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January 5, 2021

via Electronic Filing

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission 400 North Street, Filing Room Harrisburg, PA 17120

RE: Duquesne Light Company – Petition for Approval of Act 129 Phase IV

Energy Efficiency & Conservation Plan

Docket No. M-2020-3020818

Dear Secretary Chiavetta:

Please accept for filing the Community Action Association of Pennsylvania's Prehearing Memorandum in the above-referenced matter. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,

Joseph L. Vullo

JLV/jar encl.

cc: All Parties of Record

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company – Petition

For Approval of Act 129 Phase IV Energy : Docket No. M-2020-3020818

Efficiency & Conservation Plan

COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA'S PREHEARING MEMORANDUM

I. <u>HISTORY</u>

The Community Action Association of Pennsylvania (CAAP) intervened in this matter

by Petition to Intervene filed on December 21, 2020. CAAP is a statewide association

representing Pennsylvania's community action agencies that provide anti-poverty planning and

community development activities for low-income communities and services to individuals and

families. CAAP has intervened in prior matters before the Pennsylvania Public Utility

Commission for the purpose of addressing a company's universal service programs and Act 129

Plans. CAAP intervened in this particular matter to examine the Company's proposed plan,

particularly the low-income component of that plan. CAAP reserves the right to address other

issues raised by the Company's proposed Plan.

II. ISSUES TO BE PRESENTED BY CAAP

1. CAAP reserves the right to address all portions of the Company's Plan but its

main purpose is to address that portion of the Plan that addresses low-income customers.

2. Whether the Company's Plan serves the substantial public interest in ensuring that

low-income customers receive the consumption reduction benefits as required under Act 129 and

the Phase IV Implementation Order.

3. Such other additional issues as may arise during the discovery process.

III. <u>WITNESSES</u>

CAAP will present the testimony of Susan A. Moore, Executive Director of CAAP, to address the issues above-described.

IV. PROPOSED SCHEDULE

CAAP will work with the other parties for an agreed upon schedule to be presented to the Administrative Law Judge.

V. <u>SETTLEMENT</u>

CAAP will be open to settlement discussions as this matter proceeds.

Respectfully submitted,

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BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Community Action Association of Pennsylvania's Petition to Intervene upon the following participants this 5th day of January, 2021, via electronic mail:

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