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March 28, 2022

**Via Electronic Filing**

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

**RE: Petition to Temporarily Increase Hardship Fund Grants for Duquesne Light Company's Eligible Customers**  
**Docket No. P-2022-\_\_\_\_\_**  
**Docket No. M-2019-3008227**  
**Docket No. R-2021-3024750**

Dear Secretary Chiavetta:

Duquesne Light Company ("Company" or "Duquesne Light") respectfully submits this Letter Petition to the Pennsylvania Public Utility Commission ("Commission") requesting that its Universal Service and Energy Conservation Plan ("USECP") Hardship Fund be temporarily amended to better assist eligible customers recovering from the impacts of the COVID-19 pandemic in 2022 and 2023. If approved, these changes will provide greater assistance to eligible customers by providing increased funding, as detailed below.

By way of background, Duquesne Light's Hardship Fund is administered by Dollar Energy Fund. The program is designed for lower-income residential customers who are unable to pay for their electric service. Specifically, the Hardship Fund currently provides customers who have the following criteria with up to one \$500 grant per program year:

1. Provide proof of monthly household income at or below 300%<sup>1</sup> of the Federal Poverty Level ("FPL"), and

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<sup>1</sup> As indicated in paragraph 53 of the Company's Commission-approved Joint Petition for Settlement entered in the Company's most recent base rate case, the maximum household income eligibility criterion for Duquesne Light's Hardship Fund was increased from 200% of the Federal Poverty Level to 300% of the Federal Poverty Level for program years 2022 and 2023. Additionally in accordance with the Joint Petition for Settlement, Duquesne Light Company shareholders agreed to provide additional \$1 million contributions to the Hardship Fund for program years 2022 and 2023.



2. Have residential account and reside at the premise address, and
3. Have made a minimum payment toward their utility bill, and
  - a. For customers under the age of 62, minimum payment is determined to be a payment of at least \$150 toward their utility bill or three consecutive CAP payments within the last 90 days
  - b. For customers over the age of 62, minimum payment is determined to be a payment of at least \$100 toward their utility bill or three consecutive CAP payments within the last 90 days
4. Have a minimum balance on their electric bill
  - a. For customers under the age of 62, minimum balance is determined to be \$100
  - b. For customers over the age of 62, no minimum balance is required, but customers cannot have an existing credit balance

If the above criteria are met, the Hardship Fund is accessible to customers at various times in the year depending on account status. In pertinent part, customers may receive Hardship Fund grants between December 1 to January 31 only if their electric service has been terminated.

The COVID-19 pandemic has increased utility assistance dollars available to customers across multiple programs, which in turn resulted in recent declines to Hardship Fund grant requests.<sup>2</sup> For example, the Low-Income Home Energy Assistance Program (“LIHEAP”) operated at record levels in 2021 and is expected to operate at higher levels again in 2022.<sup>3</sup> Additionally, robust use of third-party grant programs, like the Emergency Rental Assistance Program (“ERAP”)<sup>4</sup> and Allegheny County Community Development Block Grant (“ACCDBG”)<sup>5</sup> likely contributed to customers’ decreased utilization of the Hardship Fund, which is a fund of last resort. Collectively among LIHEAP, ERAP, and ACCDBG, Duquesne Light customers were issued approximately \$6.3 million more in utility assistance in 2020 compared to 2021. Given the increase in available funding, including the additional \$1 million Hardship Fund contributions in 2022 and 2023, it is reasonable and in the public interest to temporarily expand access and increase grant amounts issued to eligible customers through the Hardship Fund. Despite the increase in available funding, many customers continue to face challenges resolving their delinquency. If approved, these changes will allow customers to capitalize on the temporary increase in available funding to

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<sup>2</sup> From October 1, 2020 to March 10, 2021, Duquesne Light issued 486 grants totaling \$281,838. On the other hand, from October 1, 2021 to March 10, 2022, Duquesne Light issued 191 grants totaling \$72,058. From January 1, 2022 through March 21, 2022, the Company has provided a total of 141 Hardship Fund grants in the amount of \$49,108. Of the \$49,108 provided, 24 grants totaling \$10,242 have been issued to customers with income levels between 200-300% of the FPL.

<sup>3</sup> In 2021, LIHEAP grants issued to Duquesne Light customers totaled \$6,415,920, which was more than double the amount issued in 2020.

<sup>4</sup> In 2021, Duquesne Light processed \$2,694,808.78 in ERAP grants for Allegheny County customers and \$152,492.85 for Beaver County customers.

<sup>5</sup> In 2021, Duquesne Light processed 107 ACCDBG grants totaling \$117,115.81 in assistance for customers.



help resolve their delinquencies more expeditiously. Moreover, the proposed changes assure that these dollars make it into the hands of the customers who need it.

Specifically, Duquesne Light requests to provide customers who have the following criteria with up to two grants per program year:

1. Provide proof of monthly household income at or below 300% of the FPL, and
2. Have residential account and reside at the premise address, and
3. Have made a minimum payment of \$50 toward their utility bill or one CAP payment in the last 90 days.

Under the amended Hardship Fund proposal, eligible customers who are billed in accordance with the Residential Service rate may receive two grants up to \$500 each program year. Eligible customers who are billed in accordance with the Residential Heating (RH) or Residential Add-On Heat Pump (RA) rate may receive two grants up to \$1,000 each program year. The change for RH/RA customers will create greater equity in the treatment of gas and electric heating customers' ability to receive grant funding. Additionally, the Company proposes to expand access to the Hardship Fund between December 1 to January 31 to customers whose electric service has been terminated or is currently in threat of termination. Any unused Hardship Funds from the 2022 and 2023 program years will be carried over to the Hardship Fund for the 2024 program year.

Duquesne Light has discussed the foregoing request with the Office of Consumer Advocate ("OCA"), and the Coalition for Affordable Utility Service and Energy Efficiency ("CAUSE-PA"). The OCA and CAUSE-PA have authorized the Company to state that they do not object to the requested temporary Hardship Fund eligibility changes. An electronic copy of this document has been served upon the OCA and CAUSE-PA as indicated in the enclosed Certificate of Service.

Please contact me with any questions, comments, or concerns.

Respectfully,

A handwritten signature in blue ink, appearing to read "Tishekia E. Williams", with a long horizontal flourish extending to the right.

Tishekia E. Williams  
Duquesne Light Company  
Director, Regulatory Legal

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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Date: March 28, 2022

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