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June 8, 2020

**VIA E-FILE**

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

Re: **Response to May 29, 2020 Secretarial Letter, Docket No. M-2020-3020055**

Dear Secretary Chiavetta,

Enclosed please find the response of Duquesne Light Company to the Secretarial Letter dated May 29, 2020.

If you have any questions, please contact me at [lbaxter@duqlight.com](mailto:lbaxter@duqlight.com) or 412-393-6224.

Sincerely,

A handwritten signature in blue ink, appearing to read "LB Baxter".

Lindsay A. Baxter  
Manager, State Regulatory Strategy

Enclosure

cc: Tom Charles ([thcharles@pa.gov](mailto:thcharles@pa.gov))  
Sara Dewey ([sdewey@pa.gov](mailto:sdewey@pa.gov))

**Response of Duquesne Light Company to  
May 29, 2020 Secretarial Letter  
June 8, 2020  
Docket No. M-2020-3020055**

**I. COVID-19 Utility Consumer Service and Billing Policies and Procedures**

Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:

**Response: Since Duquesne Light realized the extent of the pandemic, it has been planning and taking proactive steps to be there for its communities. Duquesne Light suspended terminations prior the Commission's order, and has waived late fees. Duquesne Light has also waived reconnection fees and deposits at the customer's request. Additionally, the Company has waived the CAP recertification requirement, and has taken steps to be in constant communication with our customers about the programs that can help them.**

**Duquesne Light has also taken further steps to help the community, by a \$500,000 donation to the Emergency Action Fund. Along with the OCA, the Company increased funds available to the Dollar Energy Fund and increased the income limits so that more customers qualify. Finally, Duquesne Light employees donated \$40,000 to the Great Pittsburgh Community Food Bank, and the Company matched those donations with \$20,000.**

**Termination of Utility Service:**

- After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment? How does the utility plan to implement terminations and will it start the process with new termination notices?

**Response:**

**On June 3, 2020, Governor Wolf extended the 90-day State of Emergency. However, the PUC Emergency Order issued March 13, 2020 (M-2020-3019244) provides the opportunity for the Commission to Act to end the moratorium earlier or extend it longer. Duquesne Light has laid out its process below based on an end to moratorium of July 1, 2020 and no later than August 3, 2020. The timeline laid out below, which provides a grace period between the conclusion of the moratorium and the beginning of collections, can be adjusted.**

- Throughout the remainder of moratorium, continue to send monthly past due notices so that customers are not surprised by arrearages at end of moratorium.
- Continue the proactive customer outreach campaign launched May 18, 2020 to inform customers with past due balances of available assistance (CAP,

LIHEAP, hardship fund, payment arrangements, budget billing, autopay, eBill, etc.).

- On July 1<sup>st</sup>, an email or letter will be sent to all delinquent customers outlining the end of moratorium date and the services available to them.
- On July 20<sup>th</sup>, the Duquesne Light will begin sending 14-day residential termination notices, with an August 3<sup>rd</sup> termination date.
- On July 27<sup>th</sup>, the first residential and commercial residential and commercial 72-hour disconnect notices will be issued, with an August 3<sup>rd</sup> termination date.
- Terminations will begin August 3<sup>rd</sup>.

Duquesne Light plans to issue new termination notices approximately 20 days after the end of moratorium. The Company plans to enter customers into the termination process in waves to ensure timely action and Contact Center availability. As noted above, extensive customer communication during the moratorium and leading up to service disconnections is an essential component of Duquesne Light’s plan.

If the moratorium extends beyond August 3<sup>rd</sup>, Duquesne Light will implement a more aggressive collections strategy in light of the pending winter moratorium.

- Broken out by customer class, how many customer accounts may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?

**Response:**

<b>All Customers Subject to Termination</b>			
<b>Customer Class</b>	<b>March ‘19</b>	<b>May ‘19</b>	<b>May ‘20</b>
<b>Residential</b>	47,366	33,736	54,114
<b>Commercial</b>	3,929	3,896	6,098
Total	51,295	37,632	60,212

To allow for further comparison, Duquesne Light has also provided the number of customer accounts that were subject to termination in March 2019. The end of winter moratorium typically results in more customers enrolling in CAP, requesting payment arrangements, and seeking other assistance, as illustrated in the table above for 2019. Because of the extended moratorium on terminations in 2020, the Company has not experienced the increase in enrollment in assistance programs that normally occurs in the spring, however it anticipates this will occur if and when the moratorium ends.

- Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.

**Response:**

<b>Residential Customers Subject to Termination</b>			
<b>Confirmed Low-Income</b>	<b>March '19</b>	<b>May '19</b>	<b>May '20</b>
<b>Yes</b>	10,474	6,632	11,824
<b>No</b>	36,892	27,104	42,290
<b>Total</b>	47,366	33,736	54,114

- Provide future projections if available.

**Response: Not available**

- Is the utility currently assessing a “reconnection fee” to restore service?  
**Response: Duquesne Light is not currently assessing a “reconnection fee” to restore service.**

- If yes, how is the fee billed and/or collected?

**Response: Not applicable**

- Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

**Response: Not applicable**

**Universal Service Programs:**

- Is the utility currently removing customers from CAP for non-payment or failure to recertify?

**Response: No**

- What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

**Response: Under normal program rules, a customer cannot receive a hardship fund grant unless he/she has paid a minimum of \$150 toward their utility bill within the last 90 days or made three consecutive CAP payments. Duquesne Light has waived this “good faith payment” requirement for CAP customers through the remainder of 2020.**

**Additionally, Duquesne Light has expanded the upper threshold for income eligibility from 200% Federal Poverty Line (FPL) to 250% FPL through the end of 2020 (See P-2020-3019460). The Company contributed an additional \$375,000 to the hardship fund to assist more customers in need, with the Office of Consumer Advocate making a matching contribution of \$375,000.**

## **Other Assistance Initiatives:**

- Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

**Response: As mentioned above, Duquesne Light voluntarily suspended terminations in advance of the PUC Emergency Order and has stopped assessing late payment charges for all customers during the extended moratorium. It increased eligibility for its hardship fund and waived the “good faith payment” requirement (see above).**

**To ensure customers have access to essential services, DLC has been waiving deposit requirements, reconnect fees, and upfront payments as a condition of starting service.**

**Duquesne Light has also begun offering payment arrangements to commercial customers, up to 12 months.**

**As mentioned above, as of this date, Duquesne Light has temporarily stopped requiring recertification for CAP to eliminate the challenge of income documentation for customers. It has also provided the Community Based Organization who administer enrollment with Duquesne Light phones to avoid the challenges of customers not answering phone calls from blocked or unavailable numbers.**

**Duquesne Light has conducted additional outreach to its customers as well to discuss the programs available to them.**

- Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor’s Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

**Response: Duquesne Light will continue to assess conditions and determine if additional changes to programs, practices, and policies are required, in consultation with the Commission and other stakeholders.**

*This information has been submitted to Sarah Dewey, [sdewey@pa.gov](mailto:sdewey@pa.gov) in the Commission’s Bureau of Consumer Services (BCS), as directed by the Secretarial Letter.*

## **II. Consumer Education and Outreach**

- Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

**Response: Most recently, on June 4, 2020, the Company launched its “Here to Help” Campaign ([duquesnelight.com/heretohelp](http://duquesnelight.com/heretohelp)), which bundles together all resources to**

help both residential and commercial customers in one convenient place. As part of this Campaign, Duquesne Light also developed a landing page specially tailored to commercial customers, and established a dedicated phone number for business customers to reach specially-trained agents in its Contact Center. The Company is inviting elected officials, non-profits, and community organizations to hold “virtual town halls,” for which Duquesne Light will provide a meeting link and a speaker to present on customer programs and answer questions. Participants can also email questions confidentially regarding individual accounts for a response within 24-hours.

Since the start of the COVID-19 pandemic, Duquesne Light has provided outreach to its customers through a variety of efforts, including the following:

- The Company produced regular press releases with updates on its response to COVID-19 and the resources available for customers. All are available at <http://newsroom.duquesnelight.com/>. Both major newspapers as well as the three major television news channels that serve the Pittsburgh area ran stories with this information.
- Duquesne Light also used social media creatively to reach its customers during this time. Its weekly #HelpersPGH series highlighted five individuals or organizations in the Pittsburgh area helping with COVID-19 impacts. These weekly posts were shared outside of the normal circle of Duquesne Light followers, and all included information on assistance available to customers. Similarly, the weekly “5 Things You Should Know About the COVID-19 Response in Pittsburgh” social media posts reached new audiences than a post specifically focused on the utility.
- An email was sent to all customers with email addresses in our system (over 300,000) the week of May 4, 2020 to provide information about payment assistance programs.
- The message heard by callers to the Contact Center was updated to communicate the suspension of shut-offs and late payment charges.
- Features were added to the homepage of [www.duquesnelight.com](http://www.duquesnelight.com) and the Duquesne Light mobile app to communicate available assistance.
- Payment assistance information was also added to the weekly email on energy usage and energy efficiency. Additionally, the Company continued to promote energy efficiency programs that could be safely implemented, including promoting the online energy audit and conservation kit via social media, which served as a gateway to inform customers of other offerings, including rebates and appliance recycling.
- The Company continued outreach to income-eligible customers for LIURP to build a pipeline of eligible customers ready for in-home services once it is safe to resume.
- Duquesne Light’s senior leadership participated in two virtual town halls, one hosted by the Pittsburgh Black Elected Officials Coalition and one hosted by Senator Jay Costa, to discuss programs available to assist customers.

- As mentioned above, the Company has proactively called customers whose accounts are past due to discuss options available.
- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

**Response: Please see Duquesne Light's response to the above question.**

- Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

**Response: Duquesne Light has not had any such proceedings since the commencement of the COVID-19 pandemic. In the future, the Company will use different communication channels including its website and social media to make customers aware of the opportunity to provide input.**

- Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

**Response: Not Applicable**

*This information has been submitted to Tom Charles [thcharles@pa.gov](mailto:thcharles@pa.gov), in the Commission's Office of Communications, as directed by the Secretarial Letter.*