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January 27, 2020

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via Overnight Mail

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

**Re: Petition of Duquesne Light Company for Approval of a Customer Rate Contract
Docket No. P-2019-3014640**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's REDACTED responses to the Data Requests Propounded by the Bureau of Technical Utility Services ("TUS") Set II. Duquesne Light is concurrently filing a CONFIDENTIAL version of these responses under a separate cover.

Sincerely,

Michael Zimmerman

Enclosures

cc: Jordan Van Order, TUS (jvanorder@pa.gov)

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Bureau of Technical Utility Services
Data Requests
Docket No. P-2019-3014640

Note: If any responses contain Confidential Security Information (CSI), please inform TUS staff via phone call or email.

P-3 Reference the Petition, Paragraph 5. Please explain whether the peak demand is expected to be maintained throughout the life of the contract.

Response:

The Customer's peak demand is expected to increase over the life of the Contract.

P-4 Reference the Petition, Paragraph 8. Please provide a detailed explanation of how the revenues comply with Duquesne Light Tariff Rule No. 4.

Response:

Rule 4 provides, in relevant part, that "rates established under special contracts will be sufficient to recover, at a minimum, all appropriate incremental costs." The Company expects to recover from the Customer all incremental costs associated with serving the Customer. The Company's incremental cost to interconnect the Customer is approximately [REDACTED]. As explained in the Company's Petition, the Company anticipates that it will recover all of its incremental costs to serve the Customer during the term of the Contract. The Company expects to recover as much as [REDACTED] in incremental base distribution revenues under this Contract. Because this is a Contract for new service, the projected revenue is a good-faith estimate based on reasonable information provided by the Customer, at this time.

The Company expects that the Customer will remain a Duquesne Light customer following expiration of the Contract. See response to P-5 below.

The Company will provide a confidential report to the Commission that details the revenue resulting from this Contract at the end of the contract period, or in a future rate case, whichever occurs first.

P-5 Reference the Petition, Paragraph 10. Please explain whether Duquesne Light knows of any circumstances under which the customer would not continue to seek service from Duquesne Light.

Response:

Duquesne Light is not aware of any circumstances under which the Customer would not continue service with the Company.

P-6 Reference the Petition, Paragraph 17. The full range of projected revenues does not appear

to exceed the projected incremental costs. Please explain.

Response:

See response to P-4 above.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light :
Company for Approval of a Rate : Docket No. P-2019-3014640
Contract with the University of :
Pittsburgh Energy GRID Institute :

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VERIFICATION

I, C. James Davis, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and 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).



C. James Davis
Director – Rates, Energy Procurement, and
Federal/RTO Affairs

Dated: January 27, 2020

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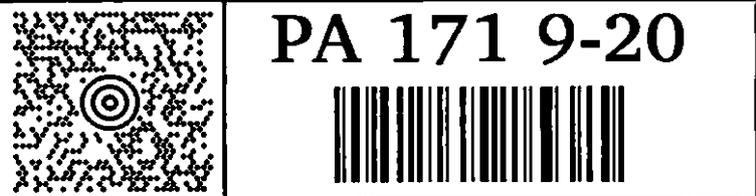
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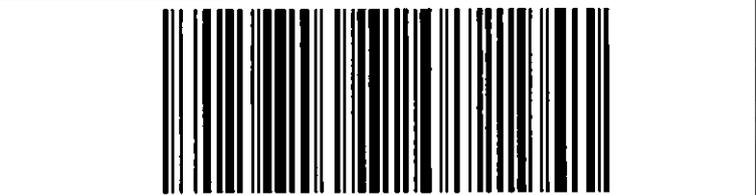
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