



COMMONWEALTH OF PENNSYLVANIA

November 30, 2020

E-FILED

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

**Re: Petition of Duquesne Light Company for Implementation of the Percentage of
Income Payment Plan Customer Assistance Program as Proposed on January 6,
2020 / Docket Nos. M-2019-3008227, P-2020-3022770**

Dear Secretary Chiavetta:

Enclosed please find the Answer, Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Sharon E. Webb

Sharon E. Webb
Assistant Small Business Advocate
Attorney ID No. 73995

Enclosures

cc: Brian Kalcic
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
for Implementation of the Percentage of : **Docket Nos. M-2019-3008227, P-2020-**
Income Payment Plan Customer : **3022770**
Assistance Program as Proposed on :
January 6, 2020

**ANSWER OF THE
OFFICE OF SMALL BUSINESS ADVOCATE TO
PETITION OF DUQUESNE LIGHT COMPANY**

I. INTRODUCTION

On January 6, 2020, Duquesne Light Company (“Duquesne” or the “Company”) submitted to the Pennsylvania Public Utility Commission (“PUC” or the “Commission”) a Petition for Implementation of the Percentage of Income Payment Plan Customer Assistance Program in response to the Commission’s revised Customer Assistance Program (“CAP”) Policy Statement issued at Docket No. M-2019-3012599.

In its *Petition*, the Company proposed to implement a percent of income payment plan (“PIPP”) to modify its pending 2020-2023 USECP at Docket No. M-2019-3008227. *Petition*, at para 13. Duquesne proposed to implement the PIPP on an expedited basis, in part, due to the company’s planned upgrade of its Customer Care and Billing System called “Project Spark” Petition at Para. 24.

II. ANSWER

The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission. The Office of Small Business Advocate (“OSBA”) respectfully submits that the Company has not presented sufficient justification for implementation of its proposals on an expedited basis and the OSBA, as well as other stakeholders, must have the opportunity to investigate and further analyze the justness and reasonableness of the claims and proposals Duquesne made in the *Petition for Implementation of the Percentage of Income Payment Plan Customer Assistance Program*. As such, the OSBA submits that the Commission should direct the Office of Administrative Law Judge to hold hearings on the *Petition* and prepare an initial decision.

III. CONCLUSION

In view of the foregoing, the Office of Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Direct the Office of Administrative Law Judge to hold hearings on the *Petition for Implementation of the Percentage of Income Payment Plan Customer Assistance Program* and prepare an initial decision; and
- B. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Sharon E. Webb

Sharon E. Webb
Attorney ID No. 73995
Assistant Small Business Advocate

For:

John R. Evans
Small Business Advocate

Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831

Dated: November 30, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
for Implementation of the Percentage : **Docket Nos. M-2019-3008227, P-2020-**
of Income Payment Plan Customer : **3022770**
Assistance Program as Proposed on :
January 6, 2020

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the *Petition for Implementation of the Percentage of Income Payment Plan Customer Assistance Program* (“PIPP”) in response to the Commission’s revised Customer Assistance Program (“CAP”) Policy Statement issued at Docket No. M-2019-3012599 that was filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) on January 6, 2020 by Duquesne Light Company (“Duquesne” or the “Company”) in response to the Commission’s revised Customer Assistance Program (“CAP”) Policy Statement issued at Docket No. M-2019-3012599. In support of this Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50) to represent the interest of small business customers as a party in proceedings before the Commission.
2. Intervention in this case is necessary to ensure that the interests of small business customers served by PECO are adequately represented.

3. Representing the OSBA in this proceeding is:

Sharon E. Webb
Office of Small Business Advocate
555 Walnut Street, 1st Floor
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(717) 783-2525
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swebb@pa.gov

Respectfully submitted,

/s/ Sharon E. Webb

Sharon E. Webb
Assistant Small Business Advocate
Attorney ID No. 73995

Dated: November 30, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
for Implementation of the Percentage of : **Docket Nos. M-2019-3008227, P-2020-**
Income Payment Plan Customer : **3022770**
Assistance Program as Proposed on :
January 6, 2020

**PUBLIC STATEMENT OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“PUC” or the “Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of an answer and intervention regarding Duquesne’s Petition for Implementation of the Percentage of Income Payment Plan Customer Assistance Program (“PIPP”) in response to the Commission’s revised Customer Assistance Program (“CAP”) Policy Statement issued at Docket No. M-2019-3012599.

The Small Business Advocate has intervened in this case to ensure that the interests of small business customers served by Duquesne are adequately represented.

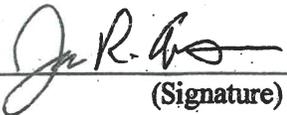
In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the *PIPP Petition* .

Dated: November 30, 2020

VERIFICATION

I, John R. Evans, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that 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).

Date: 11/30/2020


(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :
Implementation of the Percentage of :
Income Payment Plan Customer : **Docket Nos. M-2019-3008227, P-2020-**
Assistance Program as Proposed on : **3022770**
January 6, 2020 :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey Jr.
Chief Administrative Law Judge
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118 Locust Street
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DATE: November 30, 2020

/s/ Sharon E. Webb

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Assistant Small Business Advocate
Attorney ID No. 73995