



COMMONWEALTH OF PENNSYLVANIA

January 5, 2021

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 Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan / Docket No. M-2020-3020818

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-captioned proceeding. I respectfully request that a copy of any documents filed in this case also be shared with our witness at the address below:

Robert D. Knecht
Industrial Economics, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com

Copies will be served on all known parties in this proceeding, 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: Parties of Record
Robert D. Knecht

II. PROCEDURAL BACKGROUND

On November 30, 2020 Duquesne Light Company (“Duquesne” or “Company”) filed a Petition for Approval of its Act 129 Phase III Energy and Conservation Plan (“Phase III Plan”).

On December 21, 2020, the OSBA filed a Notice of Intervention and Public Statement in each proceeding.

A Notice of Intervention and Public Statement was also filed by the Office of Consumer Advocate (“OCA”) on December 31, 2020.

Petitions to Intervene have been filed by CAUSE-PA, and the Community Action Association of Pennsylvania.

Deputy Chief Administrative Law Judge (“ALJ”) Mark A. Hoyer has been assigned to this proceeding. On December 30, 2020, a Prehearing Conference Notice was issued scheduling a telephonic prehearing conference for January 6, 2021. ALJ Hoyer issued a Prehearing Conference Order on December 30, 2020. The OSBA submits this Prehearing Memorandum in accordance with that Order.

III. WITNESS

Assisting in the development and presentation of the OSBA’s position in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA requests that all parties provide courtesy copies of all documents, including discovery, testimony and briefs, to Mr. Knecht, simultaneously with service upon the OSBA.

IV. IDENTIFICATION OF ISSUES

The OSBA is participating in this case to ensure that the interests of small business customers of the Company are adequately represented and protected.

At this time, the OSBA is concentrating on the following issues:

1. Whether the overall level of utility costs for the various rate classes is reasonably commensurate to distribution voltage energy consumption, or an adequate explanation for any major variation is provided by the Company;
2. Whether program beneficiaries for small business programs bear a reasonable share of the cost of each program, both in absolute terms and relative to the statistics for programs targeted to other rate class groups.

The OSBA reserves the right to pursue additional issues as they may arise throughout the course of the proceeding.

V. DISCOVERY

Discovery is ongoing. The OSBA will cooperate with the ALJ and other parties to arrive at any mutually agreeable discovery modifications.

VI. SERVICE OF DOCUMENTS

The OSBA agrees to accept electronic delivery of documents on the due date as satisfying the in-hand requirement.

VII. SETTLEMENT

The OSBA is willing to enter into settlement discussions at the appropriate phase of this proceeding.

VIII. PROCEDURAL SCHEDULE

The OSBA will work with the ALJ and other parties to develop a mutually acceptable procedural schedule.

Respectfully submitted,

/s/ Sharon E. Webb

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

For:

John Evans
Small Business Advocate

Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: January 5, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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).

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/s/ Sharon E. Webb

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Attorney ID No. 73995

DATE: January 5, 2021