



Tishekia Williams
Managing Director, External Affairs & Regulatory Law

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October 20, 2022

VIA ELECTRONIC FILING (via SharePoint)

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

Re: Affiliate Interest Agreement between Duquesne Light Company and The Efficiency Network
Docket No.: G-2022-3035094

Dear Secretary Chiavetta:

Enclosed please find a copy of Duquesne Light Company's response to the Bureau of Technical Utility Services Set I. Please note that Duquesne Light's Response to TUS I-3 and TUSI-5 should be treated as **CONFIDENTIAL** Information.

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

Respectfully Submitted,

A handwritten signature in blue ink that reads "Tishekia Williams". The signature is written in a cursive style with a long horizontal stroke at the end.

Tishekia Williams
Managing Director, External Affairs &
Regulatory Law

Enclosure

Cc: Lee Yalcin (lyalcin@pa.gov)

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
NazAarah Sabree
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov
tereswagne@pa.gov

Office of Consumer Advocate
Patrick Cicero
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
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Tishekia Williams
Duquesne Light Company
411 Seventh Avenue, 15-7
Pittsburgh, PA 15219
Phone: 412-393-6268
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Dated: October 20, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Affiliate Interest Agreement between :
Duquesne Light Company and The : Docket No. G-2022-3035094
Efficiency Network :

VERIFICATION

I, Yvonne Phillips, Director of Meter Operations at Duquesne Light Company, the facts set forth above are true and correct to the best of my knowledge, information and belief, and I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Yvonne Phillips
Director, Meter Operations

Dated: October 19, 2022

Affiliated Interest Agreement between Duquesne Light Company and the Efficiency Network

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Set I

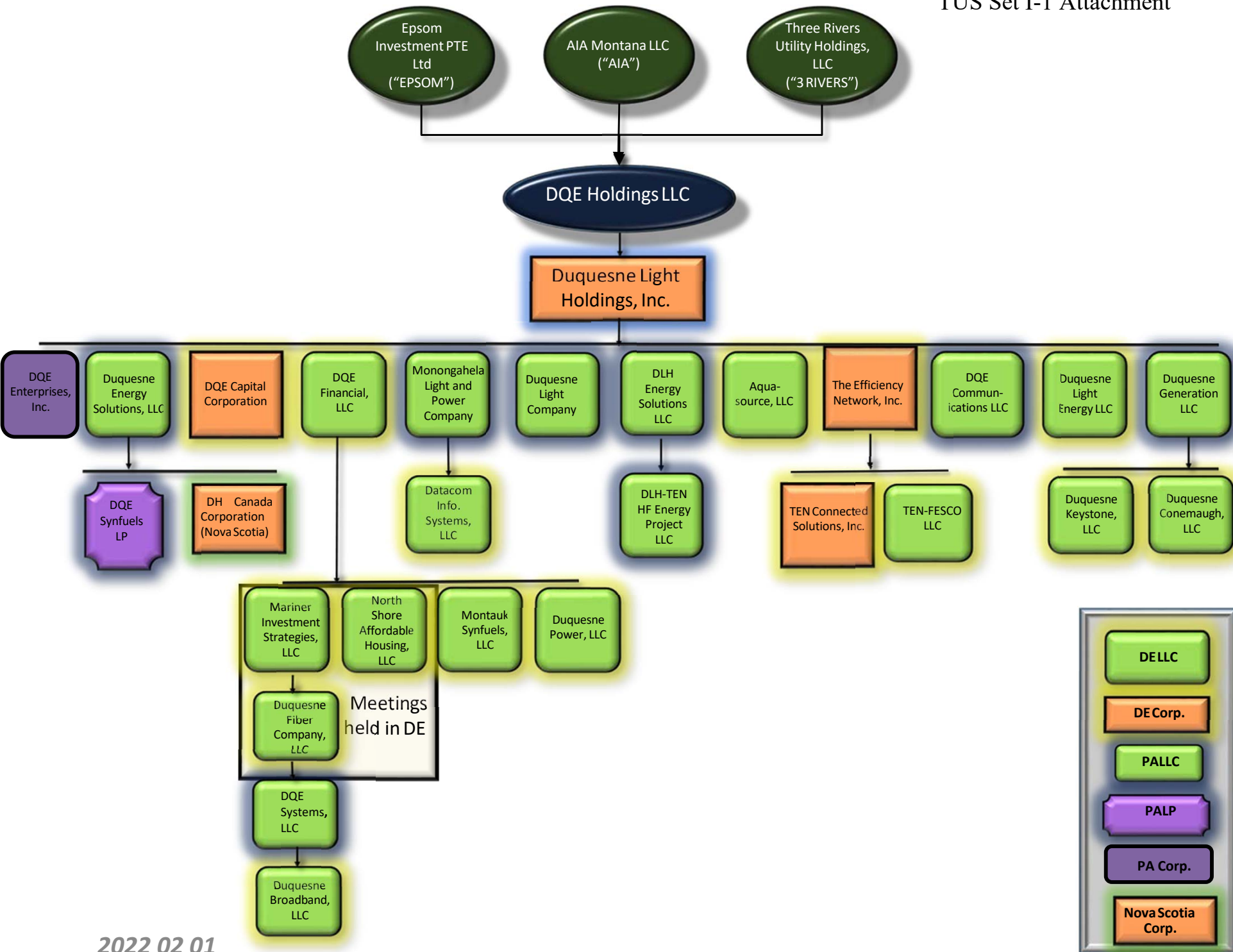
Witness:

TUS- I-1

1. Please explain the nature of the affiliation between Duquesne Light Company and The Efficiency Network.

Response:

Enclosed and marked DLC Attachment TUS I-1 please find Duquesne Light Holdings, LLC organization chart which shows the relationships between Duquesne Light Company (“DLC”) and The Efficiency Network (“TEN”). TEN and DLC are both directly held by Duquesne Light Holdings, LLC.



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Witness:

TUS- I-2

2. Is the Construction Services Master Agreement (Agreement) based on a competitive analysis? If not, why? If so, what alternatives to The Efficiency Network were considered, what criteria were used in conducting the comparison, and why was The Efficiency Network specifically selected?

Response:

Yes, the MSA is based on the results of a competitive bid.

Seven different vendors were invited to bid on this contract. Of the seven invited, four responded. Each of the four that responded submitted separate proposals to complete this work.

The vendors were evaluated on the categories of safety, completeness of submitted bids, qualifications / references projects, quality, team member qualifications & experience, ability to meet our schedule, pricing, terms & conditions compliance, and supplier diversity.

Based on a weighted scorecard using these items as evaluation points, TEN received the highest overall rating, achieving a score of 4.15 out of 5.0 with the next closest vendor receiving a 3.61.

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Witness:

TUS- I-3

3. Provide a list of rates Duquesne Light Company would have to pay for the services listed in the Agreement if a non-affiliated company provided these services.

Response:

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Set I

Witness:

TUS- I-4

4. Will the rates for the services provided under the Agreement change during the course of the Agreement? If so, what method would be used to calculate the new rates and on what is this calculation based?

Response:

Labor rates will change based on IBEW labor rates increasing over time. Duquesne Light requires such adjustments to be included in the Scope of Work (SOW) document for the selected vendor.

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Witness:

TUS- I-5

5. What is the estimated total annual amount Duquesne Light Company will pay The Efficiency Network for the services it will provide per the Agreement? How much has already been by the Duquesne Light Company to The Efficiency Network?

Response:

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Set I

Witness:

TUS- I-6

6. Explain all revenue and ratemaking implications the Agreement may have.

Response:

No discernable revenue impacts are expected from the street light replacements. Duquesne Light Company would include the unamortized depreciated value of the assets in a future distribution rate case claim, subject to Commission review.