

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 7, 2020

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

Re: Duquesne Light Company Universal
Service and Energy Conservation Plan
For 2020-2025
Docket No. M-2019-3008227

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

Enclosures:

cc: Office of Administrative Law Judge **(email only)**
Office of Special Assistants **(email only: ra-OSA@pa.gov)**
Bureau of Technical Utility Services **(email only)**
Jennifer Johnson, Bureau of Consumer Services **(email only)**
Christina Chase-Pettis, Office of Communications **(email only)**
Rhonda L. Daviston, Law Bureau **(email only)**
Louise Fink Smith, Law Bureau **(email only)**
Certificate of Service

*300462

CERTIFICATE OF SERVICE

Re: Duquesne Light Company Universal Service : Docket No. M-2019-3008227
and Energy Conservation Plan for 2020-2025 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 7th day of December 2020.

SERVICE BY E-MAIL ONLY

Richard A. Kanaskie, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Sharon E. Webb, Esquire
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Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

/s/ Christy M. Appleby
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Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: December 7, 2020
*300463

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company :
Universal Service and Energy Conservation Plan : Docket No. M-2019-3008227
For 2020-2025 :

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code § 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Christy M. Appleby
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
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Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

Respectfully Submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CApplby@paoca.org

DATED: December 7, 2020
*300453

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file a Notice of Intervention, and to participate in proceedings before the Commission involving the Universal Service and Energy Conservation Plan for Duquesne Light Company (Duquesne or Company).

On February 29, 2019, Duquesne filed its proposed Universal Service and Energy Conservation Plan for 2020-2023(USECP). By Commission Order, the USECP was subsequently extended until 2025. On January 6, 2020, the Company also proposed to modify their USECP to make changes, including to the energy burdens, in response to the Commission's *Final CAP Policy Statement and Order* at Docket No. M-2019-3012599. On November 19, 2020, the Commission issued its Tentative Order regarding the Company's Universal Service and Energy Conservation Plans and proposed amendments to the Universal Service and Energy Conservation Plans.

The objective of the Acting Consumer Advocate in intervening in this case is to protect the interests of consumers in Duquesne's service territory. The OCA seeks to ensure that the universal service programs are reasonable and appropriately designed. The OCA will also seek to ensure that the costs that are sought to be recovered are consistent with the Commission regulations, statutes and applicable case law and result in rates that are just and reasonable.