



Lindsay Baxter
Manager, State Regulatory Strategy
lbaxter@duqlight.com
412-393-6224

November 12, 2019

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, PA 17120

Re: **2021 Total Resource Cost (TRC) Test
M-2019-3006868**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's Reply Comments for filing in the above referenced proceeding.

The Company has limited its reply to those Comments submitted by the November 1, 2019 deadline. Should the Commission elect to accept Comments filed after this date, the Company requests the opportunity to file supplemental Reply Comments in response.

Upon receipt, if you have any questions regarding the information contained in this filing, please feel free to contact me or Audrey Waldock at 412-393-6334 or awaldock@duqlight.com.

Sincerely,

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

Lindsay A. Baxter
Manager, State Regulatory Strategy

Enclosure

cc (w/ Word version of enclosure.):
Louise Fink Smith (finksmith@pa.gov)
David Edinger (dedinger@pa.gov)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Total Resource Cost (TRC) Test : **Docket No. M-2019-3006868**

**REPLY COMMENTS OF
DUQUESNE LIGHT COMPANY**

I. INTRODUCTION

Duquesne Light Company (“Duquesne Light” or “Company”), submits the following Reply Comments regarding the Tentative Order issued September 19, 2019, seeking input on the proposed 2021 Total Resource Cost (TRC) Test. The Company filed Comments in this proceeding on November 1, 2019 and submits these reply comments to further inform the Commission as to the Company’s position on issues raised by other commenters and to further develop the record regarding this matter.

II. COMMENTS

The comments submitted at this docket bolster the Company’s position that the proposed demand response (DR) program methodology is problematic and should be rejected. In particular, the Company supports the detailed and thorough analysis contained in the comments of the Energy Association of Pennsylvania (EAP). The EAP’s comments assert that requiring electric distribution companies (EDCs) to nominate DR programs for PJM’s Peak Shaving Adjustment (PSA) program is premature and inappropriate at this time. Duquesne Light concurs.

It is notable that of the ten entities which submitted comments at this docket,¹ none offered support for the proposed DR program methodology as outlined in the draft TRC. Further, entities representing diverse interests noted similar sentiments regarding the DR program proposal. Specifically the EAP, representing its utility company members, the Office of Consumer Advocate (OCA), representing the interests of Pennsylvania residential consumers, and the Keystone Energy Efficiency Alliance (KEEA), which represents energy efficiency businesses and non-profit organizations in Pennsylvania all expressed concern with the proposed methodology around DR.² In particular, the comments of the OCA and the EAP agreed that requiring nomination of DR programs to the PJM PSA program is premature, a point made by Duquesne Light in its comments. The OCA recommended that instead of the tentative TRC Order's proposal, "the Commission should allow for comments once the results of the PJM Pennsylvania study have been completed."³ As stated in its original comments, Duquesne Light believes the PSA Program is new and untested, and thus a decision about its use for a potential Phase IV is premature.⁴

¹ The following entities filed Comments by the November 1, 2019 deadline: Duquesne Light Company; Energy Association of Pennsylvania; Keystone Energy Efficiency Alliance; Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company; Office of Consumer Advocate; Office of Small Business Advocate; PECO; Pennsylvania Energy Efficiency for All Coalition; PPL Electric Utilities; and the Building Performance Association (submitted jointly with Clean Air Council, NRDC, Penn Future, Pennsylvania Chapter of the Sierra Club, and Philadelphia Solar Energy Association).

Note that Duquesne Light has not addressed the late Comments of Advanced Energy Management Alliance or the Industrials (Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Philadelphia Area Industrial Energy Users Group, the PP&L Industrial Customer Alliance, the West Penn Power Industrial Intervenors, and the Pennsylvania Energy Consumer Alliance). Should these comments be accepted by the Commission, Duquesne Light respectfully requests the opportunity to file Reply Comments.

² EAP at 3-14, OCA at 7, and KEEA at 4.

³ OCA at 8.

⁴ The Company's silence on additional subjects should not be construed as agreement with other issues addressed by commenters.

III. CONCLUSION

Duquesne Light is dedicated to providing energy efficiency and conservation programs that are cost effective and impactful. The Company appreciates the opportunity to comment on the 2021 Draft TRC Order and looks forward to additional opportunity for input if a potential Phase IV is initiated.

Respectfully submitted,



Lindsay A. Baxter
Manager, State Regulatory Strategy
Duquesne Light Company
411 Seventh Avenue, Mail Drop 15-7
Pittsburgh, PA 15219
lbaxter@duqlight.com
Tel. (412) 393-6224

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