Light Conservation Service Provider, subsequently conducted telephone interviews of a sample of Phase II Multifamily projects. Navigant interviewed decision-makers of 29 Phase II Multifamily projects (or approximately 35% of the total). In relevant part, each decision-maker reported (1) the total number of units in their building and (2) the total number of units occupied by households having annual incomes of 150% of federal poverty guidelines or less.

Each building's ratio of low-income units to total units was applied to the building's reported energy savings to determine a qualified "low-income savings" value. The sum

of the qualified low-income reported savings values for all surveyed buildings was then divided by the total reported savings for all surveyed buildings to determine the percentage of all reported savings that were qualified low-income savings. That value, 96%, was then multiplied by the total Phase II reported savings for the program, and the resulting amount was counted as low-income-specific savings for purposes of calculating the low-income savings that could be carried over into Phase III.

For Navigant's survey results and consequent calculation of the 96% low-income-specific savings factor, please see attached **CONFIDENTIAL** Excel worksheet labeled "CONFIDENTIAL - DLC Low Income Data Request Navigant Survey Sample."

2. Please provide, in an Excel worksheet, the breakout of common area kWh savings versus in-unit savings for each individual multi-family housing project in Phase II, with all supporting documentation.

Company Response: See the attached **CONFIDENTIAL** Excel worksheet, labeled "CONFIDENTIAL - Phase II Multifamily Low Income Savings Common Area vs. Unit," for the breakout of common area kWh savings versus in-unit savings for each individual multi-family housing project. Supporting documentation is found on the Raw Data tab of the worksheet, which provides measure-level data including the building type/use area for each measure installed (see Column P).

3. Please provide a detailed explanation of how Duquesne Light Company verified that occupants of multi-family units meet the Act 129 definition of low income (annual income at or below 150% of the Federal Income Poverty Guidelines, as per the Act 129 Phase II Implementation Order).

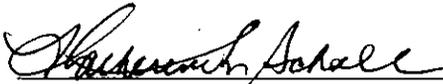
Company Response: Please see the Company's response to Question 1 of this data request.

4. Please also clarify if the multi-family rebates pay for the full cost of low income measures, or just the incremental cost of the measures.

Company Response: Duquesne Light Company incentives offset an average of 48% of full project costs for participating customers. Consistent with the Duquesne Light's Phase II Energy Efficiency and Conservation Plan, the portion of project cost covered by the Multi-Family Housing Retrofit Program was based on participant resources/ability to pay and availability of other funding sources. *See, e.g.,* Phase II Energy Efficiency and Conservation Plan at Section 3.5.2 ("The Multifamily Market Manager will integrate funding sources to include program and agency co-funding, performance contracting, grant funding and available financing options.")

VERIFICATION

I, Katherine Scholl hereby state that the facts set forth 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).


Katherine Scholl

Dated : June 9, 2017

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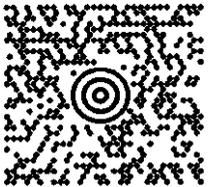
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