



Emily Farah
Counsel, Regulatory

411 Seventh Avenue
Mail Drop 15-7
Pittsburgh, PA 15219

Tel: 412-393-6431
efarah@duqlight.com

March 8, 2021

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Bldg. 2nd Floor W
400 N. Street
Harrisburg, PA 17120

**RE: Duquesne Light Co. 2020-2025 Universal Service and Energy Conservation Plan
Docket Nos. P-2020-3023448, M-2016-2534323, M-2019-3008227**

Dear Secretary Chiavetta:

By letter dated April 3, 2020, Duquesne Light Company (“Duquesne Light” or the “Company”) requested a delayed implementation of its Percentage of Income Payment Plan (“PIPP”) Customer Assistance Program (“CAP”). Implementation of the PIPP CAP was tied to the Company’s Customer Care and Billing system implementation, known as “Project Spark.” Unfortunately, due to the COVID-19 pandemic, Project Spark implementation was delayed resulting in a delay in the PIPP CAP implementation. On April 20, 2020, the Pennsylvania Public Utility Commission (“Commission”) granted Duquesne Light an extension of the PIPP CAP implementation, subject to monthly status reports beginning June 1, 2020. On June 1, 2020, July 1, 2020, August 3, 2020, September 1, 2020, October 5, 2020, and November 6, 2020 Duquesne Light submitted its monthly status reports. On December 24, 2020 Duquesne Light petitioned the Commission for permission to implement its PIPP CAP no later than April 1, 2021. To date, the Commission has not granted or denied the Company’s latest petition for an extension. Duquesne Light implemented Project Spark effective January 19, 2021. The Company is currently within the 90-day hypercare period and pleased to report that the system upgrade was an overall success.

By way of additional detail, Duquesne Light is pleased to report that the Company experienced few technology issues with Project Spark implementation. In February 2021, the Company completed one full cycle of billing. Duquesne Light experienced a few issues that have impacted customers, and are mostly limited to some one-time conversion items, a few minor integration issues with our website, and a few bill presentation issues. All of these issues were resolved quickly.



Finally, with the Project Spark go-live, Duquesne Light implemented the PIPP CAP tiers as requested in its January 2020 filing at docket number M-2019-3008227, and recommended by the Commission in its Final Policy Statement and Order adopting CAP Policy Statement at 52 Pa. Code §§ 69.261-69.267 docketed at M-2019-3012599 (“Final Policy Statement and Order”). The Company believes that implementing the Commission’s recommended PIPP tiers was prudent because the proposed changes to the PIPP tiers included in the Company’s January 6th filing provide greater affordability for Duquesne Light CAP customers in four of the six PIPP tiers as compared to the February 2019 USECP filing. The details of the CAP program are otherwise identical to the Company’s Commission approved CAP. Moreover, the bill impact associated with implementing the PIPP tiers in the Company’s January 6, 2020 revised USECP and the Commission’s Final Statement and Order is minimal. The average non-CAP customer could see a monthly bill impact of just \$0.35 in calendar year 2021 and \$0.36 in calendar year 2022. Given the Company’s proposed change to the arrears forgiveness cost recovery period detailed in its pending 2020-2025 USECP, the changes to the PIPP tiers are bill neutral, or favorable to customers. Duquesne further notes that the parties to the Company’s Universal Service and Energy Conservation Plan have been advised of the status of the PIPP implementation, and are copied on this letter. CAUSE-PA supported the Company’s implementation of the PIPP tiers.

Duquesne Light will continue to operate in hypercare for the first 90 days following go-live, during which we will have dedicated business and IT representatives in front-line support positions to assist with any issues that arise. The Company will provide updates every 30 days and promptly bring any issues to the Commission’s and parties’ attentions, as necessary and appropriate.

Please contact me with any questions, comments, or concerns. This letter has been served on the parties listed below, by electronic mailing only.

Respectfully,

A handwritten signature in blue ink, appearing to read "Emily M. Farah".

Emily M. Farah
Duquesne Light Company
Counsel, Regulatory

cc: Louise Fink Smith, Law Bureau
Joseph Magee, Bureau of Consumer Services
Christy Appleby, Office of Consumer Advocate
Elizabeth Marx, CAUSE-PA