



**COMMONWEALTH OF PENNSYLVANIA**  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET  
HARRISBURG, PENNSYLVANIA 17120

IN REPLY, PLEASE  
REFER TO OUR FILES  
M-2019-3008227  
P-2020-3022770  
P-2020-3023448  
M-2016-2534323  
P-2022-3031621

**August 4, 2022**

To: All Parties of Record at Docket Nos.:

M-2019-3008227 – Duquesne’s 2020-2025 USECP

P-2020-3022770 – Duquesne’s Petition for Implementation of the PIPP CAP as proposed on January 6, 2020

P-2020-3023448 – Duquesne’s Petition for Implementation of the PIPP CAP

M-2016-2534323 – Duquesne’s 2017-2019 USECP

P-2022-3031621 – Duquesne’s Petition to Temporarily Increase Hardship Grants

**RE: Duquesne Light Company’s Further Revised 2020-2025 USECP  
July 27, 2022 Compliance Filing**

*Overview*

On April 21, 2022, the Pennsylvania Public Utility Commission (Commission) entered an Order (April 21 Order) directing Duquesne Light Company (Duquesne) to, *inter alia*, submit a revised 2020-2025 Universal Service and Energy Conservation Plan (2020 USECP) within 30 days reflecting changes approved or directed in the April 21 Order. Duquesne was also directed to confirm that the Hardship Fund provisions on the Dollar Energy Fund (DEF) website were consistent with its 2020 USECP. April 21 Order at 96, OP #10. The Commission approved the 2020 USECP conditioned upon Duquesne making the changes directed in the April 21 Order.

By Order entered on May 12, 2022, the Commission approved a Petition filed by Duquesne on March 28, 2022, at Docket Nos. P-2022-3031621, *et al.*, to temporarily modify Duquesne’s Hardship Fund program benefits and eligibility requirements (May 12 Order). Duquesne was ordered to reflect these changes in its revised 2020 USECP.

On May 23, 2022, Duquesne filed clean and redlined versions of its revised 2020 USECP (May 23 Compliance Filing). On June 8, 2022, the Commission’s Bureau of Consumer Services (BCS) issued a Secretarial Letter (June 8 Secretarial Letter) identifying several areas where the May 23 Compliance Filing was inconsistent with the Commission’s April 21 and May 12 Orders. Duquesne was directed to file and serve a further revised 2020 USECP within 20 days addressing the compliance issues and to confirm the DEF website is consistent with its 2020 USECP. June 8 Secretarial Letter at 4.

On June 28, 2022, Duquesne filed clean and redlined versions of its further revised 2020 USECP (June 28 Compliance Filing) and asserted that the DEF website then accurately reflected the Hardship Fund provisions articulated in the May 23 Compliance Filing. June 28 Compliance Filing Cover Letter at 1. On June 30, 2022, BCS issued a Secretarial Letter (June 30 Secretarial Letter) identifying areas where the June 28 Compliance Filing and DEF website were still inconsistent with the Commission’s April 21 and May 12 Orders. Duquesne was directed to address these issues in a filing due within 20 days. June 30 Secretarial Letter at 2-3.

On July 27, 2022, Duquesne filed clean and redlined versions of its further revised 2020 USECP (July 27 Compliance Filing) and stated that the DEF website now reflects the Hardship Fund provisions and requirements in its 2020 USECP.<sup>1</sup> July 27 Compliance Filing Cover Letter at 1. To date, no protests or other responsive pleadings have been filed relative to the June 27 Compliance Filing.

BCS finds that the July 27 Compliance Filing is compliant with the April 21 and May 12 Orders. However, there remains one provision on the DEF website which is non-compliant with the Hardship Fund eligibility provisions in the July 27 Compliance Filing.

#### *Hardship Fund Provisions on the DEF Website Non-Compliance*

The July 27 Compliance Filing states that, "Hardship Fund balance requirements will not be imposed during 2022 and 2023." July 27 Compliance Filing at 27. The DEF website currently states that Duquesne Light customers "must have an outstanding balance on their utility bill" to qualify for a Hardship Fund grant.<sup>2</sup> This program requirement is not compliant with the July 27 Compliance Filing or the Hardship Fund provisions approved in the May 12 Order. Duquesne is directed to have this non-compliant provision removed from the DEF website and to ensure that any posted description of its Hardship Fund requirements are consistent with the July 27 Compliance Filing.

#### *Conclusion*

Accordingly, BCS finds the July 27 Compliance Filing to be both compliant with the April 21 and May 12 Orders. Duquesne is directed to address the Hardship Fund compliance issue on the DEF website. These staff determinations relative to the review of the July 27 Compliance Filing and DEF website will be deemed to be the final action of the Commission unless reconsideration is sought from the Commission within 20 days after service of this Secretarial Letter. *See* 52 Pa. Code § 5.44 (relating to petitions for appeal from actions of the staff).

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<sup>1</sup> All references to the July 27 Compliance Filing refer to the clean version of the further revised 2020 USECP.

<sup>2</sup> *See* <https://www.dollarenergy.org/wp-content/uploads/2022/07/2022-PA-Fact-Sheet-Duquesne-Light-Company.pdf>. We note that the Duquesne Light website also states that customers under the age of 62 must currently have an outstanding utility bill balance of at least \$100 to qualify for a Hardship Fund grant, which is inconsistent with the July 27 Compliance Filing. *See* <https://www.duquesnelight.com/account-billing/payment-assistance/dollar-energy-fund>.

If you have any questions, please contact Jennifer Johnson at [jennifjohn@pa.gov](mailto:jennifjohn@pa.gov).

Sincerely,



Rosemary Chiavetta  
Secretary

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