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December 30, 2021

Via Electronic Filing

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**Re: Duquesne Light Company 2021 Eligible Customer List Solicitation Report
Docket No. P-2020-3022674**

Dear Secretary Chiavetta:

Pursuant to Paragraphs 17 and 23 of the *Petition for Clarification*, approved by the Pennsylvania Public Utility Commission by Order entered January 14, 2021 at the above-captioned docket, please find enclosed for filing Duquesne Light Company's Report for the 2021 Eligible Customer List triennial solicitation.

Should you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Michael Zimmerman".

Michael Zimmerman
Senior Counsel, Regulatory

Cc: Certificate of Service
Enclosure

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):

ELECTRONIC MAIL

Bureau of Investigation & Enforcement
Richard Kanaskie
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265
rkanaskie@pa.gov

Office of Small Business Advocate
Sharon Webb
Steve Gray
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov
sgray@pa.gov

Office of Consumer Advocate
Aron Beatty
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
ABeatty@paoca.org

Pennsylvania Utility Law Project
Elizabeth R. Marx
118 Locust Street
Harrisburg, PA 17101
emarx@pautilitylawproject.org

Hawke McKeon & Sniscak, LLP
Todd S. Stewart
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
On behalf of RESA



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Dated: October 30, 2020



Triennial Eligible Customer List Solicitation Report

2021

12/30/2021



Introduction and Background

This Report is filed pursuant to the Pennsylvania Public Utility Commission's ("Commission") Order entered January 14, 2021, at Docket P-2020-3022674, regarding Duquesne Light Company's ("Duquesne Light" or "Company") Eligible Customer List ("ECL") solicitation conducted in 2021.

Pursuant to the *Interim Guidelines for Eligible Customer Lists*, Final Order entered October 23, 2014, at Docket No. M-2010-2183412 ("ECL Order"), every three years, electric distribution companies ("EDCs") perform a company-wide solicitation to their customers to refresh their ECL. This ECL solicitation notifies customers of their opportunity to withhold the release of certain information from licensed electric generation suppliers ("EGSs"). Customers that do not respond to the solicitation are automatically included in the ECL unless they otherwise request to be excluded.

Traditionally, Duquesne Light served the ECL solicitation via hard copy-mailings. In anticipation of the 2021 ECL solicitation, on October 30, 2020, the Company filed a petition ("Petition") with the Commission for permission to expand email ECL service to include "e-communication customers" in addition to e-billing customers.¹ E-communication customers are those residential customers who have not registered for e-billing but have provided their emails to the Company and consented to receive electronic communications.

Inter alia, the Petition describes Duquesne Light's proposed process for administering email ECL service, providing in relevant part at ¶15:

[T]he Company will email the ECL solicitation to all e-communication and e-billing customers. The email will clearly state – in its subject line and in multiple places within the email – that the customer is expected to respond. Additionally, the Company will send a second email to all e-communication and e-billing customers who do not open the initial email. Where the ECL solicitation email to a customer is returned as undeliverable, or where the customer requests a hard-copy ECL solicitation, the Company will send an ECL solicitation to the customer via standard mail.

The Petition further proposed to allow all customers to be able to respond to the ECL solicitation via Duquesne Light's website, telephone or by mail, irrespective of how the solicitation was served on them. The Company also proposed to provide a report to the Commission and stakeholders with an evaluation of the electronic ECL solicitation and lessons learned no later than December 31, 2021.

¹ P-2020-3022674, *Petition of Duquesne Light Company for Limited Waiver of Service Requirements of the Eligible Customer List Triennial Solicitation* (October 30, 2020) ("Petition"). The Commission treated the Petition as a petition for clarification. See Opinion and Order entered January 14, 2021, at 3.

The Commission granted the Petition by Order entered January 14, 2021 (“January 14th Order”). The January 14th Order further directed the Company to include “RESPONSE REQUESTED,” in capital letters, in the subject line of ECL solicitation emails.

The Company conducted its triennial ECL solicitation in early 2021. Pursuant to the Petition and the January 14th Order, this Report summarizes the results and the Company’s evaluation of such solicitation.

Email and Mail Statistics

Consistent with the January 14th Order, the Company sent two email solicitations to the email addresses on file for e-communication and e-billing customers with a subject line of “RESPONSE REQUESTED: Important Information About Electric Choice.” The first was sent on March 4, 2021 to 310,391 email addresses. The second solicitation, which was issued on March 9, 2021 to 127,201 addresses, was sent to customers who received but did not open the first email. In total, there were 437,592 emails sent. An image of the email body is shown in Appendix 1. For both email solicitations, where an email was returned as undeliverable, or where the customer indicated a preference for hard-copy solicitation, the Company provided a hard-copy solicitation by mail.

Table 1 shows the results of the email communications.

Table 1: Analytics for Eligible Customer List Email Campaign (as of 12/07/2021)

Analytics	Sent 3/4/2021		Sent 3/9/2021		Combined Total	Combined Rate
	Total	Rate	Total	Rate		
Total Sent	310,391		127,201		437,592	
Delivered	308,889	99.52%	127,134	99.95%	436,023	99.64%
Total Opens*	498,522		79,012		577,534	
Unique Opens	186,838	60.49%	39,677	31.21%	226,515	73.45%**
Undeliverable or Customer Opt-Out of E-Communication	1,844	0.60%	180	0.14%	2,024	0.46%
<i>*Includes duplicate opens</i>						
<i>**Indicates percentage of e-communication customers who opened at least one ECL solicitation email</i>						

When compiling customer information, Duquesne Light identified 208,130 customer accounts without email addresses. These customers were mailed a hard-copy solicitation during the period February 26 to March 8, 2021. A copy of the hard-copy solicitation is provided at Appendix 2. As indicated above, the Company also provided hard-copy solicitations to customers with nonfunctioning email addresses or who

indicated a preference for hard-copy service. These solicitations were provided via a second mailing of 24,613 letters on March 31, 2021.

Customer Responses

All customers had the option to respond to the ECL solicitation via Duquesne Light’s website, mobile app, telephone or by mail. As the data shows in Table 2 below, the preferred method to respond was through Duquesne Light’s website or mobile app. The Company attributes this in part to expanded electronic service of the ECL solicitation, new options for customers to respond electronically using a QR code or shortened URL, and to increasing customer preferences for electronic communications. The second most popular result was to speak to a customer service representative or mail in a paper response. The least favorite method was to self-serve using the automated phone system or interactive voice response (IVR).

Table 2: Customer Responses (as of 12/8/2021)

Transaction Type	Total Responses		Rate
	2018	2021	
Total Opt-Outs	48,800	33,809	
Web/mobile	-	21,374	63.22%
CSR or mail-in	-	9,881	29.23%
IVR	-	2,554	7.55%

Customer opt-outs broken down by method of Company contact (i.e., email versus hard copy mail) for the 2021 solicitation are shown in the following Table 3:

Table 3: Customer Responses by Company Contact Method (as of 12/8/2021)

Contact Method	# Customers Contacted	# Opt-Outs	Opt-Out Rate
2018 – Hard Copy Mail	564,162	48,800	8.65%
2021 - All Methods	541,110	33,809	6.5%
2021 - Email	308,367	16,191	5.3%
2021 - Hard Copy Mail	232,743	17,618	7.6%

Compared to 2018, the number and rate of opt-outs decreased slightly in 2021. The “Evaluation and Lessons Learned” section below discusses why that might be the case.

Cost Savings

In the Petition, the Company estimated that expanded electronic ECL solicitation service would save approximately \$100,000 in printing and postage costs, thereby reducing the Company’s revenue requirement in future base rate proceedings. The Company’s actual savings came to \$121,895. A comparison of the number of ECL mailings in 2018 and 2021, and corresponding costs, is provided in Table 4 below.

Table 4: Letters Sent and Mailing Costs (as of 12/17/2021)

	2018	2021	Difference
Total Letters Sent	563,800	232,732	(331,068)
First Mailing		208,130	
Second Mailing		24,613	
Cost of ECL Mailing	\$205,080	\$83,185	(\$121,895)

Evaluation and Lessons Learned

The Company believes that its 2021 ECL solicitation, including expanded electronic service, was successful. The high open rate for email solicitations – 73.45% of all customers who received emailed solicitations – is indicative of customers’ increasing preference for, and ability to engage with, electronic communications. Additionally, the Company’s actual cost savings, which ultimately accrue to the customers’ benefit, exceeded expectations.

As indicated above, customers responded at a lower rate to the 2021 ECL solicitation than to the 2018 solicitation, across both service methods. In 2018, when all customers were served via hard copy mail, 8.65% of customers responded; whereas in 2021, 7.6% of customers who were served via hard copy mail responded. The content and approach of the Company’s hard-copy ECL mailings were substantially similar in both solicitations; therefore, the Company believes that this lower customer response rate may be attributable to other factors, which might include changing customer preferences regarding ECL participation, changes in overall customer engagement patterns, and other issues competing for customers’ attention (e.g., the COVID-19 pandemic).

Additionally, in 2021, customers served via email responded at a lower rate than those served via hard-copy mail (i.e., 5.3% compared to 7.6%). The Company has not yet drawn definite conclusions from this fact, as multiple factors may have contributed. Some potential factors are largely outside the Company’s control. For example, e-communication customers might have a greater willingness to remain on the ECL. Customers may also have been unaccustomed to Duquesne Light emails requesting a response (other than payment).

Some potential factors are partially within the Company’s control. For example, customers responding via the web or mobile app needed to log into their online Duquesne Light account to complete ECL opt-out. This online account login process may have reduced response rates from customers who did not have their log-in credentials immediately available. Additionally, the Company used identical language, largely developed as part of prior hard-copy ECL solicitations, in the bodies of both email and hard-copy solicitations (see Appendices 1 and 2). It is possible that such longer-form language may not be as effective when communicated within an email.

The Company works continually to improve customer engagement. The Company has planned, or is considering, several potential efforts to enhance overall customer engagement, which include future ECL updates, including:

- Deploy enhancements to the customer login and registration experience on DuquesneLight.com, planned for 2022
- Provide recurring reminders of the ECL to e-communication customers via the Company's monthly e-Newsletters
- Develop potential changes for future ECL solicitations, which may include:
 - o Updating ECL solicitation emails to be shorter, mobile friendly and visually engaging
 - o Utilizing industry benchmarks to determine the right time and day of the week to issue the notices
 - o Enabling "one-click" response options
 - o Increasing cross-promotion of future ECL solicitations (e.g., by including bill messages and/or social media messaging)

This list is not intended to be prescriptive or exclusive. The Company intends to further evaluate other options to engage customers and facilitate a more robust response from our e-communication customers in the years to come.

Appendix 1 – Email Sent to Customers

A message from Duquesne Light Co.

IMPORTANT NOTICE ABOUT ELECTRIC CHOICE

TO PREVENT DISCLOSURE OF ACCOUNT INFORMATION

Dear Customer:

Pennsylvania residents have the option to choose the company that generates their electricity. Choosing an alternative supplier for generation service may save you money but the choice is yours. Duquesne Light will continue to deliver electricity to you even if you've switched to another generation supplier.

To support electric choice, we're required to provide licensed generation suppliers with certain customer information so they can more readily identify potential customers and better tailor their service offerings to meet customer needs. This information includes your name, billing address, service address, Supplier Agreement ID, electric usage data and rate class.

You have the right to withhold all of this information from suppliers. Even if you previously notified us to withhold certain information from suppliers, due to an order issued by the Pennsylvania Public Utility Commission (PUC), your information will be provided to generation suppliers unless you use one of the options below. Whatever you decide, suppliers who receive your information are required by the PUC to keep that information confidential. In addition, Duquesne Light does not release customer telephone numbers to generation suppliers.

If you would like to withhold your customer information from approved electric generation suppliers, complete **ONE** of the following options within 15 days of receiving this email and we will not release your information:

- Visit our [website](#) to make updates to your online account* in the "Restrict Information Access" section
- Call us at 1-888-756-0887 > Listen for "Welcome to Duquesne Light" > Press 4 > Press 1
- Print, complete, cut and mail the bottom of this email

If you do not act, your customer information, excluding telephone number, will be made available to approved electric generation suppliers, as required by the PUC.

If you are interested in shopping for a new electricity supplier and aren't sure where to begin, visit PUC operated [PAPowerSwitch.com](#).

*Have multiple accounts? Please make sure to log into each account and select your preferences for each account

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ELECTRIC CHOICE OPTION TO PREVENT DISCLOSURE OF ACCOUNT INFORMATION

You have the right to withhold your information from suppliers including your name, billing address, service address, Supplier Agreement ID, electric usage data and rate class. If you would like to withhold your customer information from approved electric generation suppliers and are unable to respond by web or phone, complete the form below. Then print, cut along the dotted line and mail within 15 days of receiving this email and we will not release your information.

Your Duquesne Light Supplier Agreement ID:
(Can be found in the top right corner of your bill, page 3)

SALLY A SAMPLE Account # 0000-000-000 Page 3 of 3
Account Details
100 MAIN ST Supplier Agreement ID: 000000000

I do NOT want Duquesne Light to release my customer information to approved electric generation suppliers.

Your Name (PLEASE PRINT): _____
Service Address: _____
City: _____ State: _____ Zip: _____
Your Signature: _____ Date: _____

Mail to: Duquesne Light Company, Dept 6-1, 411 7th Ave Ste 3, Pittsburgh, PA 15219

RESPOND NOW



CUSTOMER NAME
CUSTOMER ADDRESS
CITY, ST ZIP

Supplier Agreement ID: XXXXXXXXXXXX

**IMPORTANT NOTICE ABOUT ELECTRIC CHOICE OPTION
TO PREVENT DISCLOSURE OF ACCOUNT INFORMATION**

Month DD, Year


Dear Customer:

Pennsylvania residents have the option to choose the company that generates their electricity. Choosing an alternative supplier for generation service may save you money but the choice is yours. Duquesne Light will continue to deliver electricity to you even if you've switched to another generation supplier.

To support electric choice, we're required to provide licensed generation suppliers with certain customer information so they can more readily identify potential customers and better tailor their service offerings to meet customer needs. This information includes your name, billing address, service address, Supplier Agreement ID (listed above), electric usage data and rate class.

You have the right to withhold all of this information from suppliers. Even if you previously notified us to withhold certain information from suppliers, due to an order issued by the Pennsylvania Public Utility Commission (PUC), your information will be provided to generation suppliers unless you use one of the options below. Whatever you decide, suppliers who receive your information are required by the PUC to keep that information confidential. In addition, Duquesne Light does not release customer telephone numbers to generation suppliers.




If you would like to withhold your customer information from approved electric generation suppliers, complete **ONE** of the following options within 15 days of receiving this letter and we will not release your information:

-  Use your mobile phone to scan the QR code and make updates to your online account in the "Restrict Information Access" section



ECL

Appendix 2 – Letter to Customers

-  Visit DuquesneLight.com/supplier to make updates to your online account in the "Restrict Information Access" section
-  Call us at 1-888-756-0887 > Listen for "Welcome to Duquesne Light" > Press 4 > Press 1
-  Complete, cut and mail the bottom of this page to Duquesne Light Company, Dept 6-1, 411 7th Ave Ste 3, Pittsburgh, PA 15219

If you do not act, your customer information, excluding telephone number, will be made available to approved electric generation suppliers, as required by the PUC.

If you are interested in shopping for a new electricity supplier and aren't sure where to begin, visit PUC operated PAPowerSwitch.com.

Duquesne Light Company



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Your Duquesne Light Supplier Agreement ID:
(Can be found in the top right corner of the opposite page.)

I do NOT want Duquesne Light to release my customer information to approved electric generation suppliers.

Your Name (PLEASE PRINT): _____

Service Address: _____

City: _____ State: _____ Zip: _____

Your Signature: _____ Date: _____

Mail to: Duquesne Light Company, Dept 6-1, 411 7th Ave Ste 3, Pittsburgh, PA 15219
