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January 13, 2021

**Via Electronic Mail**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Keystone Building 2<sup>nd</sup> Floor W  
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,

On January 13, 2021, Duquesne Light Company filed Reply Comments in the above docket. After filing, an inadvertent typographical error was discovered.

Enclosed please find a copy of the corrected Duquesne Light Company's Reply Comments. Please feel free to contact me with any questions, comments, or concerns.

Best Regards,

A handwritten signature in black ink, appearing to read "Tishekia Williams", written over a horizontal line.

Tishekia Williams

Enclosures

cc: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

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Dated: January 13, 2021

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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DUQUESNE LIGHT COMPANY'S  
REPLY COMMENTS

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Phone: (412) 393-1541  
Dated: January 13, 2021

## **DUQUESNE LIGHT'S REPLY COMMENTS**

Duquesne Light Company (Duquesne Light or the Company) files these Reply Comments in response to the Comments of Coalition for Affordable Utility Services and Energy Efficiency (CAUSE-PA) and the Office of Consumer Advocate (OCA) pursuant to the Pennsylvania Public Utility Commission's (Commission) directive in the Tentative Order entered November 19, 2020.

### **I. INTRODUCTION**

Duquesne Light Company's ("Duquesne Light" or "Company") Universal Service and Energy Conservation Plan (USECP) has undergone significant changes over the past several years. These changes were designed to improve the efficiency and affordability of the service provided to low-income customers. Indeed, many of these changes were made in response to concerns raised by the Pennsylvania Public Utility Commission ("Commission" or "PUC") and interested stakeholders such as the Office of Consumer Advocate (OCA) and the Coalition for Affordable Utility Service and Energy Efficiency (CAUSE-PA). These improvements have resulted in increased program costs, which were vetted extensively by stakeholders prior to Commission approval. In its Comments, the OCA raised several concerns related to the increased costs of Duquesne Light's USECP. However, as detailed herein, the historical cost increases *are not* related to the Percentage of Income Payment Plan ("PIPP") change proposed in the instant docket. Accordingly, the Commission should not be swayed by the OCAs concerns regarding historical cost increase that have already been approved, and in no way diminish the reasonableness of the Company's proposal to implement the PIPP tiers as outlined in the Commission's Policy Statement.

By way of further background, in the Company’s 2014-2016 USECP, and as approved by the Commission in the Company’s Rate Case Settlement at Docket No. R-2013-2372129, Duquesne Light increased its maximum annual CAP credits to assist income qualified customers in managing their energy burden. Duquesne Light increased the maximum CAP credit from \$560 to \$700 for nonheating customers and from \$1,400 to \$1,800 for heating customers. This change increased the Company’s USECP costs and was supported or not opposed by the OCA and CAUSE-PA.

Likewise, the 2017-2019 USECP, as amended by Commission order entered July 20, 2017, at Docket No. M-2016-2543423, included several program enhancements and modifications. Most notably, the Plan included an increase in the percentage of budget discounts for CAP customers and an increase in the CAP maximum credits from \$700 to \$1500 per program year for non-heating customers. The Percent of Budget Plan CAP tiers were also updated as follows:

Federal Poverty Level	Non-Electric Heat	Electric Heat
0-50%	15% of Budget	25% of Budget
51-100%	40% of Budget	60% of Budget
101-150%	80% of Budget	80% of Budget

These changes increased the Company’s USECP costs by approximately \$6.5M and were supported by the OCA and CAUSE-PA.

On February 28, 2019, Duquesne Light filed its proposed 2020-2025 USECP at docket number M-2019-3008227.<sup>1</sup> On November 5, 2019, the Commission entered a Final Policy Statement and Order adopting CAP Policy Statement at 52 Pa. Code §§ 69.261-69.267 docketed

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<sup>1</sup> On October 3, 2019, the Commission issued an Order at docket no. M-2019-3012601 implementing a pilot USECP filing schedule and universal service impact evaluation filing schedule. The pilot extended the duration of USECPs from 3 years to 5 years. Accordingly, DLC’s February 28, 2019 proposed USECP was amended to cover the timeframe of 2020-2025.

at M-2019-3012599 (“Final Policy Statement and Order”). Pursuant to the Commission’s directive in its Final Policy Statement and Order, Duquesne Light filed a revised USECP on January 6, 2020, which proposed changes to its Percentage of Income Payment Plan (PIPP) for those enrolled in the Company’s Customer Assistance Program (CAP). *It is important to note that this was the sole change proposed to its CAP that had not been previously approved by the Commission in a universal services proceeding.*

On November 6, 2020, the Company petitioned the Commission to implement the proposed changes to the PIPP tiers included in the Company’s January 6<sup>th</sup> filing on the basis that the amended PIPP tiers provide greater affordability for Duquesne Light CAP customers. CAUSE-PA and the OCA filed Answers to the November 6, 2020 Petition.

On November 19, 2020, the Commission entered a Tentative Order and requested Supplemental Information. On December 10, 2020, Duquesne filed Supplemental Information as requested in the Tentative Order.<sup>2</sup> On December 22, 2020, Duquesne filed a Petition, docketed at P-2020-3023448, requesting an Extension in order to implement the PIPP tiers included in the Company’s January 6<sup>th</sup> filing *no later than* April 1, 2021.<sup>3</sup> On December 29, 2020, CAUSE-PA and the OCA filed Comments as directed by the Tentative Order.

The OCA Comments raised issues regarding: (1) energy burdens; (2) evaluating CAP household bills; (3) Customer Outreach and Education Plan; and (4) Dollar Energy Fund (DEF) Administration of Hardship Fund. CAUSE-PA’s comments were largely supportive of the Company’s request to implement its PIPP at the energy burden levels outlined in Duquesne Light’s

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<sup>2</sup> On December 7, 2020, before the Company filed its Supplemental Information, the OCA propounded discovery on Duquesne Light.

<sup>3</sup> As of the filing of these Comments, the Company’s request for extension is unopposed. On January 12, 2021, OCA and CAUSE-PA filed Answers to the Company’s requested extension. CAUSE-PA supported the Company’s requested extension; OCA did not oppose it.

revised USECP dated January 6, 2020, but also raised other issues. Duquesne Light files the present Reply Comments in response to the issues raised by the OCA and CAUSE-PA, and states as follows:

**II. REPLY COMMENTS**

**A. OCA’s Identified Issues**

**1. Energy Burdens**

Duquesne Light’s approved PIPP structure for CAP customers is as follows:

<b>INCOME CATEGORY</b>	<b>RESIDENTIALSERVICE NON-ELECTRIC HEAT PERCENTAGE OF INCOME PAYMENT</b>	<b>RESIDENTIAL ELECTRIC HEAT PERCENTAGE OF INCOME PAYMENT</b>
0-50%	3%	7%
51-100%	4%	8%
101-150%	5%	9%

In its revised USECP dated January 6, 2020, Duquesne Light amended its PIPP structure for CAP customers to reflect the following energy burdens:<sup>4</sup>

<b>INCOME CATEGORY</b>	<b>RESIDENTIALSERVICE NON-ELECTRIC HEAT PERCENTAGE OF INCOME PAYMENT</b>	<b>RESIDENTIAL ELECTRIC HEAT PERCENTAGE OF INCOME PAYMENT</b>
0-50%	2%	6%
51-100%	4%	10%
101-150%	4%	10%

The OCA does not support the proposed changes to the energy burdens, alleging that the revised energy burdens would increase universal service costs. OCA argues that the cost of

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<sup>4</sup> The implementation of the revised PIPP tiers are inextricably tied to the Company’s Customer Care and Billing system upgrade, named “Project Spark.” The PIPP tiers in the Company’s Project Spark reflect the revised USECP dated January 6, 2020. Currently, Project Spark is expected to go-live the weekend of January 16-18, 2021, and the upgraded system will be fully functional on January 19, 2021.

Duquesne Light's universal service programs have increased from \$549 per CAP participant in 2016 to \$862 in 2019, which OCA appears to attribute to the implementation of a PIPP.<sup>5</sup>

The OCA's allegations are misleading and fail to account for incremental costs associated with its USECP since 2016. The sole cause of the increased costs was not due to the Company's implementation of a PIPP. Indeed, to date, the PIPP has not been implemented. The primary historical increase in USECP costs, which is not before this Commission, was due to increased discounts and increased CAP maximum credits<sup>6</sup> which were implemented because the Commission and stakeholders found that the Company's CAP rates were unaffordable.

In the instant proceeding, Duquesne Light seeks Commission approval for a single change to its CAP. Namely, Duquesne Light proposes to implement the PIPP tiers established by the Commission after a multi-year on the record investigation. Under the revised PIPP tiers, majority of Duquesne Light's low-income customers enrolled in CAP will experience greater affordability. The proposed PIPP tiers were developed following a two years-long proceedings<sup>7</sup> related to energy affordability. The Commission's examination of energy burdens and affordability "involved a holistic review of universal service and energy conservation programs, including a thorough examination of the effects of the Commission's current energy burden thresholds, focusing on whether existing CAP pricing is affordable for low-income customers."<sup>8</sup> Duquesne Light's proposed PIPP structure is a result of a thorough process to reduce energy burdens on low-income households in Pennsylvania.

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<sup>5</sup> See OCA Comments, pp. 5-7 ("As noted above, residential customers have already seen increased universal service costs as a result of Duquesne's adoption of a PIPP structure . . .").

<sup>6</sup> The increase of the maximum CAP credit amounts are discussed in more detail, below.

<sup>7</sup> The two separate proceedings were identified as: (1) Energy Affordability for Low-Income Customers at Docket No. M-2017-2587711, and (2) Review of Universal Service and Energy Conservation Programs, Docket No. M-2017-2596907.

<sup>8</sup> Joint Motion by Chairman Gladys Brown Dutrieuille and Commissioner Place, Docket No. L-2019-3012600 (September 19, 2019).

Duquesne Light fully understands that the economic and health pandemic has created substantial challenges for some customers. For that very reason, the Company believes it is critically important to ensure affordability for the most vulnerable customers. The bill impact to non-CAP customers that is associated with implementing the revised PIPP tiers is less than \$5 per year. The average non-CAP customer would see a monthly bill increase of \$0.35 in calendar year 2021 and \$0.36 in calendar year 2022. The minimal impact to non-CAP customers weighs in favor of implementing the revised PIPP tiers. As discussed in more detail below, Duquesne Light is supportive of changing the arrears forgiveness period from 24 months to 36 months. This change would negate the entire monthly bill impact associated with implementing the proposed PIPP tiers. Accordingly, Duquesne Light believes that the Commission should approve its proposal to implement the PIPP maximums as outlined in its January 6, 2020 filing.

## **2. Cost Mitigation And Cost Control Measures**

### ***i. Controlling Annual Increases In the Universal Service Charge.***

The OCA asks the Commission to consider holding Duquesne Light's annual costs recovered through the Universal Services surcharge to the levels projected in the filing or be limited to a percentage increase in residential distribution costs each year. The OCA's cost cap proposals are contrary to clear statutory authority, and shall not be considered by this Commission.

66 Pa.C.S. § 2804 states:

(8) The commission shall establish for each electric utility an appropriate cost-recovery mechanism which is designed to fully recover the electric utility's universal service and energy conservation costs over the life of these programs.

(9) The commission shall ensure that universal service and energy conservation policies, activities and services are appropriately funded and available in each electric distribution territory. Policies, activities and services under this paragraph shall be funded in each electric distribution territory by nonbypassable, competitively neutral cost-recovery mechanisms that fully recover the costs of universal service and energy conservation services. The commission shall encourage the use of community-based

organizations that have the necessary technical and administrative experience to be the direct providers of services or programs which reduce energy consumption or otherwise assist low-income customers to afford electric service. Programs under this paragraph shall be subject to the administrative oversight of the commission which will ensure that the programs are operated in a cost-effective manner.

(emphasis added). The OCA's recommendation is directly in conflict with the statute. The Commission has the authority to review whether costs were incurred prudently. Ultimately, Universal Service Program costs, including CAP costs, are recovered through a reconcilable surcharge found in Duquesne Light's Tariff. The Commission should not cap or otherwise prevent recovery of Duquesne Light's prudently incurred costs of its universal service programs, consistent with Pennsylvania statute.

While Duquesne Light *strongly disagrees* with any cap on cost recovery through its surcharge, if the Commission determines that a cap on surcharge recovery is appropriate, the Commission should expressly granted Duquesne Light a regulatory asset for its prudently incurred, incremental cost for universal service programs.

*ii. Arrearage Forgiveness*

Presently, Duquesne Light's proposed CAP would allow participants to earn arrearage forgiveness over a 24-month period. The OCA recommends the Commission consider lengthening its arrearage forgiveness period from 24 months to at least 36 months if not longer. Duquesne Light does not oppose changing the arrears forgiveness period from 24 months to 36 months effective January 2023. Changing the arrears forgiveness period to 36 months would reduce the monthly costs to non-CAP residential customers by \$.46 per month thereby offsetting the increase associated with the PIPP tier. Duquesne Light submits that this change will require changes to its billing system. Because the Company plans to go-live with significant updates in the near future, work on these changes cannot begin until after the stabilization period. Additionally, the Company

would have to educate CAP customers about the change. January 2023 is a reasonable timeframe to exit the stabilization period, develop and test the changes, and educate customers prior to implementation.

OCA also argues that Duquesne Light should improve its efforts to enroll customers in CAP thereby mitigating the costs of arrears forgiveness. Duquesne Light agrees that it does not benefit the CAP customer or other residential ratepayers to bring high arrearages into the program. Duquesne Light has a variety of programs that are designed to provide customers in need of assistance with the support they need.<sup>9</sup> The Company utilizes bill messages, ServiceLine (the Company's customer newsletter), webinars hosted by elected officials, targeted e-mail communications, and social media to reach customers about available programs. The Company works with Community Based Partners, including Holy Family Institute, Catholic Charities and Dollar Energy Fund, using their networks to reach out to customers. The goal is to increase customer participation in universal services programs, and to that end, the Company will continue to make it easy to do business with us by offering multiple channels for customer interaction.

### *iii. Administrative Costs*

The OCA recommends the Commission limit administrative costs that flow through the automatic recovery mechanism. To avoid repetition, Duquesne Light disagrees for reasons stated above regarding its ability to recover the prudently incurred costs, including administrative costs, associated with its USECP as allowed by statute. By way of further response, Duquesne Light has already begun pursuing new ways to reduce administrative costs, such as: cooperating with Peoples Natural Gas to select one vendor to administer Low Income Usage Reduction Program (LIURP) and collaborating with CBOs to borrow community spaces as “pop-up” offices where customers

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<sup>9</sup>Supplemental Information, Dec. 10, 2020, Attachment N.

can apply or recertify for CAP. Further, allowing the Company to implement its revised USECP *will not* increase universal service administrative costs. To the contrary, requiring Duquesne Light to rebuild Project Spark to accommodate energy burden tiers that are inconsistent with the Final Policy Statement and Order will increase costs. Changes to the revised USECP, including the revised energy burden levels, would require technology solutions, testing, and user training. The cost associated with testing, user training, and rebuilding Project Spark to implement the OCA’s various recommendations is counterproductive to the objective of the PIPP CAP, which seeks to benefit low income customers by reducing the percentage total household income that is used to pay utility bills. See Supplemental Information dated Dec. 10, 2021, Attachment A1.

***iv. Maximum CAP Credit Ceilings***

The OCA speculates that Duquesne Light’s current maximum CAP credit ceilings are problematic and suggests the Commission re-evaluate the current standards. There is no evidence that Duquesne Light Company’s maximum CAP credits are too high.

The 2020-2025 plan, which was built into Project Spark, and not yet implemented, proposed CAP credit maximums tailored to specific income tiers, as follows:

<b>Income Category</b>	<b>Non-Heating Maximum Annual Discount</b>	<b>Electric Heating Maximum Annual Discount</b>
Up to 50% FPL	\$1,600	\$2,350
51% to 100% FPL	\$1,400	\$1,800
101% to 150% FPL	\$900	\$1,300

Duquesne Light’s 2020-2025 proposal also allows the maximum annual CAP discount to be adjusted for extenuating circumstances including, but not limited to: increased household occupants, serious illness or medical condition; consumption increase beyond the customer’s

control. Duquesne Light's maximum CAP credit ceilings encourage conservation for high use customers and are based on thoughtful analysis and customers' income and occupancy data, and further considers the unique circumstances that enrolled customers may face, especially in light of the COVID-19 pandemic. While the Company has not implemented the new CAP maximums, Duquesne Light should be permitted to implement the CAP maximums as approved by the Commission and previously supported or not opposed by the OCA and CAUSE-PA.<sup>10</sup> As such, the OCA's suggestion that the Commission re-evaluate the current standards should be denied.

**v. *Allocation of LIURP Resources To Customers With High CAP Credits***

The OCA recommends Duquesne Light prioritize customers with high CAP credit usage for the Low Income Usage Reduction Program (LIURP). Duquesne Light does, in fact, prioritize CAP customers with high CAP credit usage for LIURP. Specifically, customers who receive \$1,000 or more in CAP credits in a year are prioritized to schedule a LIURP visit.<sup>11</sup> The Company will also use the high usage CAP customer list as well as eligible customers requesting weatherization to inform its prioritization.<sup>12</sup> Given the foregoing, the OCA's concern that customers may be reaching the maximum CAP credits before they have had an opportunity to take cost-saving measures identified through LIURP is without merit.

**vi. *HUD Recipient Participation in CAP***

The OCA recommends the Company provide the data necessary to determine whether it would be appropriate to limit HUD recipient participation in CAP. The Company does not

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<sup>10</sup> See Duquesne Light Universal Service And Energy Conservation Plan for 2017-2019 Submitted in Compliance with 52 Pa. Code §§ 69.261–69.267, Order on Reconsideration. Docket No. M-2016-2534323 (order entered April 19, 2018)

<sup>11</sup> 2020-2025 Proposed USECP, p. 31.

<sup>12</sup> 2020-2025 Proposed USECP, p. 31.

specifically track whether its CAP customers' incomes include HUD allowances, though some customers do report HUD allowances as a part of their monthly household incomes for the purposes of determining program eligibility. Presently, HUD specific income cannot be identified separately from other income. Developing technology to track HUD recipients would increase the administrative costs associated with the USECP, and is contrary to the OCA's prior argument that administrative costs should be reduced.

Additionally, Duquesne Light fundamentally disagrees that customers who receive HUD allowances should be excluded from CAP. CAP customer eligibility is based on total household income. Customers are not categorically excluded based on the availability of government assistance (HUD allowances, LIHEAP grants, etc). Accordingly, it is unclear why HUD allowances should disqualify participation. Such a policy appears to be a fundamental restructuring of CAP eligibility.

***vii. Impact of Unused LIHEAP Grants***

The Company cannot predict the amount of returned Low Income Home Energy Assistance Program (LIHEAP) as a result of the revised energy burdens. The Company has no data to suggest that the amount of returned LIHEAP grants will increase or decrease due to a revision of the energy burden levels concurrent with a global pandemic. Duquesne Light is willing to review returned LIHEAP grants over the next 18 months (2 heating seasons) to analyze the impact, if any, of the proposed CAP energy burdens on the amount of LIHEAP benefits that would be returned to DHS.

***2. Evaluating Household CAP Bills***

The OCA objects to the Company's approach to evaluating CAP customer bills every four months to determine whether the customer is best served in the PIPP or the Average

Monthly Bill Plan. The OCA argues that the cadence of Duquesne Light's evaluation of CAP bills is not consistent with Section 69.365(8)(vii) of the CAP Policy Statement.

To be clear, the Average Bill methodology uses the previous 12 months' usage to calculate an average bill amount. The average bill amount is recalculated every 4 months. Any usage older than 12 months is dropped from the recalculation, and it is replaced by the most recent usage. Duquesne Light avers that the calculation is appropriate.

Moreover, Duquesne Light does not ensure that the annual PIPP payment is equal to the prescribed percentage of income burden at all times. Customers should not be required to pay the designated PIPP based on income if the customer is using less electricity than what would be required by the PIPP payment amount. Such a requirement would punish low-income customers for conserving electricity.

### **3. Customer Education and Outreach Plan**

The OCA submits that the Commission should direct Duquesne Light to develop specific outreach to customers at 0-50% of the FPL. As indicated previously, Duquesne Light has a comprehensive outreach strategy. The method and content of outreach for a CAP-eligible customers is the same for all CAP-eligible customers. Carving out a separate communication for the 0-50% FPL customer population would only drive up program costs and yield little to no increased rate of CAP enrollment.

### **4. DEF Administration of Hardship Fund**

The OCA implies that Dollar Energy Fund's (DEF) administration of the Company's Hardship Fund is inconsistent with the eligibility guidelines in Duquesne Light's Commission-approved USECP, based on incorrect information on Dollar Energy Fund's website. To be eligible for a Hardship Fund grant under the Commission-approved USECP, a customer must have made

a sincere effort of payment of \$150 within 90 days or at least \$100 in the past 90 days for a senior (aged 62 years and above). The Company has, in cases when a customer owes over \$500 to be restored or to stop a termination, required the customer to apply for other payment assistance and/or make the good faith payment as outlined above in order to secure a Hardship Fund grant. The statement on Dollar Energy Fund’s website<sup>13</sup> that a Duquesne Light customer’s application for a Hardship Fund grant will be denied if maximum grant amount will not restore service or stop termination is not consistent with Duquesne Light’s practices. Duquesne Light will advise DEF of the error on its website and work with DEF to correct it.

**A. CAUSE-PA’s Identified Issues**

**1. CAP Recertification**

***a. Recertification Methods***

CAUSE-PA opposes Duquesne Light’s practice of treating CAP participants who relocate, but fail to transfer service within 30 days, as applicants who are required to apply for new service and CAP enrollment. CAUSE-PA’s recommendation that Duquesne Light treat a person who has not had active service for more than 30 days as a customer and not an applicant is contradictory to clear Commission regulation. Specifically, 52 Pa. Code § 56.1 defines a customer as including “a person who, within 30 days after service termination or discontinuance of service, seeks to have service reconnected at the same location or transferred to another location within the service territory of the public utility.” Inasmuch as CAUSE-PA’s recommendation starkly contrasts the Commission’s lawful definition of a customer, the Commission should reject the recommendation.

***b. Recertification Timeframes***

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<sup>13</sup> <https://www.dollarenergy.org/wp-content/uploads/2020/12/2020-2021-PA-Fact-Sheet-Duquesne-Light-Company-revised.pdf>

CAUSE-PA recommends DLC implement a three-year re-certification requirement. Duquesne Light does not support changes to the recertification timeframe. Recertification allows the Company to ensure that customers are enrolled in CAP at the appropriate tier based on their income. Duquesne Light avers that the recertification process included in the 2020-2025 USECP is appropriate and should not be changed.

*c. Language Access*

CAUSE-PA recommends that the Commission direct Duquesne Light to articulate its language access policies as they pertain to universal service enrollment, and detail its methods for ensuring that its application and recertification processes are fully accessible to low income consumers with limited English proficiency. Duquesne Light is evaluating all language access capabilities broadly given the increasing diversity of its customer base. Duquesne Light will work with its Income Eligible Advisory Group to roll out additional language access written communication capabilities. Duquesne Light does have the ability to access translation services for phone calls via Language Line.

**2. Evaluating Household CAP bills**

CAUSE-PA requests that the Commission direct Duquesne Light to remove the provision in its USECP that provides for back-billing customers at the full tariff rate if it is determined at the time of recertification that they no longer meet income limitations. Duquesne Light is not opposed to removing this provision at this time.

**3. Refund of Security Deposits**

CAUSE-PA submits that Duquesne Light's practice of refunding security deposits to customer accounts once it is confirmed that they are low income (in this case, enrolled in CAP) contradicts the statutory prohibition on assessment of security deposits for CAP eligible

households. CAUSE-PA argues that Section 1404(a.1) prohibits utilities from collecting cash deposits from a customer or applicant that is income eligible for CAP, and that once it is determined that a customer has income at or below 150% FPL, any previously collected security deposit should be returned to the customer – and should only be applied to the customers’ account if requested. Duquesne Light disagrees. The Company is properly refunding the deposits to low income customers as required by law. CAUSE-PA effectively suggests that when a customer has an undisputed unpaid balance, the Company should not be permitted to apply the customer’s prior payment to that balance. Nothing in the statute or Commission orders support such an assertion. Moreover, such a policy would likely increase universal services costs and uncollectible amounts which are borne by other customers.

### **III. CONCLUSION**

Duquesne Light appreciates the opportunity to provide these Reply Comments at the above-captioned docket, and respectfully requests that its Reply Comments be duly considered by the Commission.

Respectfully Submitted,



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DATE: January 13, 2021