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February 6, 2019

Via Electronic Filing

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

**Re: Duquesne Light Company – Supplement No. 194 to Tariff Electric- PA P.U.C. No.24
Docket No.**

Dear Secretary Chiavetta:

Enclosed for filing, please find an original copy of Duquesne Light Company's ("Duquesne Light" or the "Company") Supplement No. 194 to Tariff Electric - PA. P.U.C. No. 24. Supplement No. 194 would update Rule No. 9 and Rule No. 42, and delete Rule No. 14.2, to clarify Company meter standards and to reflect the impending completion of the Company's smart meter deployment. Should you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Michael Zimmerman", is written over a light blue horizontal line.

Michael Zimmerman
Counsel, Regulatory

Enclosure

Cc: 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):

FIRST-CLASS MAIL

Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Dated: February 6, 2019



Michael Zimmerman, Esquire
Duquesne Light Company
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Email: mzimmerman@duqlight.com



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY

411 Seventh Avenue
Pittsburgh, PA 15219

Richard Riazzi
President and Chief Executive Officer

ISSUED: February 6, 2019

EFFECTIVE: April 8, 2019

NOTICE

THIS TARIFF SUPPLEMENT INSERTS A NEW RULE AND REMOVES AN EXISTING RULE

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF**CHANGES****Rules and Regulations****Installation of Service****9. Relocations of Facilities – (Continued)****B. Meter Relocation for all Customers****Second Revised Page No. 15A
Cancelling First Revised Page No. 15A**

A new rule “B. Meter Relocation for all Customers” has been inserted into the tariff to clarify the Company’s existing policy with respect to smart meter relocation.

Rules and Regulations**Installation of Service****9. Relocations of Facilities – (Continued)****C. Other Company Facilities for all Customers****Second Revised Page No. 15A
Cancelling First Revised Page No. 15A**

With the addition of new Rule “B. Meter Relocation for all Customers,” current Rule “B.” has been moved down on the page and renamed to Rule “C. Other Company Facilities for all Customers.”

Rules and Regulations**Measurement and Use of Service****14.2 Customer Request for Special Metering****Third Revised Page No. 21
Cancelling Second Revised Page No. 21****Seventh Revised Page No. 22
Cancelling Sixth Revised Page No. 22**

Rule No. 14.2 has been removed from Tariff No. 24 as the provisions have become obsolete and unnecessary due to the Company’s installation of smart meters.

Rules and Regulations**General Provisions****42. Meter Testing****Fourth Revised Page No. 29
Cancelling Third Revised Page No. 29**

The last line of Rule No. 42 Meter Testing has been removed as it references Rule No. 14.2 which is being removed from Tariff No. 24.

RULES AND REGULATIONS - (Continued)**INSTALLATION OF SERVICE - (Continued)****9. RELOCATIONS OF FACILITIES – (Continued)****A. Pole Removal or Relocation for Residential Customers – (Continued)**

- (2) **Direct labor costs** - Includes pay and expenses of public utility employees directly attributable to work performed on pole removals or relocations. Excludes payroll taxes, workmen's compensation, similar items of expense and construction overhead costs.
- (3) **Direct materials costs** - Includes the purchase price of materials used in performing a pole removal or relocation and excludes the related stores expenses. Proper allowance shall be made for unused materials, and materials recovered from temporary structures, and for discounts allowed and realized in purchase of materials.
- (4) **Income tax** - Federal and State tax relating to the tax liability of contributions in aid-of-construction.

B. Meter Relocation for all Customers**(C)**

Pursuant to Act 129 of 2008; the Commission's Smart Meter Procurement and Installation Implementation Order entered June 24, 2009, at Docket No. M-2009-2092655; and Duquesne Light's Smart Meter Procurement and Installation Plan, approved in relevant part by Order entered April 7, 2017, at Docket No. P-2015-249726; smart meter(s) conforming to Company standards must be installed at each metered service premises. Customers may not decline smart meter installation for any reason. Instead, as their sole remedy, customers may designate an alternative location on the premises for the smart meter. The Company shall relocate the smart meter to such alternative location where (i) the relocation (including associated customer service equipment) conforms to the Company's "Electric Service Installation Rules" (see Rule No. 6) and the National Electric Safety Code, as determined by the Company in its sole judgment; (ii) the relocation can be readily, safely, and reliably interconnected to the Company's facilities, as determined by the Company in its sole judgment; (iii) the customer provides any easements, permits, or other governmental or third-party approvals the Company deems necessary to accommodate such relocation; and (iv) the Company receives, in advance, payment for the Company's estimated total direct and indirect costs including the related income tax of such relocation.

(C)**C. Other Company Facilities for all Customers****(C)**

When requested or required by the action of a customer or a third party, relocation of Company facilities, except those covered under Section A of this Rule, will be performed by the Company upon receipt, in advance, of the Company's estimated total direct and indirect costs including the related income tax of such relocations from the customer or such third party. The Company may waive charges under this rule if, in the Company's judgment, the location of the Company's existing supply line and/or service line on the customer's property restricts the growth of the customer's operations and the potential increase in the Company's revenues.

RULES AND REGULATIONS - (Continued)**MEASUREMENT AND USE OF SERVICE****13.2 UNDERGROUND ELECTRIC SERVICE IN NEW RESIDENTIAL DEVELOPMENTS - (Continued)****H. Subdivisions – (Continued)**

when a bona fide developer exists, that is, only when utility-ready lots are provided by the developer. A mere subdivision is not required to have underground service. Should the lot owner or owners in a subdivision desire underground service, the service will be provided by the Company if the lot owner or owners, at their option, either comply with paragraph C (relating to applicants for electric service) or pays to the Company charges that are contained in the Company's tariff for underground electric service not required by this rule.

13.3 BUILDING ENERGY CONSERVATION STANDARDS FOR RECEIPT OF UTILITY SERVICE FOR RESIDENTIAL BUILDINGS Pursuant to the requirements of amended Pa. Code §69.101 through §69.107, the following provisions are incorporated in this Tariff:

The Company must receive proof of compliance with, or exemption from, the insulation standards set forth in the Building Energy Conservation Act (Act 222) prior to providing electric service for any purpose, including temporary electric service for residential building construction purposes, to (1) new residential buildings, (2) additions to existing residential buildings, and (3) renovated residential buildings located in municipalities that have not elected to administer Act 222.

Proof of compliance shall be made by furnishing the Company with a "Notice of Intent to Construct" form certified by Pennsylvania's Department of Community Affairs.

Upon request, the Company will provide information and the required forms for compliance with Act 222.

14. MEASUREMENT OF SERVICE The quantity of energy recorded by the Company's meters for billing purposes shall be final and conclusive, except where the meters fail to register or are determined to be in error. In these instances, the quantity delivered during the period in question shall be estimated, after due consideration of previous or subsequent properly measured deliveries. Upon a customer's request, the Company shall secure an in-person meter reading to confirm the accuracy of an automatic meter reading device when a customer disconnects service or a new service request is received. All tests of meters including confirmation of meter accuracy made upon request of the customer will be in accordance with the rules and regulations of the Pennsylvania Public Utility Commission. See Rule No. 42 for more detail on meter inspections.

14.1 METER READING INTERVALS For billing purposes, the Company will read meters at scheduled regular monthly intervals.

(C)

RULES AND REGULATIONS - (Continued)**MEASUREMENT AND USE OF SERVICE - (Continued)**

15. INABILITY TO READ RESIDENTIAL METERS When scheduled readings of kilowatt-hour meters are not obtained because of inability to gain access to the meter location, the customer may read his meter and furnish the Company the reading on cards supplied by the Company, or by telephone to the Company, in which case the bill will be rendered on the basis of such reading; otherwise, the Company will estimate the bill. No more than five (5) successive bills will be rendered on readings made by the customer.

15.1 INABILITY TO READ COMMERCIAL OR INDUSTRIAL METERS When scheduled readings of kilowatt-hour and demand meters are not obtained, the Company may render an interim statement for each month until the meters are read.

16. USE OF SERVICE BY CUSTOMER The customer shall use the electric service only at the premise where service is established; and after electric service has been established, shall notify the Company of any change in connected load, demand, or other conditions of use. The customer shall notify the Company of other on site sources of electric generation or electricity concurrently produced as a by-product of another process or electricity produced utilizing renewable resources. Customers who own and operate electric generation equipment shall conform with the Company's "Electric Service Installation Rules," copies of which may be obtained by calling, e-mailing or writing the Company's business office or at www.duquesnelight.com. For customers who own and operate electric generation, the provisions of Rider No. 16 - Service to Non-Utility Generating Facilities and Rider No. 21 - Net Metering Service may also apply.

(C)

RULES AND REGULATIONS - (Continued)**DISCONTINUANCE, CURTAILMENT OR INTERRUPTION OF ELECTRIC SERVICE - (Continued)**

41. PROHIBITION OF RESIDENTIAL MASTER METERING Each residential dwelling unit in a building must be individually metered by the Company for buildings connected after January 1, 1981. For the purposes of the Rule, a dwelling unit is defined as:

One or more rooms for the use of one or more persons as a housekeeping unit with space for eating, living, and sleeping, and permanent provisions for cooking and sanitation.

This Rule does not preclude the use of a single meter for the common areas and common facilities of a multi-tenant building.

This Rule shall not affect any practice undertaken prior to January 1, 1981.

GENERAL PROVISIONS

42. METER TESTING The Company will inspect or test the accuracy of a meter at the request of the customer or an EGS for whom the meter registers service, but reserves the right to require payment of the fees set forth in 52 Pa. Code § 57.22 for such test. (C)

43. OTHER SERVICES The Company may, where possible, provide and charge a reasonable fee for services including, but not limited to, energy audits, equipment inspections, technical reports and other similar services, at the request of the customer. Where possible, the Company will give an advanced, written estimate of the cost to provide the service.

44. SURGE PROTECTION SERVICE Effective September 30, 2013, the Company has eliminated the Surge Protection Service. The surge protection device will be removed from a customer's premise upon the earlier to occur of:

- (a) a request by the customer,
- (b) a Company representative performs work at the customer's meter or is otherwise available to remove the device, or
- (c) the replacement of the customer's meter with a smart meter.

The Company is also eliminating the liability coverage formerly provided under Rule No. 44 as the Company will not be liable for any damage to the customer's equipment, appliances or premise if the surge protection device fails or is defective for any reason on or after September 30, 2013. Any claim by a customer regarding damages relating to a failed or defective surge protection device that happened or occurred before September 30, 2013, must be submitted to the Company by December 29, 2013.



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For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

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DUQUESNE LIGHT COMPANY

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(C)**BC. Other Company Facilities for all Customers****(C)**

When requested or required by the action of a customer or a third party, relocation of Company facilities, except those covered under Section A of this Rule, will be performed by the Company upon receipt, in advance, of the Company's estimated total direct and indirect costs including the related income tax of such relocations from the customer or such third party. The Company may waive charges under this rule if, in the Company's judgment, the location of the Company's existing supply line and/or service line on the customer's property restricts the growth of the customer's operations and the potential increase in the Company's revenues.

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14.1 METER READING INTERVALS For billing purposes, the Company will read meters at scheduled regular monthly intervals.

~~**14.2 CUSTOMER REQUEST FOR SPECIAL METERING** If a customer wishes to replace the Company billing meter, to the extent technically possible, the Company will offer, provide and support a selection of qualified meters that conform with Company standards. The Company will perform the installation within a reasonable amount of time and at the expense of the customer. The customer must pay for such metering equipment based on the net incremental cost of purchasing and installing the new equipment. The Company will own and maintain all such new metering equipment. The Company will continue to read the meter for billing purposes, and to obtain the data to be used to fulfill its obligations in satisfying arrangements with the EGS as required.~~ (C)

RULES AND REGULATIONS - (Continued)

MEASUREMENT AND USE OF SERVICE - (Continued)~~14.2 CUSTOMER REQUEST FOR SPECIAL METERING – (Continued)~~

(C)

~~The Company has adopted a program that provides all customers with meters to provide data for normal monthly billing services. In the event that a residential or small commercial customer, or an EGS on behalf of a residential or small commercial customer, requests an upgrade to an Alpha Powerplus meter, which the Company provides for large commercial and industrial customers, installation of that meter will be provided at a cost of \$586.00, plus additional costs for the appropriate communication/system infrastructure. These net incremental charges, as set forth in the Company's Advance Meter Catalog, may be paid to the Company by either the customer or the EGS, or jointly by the customer and the EGS pursuant to a mutual agreement.~~

(C)
(C)

15. INABILITY TO READ RESIDENTIAL METERS When scheduled readings of kilowatt-hour meters are not obtained because of inability to gain access to the meter location, the customer may read his meter and furnish the Company the reading on cards supplied by the Company, or by telephone to the Company, in which case the bill will be rendered on the basis of such reading; otherwise, the Company will estimate the bill. No more than five (5) successive bills will be rendered on readings made by the customer.

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This Rule does not preclude the use of a single meter for the common areas and common facilities of a multi-tenant building.

This Rule shall not affect any practice undertaken prior to January 1, 1981.

(C)

GENERAL PROVISIONS

42. METER TESTING The Company will inspect or test the accuracy of a meter at the request of the customer or an EGS for whom the meter registers service, but reserves the right to require payment of the fees set forth in 52 Pa. Code § 57.22 for such test. ~~This rule shall apply to the inspection or testing of special meters described in Rule No. 14.2.~~

(C)

43. OTHER SERVICES The Company may, where possible, provide and charge a reasonable fee for services including, but not limited to, energy audits, equipment inspections, technical reports and other similar services, at the request of the customer. Where possible, the Company will give an advanced, written estimate of the cost to provide the service.

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DUQUESNE LIGHT COMPANY
SUPPLEMENT NO. 194 TO TARIFF ELECTRIC - PA. P.U.C. NO. 24

STATEMENT OF REASONS

A. Introduction

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby submits this Statement of Reasons in support of Supplement No. 194 to Tariff Electric - PA. P.U.C. No. 24 (“Supplement No. 194”) of the Company’s Retail Electric Tariff. In Supplement No. 194, Duquesne Light proposes to amend Rule No. 9 – Relocations of Facilities and Rule No. 42 – Meter Testing, and delete Rule No. 14.2 – Customer Request for Special Metering, to clarify standards applicable to Company meters on metered customer premises.

Supplement No. 194 would update Rule Nos. 9 and 42 and delete Rule No. 14.2 in part to reflect the impending completion of the Company’s smart meter deployment. Pursuant to Act 129 of 2008; the Commission’s Smart Meter Procurement and Installation Implementation Order entered June 24, 2009, at Docket No. M-2009-2092655; and Duquesne Light’s Smart Meter Procurement and Installation Plan (“Smart Meter Plan”), approved in part and denied in part by Order entered April 7, 2017, at Docket No. P-2015-249726; the Company has installed over 600,000 smart meters throughout its service territory. The Company has exchanged nearly all of its legacy meters with smart meters as of the date of this filing, making Rule Nos. 9, 14.2, and 42 ripe for amendment.

For the reasons discussed below, approval of Supplement No. 194 is proper and in the public interest. Attached to this filing is the supporting data required by 52 Pa. Code § 53.52(a) as well as clean and red-line versions of Supplement No. 194 to the Company’s Tariff Electric No. 24.

B. Proposed Rule Changes

The proposed update to Rule No. 9 would clarify and memorialize the Company's existing policy with respect to meter relocation. During the course of its smart meter deployment, the Company received occasional inquiries from customers who were unfamiliar with Company meters. Customers were not always aware that (i) the meter at their service address belonged to the Company (not the customer); (ii) the Company was under statutory and Commission mandates to exchange its legacy meters with smart meters; or (iii) the Company allows customers to relocate the metering point at their premises, subject to certain requirements and at the customer's expense.

A small minority of customers also objected to the installation of a smart meter at their premises. Some of these objections have come from customers at whose premises the Company has already installed a smart meter. The Company engages extensively with these customers in an effort to reach mutually-agreeable resolutions to their concerns; however, these customers' most common request – that the Company install a legacy or “analog” meter at their premises instead of a smart meter – is not a remedy the Company can provide under Act 129 or its Smart Meter Plan. The Company is required to install smart meters at all metered service premises. The next closest remedy the Company can provide is to work with the customer to relocate the meter to an alternative location at the premises.

By the proposed update to Rule No. 9, the Company seeks to clarify that customers who object to smart meter installation are entitled to meter relocation (subject to conditions), but they are not entitled to – and cannot receive – an exemption from smart

meter installation altogether. This relocation option is and would continue to be applicable to all customers, including those at whose premises smart meters have already been installed. And as noted above, the relocation option reflected in the proposed update to Rule No. 9 is also consistent with the Company's existing standards and requirements regarding relocation of Company facilities upon customer request.

The Company proposes to delete Rule No. 14.2 because it has become obsolete and redundant. Rule No. 14.2 was first implemented in 1999.¹ It governs customer requests for nonstandard metering equipment; namely, (i) Alpha Powerplus meters, or (ii) other unspecified meters "that conform with Company standards." As a practical matter, Rule No. 14.2 has been superseded by the Company's deployment of smart meter infrastructure. For example, while the Alpha Powerplus meter's two-way communication and interval data functionalities were considered advanced in 1999, with the Company's deployment of smart meters, those functionalities are now provided as a standard service offering.

Act 129 and the Commission's Smart Meter Implementation Orders have also narrowed the types of meters that the Company can accommodate on its system. For example, Act 129 requires two-way communicability between the Company and its meters.² Only the Company's smart meter models are capable of communicating over its smart meter communication network, so except for meters that have separate communication interfaces with the Company, other meter models generally cannot "conform with Company standards."

¹ Tariff – Electric, PA PUC No. 18, Supplement No. 5 (effective May 28, 1999).

² See 66 Pa. C.S. 2807; *see also Smart Meter Procurement and Installation*, p. 6 (Implementation Order entered June 24, 2009, at Docket No. M-2009-2092655).

Additionally, the Company's recent updates³ to Tariff Rule No. 8, "Nonstandard Service," make Rule No. 14.2 unnecessary. Rule No. 8 provides in part that the Company may "require a customer or applicant for service to pay the cost, including the related income tax, of any special installation necessary to meet the unusual requirements of the customer or applicant for service." In the rare instance that a customer's metering needs exceed the functionalities of the Company's standard meter offerings, the Company could work with the customer to provide necessary facilities (at the customer's expense) as a nonstandard service.

Finally, the Company proposes a housekeeping amendment to Rule No. 42 to remove a reference to Rule No. 14.2, because as discussed above, Rule No. 14.2 is proposed to be deleted.

C. It Is Reasonable For Duquesne Light To Amend Rule Nos. 9 and 42 and Delete Rule No. 14.2.

The proposed update to Rule No. 9 is reasonable because it would reinforce existing Company standards pertaining to meter relocations, and enhance customer and contractor awareness of those standards. The proposed update would also support the Company's statutory obligation to deploy smart meters throughout its service territory. Finally, the proposed update would further memorialize the appropriate allocation of costs for relocations of Company facilities that are made at the behest of a customer.

The proposed deletion of Rule No. 14.2 (and corresponding housekeeping update to Rule No. 42) is reasonable because, as discussed in Part B above, it has become

³ Tariff – Electric, PA PUC No. 24, Supplement No. 188 (effective December 29, 2018, at Docket No. R-2018-3000124).

unnecessary. Rule No. 14.2 should be deleted to reduce the potential for customer confusion regarding the meters that can be accommodated on the Company's system. Deleting the identified provisions of Rule No. 14.2 would enhance tariff clarity and currency without materially reducing options presently available to customers.

D. Conclusion

For the reasons stated above, Duquesne Light Company respectfully requests that the Commission approve Supplement No. 194 to the Company's Tariff Electric - PA. P.U.C. No. 24, without modification, and that Supplement No. 194 be permitted to become effective on April 8, 2019.

DUQUESNE LIGHT COMPANY
Responses to 52 Pa. Code 53.52(a), (b), and (c)
Supplement No. 194 to Tariff Electric - PA. P.U.C. NO. 24

§ 53.52. Applicability; public utilities other than canal, turnpike, tunnel, bridge and wharf companies.

(a) Whenever a public utility, other than a canal, turnpike, tunnel, bridge or wharf company files a tariff, revision or supplement effecting changes in the terms and conditions of service rendered or to be rendered, it shall submit to the Commission, with the tariff, revision or supplement, statements showing all of the following:

(1) The specific reasons for each change.

Response: See the Statement of Reasons included with this filing.

(2) The total number of customers served by the utility.

Response: 600,247 as of January 31, 2019.

(3) A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.

Response: The proposed change would have no impact on customer bills.

(4) The effect of the change on the utility's customers.

Response: As discussed in the Statement of Reasons included in this filing, the proposed changes reflect existing Company standards and procedures. The Company anticipates that the proposed change may enhance awareness of these standards and procedures.

(5) The direct or indirect effect of the proposed change on the utility's revenue and expenses.

Response: The proposed changes would have no effect on the Company's revenue.

(6) The effect of the change on the service rendered by the utility.

Response: The proposed changes would not alter the service rendered by the Company. See the Statement of Reasons included with this filing.

(7) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each. This

subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308 (relating to voluntary changes in rates).

Response: See the Statement of Reasons included with this filing for a discussion of the factors underlying the proposed change. The anticipated benefits of the proposed change, in decreasing order of relative importance, are as follows: (1) ensuring tariff accurately reflects the Company's smart meter implementation, which is in its final stages; (2) reinforcing the statutory, Commission, and Company requirement that smart meters must be installed at all metered service premises, and may not be replaced with non-smart meters; (3) improving customer/contractor awareness of existing options related to meter relocation; and (4) reducing opportunities for customer/contractor confusion and enhancing overall tariff clarity.

(8) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308.

Response: No studies were conducted by the Company to draft the proposed change.

(9) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

Response: No customer polls were taken in regard to the proposed change.

(10) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

Response: The Company respectfully requests that the Secretary's Bureau publish notice of this proposed change in the *Pennsylvania Bulletin*. The Company will also post Supplement No. 194 under the Pending Tariff Supplements section at www.duquesnelight.com.

Upon Commission approval, the Company will incorporate Supplement No. 194 into Tariff No. 24 and post an updated Tariff No. 24 and Tariff History to the appropriate areas on the website.

(11) FCC, FERC or Commission orders or rulings applicable to the filing.

Response: See the Statement of Reasons included with this filing.