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November 6, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Bldg. 2nd Floor W
400 N. Street
Harrisburg, PA 17120

**RE: Duquesne Light Co. Universal Service and Energy Conservation Plan
Docket Nos. M-2016-2534323 and M-2019-3008227**

Dear Secretary Chiavetta:

By letter dated April 3, 2020, Duquesne Light Company (Duquesne Light or the Company) requested a delayed implementation of its Percentage of Income Payment Plan (PIPP) Customer Assistance Program (CAP) due to the COVID-19 pandemic. By Secretarial Letter dated April 20, 2020, the Pennsylvania Public Utility Commission (Commission) granted Duquesne Light an extension of the PIPP CAP implementation, subject to monthly status reports beginning June 1, 2020. On June 1, 2020, July 1, 2020, August 3, 2020, September 1, 2020, and October 2, 2020, Duquesne Light submitted its monthly status reports.

The implementation of Duquesne Light's PIPP CAP is connected to the planned Customer Care and Billing (CC&B) system upgrade, referred to as "Project Spark." Due to the COVID-19 pandemic, the Company temporarily halted Project Spark so that employees could focus on critical tasks related to business continuity. Although Duquesne Light returned Project Spark to full capacity, the Company is facing significant challenges ahead of its anticipated go-live date. Duquesne Light identified a CC&B Original Equipment Manufacturer (OEM) defect that was substantially slowing overall system performance. This CC&B OEM defect has required the Company to delay several training classes and slow testing efforts. The CC&B OEM has provided a solution, which will be tested in a robust manner over the next several weeks. If the Company is unable to complete implementation of the PIPP CAP by December 31, 2020, Duquesne Light will file a Petition to extend the implementation date for the PIPP CAP as required by the Secretarial Letter entered on April 20, 2020 in the above-captioned matter.

Related to the above-referenced PIPP implementation, Duquesne Light is petitioning the Commission for approval to implement its PIPP CAP at the income levels as proposed in the



Company's revised Universal Service and Energy Conservation Plan (USECP) submitted on January 6, 2020 at docket number M-2019-3008227.

Please contact me with any questions, comments, or concerns. This letter has been served on the parties listed below, by electronic mailing only.

Respectfully,

A handwritten signature in blue ink, appearing to read "Emily M. Farah", is positioned above the printed name.

Emily M. Farah
Duquesne Light Company
Counsel, Regulatory

cc: Louise Fink Smith, Law Bureau
Joseph Magee, Bureau of Consumer Services
Christy Appleby, Office of Consumer Advocate
Elizabeth Marx, CAUSE-PA