

COMMONWEALTH OF PENNSYLVANIA



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December 23, 2022

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Duquesne Light Company – Universal Services and
Energy Conservation Plan for 2020-2025 Submitted
in Compliance with 52 Pa. Code. § 54.74
Docket No. M-2019-3008227

Dear Secretary Chiavetta:

On December 16, 2022, Duquesne Light Company (Duquesne or Company) filed a Letter in Lieu of Petition pursuant to the *Joint Petition of Duquesne Light, the Office of Consumer Advocate and the Coalition for Affordable Utility Service and Energy Efficiency for Approval of a Settlement* (Settlement). The Settlement provided that the Company would file with the Commission in the event that universal service program costs exceeded 10% of the projected budget in the Company's Universal Service and Energy Conservation Plan (USECP). As the Letter in Lieu of Petition states, the Company's USECP included a projected 2022 USECP budget of approximately \$38.6 million. Letter in Lieu of Petition at 2. As of November 30, 2022, the Company projected its 2022 USECP costs will come to approximately \$47.9 million, which exceeds the corresponding as-filed budget by more than 10%. Letter in Lieu of Petition at 2. The Company's Letter in Lieu of Petition identifies the three reasons for the projected increases to the programmatic costs: (1) increased electric supply costs; (2) increased customer assistance program enrollment; and (3) increased grant availability. Letter in Lieu of Petition at 2-3.

In advance of filing the Letter in Lieu of Petition and consistent with the Settlement in the above-referenced docket, Duquesne discussed the reasons for the CAP cost increases, the Company's intent not to propose cost containments and received the parties' feedback on the matter. As the Letter correctly states, the OCA does not oppose the filing of this Letter in Lieu of Petition consistent with paragraph 14 of the Settlement. The OCA also does not oppose the Company's decision to not here propose programmatic cost containment measure(s) that would modify the approved USECP at this time. The parties will reconvene in May 2023 to continue to monitor the programmatic costs.

Rosemary Chiavetta, Secretary

December 23, 2022

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If you have any questions, please contact me at (717) 599-8954.

Sincerely,

/s/ Christy M. Appleby

Christy M. Appleby

Assistant Consumer Advocate

PA Attorney I.D. # 85824

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Certificate of Service

*338853

CERTIFICATE OF SERVICE

Duquesne Light Company – Universal :
Services and Energy Conservation Plan : Docket No. M-2019-3008227
for 2020-2025 Submitted in Compliance :
with 52 Pa. Code. § 54.74 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Letter in Response to Letter in Lieu of Petition, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 23rd day of December 2022.

SERVICE BY E-MAIL ONLY

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Dated: December 23, 2022
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