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June 5, 2024

***VIA ELECTRONIC FILING***

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

**Re: Petition of Duquesne Light Company For Approval of Default Service Plan For The  
Period June 1, 2025 Through May 31, 2029  
Docket No. P-2024-3048592**

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Dear Secretary Chiavetta:

Attached for filing on behalf of Duquesne Light Company (“Duquesne Light” or the “Company”), please find Duquesne Light’s Prehearing Memorandum in the above-referenced proceeding. Copies will be provided as indicated on the attached Certificate of Service.

Respectfully submitted,



Anthony D. Kanagy

ADK/kl  
Attachment

cc: The Honorable Mary D. Long (*via email; w/attachment*)  
The Honorable John M. Coogan (*via email; w/attachment*)  
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).

### VIA EMAIL

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DATE: June 5, 2024



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Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company	:	
For Approval of Default Service Plan	:	Docket No. P-2024-3048592
For The Period of June 1, 2025	:	
Through May 31, 2029	:	

**PREHEARING CONFERENCE MEMORANDUM OF  
DUQUESNE LIGHT COMPANY**

**TO ADMINISTRATIVE LAW JUDGES MARY D. LONG AND JOHN M. COOGAN:**

**I. INTRODUCTION AND BACKGROUND**

Duquesne Light Company (“Duquesne Light” or “Company”) hereby submits this Prehearing Conference Memorandum in compliance with the Prehearing Conference Order issued by Administrative Law Judges Mary D. Long and John M. Coogan (the “ALJs”) on May 7, 2024, for the above-captioned proceeding.

On April 19, 2024, Duquesne Light filed the above-captioned petition with the Pennsylvania Public Utility Commission (“Commission”) requesting approval for a Default Service Plan for the period of June 1, 2025 through May 31, 2029 (“DSP X,” “Default Service Plan,” or “Plan”).

In the Default Service Plan, Duquesne Light proposes to continue separate default supply procurements for: (1) Residential and Lighting customers, (2) Small Commercial and Industrial (“C&I”) customers, (3) Medium C&I customers with demands under 200 kW (“Medium C&I <200kW”), and (4) Medium C&I customers with demands equal to or greater than 200 kW and Large C&I customers (collectively, “HPS-Eligible”). Duquesne Light proposes to procure supplies for Residential and Lighting and Small C&I customers through the combination of twelve (12) and twenty-four (24) month fixed price, full requirements, laddered contracts. Duquesne

Light proposes to supply Medium C&I <200kW default service customers through six month fixed-price full requirements supply contracts with three month terms from third-party suppliers with no laddering. Duquesne Light proposes to continue to procure supply for HPS-Eligible default service customers through the day-ahead PJM energy market prices. Duquesne Light proposes to continue the current structure and administration for HPS customers, to conduct an RFP to supply HPS customers, and to preserve the demand threshold for HPS at  $\geq 200$  kW.

In the Default Service Plan, Duquesne Light also proposes to: continue its Electric Vehicle Time-of-Use Pilot Program (“EV-TOU”); (2) implement a Green Tariff Pilot; (3) continue the Standard Offer Program (“SOP”); (4) continue the Solar Purchase Power Plan provisions approved in DSP IX to the extent that the Company is not able to enter into a contract during the remainder of the DSP IX period; and (5) make minor amendments to the Company’s Supply Master Agreement (“SMA”).

On April 29, 2024, the Office of Consumer Advocate (“OCA”) filed an Answer to DSP X.

On April 30, 2024, the Commission issued a Notice to Be Published, dictating that Formal Protests, Petitions to Intervene, and Answers must be filed in accordance with Title 52 of the Pennsylvania Code on or before May 31, 2024.

On May 6, 2024, the Commission issued a Call-In Telephone Prehearing Conference Notice, scheduling a Prehearing Conference in this proceeding for June 7, 2024, at 9:00 a.m. before Administrative Law Judges Mary D. Long and John M. Coogan (the “ALJs”).

On May 7, 2024, ALJs issued a Prehearing Conference Order, directing the submission of Prehearing Conference Memorandums on or before June 5, 2024, among other things.

On May 9, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance, Notice of Intervention, Public Statement, and Verification.

On May 10, 2024, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a Petition to Intervene and Answer.

On May 30, 2024, the retail Energy Supply Association (“RESA”) filed a Petition to Intervene.

Also on May 30, 2024, NRG Energy Inc. (“NRG”) filed a Petition to Intervene.

On May 31, 2024, Calpine Retail Holdings, LLC (“Calpine”) filed a Petition to Intervene.

Also on May 31, 2024, Constellation NewEnergy, Inc. (“CNE”) and Constellation Energy Generation, LLC (“CEG”) (collectively, “Constellation”) filed a Petition to Intervene.

## **II. SERVICE OF DOCUMENTS**

Counsel for Duquesne Light is authorized to receive service of all documents in this matter.

Counsel for Duquesne Light, together with their contact information, is listed below.

Lisa A. Grimenstein, Esquire  
Duquesne Light Company  
411 Seventh Avenue, 15<sup>th</sup> Fl.  
Pittsburgh, PA 15219  
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Counsel for Duquesne Light request to be served via electronic communication where practicable.

## **III. WITNESSES AND ISSUES**

Duquesne Light interprets the issues in this proceeding to be those addressed in the direct testimony and exhibits filed with its Default Service Plan. The list below delineates the witnesses to testify in this proceeding and their respective subject matters:

**Witness****Subject Matter**

C. James Davis  
Director of Rates, Energy Procurement, and  
Federal/RTO Affairs  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219

Mr. Davis introduces other witnesses, provides an overview of the Default Service Plan, addresses Duquesne Light's Default Service obligations, discusses the proposed Green Tariff, updates the status on the Company's Solar Procurement Pilot, and discusses Duquesne Light's other retail market initiatives, including the SOP.

John A. Peoples  
Manager, Energy Procurements and  
Settlements  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219

Mr. Peoples addresses Duquesne Light's default service supply procurement plan for Residential and Lighting, Small Commercial and Industrial ("C&I"), Medium C&I, and Large C&I customers obtained through competitive auctions, and describes changes to the default service supply procurement plan for the Company's Medium C&I customers.

Scott G. Fisher  
Partner  
The NorthBridge Group  
30 Monument Square, Suite 105  
Concord, Massachusetts 01742

Mr. Fisher addresses the models used by Duquesne Light, how the Plan supports competitive markets and provides the least cost to customers over time, and the consistency of the Plan with Act 129.

David B. Ogden  
Manager, Rates and Tariff Services  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219

Mr. Ogden addresses changes to the default service rates; the default service supply rates for the proposed EV-TOU program, default service costs, reconciliation and recovery processes, and the associated tariff modifications.

Sarah J. Oleksak  
Senior Manager, Transportation  
Electrification  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219

Ms. Oleksak addresses the continuation of the EV-TOU Supply Rate Pilot Program.

The subject matters listed above, as further supported by the testimony and exhibits, represent Duquesne Light's statement of the issues on this proceeding. Further definition of the issues will be developed by the parties during the course of this proceeding. Duquesne Light

reserves the right to call additional witnesses to present testimony on additional issues and subject matters that may arise during the course of this proceeding.

**IV. PROCEDURAL SCHEDULE**

Duquesne Light proposes the following schedule:

Non-Company Parties' Direct Testimony	July 12, 2024
Rebuttal Testimony	August 9, 2024
Surrebuttal Testimony	August 22, 2024
Rejoinder Outlines	August 27, 2024 at noon
Evidentiary Hearings	August 28-29, 2024
Main Briefs	September 19, 2024
Reply Briefs	October 1, 2024
Public Meeting Date	January 9, 2025

Duquesne Light has been in communication with the parties in an effort to develop a mutually agreeable schedule. As of the filing of this Prehearing Memorandum, no parties have indicated objection to the schedule proposed above. Duquesne Light understands that OCA, OSBA, and CAUSE-PA are agreeable to the schedule proposed above.

**V. DISCOVERY**

Duquesne Light does not propose any modification to the Commission's procedural rules regarding discovery for the remainder of the proceeding but is amenable to adopting other parties' modifications.

Duquesne Light has been engaged in discovery in this proceeding, and is not aware of any discovery issues to date.

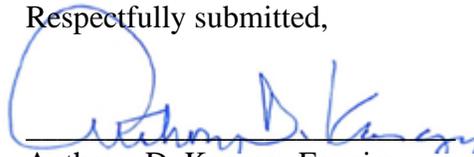
**VI. PROTECTION OF CONFIDENTIAL INFORMATION**

Duquesne Light intends to timely submit an appropriate Motion for Protective Order. Duquesne Light intends to collaborate with the parties in an effort to develop the proposed Protective Order.

**VII. SETTLEMENT**

Though there have not yet been any formal settlement discussions, Duquesne Light is willing to enter settlement discussions with all parties on all issues in this proceeding.

Respectfully submitted,



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Date: June 5, 2024