COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE 555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

December 31, 2020



FAX (717) 783-7152 consumer@paoca.org

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

> Re: Petition of Duquesne Light Company for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan Docket No. M-2020-3020818

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,

<u>/s/ Lauren E. Guerra</u> Lauren E. Guerra Assistant Consumer Advocate PA Attorney I.D. # 323192 E-Mail: LGuerra@paoca.org

Enclosures:

cc: The Honorable Mark A. Hoyer (email only)
Office of Special Assistants (email only: <u>ra-OSA@pa.gov</u>)
Bureau of Technical Utility Services (email only)
Certificate of Service

*301735

CERTIFICATE OF SERVICE

Re:	Petition of Duquesne Light Company	:	
	for Approval of its Act 129 Phase IV	:	Docket No. M-2020-3020818
	Energy Efficiency and Conservation Plan	:	

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 31st 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

Michael Zimmerman, Esquire Duquesne Light Company 411 7th Avenue 15th Floor Pittsburgh, PA 15219

Elizabeth R. Marx, Esquire John W. Sweet, Esquire Ria M. Pereira, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 Sharon E. Webb, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101-1923

Timothy McHugh, Esquire Michael A. Gruin, Esquire Stevens & Lee 17 North 2nd Street, 16th Floor Harrisburg, PA 17101

Joseph L. Vullo, Esquire Commission on Economic Opportunity 1460 Wyoming Avenue Forty Fort, PA 18704

<u>/s/ Lauren E. Guerra</u> Lauren E. Guerra Assistant Consumer Advocate PA Attorney I.D. # 323192 E-Mail: <u>LGuerra@paoca.org</u>

Aron J. Beatty Senior Assistant Consumer Advocate PA Attorney I.D. # 86625 E-Mail: <u>ABeatty@paoca.org</u> Counsel for: Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048 Fax: (717) 783-7152 Dated: December 31, 2020 *301734

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Petition of Duquesne Light Company for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan

Docket No. M-2020-3020818

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code 5.71-5.74, the Office of Consumer Advocate hereby gives its 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:

> Lauren E. Guerra Assistant Consumer Advocate PA Attorney I.D. # 323192 E-Mail: <u>LGuerra@paoca.org</u>

Aron J. Beatty Senior Assistant Consumer Advocate PA. Attorney I.D. # 86625 E-Mail: <u>ABeatty@paoca.org</u>

Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Telephone: (717) 783-5048 Fax: (717) 783-7152

Respectfully submitted,

<u>/s/ Lauren E. Guerra</u>

Lauren E. Guerra Assistant Consumer Advocate PA. Attorney I.D. # 323192

DATE: December 31, 2020

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. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the Petition of Duquesne Light Company for Approval of its Phase IV Energy Efficiency and Conservation Plan (Petition).

On November 30, 2020, Duquesne Light Company (Duquesne or the Company) filed the Petition, pursuant to Section 2806.1 of the Public Utility Code and pursuant to the Implementation Order entered by the Commission at Docket No. M-2020-3015228 on June 18, 2020. The Company's budget cap for the EE&C Phase IV Plan is \$97,729,760. Duquesne Statement No. 1 at 23. The Company plans to reduce annual energy consumption by 383,733 MWh and reduce demand by 68.7 MW by May 31, 2026. Duquesne Statement No. 1 at 5. With respect to residential customers, Duquesne has proposed the following four residential customer energy efficiency programs: (1) Rebate Program with Downstream, Midstream and Upstream delivery channels; 2) Residential Appliance Recycling Program; 3) Residential and Low Income Behavioral Energy Efficiency Programs; and 4) the Residential Low Income Energy Efficiency Program. Duquesne Plan at 24-46.

The Acting Consumer Advocate determined to intervene in this proceeding to protect the interests of Duquesne's customers; to ensure that the proposed Plan and programs are in accordance with Act 129 and all other applicable statutes, regulations, and Commission Orders; and to ensure that any increase in rates resulting from the adoption of the proposed programs and any related expenses are just and reasonable.