
Nicholas A. Stobbe

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File #: 203812

February 10, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition Of Duquesne Light Company For Approval Of Default Service Plan For
The Period June 1, 2025, Through May 31, 2029
Docket Nos. P-2024-3048592, et al.**

Dear Secretary Chiavetta:

Enclosed for filing is Supplement No. 89 to Duquesne Light Company's ("Duquesne Light" or "Company") Tariff Electric, PA. P.U.C. No. 25 issued February 10, 2025, to become effective June 1, 2025 ("Supplement No. 89"). The Company is filing Supplement No. 89 in compliance with the Pennsylvania Public Utility Commission's Order entered on January 14, 2025 in the above-referenced proceeding in order to expand the Time of Use ("TOU") Program to make it available to residential and commercial customers with smart meters under 200 kW of demand. Duquesne Light seeks approval of Supplement No. 89 by April 10, 2025 in order to have time to implement the revised TOU Program by June 1, 2025. As noted in Supplement No. 89, if approved, the revised TOU Program will go into effect on June 1, 2025 or approximately 6 weeks after Commission approval of the Supplement, whichever is later.

Copies of this filing will be provided as indicated on the Certificate of Service.

Rosemary Chiavetta, Secretary
February 10, 2025
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Respectfully submitted,



Nicholas A. Stobbe

NAS/kl
Enclosures

cc: The Honorable Mary D. Long (*via email; with attachments*)
The Honorable John M. Coogan (*via email; with attachments*)
Office of Special Assistants (*via email; with attachments*)
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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VIA FIRST-CLASS MAIL
(Letter and Certificate of Service only)

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Ap Gas & Electric (Pa), LLC
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Houston, Tx 77036

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APN Starfirst, LP
45 Commerce Dr
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Agway Energy Services, LLC.
Po Box 4819
Syracuse, Ny 13221

Approved Energy II LLC
6717 4th Avenue
Brooklyn, Ny 11220

Allegheny Energy Supply Co, LLC
341 White Pond Dr
Akron, Oh 44320

Aspurity Energy LLC
701 Xenia Ave S Ste 475
Minneapolis, Mn 55416

Alpha Gas And Electric, LLC
12 College Rd
Monsey, Ny 10952

Astral Energy LLC
25 Phillips Parkway
Montvale, Nj 07645

Ambit Energy
1801 N Lamar St Ste 200
Dallas, Tx 75202

Atlantic Energy Md, LLC
1166 W Newport Center Drive Ste 112
Deerfield Beach, Fl 33442

American Power & Gas Of Pa LLC
10601 Belcher Rd S
Seminole, Fl 33777

Blue Pilot Energy
250 Pilot Rd Ste 300
Las Vegas, Nv 89119

American Power Partners, LLC
8205 Main St Ste 11
Williamsville, Ny 14221

Bluerock Energy, Inc.
125 E Jefferson St Ste 800
Syracuse, Ny 13202

American Powernet Management, LP
45 Commerce Dr
Wyomissing, Pa 19610

Bounce Energy
2802 Albany St
Houston, Tx 77006

Bp Energy Retail Company LLC
201 Helios Way
Houston, Tx 77079

Brighten Energy, LLC
6555 Sierra Dr
Irving, Tx 75039

Capital Energy Pa LLC DbA Sunrise Power
& Gas
1770 St. James Place Suite # 606
Houston, Tx 77056

Catalyst Power & Gas LLC
600 Franklin Ave., #268
Garden City, Ny 11530

Champion Energy Services, LLC
1500 Rankin Rd Ste 200
Houston, Tx 77073

Choice Energy, LLC D/B/A 4 Choice
Energy, LLC
601 SW 9th St
Des Moines, Ia 50309

City Power and Gas, LLC
5 Commerce Road
Newtown, Ct 06470

Clean Choice Energy, Inc
1055 Thomas Jefferson Street NW
Washington Dc 20007

Cleansky Energy
3355 W Alabama St Ste 500
Houston, Tx 77098

Clearview Electric, Inc
600 N Pearl St Ste S104
Dallas, Tx 75201

Community Energy, Inc.
100 Matsonford Rd Ste 300
Radnor, Pa 19087

Conoco Phillips Company
600 North Dairy Ashford (Ch 1032)
Houston, Tx 77079

Consolidated Edison Solutions,
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Valhalla, Ny 10595

Constellation Energy Services, Inc.
1716 Lawrence Dr
De Pere, Wi 54115

Constellation New Energy, Inc
1001 Louisiana St Ste 2300
Houston, Tx 77002

Constellation NewEnergy, Inc.
100 Constellation Way
Baltimore, Md 21202

CPY Retail Energy LP
2245 Texas Dr
Sugar Land, Tx 77479

Direct Energy Business LLC Sub
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Pittsburgh, Pa 15222

Direct Energy Services, LLC
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Tulsa, Ok 74101

Discount Power, Inc.
6 Armstrong Rd
Shelton, Ct 06484

Dominion Energy Solutions
120 Tredegar St Ste 500
Richmond, Va 23219

Dominion Marketing Services
DPL Energy Resources, Inc.
1065 Woodman Dr
Dayton, Oh 45432

DTE Energy Supply, Inc.
414 S Main St Ste 200
Ann Arbor, Mi 48104

Duquesne Light Energy LLC
424 S 27th St Ste 220
Pittsburgh, Pa 15203

Dynergy Energy Services (East), LLC
312 Walnut St Ste 1500
Cincinnati, Oh 45202

Dynergy Energy Services (East), LLC d/b/a
Better Buy Energy
6555 Sierra Dr
Irving, Tx 75039

East Coast Power & Gas
340 Jackson Ave
Bronx, Ny 10454

Eligo Energy Pa, LLC
201 W Lake St Ste 151
Chicago, Il 60606

Energetix, Inc
50 Methodist Hill Dr Ste 1500
Rochester, Ny 14623

Entrust Energy East, Inc.
1301 McKinney, Level 12
Houston, Tx 77010

First Point Power LLC
300 Jefferson Blvd Ste 104
Warwick, Ri 02888

Freepoint Energy Solutions LLC
3050 Post Oak Blvd Ste 1330
Houston, Tx 77056

Energ Power & Gas LLC D/B/A Marathon
Energy D/B/A Energy
100 Elwood Davis Road, 2g
Syracuse, Ny 13212

Energy Harbor, LLC
168 E. Market St
Akron, Oh 44308
Energy Plus Holdings, LLC
3711 Market St Fl 10
Philadelphia, Pa 19104

Energy Rewards
535 Connecticut Ave Fl 6
Norwalk, Ct 06854

Energy Transfer Retail Power, LLC
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San Antonio, Tx 78258

Energypenn USA LLC
1275 Glenlivet Dr Ste 100
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Engie Resources
Po Box 25237
Lehigh Valley, Pa 18002

Empowered USA Inc.
151 Charles Street West
Kitchener, N2G 1
Frontier Utilities Ne, LLC
601 Travis Street Ste 1400
Houston, Tx 77002

Glacial Energy Of Pa, Inc.
555 Pleasantville Rd
Briarcliff, Ny 10510

Grand Energy, LLC
15215 N. Kierland Blvd
Scottsdale, Az 85254

Great American Power
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Dallas, Tx 75208

Green Mountain Energy Company
Po Box 25225
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Green Mountain Energy Company
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Philadelphia, Pa 19101

Greenlight Energy, Inc.
10818 Queens Blvd Fl 4
Forest Hills, Ny 11375

Grid Power Direct, LLC
1 Metrotech Center North
Brooklyn, Ny 11201

Guttman Energy Inc.
3117 Washington Pike Ste 550
Bridgeville, Pa 15017

Hess Corporation
1 Hess Plz
Woodbridge, Nj 07095

Hiko Energy, LLC
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Monsey, Ny 10952

Hudson Energy Services
5251 Westheimer Rd Ste 1000
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IDT Energy, Inc.
550 Broad St
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IGS Energy
Po Box 9060
Dublin, Oh 43017

Independence Energy Group, LLC Db
Cirro Energy
3711 Market St Fl 10
Philadelphia, Pa 19104

Indra Energy
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Philadelphia, Pa 19102

Inspire Energy Holdings, LLC
923 Haddonfield Road
Cherry Hill, Nj 08002

Iron Energy
1114 Lost Creek Blvd Ste 410
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Josco Energy USA LLC
200 Route 17 South
Mahwah, Nj 07430

Just Energy Pennsylvania Corp.
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Liberty Power Holdings LLC
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Ft Lauderdale, Fl 33309

Life Energy, LLC
2000 West Loop S Ste 2010
Houston, Tx 77027

Linde Energy Services, Inc.
1 Greenwich St Ste 200
Stewartsville, Nj 08886

Median Energy Pa LLC
1 Lethbridge Plz Ste 2
Mahwah, Nj 07430

MidAmerican Energy
4299 NW Urbandale Dr
Urbandale, Ia 50322

MidAmerican Energy Service, LLC
Po Box 4350
Davenport, Ia 52808

Mint Energy LLC
1 Rounder Way Ste 220
Burlington, Ma 01803

MP2 Energy NE, LLC
909 Fannin St., Ste 3500
Houston, Tx 77010

MPower Energy NJ LLC
24 Hillel Pl
Brooklyn, Ny 11210

National Choice Energy, LLC
17113 Miramar Pkwy Ste 200
Miramar, Fl 33027

National Gas & Electric, LLC.
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New Wave Energy Corp
410 Main St.
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Nextera Energy Services Pa LLC
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Oakbrook Terrace, Il 60181

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Oasis Energy
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114 Main Street, Suite 500
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Amherst, Ny 14228

Park Power
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Broomall, Pa 19008

Pennsylvania Gas & Electric
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Pepco Energy Services, Inc
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Pinnacle Power, LLC
5847 San Felipe St Ste 3700
Houston, Tx 77057

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Miami Beach, Fl 33139

Plymouth Rock Energy Corp.
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Public Power, LLC
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Stamford, Ct 06901

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Bridgeport, Ct 06610

Residents Energy, LLC
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Jamestown, Ny 14701

Respond Power DbA Major Energy
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Houston, Tx 77079

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Rushmore Energy, LLC
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Shiple Energy
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Source Power & Gas LLC
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Spark Energy, LLC
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Houston, Tx 77079

Spring Energy RRH, LLC D/B/A Spring
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Fairlawn, Oh 44333

Starion Energy Pa Inc.
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Summer Energy Midwest, LLC
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Sunwave Gas & Power Pennsylvania Inc.
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Boston, Ma 02114

Talen Energy Marketing LLC
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Allentown, Pa 18101

Talen Energy Marketing, LLC
2 N 9th St
Allentown, Pa 18101

Tenaska Power Management, LLC
170 E Lamar Blvd
Arlington, Tx 76006

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Texas Retail Energy, LLC
2001 Se 10th St
Bentonville, Ar 72712

Texas Retail Energy, LLC
2608 Se J St.
Bentonville, Ar 72716

The Energy Cooperative Association Of
Philadelphia
1515 Market Street
Philadelphia, Pa 19102

Titan Gas, LLC
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Houston, Tx 77098

Tomorrow Energy Corp
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Houston, Tx 77042

Town Square Energy East, LLC
208 W Chandler Heights Rd Ste 102
Chandler, Az 85248

Triegle Energy, LP
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U.S. Energy Partners, LLC
100 College Pkwy Ste 280
Williamsville, Ny 14221

UGI Energy Services, Inc.
1 Meridian Blvd
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Verde Energy USA, Inc.
101 Merritt 7 Ste 3
Norwalk, Ct 06851

Viridian Energy Pa, LLC
1055 Washington Blvd Fl 7
Stamford, Ct 06901

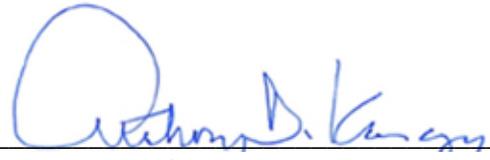
Vista Energy
4306 Yoakum Blvd Ste 600
Houston, Tx 77006

WGL Energy Services, Inc
Po Box 7600
Hampton, Va 23666

WGL Energy Services, Inc.
8614 Westwood Center Dr
Vienna, Va 22182

Xoom Energy Pennsylvania, Inc
11208 Statesville Rd Ste 2000
Huntersville, Nc 28078

DATE: February 10, 2025



Anthony D. Kanagy



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY

411 Seventh Avenue
Pittsburgh, PA 15219

Kevin E. Walker

President and Chief Executive Officer

ISSUED: February 10, 2025

EFFECTIVE: June 1, 2025

Issued in compliance with the
Commission Order entered January 14, 2025, at Docket No. P-2024-3048592.

NOTICE

THIS TARIFF SUPPLEMENT REVISES LANGUAGE IN EXISTING RIDERS

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF

CHANGES

Rider No. 4 – Electric Vehicle Time-of-Use Distribution Rate Pilot
Second Revised Page No. 92B
Cancelling First Revised Page No. 92B

Rider No. 7 – Residential Managed Charging Pilot
Fifth Revised Page No. 97
Cancelling Fourth Revised Page No. 97

Rider No. 8 – Default Service Supply
Thirteenth Revised Page No. 98
Cancelling Twelfth Revised Page No. 98

Tenth Revised Page No. 98A
Cancelling Ninth Revised Page No. 98A

Original Page No. 98B

Twenty-Third Revised Page No. 99
Cancelling Twenty-Second Revised Page No. 99

Fifth Revised Page No. 104
Cancelling Fourth Revised Page No. 104

Fourth Revised Page No. 104A
Cancelling Third Revised Page No. 104A

Second Revised Page No. 105
Cancelling First Revised Page No. 105

Rider No. 21 – Net Metering Service
Fourth Revised Page No. 135
Cancelling Third Revised Page No. 135

Fourth Revised Page No. 136
Cancelling Third Revised Page No. 136

Language has been revised in accordance with the Commission Order entered January 14, 2025, at Docket No. P-2024-3048592.

STANDARD CONTRACT RIDERS - (Continued)**RIDER NO. 4 – ELECTRIC VEHICLE TIME-OF-USE DISTRIBUTION RATE PILOT – (Continued)****(Applicable to Rate Schedules RS, RH and RA)****SPECIAL TERMS AND CONDITIONS**

1. The customer retains their right to file a billing complaint at the PUC.
2. Customers enrolling in the WholeHome EV TOU Distribution rate option will not be permitted to enroll in the Default Service Supply – Standard options. Customers selecting the WholeHome EV TOU Distribution rate option must enroll in the Default Service Supply –Time-of-Use (“TOU”) Supply Rate Pilot option or select an Electric Generation Supplier (“EGS”). (C)
3. The Company may unenroll customers from the Pilot if they do not remain in good standing, signifying that the customer account is active, does not have a past due balance or an outstanding payment arrangement at the time of enrollment, and has demonstrated a timely payment history.
4. The Company reserves the right to inspect, at all reasonable times, the customer's circuitry to determine that the load served under the terms of this Rider is as defined herein.
5. If the Company finds, in its sole judgment, that the conditions of this Rider are being violated, it may discontinue application of the Rider and bill all usage pursuant to the applicable Rate Schedule.
6. Customer enrollment is dependent on continuously meeting the Applicability provisions and Special Terms and Conditions of this Rider. If the Company finds, in its sole judgment, that the conditions of this Rider are being violated, it may terminate the customer from the Pilot with notice. (C)

MISCELLANEOUS

Minimum bills shall not be reduced by reason of this Rider.

STANDARD CONTRACT RIDERS - (Continued)**RIDER NO. 7 – RESIDENTIAL MANAGED CHARGING PILOT****Applicable to Rate Schedules RS, RH and RA****PURPOSE**

The Residential Managed Charging Pilot Rider sets forth the eligibility, terms, and conditions applicable to residential customers that own or lease an electric vehicle (EV) and elect to participate under the provisions of this Rider. This Pilot is available for up to 500 eligible customers that successfully enroll on a first come, first served basis.

PILOT DESCRIPTION

The Company offers customers participating in the Residential Managed Charging Pilot an incentive to reduce their electric vehicle charging during Peak Demand Events, as designated by the Company.

APPLICABILITY

The Residential Managed Charging Pilot is available to customers that (i) are served under Rate Schedules RS, RH, or RA and have an account in good standing, signifying that the customer account is active, does not have a past due balance or an outstanding payment arrangement at the time of enrollment, and has demonstrated a timely payment history; (ii) own or lease a highway-capable plug-in battery electric vehicle or plug-in hybrid electric vehicle registered to the service address and have a private, dedicated Level 2 charging station at their service address; (iii) own or rent a single-family detached, row house or duplex property with a personal garage or private off-street parking suitable for a charging station installation; (iv) are not enrolled in Rider No. 4 – Electric Vehicle Time-of-Use Distribution Rate, the Time-of-Use Supply Rate Pilot under Rider No. 8 – Default Service Supply, or Rider No. 23 – Behavioral Load Management Pilot; and (v) comply with any other applicable Residential Managed Charging Pilot rules established at Docket No. R-2024-3046523 or subsequent proceeding. (C)

INCENTIVE

Participating customers will be eligible to receive \$20 for each Event Month that they participate (opt-in) in $\geq 50\%$ of the Peak Demand Events for that month and charge their EV for at least 15 minutes during each Event Month. Participating control group customers will be eligible to receive \$20 for each Event Month if they charge their EV at least 15 minutes during the Event Month. The Company reserves the authority to modify the incentive value by up to 25%, without advance notice to the customer.

SPECIAL TERMS AND CONDITIONS

1. The customer must have a Company-qualified Level 2 charging station or electric vehicle to enroll in the Pilot. A list of Company-qualified vehicles and charging stations will be published on the Company website at duquesnelight.com.
2. The Company will be responsible for selecting a managed charging vendor that can manage Company-qualified charging stations and vehicles.

STANDARD CONTRACT RIDERS - (Continued)**RIDER NO. 8 – DEFAULT SERVICE SUPPLY****(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)**

Default Service Supply (“DSS”) provides residential, commercial, industrial and lighting customers on the applicable rate schedules with a default service supply rate that is determined based on competitive auctions to acquire the energy to serve the load of customers taking service under the provisions of this Rider. Small and medium commercial and industrial customers are defined in Rate Schedules GS/GM and GMH. For purposes of this rider, medium customers are those customers with a monthly metered demand that is at least 25 kW and less than 200 kW, on average, in a twelve (12) month period. For purposes of assigning customers not being served by an Electric Generation Supplier (“EGS”) to the applicable supply rate, Duquesne Light shall evaluate the customer’s twelve (12) most recent months of monthly billing demand for that customer available in October of the preceding year. If the customer’s average monthly billing demand is less than 25 kW in the twelve (12) months, then that customer shall be assigned to the supply rate for small commercial and industrial customers effective with their January billing. If the customer’s average monthly demand is greater than or equal to 25 kW but less than 200 kW in the twelve (12) month period, then that customer shall be assigned to the supply rate for medium commercial and industrial customers effective with their January billing.

Eligible customers may elect to enroll in the Company’s Time-of-Use Supply Rate Pilot (“TOU Supply Rate Pilot”). (C)
The TOU Supply Rate Pilot is available to customers that (i) are served under Rate Schedules RS, RH, RA, GS/GM, (C)
or GMH and have an account in good standing, signifying that the account is active, does not have a past due balance or an outstanding payment arrangement at the time of enrollment, and has demonstrated a timely payment history; (ii) are not enrolled in the Company’s Customer Assistance Program, budget billing, virtual meter aggregation, Rider No. 7 – Residential Managed Charging Pilot, or Rider No. 23 – Behavioral Load Management Pilot; (iii) have not de-enrolled from the TOU Supply Rate Pilot for any reason, within the last twelve (C)
(12) months; and (iv) comply with any other applicable rules established at Docket No. P-2020-3019522, Docket No. P-2024-3048592, or subsequent proceeding. (C)

The TOU Supply Rate Pilot, also known as the WholeHome TOU Supply Rate, will apply to all the electricity used at the premises. (C)

The TOU Supply Rate Pilot will go into effect on June 1, 2025, or approximately six (6) weeks after PUC approval, whichever is later. (C)

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

DEFAULT SERVICE SUPPLY RATE

Residential

(Rate Schedules RS, RH and RA)

Application Period	Supply Charge - ¢/kWh	Time-of-Use ⁽¹⁾ Supply Rate Pilot		
		Supply Charge - ¢/kWh		
		Peak	Off-Peak	Super Off-Peak
June 1, 2025, through November 30, 2025	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2025, through May 31, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2026, through November 30, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2026, through May 31, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2027, through November 30, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2027, through May 31, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2028, through November 30, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2028, through May 31, 2029	X.XXXX	X.XXXX	X.XXXX	X.XXXX

(C)

⁽¹⁾ Peak Hours are 3:00 PM to 9:00 PM, Monday through Friday, excluding noted PJM holidays.
 Super Off-Peak Hours are 11:00 PM to 6:00 AM daily, including noted PJM holidays.
 All other hours are considered Off-Peak.
 PJM Holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY - (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

DEFAULT SERVICE SUPPLY RATE - (Continued)

Small Commercial and Industrial customers with monthly metered demand less than 25 kW.

(Rate Schedules GS/GM and GMH and Rate Schedule UMS⁽¹⁾)

Application Period	Supply Charge - ¢/kWh	Rate Schedules GS/GM and GMH Time-of-Use⁽²⁾ Supply Rate Pilot		
		Supply Charge - ¢/kWh		
		Peak	Off-Peak	Super Off-Peak
June 1, 2025, through November 30, 2025	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2025, through May 31, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2026, through November 30, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2026, through May 31, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2027, through November 30, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2027, through May 31, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2028, through November 30, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2028, through May 31, 2029	X.XXXX	X.XXXX	X.XXXX	X.XXXX

(C)

⁽¹⁾ Rate Schedule UMS is not eligible for the Time-of-Use Supply Rate Pilot.

⁽²⁾ Peak Hours are 3:00 PM to 9:00 PM, Monday through Friday, excluding noted PJM holidays.

Super Off-Peak Hours are 11:00 PM to 6:00 AM daily, including noted PJM holidays.

All other hours are considered Off-Peak.

PJM Holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

(C)

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY – (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

DEFAULT SERVICE SUPPLY RATE – (Continued)

**Medium Commercial and Industrial customers with monthly metered demand
 equal to or greater than 25 kW and less than 200 kW.**

(Rate Schedules GS/GM and GMH)

(C)

Application Period	Supply Charge - ¢/kWh	Time-of-Use Supply Rate Pilot ⁽¹⁾		
		Supply Charge - ¢/kWh		
		Peak	Off-Peak	Super Off-Peak
June 1, 2025, through August 31, 2025	X.XXXX	X.XXXX	X.XXXX	X.XXXX
September 1, 2025, through November 30, 2025	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2025, through February 28, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
March 1, 2026, through May 31, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2026, through August 31, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
September 1, 2026, through November 30, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2026, through February 28, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
March 1, 2027, through May 31, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2027, through August 31, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
September 1, 2027, through November 30, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2027, through February 29, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
March 1, 2028, through May 31, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2028, through August 31, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
September 1, 2028, through November 30, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2028, through February 28, 2029	X.XXXX	X.XXXX	X.XXXX	X.XXXX
March 1, 2029, through May 31, 2029	X.XXXX	X.XXXX	X.XXXX	X.XXXX

⁽¹⁾ Peak Hours are 3:00 PM to 9:00 PM, Monday through Friday, excluding noted PJM holidays.
 Super Off-Peak Hours are 11:00 PM to 6:00 AM daily, including noted PJM holidays.
 All other hours are considered Off-Peak.
 PJM Holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY – (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

CALCULATION OF RATE – (Continued)

- DSS_b** = Company costs may also include the expenses to support time-of-use (“TOU”) programs offered by the Company. Time-of-use expenses will be assigned to the applicable customer class for recovery through this Rider.

- SLR** = The costs associated with any Commission-approved solar contracts and its administration will be recovered from the customers in the applicable procurement group(s) that have received an allocation of the AECs associated with the solar contracts. The proceeds of any solar energy, capacity, ancillary services and solar AECs that are acquired and in excess of those allocated to default service suppliers, and sold into the market, will be netted against solar contract costs.

- E** = Experienced net over or under collection for each customer procurement group based on the revenue and expense for the six (6) month period ending one-hundred twenty (120) days prior to the end of Application Period. The DSS rate effective June 1 shall include reconciliation of revenue and expense for the six (6) month period August through January and the DSS rate effective December 1 shall include reconciliation of revenue and expense for the six (6) month period February through July. The Company recovers the net-metered excess generation cost as an expense in the respective default service class over/under collection within the Company’s 1307(e) reconciliation. Interest shall be computed monthly at the rate provided for in 52 Pa. Code §54.190, from the month the over collection or under collection occurs to the effective month that the over collection is refunded or the under collection is recouped.

- S_a** = The Company’s default service retail kWh sales to customers in the applicable Customer Class, projected for the Application Period.

- S_b** = The Company’s default service retail kWh sales to customers in the applicable TOU Customer Class, projected for the Application Period. **(C)**

- F** = Rate Factor only for the residential and lighting customer groups, updated annually when DSS rates are updated, to become effective June 1st of each year. The Rate Factor shall be 1.0 for all other customer groups. DSS for residential and lighting customer groups will be obtained in the same competitive auction. The Rate Factor adjustment reflects the load shape of the residential and lighting classes. The Rate Factor will be as follows for each Application Period.

Application Period	Residential	Lighting
June 1, 2025, through May 31, 2026	X.XXXX	X.XXXX
June 1, 2026, through May 31, 2027	X.XXXX	X.XXXX
June 1, 2027, through May 31, 2028	X.XXXX	X.XXXX
June 1, 2028, through May 31, 2029	X.XXXX	X.XXXX

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY – (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

CALCULATION OF RATE – (Continued)

T = The Pennsylvania gross receipts tax rate in effect during the billing month, expressed in decimal form.

The rate shall become effective for default supply service rendered on and after the beginning of the Application Period unless otherwise ordered by the Commission and shall remain in effect for the effective periods defined above, unless revised on an interim basis subject to the approval of the Commission. Pursuant to 52 Pa. Code §69.1809(c), upon determination that the DSS, if left unchanged, would result in a material over or under collection of supply-related costs incurred or expected to be incurred during the effective period, the Company may file with the Commission for an interim revision of the DSS to become effective thirty (30) days from the date of filing, unless otherwise ordered by the Commission.

CALCULATION OF RATE

TIME-OF-USE SUPPLY RATE PILOT (“TOU SUPPLY RATE PILOT”)

(C)

The Time-of-Use Supply Rate Pilot (“TOU Supply Rate Pilot”) rates shall be supplied via the same fixed price, full requirements (“FPFR”) products that provide default service supply for the applicable customer class. The TOU Supply rates will be distinguished by three time periods throughout the year. The Super Off-Peak Period will consist of all hours every day from 11:00 PM through 6:00 AM, including weekends and noted PJM holidays. The Peak Period will consist of all hours from 3:00 PM through 9:00 PM, Monday through Friday, excluding noted PJM holidays. All other hours will be included in the Off-Peak Period. The same Peak, Off-Peak, and Super Off-Peak Periods will be applicable to all eligible TOU Supply customers.

(C)
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(C)

The TOU Supply rates shall be filed with the Commission no less than sixty (60) days prior to the start of the next Application Period as defined under the Default Service Supply Rate section of this Rider. Rates are reconciled on a semi-annual basis in accordance with the Default Service Supply Rate section of this Rider. The rates shall include an adjustment to reconcile revenue and expense for each Application Period. The TOU Supply rates shall be determined to the nearest one-thousandth of one (1) mill per kilowatt-hour and shall be applied to all kilowatt-hours billed for TOU Supply rates provided during the billing month.

(C)

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During the pilot, the TOU Supply rates will apply to all load associated with the applicable meter.

(C)

$$DSS = [(CA + (SLR + DSS_a + E)/S_a) * F * TOUF + DSS_b/S_b] * [1/(1 - T)]$$

Where:

DSS = Default Service Supply rate as defined above, with the addition of the TOU Rate Factors.

(C)

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY – (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

CALCULATION OF RATE

TIME-OF-USE SUPPLY RATE PILOT (“TOU SUPPLY RATE PILOT”) – (Continued)

(C)

TOUF = TOU Rate Factors (as defined below), updated annually when DSS rates are updated, to become effective June 1st of each year, will be utilized to derive the Peak, Off-Peak, and Super Off-Peak rates for the customer class based on its respective energy consumption patterns and capacity requirements, as approved in the Company’s most recent DSP proceeding at Docket No. P-2024-3048592.

(C)

Time-of-Use Supply Rate Factors									
Application Period	Residential RS, RH, RA			Small C&I ⁽¹⁾ GS, GM<25, GMH<25			Medium C&I GM & GMH ≥ 25kW < 200 kW		
	PK ⁽²⁾	OFF ⁽³⁾	SUP ⁽⁴⁾	PK ⁽²⁾	OFF ⁽³⁾	SUP ⁽⁴⁾	PK ⁽²⁾	OFF ⁽³⁾	SUP ⁽⁴⁾
June 1, 2025, through May 31, 2026	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX
June 1, 2026, through May 31, 2027	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX
June 1, 2027, through May 31, 2028	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX
June 1, 2028, through May 31, 2029	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX

(C)

⁽¹⁾Rate Schedule UMS is not eligible for the Time-of-Use Supply Rate Pilot.

⁽²⁾Denotes Peak

⁽³⁾Denotes Off-Peak

⁽⁴⁾Denotes Super Off-Peak

(C)

ANNUAL RECONCILIATION

The Company will file with the Commission an annual reconciliation statement of the revenues, expenses and resulting over and under recovery for the twelve (12) months beginning February 1 and ending January 31 of the following year, in accordance with 66 Pa. C.S. § 1307(e), by March 1 for each service class. An annual reconciliation statement shall be prepared separately for the Residential, Small Commercial & Industrial and Medium Commercial & Industrial customer classes.

The standard DSS rate and TOU Supply rate over/under collections will be calculated in total for each procurement class.

(C)

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)**RIDER NO. 21 – NET METERING SERVICE – (Continued)****(Applicable to Rates RS, RH, RA, GS/GM, GMH, GL, GLH and L)****BILLING PROVISIONS - (Continued)**

1. If the Company supplies more kilowatt-hours of electricity than the customer-generator facility feeds back to the Company's system during the billing period, all charges of the appropriate rate schedule shall be applied to the net kilowatt-hours of electricity that the Company supplied. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.
2. For customer-generators involved in virtual meter aggregation programs, a credit shall be applied first to the meter through which the generating facility supplies electricity to the distribution system, then through the remaining meters for the customer-generator's account equally at each meter's designated rate. Virtual meter aggregation is the combination of readings and billing for all meters regardless of rate class on properties owned or leased and operated by a customer-generator by means of the Company's billing process, rather than through physical rewiring of the customer-generator's property for a physical, single point of contact. The customer-generators are responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

BILLING PROVISIONS FOR
TIME-OF-USE SUPPLY RATE PILOT ("TOU SUPPLY RATE PILOT")
CUSTOMER GENERATORS

(C)

(Applicable to Rates RS, RH, RA, GS/GM and GMH)

The following billing provisions apply to customer-generators that take service on Rider No 8 – Default Service Supply and are on TOU Supply rates.

(C)

1. The TOU Supply Rate customer-generator will receive a credit for each kilowatt-hour received by the Company up to the total amount of electricity delivered to the Customer during the billing period at the full retail rate consistent with Commission regulations. If a TOU Supply Rate customer-generator supplies more electricity to the Company than the Company delivers to the customer-generator in a given billing period, the Company will maintain an active record of the excess kilowatt hours produced at the customer-generators premise in a "bank". If a TOU Supply Rate customer-generator supplies more electricity to the Company than the Company delivers to the customer-generator in a given billing period, the excess kilowatt hours shall be carried forward and credited against the TOU Supply Rate customer generator's usage in a subsequent billing period at the full retail rate. If, in a subsequent billing period, a customer consumes more electricity than produced, kilowatt-hours will be pulled from the customer's bank on a first in first out basis. Any excess kilowatt hours shall continue to accumulate and credit against usage for the 12 month period ending May 31st. On an annual basis, the Company will compensate the customer-generator for kilowatt-hours remaining in the bank on May 31st, at the applicable Price To Compare at the time the excess kilowatt-hours were banked. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

(C)

(C)

(C)

(C)

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 21 – NET METERING SERVICE – (Continued)

(Applicable to Rates RS, RH, RA, GS/GM, GMH, GL, GLH and L)

**BILLING PROVISIONS FOR
TIME-OF-USE SUPPLY RATE PILOT (“TOU SUPPLY RATE PILOT”)
CUSTOMER GENERATORS – (Continued)**

(C)

(Applicable to Rates RS, RH, RA, GS/GM and GMH)

- 1. If the Company supplies more kilowatt-hours of electricity than the customer-generator supplies during the billing period, all charges of the appropriate rate schedule shall be applied to the net kilowatt-hours of electricity that the Company supplied. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

- 3. If an eligible customer-generator wishes to no longer be enrolled in the TOU Supply Rate Pilot and switches to the standard default service supply product, any excess kilowatt hours banked and remaining from the TOU Supply period will be used, as applicable, for the remaining portion of the 12 month period ending May 31 and the Company shall compensate for any excess kilowatt hours that are banked at the Price To Compare in effect at the time.

(C)

(C)

NET METERING PROVISIONS FOR SHOPPING CUSTOMERS

- 1. Customer-generators may take net metering services from EGSs that offer such services.

- 2. If a net-metering customer takes service from an EGS, the Company will credit the customer for distribution charges for each kilowatt hour produced by the customer-generator, up to the total amount of kilowatt-hours delivered to the customer by the Company during the billing period. If a customer-generator supplies more electricity to the electric distribution system than the Company delivers to the customer-generator in a given billing period, the excess kilowatt hours shall be carried forward and credited against the customer-generator’s usage in subsequent billing periods at the Company’s distribution rates. Any excess kilowatt hours shall continue to accumulate for the 12 month period ending May 31. Any excess kilowatt hours at the end of the 12 month period will not carry over to the next year for distribution charge purposes. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

- 3. If the Company delivers more kilowatt-hours of electricity than the customer-generator facility feeds back to the Company’s system during the billing period, all charges of the applicable rate schedule shall be applied to the net kilowatt-hours of electricity that the Company delivered. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

(C) – Indicates Change

SUPPLEMENT NO. 8889
TO ELECTRIC – PA. P.U.C. NO. 25



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY

411 Seventh Avenue
Pittsburgh, PA 15219

Kevin E. Walker

President and Chief Executive Officer

ISSUED: February 10, 2025

EFFECTIVE: June 1, 2025

Issued in compliance with the
Commission Order entered January 14, 2025, at Docket No. P-2024-3048592.

NOTICE

THIS TARIFF SUPPLEMENT REVISES LANGUAGE IN EXISTING RIDERS

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF

CHANGES

Rider No. 4 – Electric Vehicle Time-of-Use Distribution Rate Pilot Second Revised Page No. 92B
Cancelling First Revised Page No. 92B

Rider No. 7 – Residential Managed Charging Pilot Fifth Revised Page No. 97
Cancelling Fourth Revised Page No. 97

Rider No. 8 – Default Service Supply Thirteenth Revised Page No. 98
Cancelling Twelfth Revised Page No. 98

Tenth Revised Page No. 98A
Cancelling Ninth Revised Page No. 98A

Original Page No. 98B

Twenty-Third Revised Page No. 99
Cancelling Twenty-Second Revised Page No. 99

Fifth Revised Page No. 104
Cancelling Fourth Revised Page No. 104

Fourth Revised Page No. 104A
Cancelling Third Revised Page No. 104A

Second Revised Page No. 105
Cancelling First Revised Page No. 105

Rider No. 21 – Net Metering Service Fourth Revised Page No. 135
Cancelling Third Revised Page No. 135

Fourth Revised Page No. 136
Cancelling Third Revised Page No. 136

Language has been revised in accordance with the Commission Order entered January 14, 2025, at Docket No. P-2024-3048592.

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 4 – ELECTRIC VEHICLE TIME-OF-USE DISTRIBUTION RATE PILOT – (Continued)

(Applicable to Rate Schedules RS, RH and RA)

SPECIAL TERMS AND CONDITIONS

1. The customer retains their right to file a billing complaint at the PUC.
2. Customers enrolling in the WholeHome EV TOU Distribution rate option will not be permitted to enroll in the Default Service Supply – Standard options. Customers selecting the WholeHome EV TOU Distribution rate option must enroll in the Default Service Supply – ~~WholeHome EV Time-of-Use (“TOU”) Supply Rate Pilot~~ option or select an Electric Generation Supplier (“EGS”). (C)
(C)
(C)
3. The Company may unenroll customers from the Pilot if they do not remain in good standing, signifying that the customer account is active, does not have a past due balance or an outstanding payment arrangement at the time of enrollment, and has demonstrated a timely payment history.
4. The Company reserves the right to inspect, at all reasonable times, the customer's circuitry to determine that the load served under the terms of this Rider is as defined herein.
5. If the Company finds, in its sole judgment, that the conditions of this Rider are being violated, it may discontinue application of the Rider and bill all usage pursuant to the applicable Rate Schedule.
6. Customer enrollment is dependent on continuously meeting the Applicability provisions and Special Terms and Conditions of this Rider. If the Company finds, in its sole judgment, that the conditions of this Rider are being violated, it may terminate the customer from the Pilot with notice.

MISCELLANEOUS

Minimum bills shall not be reduced by reason of this Rider.

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 7 – RESIDENTIAL MANAGED CHARGING PILOT

Applicable to Rate Schedules RS, RH and RA

PURPOSE

The Residential Managed Charging Pilot Rider sets forth the eligibility, terms, and conditions applicable to residential customers that own or lease an electric vehicle (EV) and elect to participate under the provisions of this Rider. This Pilot is available for up to 500 eligible customers that successfully enroll on a first come, first served basis.

PILOT DESCRIPTION

The Company offers customers participating in the Residential Managed Charging Pilot an incentive to reduce their electric vehicle charging during Peak Demand Events, as designated by the Company.

APPLICABILITY

The Residential Managed Charging Pilot is available to customers that (i) are served under Rate Schedules RS, RH, or RA and have an account in good standing, signifying that the customer account is active, does not have a past due balance or an outstanding payment arrangement at the time of enrollment, and has demonstrated a timely payment history; (ii) own or lease a highway-capable plug-in battery electric vehicle or plug-in hybrid electric vehicle registered to the service address and have a private, dedicated Level 2 charging station at their service address; (iii) own or rent a single-family detached, row house or duplex property with a personal garage or private off-street parking suitable for a charging station installation; (iv) are not enrolled in Rider No. 4 – Electric Vehicle Time-of-Use Distribution Rate, the ~~Electric Vehicle~~ Time-of-Use ~~Supply #Rate~~ Pilot under Rider No. 8 – Default Service Supply, or Rider No. 23 – Behavioral Load Management Pilot; and (v) comply with any other applicable Residential Managed Charging Pilot rules established at Docket No. R-2024-3046523 or subsequent proceeding. (C)

INCENTIVE

Participating customers will be eligible to receive \$20 for each Event Month that they participate (opt-in) in $\geq 50\%$ of the Peak Demand Events for that month and charge their EV for at least 15 minutes during each Event Month. Participating control group customers will be eligible to receive \$20 for each Event Month if they charge their EV at least 15 minutes during the Event Month. The Company reserves the authority to modify the incentive value by up to 25%, without advance notice to the customer.

SPECIAL TERMS AND CONDITIONS

1. The customer must have a Company-qualified Level 2 charging station or electric vehicle to enroll in the Pilot. A list of Company-qualified vehicles and charging stations will be published on the Company website at duquesnelight.com.
2. The Company will be responsible for selecting a managed charging vendor that can manage Company-qualified charging stations and vehicles.

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

Default Service Supply (“DSS”) provides residential, commercial, industrial and lighting customers on the applicable rate schedules with a default service supply rate that is determined based on competitive auctions to acquire the energy to serve the load of customers taking service under the provisions of this Rider. Small and medium commercial and industrial customers are defined in Rate Schedules GS/GM and GMH. For purposes of this rider, medium customers are those customers with a monthly metered demand that is at least 25 kW and less than 200 kW, on average, in a twelve (12) month period. For purposes of assigning customers not being served by an Electric Generation Supplier (“EGS”) to the applicable supply rate, Duquesne Light shall evaluate the customer’s twelve (12) most recent months of monthly billing demand for that customer available in October of the preceding year. If the customer’s average monthly billing demand is less than 25 kW in the twelve (12) months, then that customer shall be assigned to the supply rate for small commercial and industrial customers effective with their January billing. If the customer’s average monthly demand is greater than or equal to 25 kW but less than 200 kW in the twelve (12) month period, then that customer shall be assigned to the supply rate for medium commercial and industrial customers effective with their January billing.

Eligible customers may elect to enroll in the Company’s ~~Electric Vehicle~~ Time-of-Use Supply Rate Pilot (“~~EV~~-TOU Supply Rate Pilot”). The ~~EV~~-TOU Supply Rate Pilot is available to customers that (i) are served under Rate Schedules RS, RH, RA, GS/GM, or GMH and have an account in good standing, signifying that the account is active, does not have a past due balance or an outstanding payment arrangement at the time of enrollment, and has demonstrated a timely payment history; ~~(ii) own or lease a highway capable plug-in battery electric vehicle or plug-in hybrid electric vehicle registered to the service address, or operate electric vehicle charging facilities at the service location;~~ ~~(iii)~~ (i) are not enrolled in the Company’s Customer Assistance Program, budget billing, virtual meter aggregation, Rider No. 7 – Residential Managed Charging Pilot, or Rider No. 23 – Behavioral Load Management Pilot; ~~(iv)~~ (ii) have not de-enrolled from the ~~EV~~-TOU Supply Rate Pilot for any reason, within the last twelve (12) months; and (iii) comply with any other applicable ~~EV-TOU Supply Rate Pilot~~ rules established at Docket No. P-2020-3019522, Docket No. P-2024-3048592, or subsequent proceeding. (C)
(C)
(C)
(C)
(C)
(C)

The ~~EV~~-TOU Supply Rate Pilot, also known as the WholeHome ~~EV~~-TOU Supply Rate, will apply to all the electricity used at the premises. (C)

The TOU Supply Rate Pilot will go into effect on June 1, 2025, or approximately six (6) weeks after PUC approval, whichever is later. (C)

(G)

(C) – Indicates ChangeISSUED: ~~OCTOBER 1, 2024~~ FEBRUARY 10, 2025EFFECTIVE: ~~DECEMBER 1, 2024~~ JUNE 1, 2025

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

DEFAULT SERVICE SUPPLY RATE

(G)

Residential

(Rate Schedules RS, RH and RA)

Application Period	Supply Charge - ¢/kWh	Electric Vehicle Time-of-Use ⁽¹⁾ Supply Rate Pilot		
		Supply Charge - ¢/kWh		
		Peak	Off-Peak	Super Off-Peak
June 1, 2025, through November 30, 2025	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2025, through May 31, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2026, through November 30, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2026, through May 31, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2027, through November 30, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2027, through May 31, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2028, through November 30, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2028, through May 31, 2029	X.XXXX	X.XXXX	X.XXXX	X.XXXX

(C)

⁽¹⁾ Peak Hours are 3:00 PM to 9:00 PM, Monday through Friday, excluding noted PJM holidays.

Super Off-Peak Hours are 11:00 PM to 6:00 AM daily, including noted PJM holidays.

All other hours are considered Off-Peak.

PJM Holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

(G)
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STANDARD CONTRACT RIDERS - (Continued)

(C)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY - (Continued)

(C)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

DEFAULT SERVICE SUPPLY RATE - (Continued)

Small Commercial and Industrial customers with monthly metered demand less than 25 kW.

(Rate Schedules GS/GM and GMH and Rate Schedule UMS⁽¹⁾)

Application Period	Supply Charge - ¢/kWh	Rate Schedules GS/GM and GMH Electric Vehicle -Time-of-Use ⁽²⁾ Supply Rate Pilot		
		Supply Charge - ¢/kWh		
		Peak	Off-Peak	Super Off-Peak
June 1, 2025, through November 30, 2025	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2025, through May 31, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2026, through November 30, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2026, through May 31, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2027, through November 30, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2027, through May 31, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2028, through November 30, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2028, through May 31, 2029	X.XXXX	X.XXXX	X.XXXX	X.XXXX

(C)

⁽¹⁾ Rate Schedule UMS is not eligible for the ~~Electric Vehicle~~-Time-of-Use Supply Rate Pilot-Program.

⁽²⁾ Peak Hours are 3:00 PM to 9:00 PM, Monday through Friday, excluding noted PJM holidays.

Super Off-Peak Hours are 11:00 PM to 6:00 AM daily, including noted PJM holidays.

All other hours are considered Off-Peak.

PJM Holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

(C)
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(C)

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY – (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

DEFAULT SERVICE SUPPLY RATE – (Continued)

Medium Commercial and Industrial customers with monthly metered demand equal to or greater than 25 kW and less than 200 kW.

(Rate Schedules GS/GM and GMH)

Application Period	Supply Charge - ¢/kWh	Electric Vehicle Time-of-Use Supply Rate Pilot ⁽¹⁾		
		Supply Charge - ¢/kWh		
		Peak	Off-Peak	Super Off-Peak
June 1, 2025, through August 31, 2025	X.XXXX	X.XXXX	X.XXXX	X.XXXX
September 1, 2025, through November 30, 2025	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2025, through February 28, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
March 1, 2026, through May 31, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2026, through August 31, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
September 1, 2026, through November 30, 2026	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2026, through February 28, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
March 1, 2027, through May 31, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2027, through August 31, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
September 1, 2027, through November 30, 2027	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2027, through February 29, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
March 1, 2028, through May 31, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
June 1, 2028, through August 31, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
September 1, 2028, through November 30, 2028	X.XXXX	X.XXXX	X.XXXX	X.XXXX
December 1, 2028, through February 28, 2029	X.XXXX	X.XXXX	X.XXXX	X.XXXX
March 1, 2029, through May 31, 2029	X.XXXX	X.XXXX	X.XXXX	X.XXXX

⁽¹⁾ Peak Hours are 3:00 PM to 9:00 PM, Monday through Friday, excluding noted PJM holidays.
 Super Off-Peak Hours are 11:00 PM to 6:00 AM daily, including noted PJM holidays.
 All other hours are considered Off-Peak.
 PJM Holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

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(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY – (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

CALCULATION OF RATE – (Continued)

- DSS_b** = Company costs may also include the expenses to support time-of-use (“TOU”) programs offered by the Company. Time-of-use expenses will be assigned to the applicable customer class for recovery through this Rider.

- SLR** = The costs associated with any Commission-approved solar contracts and its administration will be recovered from the customers in the applicable procurement group(s) that have received an allocation of the AECs associated with the solar contracts. The proceeds of any solar energy, capacity, ancillary services and solar AECs that are acquired and in excess of those allocated to default service suppliers, and sold into the market, will be netted against solar contract costs.

- E** = Experienced net over or under collection for each customer procurement group based on the revenue and expense for the six (6) month period ending one-hundred twenty (120) days prior to the end of Application Period. The DSS rate effective June 1 shall include reconciliation of revenue and expense for the six (6) month period August through January and the DSS rate effective December 1 shall include reconciliation of revenue and expense for the six (6) month period February through July. The Company recovers the net-metered excess generation cost as an expense in the respective default service class over/under collection within the Company’s 1307(e) reconciliation. Interest shall be computed monthly at the rate provided for in 52 Pa. Code §54.190, from the month the over collection or under collection occurs to the effective month that the over collection is refunded or the under collection is recouped. (C)
(C)
(C)

- S_a** = The Company’s default service retail kWh sales to customers in the applicable Customer Class, projected for the Application Period. (C)

- S_b** = The Company’s default service retail kWh sales to customers in the applicable ~~EV~~-TOU Customer Class, projected for the Application Period. (C)

- F** = Rate Factor only for the residential and lighting customer groups, updated annually when DSS rates are updated, to become effective June 1st of each year. The Rate Factor shall be 1.0 for all other customer groups. DSS for residential and lighting customer groups will be obtained in the same competitive auction. The Rate Factor adjustment reflects the load shape of the residential and lighting classes. The Rate Factor will be as follows for each Application Period.

Application Period	Residential	Lighting
June 1, 2025, through May 31, 2026	X.XXXX	X.XXXX
June 1, 2026, through May 31, 2027	X.XXXX	X.XXXX
June 1, 2027, through May 31, 2028	X.XXXX	X.XXXX
June 1, 2028, through May 31, 2029	X.XXXX	X.XXXX

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(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY – (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

CALCULATION OF RATE – (Continued)

T = The Pennsylvania gross receipts tax rate in effect during the billing month, expressed in decimal form.

The rate shall become effective for default supply service rendered on and after the beginning of the Application Period unless otherwise ordered by the Commission and shall remain in effect for the effective periods defined above, unless revised on an interim basis subject to the approval of the Commission. Pursuant to 52 Pa. Code §69.1809(c), upon determination that the DSS, if left unchanged, would result in a material over or under collection of supply-related costs incurred or expected to be incurred during the effective period, the Company may file with the Commission for an interim revision of the DSS to become effective thirty (30) days from the date of filing, unless otherwise ordered by the Commission.

CALCULATION OF RATE

~~ELECTRIC VEHICLE~~ TIME-OF-USE SUPPLY RATE PILOT (“~~EV~~-TOU SUPPLY RATE PILOT”)

The ~~Electric Vehicle~~-Time-of-Use Supply Rate Pilot (“~~EV~~-TOU Supply Rate Pilot”) rates shall be supplied via the same fixed price, full requirements (“FPFR”) products that provide default service supply for the applicable customer class. The ~~EV~~-TOU Supply rates will be distinguished by three time periods throughout the year. The Super Off-Peak Period will consist of all hours every day from 11:00 PM through 6:00 AM, including weekends and noted PJM holidays. The Peak Period will consist of all hours from 3:00 PM through 9:00 PM, Monday through Friday, excluding noted PJM holidays. All other hours will be included in the Off-Peak Period. The same Peak, Off-Peak, and Super Off-Peak Periods will be applicable to all eligible ~~EV~~-TOU Supply customers.

The ~~EV~~-TOU Supply rates shall be filed with the Commission no less than sixty (60) days prior to the start of the next Application Period as defined under the Default Service Supply Rate section of this Rider. Rates are reconciled on a semi-annual basis in accordance with the Default Service Supply Rate section of this Rider. The rates shall include an adjustment to reconcile revenue and expense for each Application Period. The ~~EV~~-TOU Supply Rate-rates shall be determined to the nearest one-thousandth of one (1) mill per kilowatt-hour and shall be applied to all kilowatt-hours billed for ~~EV~~-TOU Supply Rate-rates provided during the billing month.

During the pilot, the ~~EV~~-TOU Supply rates will apply to all load associated with the applicable meter.

$$DSS = [(CA + (SLR + DSS_a + E)/S_a) * F * TOUF + DSS_b/S_b] * [1/(1 - T)]$$

Where:

DSS = Default Service Supply rate as defined above, with the addition of the ~~EV~~-TOU Rate Factors.

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 8 – DEFAULT SERVICE SUPPLY – (Continued)

(Applicable to Rate Schedules RS, RH, RA, GS/GM, GMH, AL, SE, SM, SH, UMS and PAL)

CALCULATION OF RATE

ELECTRIC VEHICLE TIME-OF-USE SUPPLY RATE PILOT (“EV-TOU SUPPLY RATE PILOT”) – (Continued)

TOUF = ~~EV~~-TOU Rate Factors (as defined below), updated annually when DSS rates are updated, to become effective June 1st of each year, will be utilized to derive the Peak, Off-Peak, and Super Off-Peak rates for the customer class based on its respective energy consumption patterns and capacity requirements, as approved in the Company’s most recent DSP proceeding at Docket No. P-2024-3048592.

Electric Vehicle Time-of-Use Supply Rate Factors									
Application Period	Residential RS, RH, RA			Small C&I ⁽¹⁾ GS, GM<25, GMH<25			Medium C&I GM & GMH ≥ 25kW < 200 kW		
	PK ⁽²⁾	OFF ⁽³⁾	SUP ⁽⁴⁾	PK ⁽²⁾	OFF ⁽³⁾	SUP ⁽⁴⁾	PK ⁽²⁾	OFF ⁽³⁾	SUP ⁽⁴⁾
June 1, 2025, through May 31, 2026	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX
June 1, 2026, through May 31, 2027	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX
June 1, 2027, through May 31, 2028	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX
June 1, 2028, through May 31, 2029	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX	X.XX

⁽¹⁾ Rate Schedule UMS is not eligible for the ~~Electric Vehicle~~ Time-of-Use Supply Rate Pilot.

⁽²⁾ Denotes Peak

⁽³⁾ Denotes Off-Peak

⁽⁴⁾ Denotes Super Off-Peak

ANNUAL RECONCILIATION

The Company will file with the Commission an annual reconciliation statement of the revenues, expenses and resulting over and under recovery for the twelve (12) months beginning February 1 and ending January 31 of the following year, in accordance with 66 Pa. C.S. § 1307(e), by March 1 for each service class. An annual reconciliation statement shall be prepared separately for the Residential, Small Commercial & Industrial and Medium Commercial & Industrial customer classes.

The standard DSS rate and ~~EV~~-TOU Supply rate over/under collections will be calculated in total for each procurement class.

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 21 – NET METERING SERVICE – (Continued)

(Applicable to Rates RS, RH, RA, GS/GM, GMH, GL, GLH and L)

BILLING PROVISIONS - (Continued)

1. If the Company supplies more kilowatt-hours of electricity than the customer-generator facility feeds back to the Company's system during the billing period, all charges of the appropriate rate schedule shall be applied to the net kilowatt-hours of electricity that the Company supplied. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.
2. For customer-generators involved in virtual meter aggregation programs, a credit shall be applied first to the meter through which the generating facility supplies electricity to the distribution system, then through the remaining meters for the customer-generator's account equally at each meter's designated rate. Virtual meter aggregation is the combination of readings and billing for all meters regardless of rate class on properties owned or leased and operated by a customer-generator by means of the Company's billing process, rather than through physical rewiring of the customer-generator's property for a physical, single point of contact. The customer-generators are responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

BILLING PROVISIONS FOR
~~ELECTRIC VEHICLE~~ TIME-OF-USE SUPPLY RATE PILOT ("~~EV~~-TOU SUPPLY RATE PILOT")
CUSTOMER GENERATORS

(C)

(Applicable to Rates RS, RH, RA, GS/GM and GMH)

The following billing provisions apply to customer-generators that take service on Rider No 8 – Default Service Supply and are on ~~EV~~-TOU Supply rates.

(C)

1. The ~~EV~~-TOU Supply Rate customer-generator will receive a credit for each kilowatt-hour received by the Company up to the total amount of electricity delivered to the Customer during the billing period at the full retail rate consistent with Commission regulations. If ~~an~~~~a~~ ~~EV~~-TOU Supply Rate customer-generator supplies more electricity to the Company than the Company delivers to the customer-generator in a given billing period, the Company will maintain an active record of the excess kilowatt hours produced at the customer-generators premise in a "bank". If ~~an~~~~a~~ ~~EV~~-TOU Supply Rate customer-generator supplies more electricity to the Company than the Company delivers to the customer-generator in a given billing period, the excess kilowatt hours shall be carried forward and credited against the ~~EV~~-TOU Supply Rate customer generator's usage in a subsequent billing period at the full retail rate. If, in a subsequent billing period, a customer consumes more electricity than produced, kilowatt-hours will be pulled from the customer's bank on a first in first out basis. Any excess kilowatt hours shall continue to accumulate and credit against usage for the 12 month period ending May 31st. On an annual basis, the Company will compensate the customer-generator for kilowatt-hours remaining in the bank on May 31st, at the applicable Price To Compare at the time the excess kilowatt-hours were banked. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

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ISSUED: ~~JANUARY 4, 2022~~~~FEBRUARY 10, 2025~~

EFFECTIVE: ~~JANUARY 15, 2022~~~~JUNE 1, 2025~~

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 21 – NET METERING SERVICE – (Continued)

(Applicable to Rates RS, RH, RA, GS/GM, GMH, GL, GLH and L)

**BILLING PROVISIONS FOR
~~ELECTRIC VEHICLE~~ TIME-OF-USE SUPPLY RATE PILOT (“~~EV~~-TOU SUPPLY RATE PILOT”)
CUSTOMER GENERATORS – (Continued)**

(C)
(G)

(Applicable to Rates RS, RH, RA, GS/GM and GMH)

1. If the Company supplies more kilowatt-hours of electricity than the customer-generator supplies during the billing period, all charges of the appropriate rate schedule shall be applied to the net kilowatt-hours of electricity that the Company supplied. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.
3. If an eligible customer-generator wishes to no longer be enrolled in the ~~EV~~-TOU Supply Rate Pilot and switches to the standard default service supply product, any excess kilowatt hours banked and remaining from the ~~EV~~-TOU Supply period will be used, as applicable, for the remaining portion of the 12 month period ending May 31 and the Company shall compensate for any excess kilowatt hours that are banked at the Price To Compare in effect at the time.

(G)

(C)

(C)

NET METERING PROVISIONS FOR SHOPPING CUSTOMERS

1. Customer-generators may take net metering services from EGSs that offer such services.
2. If a net-metering customer takes service from an EGS, the Company will credit the customer for distribution charges for each kilowatt hour produced by the customer-generator, up to the total amount of kilowatt-hours delivered to the customer by the Company during the billing period. If a customer-generator supplies more electricity to the electric distribution system than the Company delivers to the customer-generator in a given billing period, the excess kilowatt hours shall be carried forward and credited against the customer-generator’s usage in subsequent billing periods at the Company’s distribution rates. Any excess kilowatt hours shall continue to accumulate for the 12 month period ending May 31. Any excess kilowatt hours at the end of the 12 month period will not carry over to the next year for distribution charge purposes. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.
3. If the Company delivers more kilowatt-hours of electricity than the customer-generator facility feeds back to the Company’s system during the billing period, all charges of the applicable rate schedule shall be applied to the net kilowatt-hours of electricity that the Company delivered. The customer-generator is responsible for the customer charge, demand charge and other applicable charges under the applicable Rate Schedule.

(C) – Indicates Change

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

COMPLIANCE FILING OF DUQUESNE LIGHT COMPANY

Pursuant to the Order of the Pennsylvania Public Utility Commission (“Commission”) entered on January 14, 2025, at the above-captioned docket (“January 14 Order”) and the Motion of Chairman Stephen M. DeFrank dated December 5, 2024 (“Chairman’s Motion”), Duquesne Light Company (“Duquesne Light” or “Company”) hereby makes this Compliance Filing in the above-captioned proceeding (“Compliance Filing”) in order to expand its Electric Vehicle Time of Use (“EV TOU”) Pilot to include all residential (with very limited exception) and small and medium commercial and industrial (“C&I”) default service customers with smart meters in the Company’s service territory.

A. BACKGROUND

1. Duquesne Light filed its Petition for Approval of its Default Service Plan for the Period June 1, 2025, through May 31, 2029 (“DSP X”) on April 19, 2024.
2. Multiple parties entered their appearance and/or intervened in the proceeding, including the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (“CAUSE-PA”), Retail Energy Supply Association (“RESA”), Calpine Retail Holdings, LLC (“Calpine”), Constellation New Energy and Constellation Energy Generation LLC (“Constellation”) and NRG Energy, Inc. (“NRG”).
3. Parties conducted discovery and submitted several rounds of written testimony.

4. On August 23, 2024, the parties advised the presiding Administrative Law Judges, Mary D. Long and John M. Coogan (the “ALJs”), that the parties had reached a Settlement in principle that was agreed to or not opposed by all parties. The Settlement included, in part, provisions related to the approval of an EV TOU Pilot Program under which residential and small and medium C&I customers with an EV could enroll in a TOU program as a default supply option.

5. On October 31, 2024, the ALJs issued a Recommended Decision approving the Settlement.

6. At the December 5, 2024 Public Meeting, the Commission approved the Settlement. However, Chairman DeFrank issued a Motion requiring Duquesne Light to make a supplemental filing proposing a TOU rate for all residential and small commercial default service customers with smart meters. The Chairman’s Motion requested that the expanded TOU option go into effect by June 1, 2025, if possible, along with the rest of the DSP X program.

7. On January 14, 2025, the Commission’s Order was entered, which consistent with the Chairman’s Motion, approved the Settlement and required the Company to make a supplemental filing proposing a TOU rate that is available to all residential and small commercial default service customers with a smart meter within 60 days of the entry of the Order, or by March 15, 2025. January 14 Order, p. 15.

8. In order to attempt to meet the Chairman’s requested implementation date of June 1, 2025, Duquesne Light is not waiting until March 15, 2025, to make this supplementary compliance filing.

9. Duquesne Light seeks Commission approval of this Compliance Filing no later than April 10, 2025, so that the Company: (1) has clarity regarding the TOU program, (2) is not required to implement two separate TOU program options, and (3) has adequate time to implement the

expanded TOU program on June 1, 2025.

B. PROPOSED MODIFICATIONS TO THE TOU PILOT PROGRAM

10. Under the DSP X Settlement, the parties effectively agreed to the continuation of the EV TOU Pilot that was approved under DSP IX, with minor modifications. The DSP X EV TOU Pilot approved under the Settlement is available to Residential, Small C&I and Medium C&I customers with demands less than 200 kW who own or lease an EV or who operate EV charging infrastructure at the service location. The DSP X Pilot is a whole home program, such that the time varying rates applied to the entire usage at the premises and not just the customer’s EV.

11. The DSP X EV TOU Pilot Program provides for different supply rates for Peak, Off-Peak and Super Off-Peak time periods. These time periods are as follows:

Schedule	Time Period
Peak	3pm-9pm non-holiday weekdays
Off-Peak	6am-3pm and 9pm-11pm non-holiday weekdays; 6am-11pm all other days
Super Off-Peak	11pm-6am every day

12. These time periods are consistent with the Peak and Off-Peak time periods that were approved for the Company’s distribution EV-TOU rates in its distribution base rate proceeding at Docket No, R-2024-3046523.

13. The DSP X Settlement further approved the Company’s proposal to determine EV-TOU supply rates for each time period by adjusting the wholesale price for each class using rate class factors that are initially based in part upon hourly locational marginal prices for energy from

2020 through 2023 and to update the rate class factors annually when DSS rates become effective June 1st of each year. The development of the EV TOU rate factors was discussed in detail in the testimony of Mr. Ogden in Duquesne Light Statement No. 4 and in Exhibit DBO-4 in the DSP X proceeding and is further discussed in Mr. Ogden's testimony that is being submitted with this Compliance Filing.

14. In order to comply with the Chairman's Motion and the January 14 Order, Duquesne Light is proposing to expand the EV TOU Pilot Program to drop the EV requirement and to expand eligibility to all eligible residential and small and medium commercial and industrial ("C&I") customers with < 200 kW of demand.¹

15. Similar to its existing EV TOU Supply Rate Pilot, customers will be ineligible for the TOU Supply Rate Pilot if they participate in the Company's Customer Assistance Program ("CAP"), virtual meter aggregation, or budget billing programs. The Company proposes to exclude CAP customers because they may not have the flexibility to shift their load outside of the higher-priced peak period, thus creating a risk of higher generation charges on their bills. The Company also proposes to exclude virtual meter aggregation customers due to the administrative complexities of managing billing for these groups. Further, the Company proposes to continue excluding budget billing customers due to administrative complexities and because budget billing would "smooth out" the price signals sent by the TOU rate, which may dilute its effectiveness in incenting customer load-shifting. Additionally, customers enrolled in the Company's Rider No. 7 Managed Charging Pilot or Rider No. 23 Behavioral Load Management Pilot will not be eligible for the TOU Supply Rate Pilot. These issues as well as other eligibility requirements are discussed in the supplemental direct testimony of Ms. Olexsak.

¹ Medium and Large C&I customers with ≥ 200 kW of demand are currently offered hourly default service rates, which will not change.

16. The time periods for the expanded TOU Pilot will be the same as were approved for the EV TOU Pilot under the DSP X Settlement. These time periods match the overall time periods that were approved for the Company's distribution EV-TOU rates and will avoid customer confusion that could result if the overall time periods were different.²

17. Customers will be able to enroll in the Pilot by completing an online TOU Supply Rate Pilot enrollment application or calling Duquesne Light's Customer Service Center. If a customer moves during the course of the DSP period, the customer will remain enrolled in the TOU Supply Rate Pilot unless they direct otherwise.

18. Customers actively enrolled in the EV TOU Supply Rate Pilot under DSP IX will be automatically enrolled in the TOU Supply Rate Pilot rate under DSP X. At least 30 days in advance of the transition taking effect, the Company will notify customers actively enrolled in the EV TOU Supply Rate Pilot of the changes to ensure they have sufficient opportunity to un-enroll before the changes take effect.

19. Customers may un-enroll from the TOU Pilot Supply Rate and switch to an EGS or default service fixed rate at any time. However, TOU customers leaving the TOU Supply Rate Pilot will be prohibited from re-enrolling in the Pilot for twelve billing months. This provision will help reduce customers' abilities to game rates by potentially taking advantage of lower rates in the shoulder months and not taking TOU service in the summer months when peak prices are higher (thereby not reducing peak usage when prices are higher).

20. The Company will engage customers with educational information prior to enrolling in the rate through a variety of other channels, such as email, social media, digital advertising, and print collateral at in-person events. When possible, these communications will be

² The distribution TOU rates only have Peak and Off-Peak rates (no Super Off Peak rates), however the Distribution Peak time period of 1 pm – 9 pm matches the TOU Supply Peak time period of 1 pm – 9 pm.

targeted to customers that may be able to benefit most from the TOU Supply Rate Pilot, such as customers with known shiftable load or a high proportion of peak usage.

21. The Company will implement specific measures to help educate confirmed low income customers and medically vulnerable customers as explained in the Supplemental Direct Testimony of Ms. Oleksak.

22. The Company will also provide educational tools and resources to help customers assess the rate options available to them. This will include educational information on the Company's website, as well as an online rate advisor tool that will allow residential customers to estimate the bill impact of enrolling in the TOU Supply Rate pilot based on their historical usage. The Company currently offers a similar rate tool for its EV TOU Supply Rate Pilot under DSP IX.

23. Exhibit SO-1S displays the proposed customer tools, outreach, and research budget for the TOU Supply Rate Pilot. The recovery of these costs is addressed in Mr. Ogden's Statement No. 4.

24. Similar to what was approved for EV TOU customers under the DSP X Settlement, the Company will obtain default service supply for TOU customers through the same FPFRR products that provide default service supply for the respective customer classes. The FPFRR wholesale suppliers will be paid the same price per megawatt-hour of supply regardless of how much of its supply is for TOU customers. Any mismatches between revenues from TOU supply rates and supply costs paid to FPFRR product suppliers will be recovered/refunded within the existing Rider No. 8 – DSS 1307(e) customer class reconciliation. This approach will avoid cost shifting across customer classes during the TOU Pilot Program and is simple to administer within the existing reconciliation process.

25. Additional details regarding the Company's TOU Pilot are provided in the

testimony of Ms. Olexsak in Duquesne Light Statement No. 5-S and Mr Ogden in Duquesne Light Statement No. 4-S.

C. THE PROPOSED MODIFICATIONS TO THE TOU PILOT ARE IN THE PUBLIC INTEREST

26. In the Chairman's Motion, he expressed the desire for Duquesne Light to implement an expanded TOU program by June 1, 2025 along with the other aspects of the DSP X plan.

27. Duquesne Light has proposed a simple and straight-forward expansion of its approved EV TOU Pilot that will minimize additional costs and avoid complex additional programming, which will allow the expanded TOU Pilot to go into effect on June 1, 2025, as long as it is approved by April 10, 2025.

28. The expanded TOU Pilot will provide all DLC customers under 200 kW of demand, with limited exception, with the ability to receive TOU default service rates. This will give interested customers the opportunity to shift load and save money on their electric bill.

D. REQUESTED APPROVALS

29. As explained above, Duquesne Light requests Commission approval of this filing by no later than April 10, 2025 so that the Company can implement the expanded TOU Pilot by June 1, 2025.

30. Duquesne Light requires approximately 6 weeks after approval in order to implement the expanded TOU Program. Therefore, if the approval date extends past April 10, 2025, Duquesne Light will not be able to reasonably implement the expanded TOU Program by June 1, 2025 and will implement it as soon as reasonably possible, approximately 6 weeks, following Commission approval.

31. If Duquesne Light needs to implement the EV TOU that was approved as part of

the January 14, 2025 Order and then implement the expanded TOU Program at a later date, the Company estimates that this will cost an additional \$90,000. .

E. CUSTOMER NOTIFICATION

32. As indicated by the enclosed certificate of service, Duquesne Light has served a copy of this Compliance Filing upon all of the parties in the above captioned default service proceeding and PJM. Duquesne Light is also providing notice of the filing to all registered EGSs in the Duquesne Light service area. Duquesne Light intends to notify its customers of new rates once approved by bill message or as otherwise directed by the Commission.

WHEREFORE, for all of the foregoing reasons, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission approve the Company's Compliance Filing by April 10, 2025 as proposed in herein and in the supporting testimony, and grant such other relief as deemed to be just and reasonable under the circumstances.

Respectfully submitted,



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Nstobbe@postschell.com

Date: February 10, 2025

Counsel for Duquesne Light Company

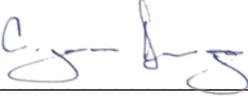
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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 :

VERIFICATION

I, C. James Davis, being the Director – Rates, Energy Procurement, and Federal/RTO Affairs for Duquesne Light Company, hereby state that the foregoing is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

February 10, 2025 _____
Date



C. James Davis

DUQUESNE LIGHT STATEMENT NO. 4-S

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**SUPPLEMENTAL DIRECT TESTIMONY OF
DAVID B. OGDEN**

Dated: February 10, 2025

1 **I. INTRODUCTION**

2 **Q. Please state your full name, business affiliation and address.**

3 A. My name is David B. Ogden. I am the Senior Manager of Rates and Tariff Services at
4 Duquesne Light Company (“Duquesne Light” or “Company”). My business address is 411
5 7th Avenue, Pittsburgh, PA, 15219.

6

7 **Q. Please describe your professional and educational background.**

8 A. I received a Bachelor of Science in Business Administration Degree with a major in
9 Accounting from Clarion University of Pennsylvania in 2001. I am a Certified Public
10 Accountant. I began my career at the Company in 2008 as the Supervisor of Derivative
11 Accounting and Special Projects. Over the last fifteen years, I have held supervisory and
12 managerial positions within Accounting, Financial Planning and Analysis and currently the
13 Rates and Tariff Services Department. Prior to joining Duquesne Light, I was a senior
14 audit associate in the Pittsburgh office of PricewaterhouseCoopers LLP, a public
15 accounting firm, where I performed attestation, advisory and compliance services for
16 clients throughout the United States. Prior to joining PricewaterhouseCoopers, I held audit
17 positions within the Allegheny County Controllers Office.

18

19 **Q. Please describe your current responsibilities.**

20 A. In my current role as Senior Manager of Rates and Tariff Services, I am responsible for
21 overseeing the Company’s retail rates and wholesale transmission rates. In addition, it is
22 my responsibility to ensure the rates are properly distributed to Customer Billing.

23

24

1 **Q. Have you previously testified before the Pennsylvania Public Utility Commission?**

2 A. Yes. I have testified in the Company’s Default Service Plan (“DSP VIII”) at Docket No.
3 P-2016-2543140, the Company’s Distribution System Improvement Charge (“DSIC”)
4 proceeding at Docket No. P-2016-2540046, the Company’s 2018 base rate proceeding at
5 Docket No. R-2018-3000124, the Company’s Default Service Plan (“DSP IX”) at Docket
6 No. P-2020-3019522, the Company’s 2020 Phase IV Energy Efficiency and Conservation
7 Plan (EE&C) at Docket No. P-2020-3015228, the Company’s 2021 base rate proceeding
8 at Docket No. R-2021-3024750, the Company’s 2024 base rate proceeding at Docket No.
9 R-2024-3046523, and the Company’s Default Service Plan (DSP X) at Docket P-2024-
10 3048592.

11
12 **Q. What is the purpose of your Supplemental Direct Testimony?**

13 A. The purpose of my Supplemental Direct Testimony is to address the following items
14 regarding the Company’s DSP X:

15 1. Describe the proposed modifications to the Electric Vehicle Time-of-Use (“EV-
16 TOU”) Supply Rate Pilot Program based on the Pennsylvania Public Utility
17 Commission’s Opinion and Order entered on January 14, 2025 at Docket No. P-2024-
18 3048592 (“January 14 Order”) regarding the Petition of Duquesne Light Company for
19 Approval of Its Default Service Plan for the Period from June 1, 2025, through May
20 31, 2029.

21 2. Describe the Company’s updated default service costs and cost recovery.

22 3. Describe the proposed changes to the Company’s Retail Tariff necessary to
23 implement the Commission’s directive as reflected in the January 14 Order.

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Q. Are you sponsoring any exhibits as part of your Supplemental Direct Testimony?

A. Yes. I am sponsoring the following exhibits:

- Exhibit DBO-3S Derivation of TOU DSS Rate Factors
- Exhibit DBO-4S Modified Default Service Plan Related Costs

Q. Were these exhibits prepared by you or under your supervision?

A. Yes. These exhibits were prepared either by me or under my supervision. They were prepared, to the best of my knowledge, in accordance with the Commission’s requirements and practice.

Q. How is your testimony organized?

A. I first discuss the rate design regarding the Company’s modified EV-TOU Supply Rate Pilot Program. Next, I describe the updated default service plan related cost. Finally, I describe the proposed changes to the Company’s Retail Tariff necessary to implement the modified rate design for the Company’s TOU Supply Rate Pilot Program.

II. ELECTRIC VEHICLE TIME-OF-USE DEFAULT SERVICE SUPPLY RATE

Q. Why is the Company proposing modifications to its EV-TOU Pilot Program?

A. Based on the Commission’s January 14 Order, the Company was instructed to make a supplemental filing proposing time-of-use rates that would be available to all residential and small commercial default service customers with smart meters. To comply with the Order and avoid additional billing system configuration expenditures, the Company is

1 expanding the EV-TOU Supply Rate Pilot Program eligibility to all residential, small and
2 medium commercial & industrial (“C&I”) customers¹. As a result, the Company would
3 change the name of the program to “Time-of-Use (“TOU”) Supply Rate Pilot. Duquesne
4 Light witness Ms. Olexsak further describes the modified eligibility requirements.

5
6 **Q. Are customers that participate in the TOU Supply Rate Pilot also eligible for net
7 metering?**

8 A. Yes, consistent with DSP X, customers who are eligible for Rider No. 8 – DSS TOU supply
9 rates are also eligible for net metering in accordance with the terms and conditions in Rider
10 No. 21 – Net Metering Service.

11
12 **Q. By what time periods will TOU supply rates be differentiated?**

13 A. The Company proposes to retain the TOU time periods that were approved as part of DSP
14 X. To summarize, the Super Off-Peak Period will consist of all hours every day from 11:00
15 PM through 6:00 AM. The Peak Period will consist of all hours from 3:00 PM through
16 9:00 PM on non-holiday weekdays. All other hours will be included in the Off-Peak
17 Period. The same Peak, Off-Peak, and Super Off-Peak Periods will be applicable to all
18 eligible TOU customers.

19
20 **Q. Did you adjust the underlying methodology originally proposed in Direct Testimony
21 to calculate the EV TOU supply rate factors for any customer class?**

¹Exclusions exist if customers are enrolled in the Company’s Customer Assistance Program, budget billing, virtual meter aggregation, Rider No. 7 – Residential Managed Charging Pilot, or Rider No. 23 – Behavioral Load Management Pilot.

1 A. Yes. Since the Company is proposing to expand the eligibility of the TOU Supply Rate
2 Pilot, the TOU supply rate factors have been updated to incorporate the entire residential
3 customer class historical load versus the historical loads of residential EV TOU customers
4 that was originally proposed. This modification should better reflect the applicable load
5 patterns of participating residential customers in the TOU Supply Rate Pilot. No further
6 refinements are required for Small and Medium C&I customers since their rate factors were
7 already derived from the entire customer class (i.e., C&I customers did not have a sufficient
8 sample of historical EV-TOU Pilot Program loads for these customer classes).
9 Additionally, the TOU supply rate factors have also been updated to reflect the results of
10 the 2025-2026 PJM capacity market auction that were published on July 30, 2024². The
11 Company previously acknowledged in Direct Testimony that there were ongoing changes
12 in the PJM capacity rules and delays in the capacity auction process for the 2025-2026
13 capacity planning period. The Company proposed at that time that it would update the rate
14 class factors using the same basic methodology as future base capacity auction prices were
15 published (Direct Testimony St. No. 4, page 4, lines 5-11). Exhibit DBO-3S shows the
16 derivation of the TOU supply rate factors that the Company proposes to use for the 2025-
17 2026 effective rate period for each applicable customer class. The Company will continue
18 to update the rate factors on an annual basis, to become effective June 1st of each year.

19
20 **Q. Is the Company proposing to adjust the cost projection associated with the TOU**
21 **Supply Rate Pilot?**

² <https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-results.xlsx>

1 A. Yes, the Company is proposing to adjust the cost projection the Company would incur to
2 expand the eligibility of the TOU Supply Rate Pilot for default service customers. The
3 increased costs are described by Duquesne Light witness Ms. Oleksak and are reflected in
4 Exhibit DBO-4S. In addition, the Company has updated the cost estimates in Exhibit
5 DBO-4S for both the Competitive Auction Process and Evaluation as well as the Filing
6 Preparation and Approval process. The Competitive Auction Process and Evaluation was
7 reduced from an annual cost of \$420,000 down to \$260,000 based on the program changes
8 that were agreed upon as part of DSP X. The Filing Preparation and Approval process was
9 reduced from an annual cost estimate of \$200,000 down to \$111,697 based on actual
10 external legal and consulting service costs to prepare and obtain approval for the DSP X
11 plan. The Company originally acknowledged in direct testimony that the Company would
12 plan to update the default service costs with actual external legal and consulting service
13 costs incurred to prepare and obtain approval for the DSP X plan as part of the Company's
14 DSP X Compliance filing that would be filed in April 2025, prior to the effective date of
15 DSP X. Since the Company is currently filing this supplemental filing, the Company
16 elected to provide an updated cost estimate as reflected in Exhibit DBO-4S. The Company
17 will plan to true up these default service costs with any remaining expenditures incurred
18 when it files its next DSP X Compliance filing.

19
20 **Q. When does the Company propose to begin to recover these costs through DSS rates?**

21 A. The Company proposes to update and recover the modified DSP X filing and other
22 identified costs through DSS rates beginning June 1, 2025.

23

1 **Q. Please explain how the Company proposes to assign the default service costs to each**
2 **customer class.**

3 A. Default service costs will continue to be directly assigned to the default service class for
4 which such costs are incurred. All other costs, which cannot be directly assigned, are
5 allocated to the default service classes in proportion to each class’s forecasted default
6 service load.

7
8 **III. RETAIL TARIFF CHANGES**

9 **Q. Have you prepared a Retail Tariff supplement that contains the changes necessary to**
10 **implement the modified rate design for the Company’s TOU Supply Rate Pilot as per**
11 **the Commission Order entered January 14, 2025?**

12 A. Yes. Supplement No. 89 to Tariff No. 25 (“Supplement No. 89”) contains the proposed
13 revisions to the applicable riders to reflect the modifications to the EV-TOU Supply Rate
14 Pilot Program to allow the Company to expand the Pilot Program eligibility to all
15 residential and small and medium C&I customers.

16
17 **Q. In general, what changes is the Company proposing to make to the Pro Forma Retail**
18 **Tariff that was attached to the Joint Petition for Approval of Settlement of All Issues**
19 **at Docket No. P-2024-3048592?**

20 A. The Company proposes to make the following modifications:
21

- Rider No. 8 – Default Service Supply:
 - 22 ○ Removed references to Electric Vehicles.
 - 23 ○ Removed the requirement to “own or lease a highway capable plug in
 - 24 battery electric vehicle or plug in hybrid electric vehicle registered to

1 the service address or operate electric vehicle charging facilities at the
2 service location”.

- 3 o Removed the reference to EV-TOU Supply Rate Pilot rules established
4 at Docket No. P-2020-3019522 as the reference was applicable to a
5 specific EV-TOU Supply Rate Pilot.

- 6 • Rider No. 21 – Net Metering Service – Removed references to Electric Vehicles
7

8 **Q. Will any pages in currently effective Tariff No. 25 be amended in this Supplement No.**
9 **89 filing?**

10 A. Yes. The Company proposes to make modifications to two additional riders in this
11 Supplement No. 89 filing that were not included in the Pro Forma Retail Tariff Supplement
12 that was attached to the Joint Petition for Approval of Settlement of All Issues at Docket
13 No. P-2024-3048592?

- 14 • Rider No. 4 – Electric Vehicle Time-of-Use Distribution Rate Pilot – Replace
15 the reference to “Default Service Supply WholeHome EV-TOU” with “Default
16 Service Supply Time-of-Use (“TOU”) Supply Rate Pilot”.
- 17 • Rider No. 7 – Residential Managed Charging Pilot – Replace “Electric Vehicle
18 Time-of-Use rate under Rider No. 8 – Default Service Supply with “Time-of-
19 Use Supply Rate Pilot under Rider No. 8 – Default Service Supply”.

20
21 **XII. CONCLUSION**

22 **Q. Does this conclude your Supplemental Direct Testimony at this time?**

23 A. Yes.

Duquesne Light Company
Default Service Supply Plan - June 1, 2025 to May 31, 2029
Derivation of TOU Supply Rate Factors: Residential and Lighting

Exhibit DBO-3S

Capacity

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>RES Total</u>
1	Capacity Obligation (MW-day)				
2	2020	525,604	0	0	525,604
3	2021	549,417	0	0	549,417
4	2022	565,885	0	0	565,885
5	2023	553,838	0	0	553,838
5	2024/2025 Capacity Price (\$/MW-day) (1)	\$270.35	\$270.35	\$270.35	\$270.35
6	Load (MWH)				
7	2020	980,158	2,454,436	1,048,627	4,483,221
8	2021	956,512	2,447,494	1,058,589	4,462,594
9	2022	930,076	2,417,803	1,065,100	4,412,979
10	2023	858,947	2,211,785	978,715	4,049,447
10	2024/2025 Capacity Price (\$/MWH)				
11	2020	\$144.97	\$0.00	\$0.00	\$31.69
12	2021	\$155.29	\$0.00	\$0.00	\$33.28
13	2022	\$164.49	\$0.00	\$0.00	\$34.67
13	2023	\$174.32	\$0.00	\$0.00	\$36.97

Energy

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>RES Total</u>
14	Load-Weighted LMP (\$/MWH)				
15	2020	\$30.41	\$24.41	\$16.19	\$23.80
16	2021	\$51.73	\$40.10	\$29.21	\$40.01
17	2022	\$110.34	\$76.20	\$61.55	\$79.86
17	2023	\$43.80	\$32.48	\$22.20	\$32.40

Capacity + Energy

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>RES Total</u>
18	\$/MWH				
19	2020	\$175.38	\$24.41	\$16.19	\$55.50
20	2021	\$207.02	\$40.10	\$29.21	\$73.29
21	2022	\$274.83	\$76.20	\$61.55	\$114.53
21	2023	\$218.11	\$32.48	\$22.20	\$69.37

Rate Factor

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>
22	2025/2026 Rate Factor			
23	2020	3.16	0.44	0.29
24	2021	2.82	0.55	0.40
25	2022	2.40	0.67	0.54
26	2023	3.14	0.47	0.32
26	Average	2.88	0.53	0.39

1/ As of PJM's Base Residual Auction for 2025/2026.

Duquesne Light Company
Default Service Supply Plan - June 1, 2025 to May 31, 2029
Derivation TOU Supply Rate Factors: Small Commercial and Industrial

Exhibit DBO-3S

Capacity

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>Total</u>
1	Capacity Obligation (MW-day)				
2	2020	80,653	0	0	80,653
3	2021	77,260	0	0	77,260
4	2022	79,211	0	0	79,211
5	2023	81,533	0	0	81,533
5	2024/2025 Capacity Price (\$/MW-day) (1)	\$270.35	\$270.35	\$270.35	\$270.35
6	Load (MWH)				
7	2020	165,827	466,343	200,877	833,047
8	2021	179,489	502,050	215,172	896,711
9	2022	183,006	520,090	225,105	928,201
10	2023	178,311	504,741	217,257	900,309
10	2024/2025 Capacity Price (\$/MWH)				
11	2020	\$131.49	\$0.00	\$0.00	\$26.17
12	2021	\$116.37	\$0.00	\$0.00	\$23.29
13	2022	\$117.01	\$0.00	\$0.00	\$23.07
13	2023	\$123.62	\$0.00	\$0.00	\$24.48

Energy

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>Total</u>
14	Load-Weighted LMP (\$/MWH)				
15	2020	\$28.76	\$23.91	\$16.03	\$22.98
16	2021	\$50.76	\$40.09	\$29.26	\$39.62
17	2022	\$100.82	\$72.79	\$58.10	\$74.75
17	2023	\$42.01	\$31.99	\$22.01	\$31.57

Capacity + Energy

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>Total</u>
18	\$/MWH				
19	2020	\$160.25	\$23.91	\$16.03	\$49.15
20	2021	\$167.13	\$40.09	\$29.26	\$62.92
21	2022	\$217.84	\$72.79	\$58.10	\$97.82
21	2023	\$165.63	\$31.99	\$22.01	\$56.05

Rate Factor

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>
22	2025/2026 Rate Factor			
23	2020	3.26	0.49	0.33
24	2021	2.66	0.64	0.46
25	2022	2.23	0.74	0.59
26	2023	2.96	0.57	0.39
26	Average	2.77	0.61	0.44

1/ As of PJM's Base Residual Auction for 2025/2026.

Duquesne Light Company
Default Service Supply Plan - June 1, 2025 to May 31, 2029
Derivation of TOU Supply Rate Factors: Medium Commercial and Industrial

Exhibit DBO-3S

Capacity

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>Total</u>
1	Capacity Obligation (MW-day)				
2	2020	145,865	0	0	145,865
3	2021	136,401	0	0	136,401
4	2022	137,780	0	0	137,780
5	2023	139,709	0	0	139,709
5	2024/2025 Capacity Price (\$/MW-day) (1)	\$270.35	\$270.35	\$270.35	\$270.35
6	Load (MWH)				
7	2020	314,904	909,673	374,497	1,599,074
8	2021	337,925	972,851	393,364	1,704,140
9	2022	339,837	992,282	402,873	1,734,992
10	2023	319,060	928,340	374,431	1,621,832
10	2024/2025 Capacity Price (\$/MWH)				
11	2020	\$125.23	\$0.00	\$0.00	\$24.66
12	2021	\$109.12	\$0.00	\$0.00	\$21.64
13	2022	\$109.61	\$0.00	\$0.00	\$21.47
13	2023	\$118.38	\$0.00	\$0.00	\$23.29

Energy

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>Total</u>
14	Load-Weighted LMP (\$/MWH)				
15	2020	\$28.46	\$23.67	\$15.99	\$22.82
16	2021	\$50.53	\$39.93	\$29.16	\$39.55
17	2022	\$99.42	\$72.16	\$57.62	\$74.13
17	2023	\$41.76	\$31.90	\$22.00	\$31.55

Capacity + Energy

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>	<u>Total</u>
18	\$/MWH				
19	2020	\$153.68	\$23.67	\$15.99	\$47.48
20	2021	\$159.66	\$39.93	\$29.16	\$61.19
21	2022	\$209.03	\$72.16	\$57.62	\$95.59
21	2023	\$160.14	\$31.90	\$22.00	\$54.84

Rate Factor

		<u>Peak</u>	<u>Off-Peak</u>	<u>Super Off-Peak</u>
22	2025/2026 Rate Factor			
23	2020	3.24	0.50	0.34
24	2021	2.61	0.65	0.48
25	2022	2.19	0.75	0.60
26	2023	2.92	0.58	0.40
26	Average	2.74	0.62	0.45

1/ As of PJM's Base Residual Auction for 2025/2026.

Duquesne Light Company
Default Service Plan June 1, 2025 to May 31, 2029

Exhibit DBO-4S

Estimated Default Service Preparation and Implementation Costs [1]

					A = (B * 4)	B = (C+D+E+F)	C	D	E	F	
					Total Estimated	Annualized Estimated	<u>Forecasted Annual Default Service Costs by Customer Class</u>				
							<u>Residential & Lighting Fixed Product</u>	<u>Small C&I Fixed Product</u>	<u>Medium C&I Fixed Product</u>	<u>Medium & Large C&I HPS Product</u>	
<u>Line</u>	<u>Item</u>	<u>Mechanism</u>	<u>Mechanism</u>	<u>Description</u>	<u>Costs</u>	<u>Costs</u>	<u>Product</u>	<u>Product</u>	<u>Product</u>	<u>Product</u>	
1	Competitive Auction Process and Evaluation [2]	Default Service Supply Rates	Default Service Supply Rates (Direct Assignment)	Consulting services for independent evaluator to conduct competitive auctions (reoccurring)	\$1,040,000	\$260,000	\$80,000	\$80,000	\$80,000	\$20,000	
2	PJM ARR Allocations [3]	Default Service Supply Rates	Default Service Supply Rates (Direct Assignment)	Consulting services for PJM ARR path selections.	\$140,000	\$35,000	\$8,750	\$8,750	\$8,750	\$8,750	
3	TOU Program [4]	Default Service Supply Rates	Default Service Supply Rates (Direct Assignment)	Customer Outreach, Research and TOU Rate Tools	\$744,397	\$358,487	\$322,653	\$17,917	\$17,917	\$0	
4	Net Metering Payout [5]	Default Service Supply Rates	Default Service Supply Rates & Transmission Service Charge (Direct Assignment)	Payouts for Net Metering Customers	\$2,292,000	\$573,000	\$301,000	\$263,000	\$9,000	\$0	
5	Miscellaneous Expense	Default Service Supply Rates	Default Service Supply Rates (Direct Assignment)	Miscellaneous Expense	\$7,200	\$1,800	\$375	\$375	\$375	\$675	
6	Solar Contract Costs [6]	Default Service Supply Rates	Default Service Supply Rates (Direct Assignment)	Consulting services for independent evaluator to conduct Solar Competitive Auctions.	\$70,000	\$17,500	\$12,920	\$2,079	\$1,498	\$1,003	
7	Average Annual Forecasted POLR Sales (MWh)							3,157,000	508,000	366,000	245,000
8	Default Service Costs										
9	Filing Preparation and Approval Process [7]	Default Service Supply Rates	Default Service Supply Rates (Allocated on forecasted POLR MWhs)	Consulting services and outside counsel to help prepare filing and throughout regulatory process	\$446,788	\$111,697	\$82,467	\$13,270	\$9,561	\$6,400	
10	Working Capital for Default Service Supply [8]	Default Service Supply Rates	Default Service Supply Rates (Allocated on forecasted POLR MWhs)	Costs associated with lag in time between the utility's out-of-pocket payment expenses and the collection of revenues for default service.	\$4,374,321	\$1,093,580	\$807,398	\$129,920	\$93,604	\$62,658	
11	Total (Line 1 + Line 2 + Line 3 + Line 4 + Line 5 + Line 6 + Line 8 + Line 9 + Line 10)					\$9,114,706	\$2,451,064	\$1,615,563	\$515,311	\$220,704	\$99,486

1/ All costs subject to change depending on final order and implementation costs.

2/ The estimated Independent Market Monitor costs have been updated to reflect changes as agreed to in DSP 10.

3/ Costs kept flat as of June 2024.

4/ These costs have been updated. The total four year estimated costs are from Exhibit SO-1S. The annualized estimates represent the first year of the plan.

5/ Estimated Net Metering payouts based on annual payouts from DSS 1307e filed on February 29, 2024 at Docket No. M-2024-3046972 and FRA 1307e filed on March 18, 2024 at Docket No. M-2024-3046974.

6/ Consistent with the Company's first compliance filing, Solar Power Purchase Agreement ("PPA") at Docket No. P-2020-3019522, the Company will recover its third party costs to prepare and implement the solar PPA for Default Service customers during the term of DSP X (6/1/25 through 5/31/29)

7/Updated costs to reflect actual spend on DSP 10.

8/ Assuming the Company's pre-tax weighted cost of capital of ~10.67%, the revenue requirement (annual expense) associated with DSS working capital is \$1,093,580 [\$10,247,546 multiplied by ~10.67% return]. The cash working capital cost of \$10,247,546 is based on the supply related working capital costs excluded from distribution base rates in the Company's base rate proceeding at Docket No. R-2024-3046523 on Exhibit 6-1, page 2 of 6, line 66.

**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	:	

VERIFICATION

I, David B. Ogden, being the Senior Manager of Rates and Tariff Services for Duquesne Light Company, hereby state that the testimony set forth in Duquesne Light Company Statement No. 4-S is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I am also sponsoring Duquesne Light Exhibit Nos. DBO-3S and DBO-4S. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

February 10, 2025
Date

David B. Ogden
David B. Ogden

1 **Q. Please state your full name and business address.**

2 A. My name is Sarah J. Oleksak. My business address is Duquesne Light Company,
3 411 Seventh Avenue, Pittsburgh, PA 15219.

4

5 **Q. What is your position at Duquesne Light Company?**

6 A. I am employed by Duquesne Light Company (“Duquesne Light” or “Company”)
7 as General Manager, Electrification Solutions.

8

9 **Q. How long have you worked at Duquesne Light?**

10 A. I have been employed by Duquesne Light since May 2018.

11

12 **Q. What are your current responsibilities?**

13 A. As the General Manager of Electrification Solutions, my primary responsibilities
14 include developing and implementing the Company’s transportation electrification
15 (TE), building electrification (BE), and load management programs. In this role, I
16 oversaw the execution of the EV ChargeUp Pilot and Transportation Electrification
17 Programs approved as part of the Company’s prior base rate cases, Docket No. R-
18 2018-3000124 and Docket No. R-2021-3024750, and oversee the Company’s
19 current electrification and load management pilots and programs approved under
20 Docket No. R-2024-3046523. I also contributed to the development of the
21 Company’s EV Time-of-Use Rate for default supply, which was approved by the
22 Commission at Docket No. P-2020-3019522 and has been available to customers
23 since June 2021.

1 **Q. What are your qualifications, work experience and educational background?**

2 A. I have been employed in the energy and automotive sector since 2006. Prior to
3 joining Duquesne Light, I was employed at the U.S. Department of Energy (“U.S.
4 DOE”) within the Office of Energy Efficiency and Renewable Energy (“EERE”).
5 During my eight-year tenure in EERE, I held a variety of positions within the Office
6 of Strategic Programs and the Vehicle Technologies Office. These positions
7 included Manager, Electrification and Project Manager, Innovation & Deployment,
8 wherein I managed electric vehicle (EV) market readiness research and performed
9 analysis to inform strategic investment across EERE’s research portfolio, and
10 Coordinator of the Workplace Charging Challenge. I also served as a Senior
11 Sustainability Officer on assignment to the White House Council on Environmental
12 Quality. Prior to this, I worked as a consultant to the U.S. DOE under employment
13 by Sentech, Inc. managing the evaluation of EV and battery manufacturing loan
14 and tax credit proposals, and as an analyst at the U.S. Fuel Cell Council (now the
15 Fuel Cell and Hydrogen Energy Association), the trade association of the hydrogen
16 fuel cell industry.

17 I have previously served on the Pittsburgh Region Clean Cities Board and
18 currently serve on the Pittsburgh Parks Conservancy Board. I have an M.S. in
19 Energy Policy and Climate from Johns Hopkins University, and a B.S. in Biology
20 from Muskingum University.

21

22 **Q. What is the purpose of your direct testimony?**

1 A. The purpose of my testimony is to describe the Company’s proposed Time-of-Use
2 (“TOU”) Supply Rate Pilot as part of its supplemental filing.

3

4 **Q. Are you sponsoring any Exhibits along with your direct testimony?**

5 A. Yes. Exhibit SO-1S depicts the Company’s budget for customer tools,
6 implementation, customer outreach, and customer research associated with the
7 TOU Supply Rate Pilot. Exhibit SO-3S depicts the Company’s evaluation and
8 assessment plan for the TOU Supply Rate Pilot.

9

10 **I. TIME-OF-USE SUPPLY RATE PILOT**

11 **Q. Describe the Company’s current time-of-use supply rate pilot for customers
12 with electric vehicles.**

13 A. Under DSP IX, the Company proposed and received approval to offer an optional
14 EV TOU Supply Rate Pilot to Residential, Small C&I, and Medium C&I < 200kW
15 customers eligible for Rider No. 8 who own or lease a plug-in battery electric
16 vehicle or a plug-in hybrid electric vehicle (collectively “EV”) or offer charging
17 infrastructure to employees or visitors. The EV TOU Supply Rate Pilot provides
18 time-varying prices for electric supply delivered during “Peak,” “Off-Peak,” and
19 “Super Off-Peak” pricing periods. The EV TOU Supply Rate Pilot is a “whole
20 premises” rate, i.e., it applies to all electric load behind a given meter.

21 The Company obtains default service supply for EV TOU Supply Rate Pilot
22 customers through the same products that provide default service supply for the
23 respective customer classes. The rates for each pricing period are based on price

1 multipliers for each procurement class which are updated annually as further
2 described in Mr. Ogden’s Statement No. 4-S. The time periods for the current EV
3 TOU Supply Rate Pilot are as follows:

4
5 **Table 1. Current EV TOU Supply Rate Pilot Schedule**

6

Schedule	Time Period
Peak	1pm-9pm
Off-Peak	6am-1pm; 9pm-11pm
Super Off-Peak	11pm-6am

7
8
9
10

11 The off-peak pricing periods offer a lower rate than the Company’s standard
12 default service rate, with the lowest pricing occurring during the super off-peak
13 period (11 p.m. – 6 a.m. daily) when grid demand is lowest. The peak pricing period
14 (1 – 9 p.m. daily) offers a higher rate than the Company’s standard default service
15 rate when grid demand is highest.

16 Once an eligible customer enrolls, they may un-enroll at any time and return
17 to DLC’s standard default service or an EGS rate. After un-enrolling, customers are
18 ineligible to re-enroll for 12 billing months to prevent gaming of the EV TOU
19 Supply Rate Pilot pricing.

20
21 **Q. Please explain why the Company is submitting this supplemental compliance**
22 **filing.**

23 A. The Company is submitting this supplemental compliance filing as directed by the
24 Commission in its January 14, 2025 Order at Docket No. P-2024-3048592

1 (“January 14 Order”) which requires the Company to propose a TOU rate available
2 to all residential and small commercial customers to help address Commission
3 concerns about increasing default service costs and resource adequacy.¹
4

5 **Q. Please describe the changes the Company is proposing to the EV TOU Supply**
6 **Rate Pilot as approved in the January 14 Order?**

7 A. Based on the motion by Commissioner DeFrank and the January 14 Order, the
8 Company proposes to change the EV TOU Supply Rate Pilot that was approved in
9 the January 14 Order to a TOU rate open to all eligible residential and small and
10 medium C&I<200kW customers, called the TOU Supply Rate Pilot. This TOU
11 Supply Rate Pilot would be identical to the approved EV TOU Supply Rate except
12 that customers would not be required to own or lease an EV or have charging
13 stations installed at their premises to participate. Offering one singular TOU supply
14 rate rather than one specific to EVs and another open to all eligible customers will
15 simplify options for customers and will help reduce the administrative and cost
16 burden.

17
18 **Q. Does the Company propose to maintain the same pricing periods and supply**
19 **rate factors as approved in the EV TOU Supply Rate Pilot?**

20 A. The Company proposes that the TOU Supply Rate Pilot has the same pricing
21 periods as the approved EV TOU Supply Rate Pilot. Keeping the time periods the
22 same will also maintain alignment with the Company’s Rider 4: EV TOU

¹ Opinion and Order of the Pennsylvania Public Utility Commission. Public Meeting Held December 5, 2024. Docket No. P-2024-3048592. <https://www.puc.pa.gov/pcdocs/1862250.pdf>

1 Distribution Rate Pilot and make it easier for customers enrolled in both rate
2 options.

3 The Company’s proposed TOU Supply Rate Pilot schedule for non-holiday
4 weekdays is defined in the table below. During holidays and weekends, the Peak
5 time period will become part of the Off-Peak time period, while the Super Off-Peak
6 time period will remain the same. Holidays follow the PJM definition and include
7 New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving
8 Day, and Christmas Day.

9

10 **Table 2. Proposed TOU Supply Rate Pilot Schedule for Non-Holiday**
11 **Weekdays**

Schedule	Time Period
Peak	3pm-9pm
Off-Peak	6am-3pm; 9pm-11pm
Super Off-Peak	11pm-6am

12

13 Witness Ogden provides additional detail in DLC Statement No. 4-S
14 regarding the proposed changes to the residential rate factors based on offering the
15 rate to the entire residential class.

16

17 **Q. Who will be eligible to participate in the TOU Supply Rate Pilot Program?**

18 A. Residential, Small C&I and Medium C&I <200kW customers eligible for Rider 8
19 – Default Service Supply are eligible for the TOU Supply Rate Pilot. Customers
20 eligible for Rider 9 – Day-Ahead Hourly Price Service will continue to be ineligible
21 for the Pilot and will not bear any of the costs associated with the Pilot. Customers

1 must have a valid e-mail address to ensure that the Company can provide enrolled
2 customers with regular and timely communications regarding their savings
3 performance.

4 Customers will be ineligible for the TOU Supply Rate Pilot if they
5 participate in the Company's CAP, virtual meter aggregation, or budget billing
6 programs. Similar to its existing EV TOU Supply Rate Pilot, the Company proposes
7 to exclude CAP customers since they may not have the flexibility to shift their load
8 outside of the higher-priced peak period, thus creating a risk of higher generation
9 charges on customers' electric bills. The Company proposes to exclude virtual
10 meter aggregation customers due to the administrative complexities of managing
11 billing for these groups. The Company proposes to continue excluding budget
12 billing customers due to administrative complexities and because budget billing
13 would "smooth out" the price signals sent by the TOU rate, which may dilute its
14 effectiveness in incenting customer load-shifting. Additionally, customers enrolled
15 in the Company's Rider No. 7 Residential Managed Charging Pilot or Rider No. 23
16 Behavioral Load Management Pilot will not be eligible for the TOU Supply Rate
17 Pilot. Lastly, the Company proposes that the customer's account must be in good
18 standing, signifying that the account is active, does not have a past due balance or
19 outstanding payment arrangement at the time of enrollment, and the customer has
20 demonstrated a timely payment history.

21 Within these parameters, all customers will be eligible to participate in the
22 TOU Supply Rate Pilot regardless of whether they are currently served through the
23 Company's default service offering or through an existing EGS.

1 **Q. Does the Company propose any additional measures to help educate**
2 **confirmed low-income customers and medically vulnerable households?**

3 A. Yes. In addition to restricting eligibility for CAP customers, the Company will
4 include the following statement on all TOU marketing and outreach materials:

5 *Time of Use Rates may not be appropriate for customers that cannot change*
6 *the time of day that they rely on electricity, such as those with medical*
7 *devices that require electricity or customers who are home during peak*
8 *hours. If you are a low income customer, other programs and assistance*
9 *may be available to help you to afford your bill. Contact DLC at 1-888-*
10 *393-7600 for more information or to apply.*

11 If confirmed low-income customers seek to enroll in the TOU Supply Rate
12 Pilot, the Company will direct them to resources about Universal Services and
13 relevant energy efficiency programs, including CAP, hardship funds grants, energy
14 efficiency and other energy usage reduction programs.

15 On an annual basis the Company will reach out to confirmed low income
16 customers that are enrolled in the TOU Supply Rate Pilot to provide information
17 about available universal service programs.

18 Finally, as part of its Time-of-Use Program Annual Report as required
19 under Act 129, the Company will include an evaluation of the impact of the
20 Company's TOU Supply Rate on confirmed low income customers enrolled in the
21 rate.

22
23

1 **Q. Does the Company propose any limitations on the TOU Supply Rate Pilot**
2 **options customers can elect between distribution and supply rates?**

3 A. Yes, similar to the approved EV TOU Supply Rate Pilot, the Company proposes
4 some limitations on rate options for the TOU Supply Rate Pilot due to technical
5 and customer experience challenges of implementing certain rate combinations and
6 to prioritize rate combinations that the Company thinks will be of greatest interest
7 to customers. Table 3 shows which rate combinations will be permitted. Customers
8 interested in selecting an Energy Generation Supplier will not be restricted from
9 participating in any distribution rate option. The Company will reexamine rate
10 options in the future based on the results of the pilot.

11
12 **Table 3. Permitted Distribution and Supply TOU Rate Combinations**

Supply Rate Options	Distribution Rate Options	
	EV TOU	Standard Distribution Rate
Default Service – TOU	Permitted	Permitted
Default Service - Standard	Not Permitted	Permitted
Electric Generation Supplier	Permitted	Permitted

13
14 **Q. How will customers enroll in the TOU Supply Rate Pilot?**

15 A. To enroll in the TOU Supply Rate Pilot, customers must complete an online TOU
16 Supply Rate Pilot enrollment application or call Duquesne Light’s Customer
17 Service Center. If a customer moves during the course of the DSP period, the
18 customer will remain enrolled in the TOU Supply Rate Pilot unless they direct
19 otherwise.

20

1 **Q. Will customers participating in the TOU Supply Rate Pilot be able to switch**
2 **to default service fixed rate or select an EGS?**

3 A. Yes. Customers may un-enroll from the TOU Pilot Supply Rate and switch to an
4 EGS or default service fixed rate at any time.

5
6 **Q. Can customers re-enroll in the TOU Supply Rate Pilot after un-enrolling?**

7 A. Yes. However, customers leaving the TOU Supply Rate Pilot will be prohibited
8 from re-enrolling in the Pilot for twelve billing months after switching off the Pilot.
9 Having this provision in place will help reduce customers' abilities to game rates
10 by not allowing them to benefit from the rates during lower energy consumption
11 shoulder seasons and then dropping the rate during higher demand seasons, such as
12 the summer.

13
14 **Q. Will customers enrolled in the existing EV TOU Supply Rate Pilot under DSP**
15 **IX be automatically enrolled in the TOU Supply Rate Pilot under DSP X?**

16 A. Yes. Customers actively enrolled in the EV TOU Supply Rate Pilot under DSP IX
17 will be automatically enrolled in the TOU Supply Rate Pilot rate under DSP X. At
18 least 30 days in advance of the transition taking effect, the Company will notify
19 customers actively enrolled in the EV TOU Supply Rate Pilot of the changes to
20 ensure they have sufficient opportunity to un-enroll before the changes take effect
21 if they do not want to be enrolled in the TOU Supply Rate Pilot.

22

1 **Q. Will the Company offer tools and resources to help customers assess their**
2 **rate options?**

3 A. Yes. The Company will provide educational tools and resources to help customers
4 assess the rate options available to them. This will include educational information
5 on the Company’s website, as well as an online rate advisor tool that will allow
6 residential customers to estimate the bill impact of enrolling in the TOU Supply
7 Rate pilot based on their historical usage. The Company currently offers a similar
8 rate tool for its EV TOU Supply Rate Pilot, which has been widely used by
9 customers under DSP IX as further described in DLC Statement No. 5, page 19 line
10 21 through page 20 line 3 under Docket P-2024-3048592. Additionally, the
11 Company will engage customers with educational information prior to enrolling in
12 the rate through a variety of other channels, such as email, social media, digital
13 advertising, and print collateral at in-person events. When possible, these
14 communications will be targeted to customers that may be able to benefit most from
15 the TOU Supply Rate Pilot, such as customers with known shiftable load or a high
16 proportion of peak usage. Exhibit SO-1S displays the proposed customer tools,
17 outreach, and research budget for the TOU Supply Rate Pilot. The recovery of these
18 costs is addressed in Mr. Ogden’s Statement No. 4-S.

19
20 **Q. Will the Company provide information to enrolled TOU Supply Rate Pilot**
21 **customers about the opportunity for bills savings?**

22 A. Yes. After a residential customer enrolls in the TOU Supply Rate Pilot, they will
23 receive personalized behavioral load shaping (BLS) communications via email

1 from a third-party provider, which will inform them how much electricity they use
2 during each TOU period and provide them with tips for shifting consumption away
3 from the peak period. Additionally, enrolled residential customers will have access
4 to a unique electricity usage dashboard on the Company’s website which allows
5 them to evaluate the amount of electricity they use in each TOU period. Similar
6 reports and tools are currently available to customers enrolled in the EV TOU
7 Supply Rate, and they have positively influenced the shift of electricity usage away
8 from the peak time period as further described in Exhibit SO-2 under DLC
9 Statement No. 5 at Docket P-2024-3048592.

10

11 **Q What is the proposed budget for the TOU Supply Rate Pilot?**

12 A. Table 4 below provides an overview of the proposed TOU Supply Rate Pilot
13 budget by category and year. A more detailed version can be found in Exhibit SO-
14 1S.

15

16

Table 4. Proposed TOU Supply Rate Pilot Budget

Category	Year 1	Year 2	Year 3	Year 4	Total
Customer Tools	\$269,736	\$76,728	\$76,728	\$123,455	\$546,647
Implementation	\$31,250	-	-	-	\$31,250
Customer Outreach	\$32,500	\$21,000	\$23,000	\$11,000	\$87,500
Customer Research	\$25,000	\$25,000	\$27,000	\$2,000	\$79,000
Total	\$358,486	\$122,728	\$126,728	\$136,455	\$744,397

17

18 **Q. How does this budget compare to the budget proposed for the EV TOU Supply**
19 **Rate Pilot?**

1 A. Table 5 below shows an overview of the incremental budget increase by year and
 2 category for the TOU Supply Rate budget (Exhibit SO-1S) as compared to the EV
 3 TOU Supply Rate Pilot budget (Exhibit SO-1) that was originally proposed under
 4 DLC Statement No. 5 at Docket P-2024-3048592 less the costs associated with
 5 implementing the EV-only option not included in the settlement. If the EV-only
 6 costs of \$288,000 were included as originally proposed, there would be no
 7 incremental cost increase associated with offering the TOU Supply Rate Pilot in
 8 place of the EV TOU Supply Rate Pilot. As shown, without including the EV-only
 9 budget, the most significant portion of the incremental budget increase comes from
 10 the customer tools category, which is necessary to provide customer tools to a
 11 significantly larger customer base. There are also smaller incremental budget
 12 increases for customer outreach and research, also reflecting the need to engage
 13 with and evaluate a larger customer base.

14
 15 **Table 5. Proposed TOU Supply Rate Pilot Incremental Budget**

Category	Year 1	Year 2	Year 3	Year 4	Total
Customer Tools	\$149,136	\$11,128	\$11,128	\$57,855	\$229,247
Implementation	-	-	-	-	-
Customer Outreach	-	\$5,000	\$5,000	-	\$10,000
Customer Research	\$14,000	\$9,000	\$6,000	\$1,000	\$30,000
Total	\$163,136	\$25,128	\$22,128	\$58,855	\$269,247

16
 17 **Q. Will there be a budget impact if there is not a final order on this supplemental**
 18 **filing by early April 2025?**

19 A. Yes. If the outcome of this proceeding results in the Company having to launch the
 20 updated version of its EV TOU Supply Rate Pilot as approved in the January 14

1 Order on June 1, 2025, and then at a later date replace it with the TOU Supply Rate
2 Pilot as proposed under this DLC Statement No. 5S, the Company estimates a total
3 budget increase of approximately \$90,000. This reflects the additional IT
4 configuration the Company would need to conduct to launch both rates, rather than
5 launching only the TOU Supply Rate Pilot. For this reason and consistent with the
6 aforementioned motion from Commissioner DeFrank, the Company strongly
7 recommends a swift outcome that allows it to launch only the TOU Supply Rate
8 Pilot on June 1, 2025, and avoids accruing additional costs to customers.

9

10 **Q Does this conclude your direct testimony?**

11 **A.** Yes, it does.

Exhibit No. SO-1S

TOU Supply Rate Pilot - Proposed Budget

	Year 1	Year 2	Year 3	Year 4	Total	Notes
Customer Tools						
Pre-Enrollment Rate Advisor	\$ 224,736	\$ 31,728	\$ 31,728	\$ 63,455	\$ 351,647	Based on historical costs and vendor quotes. Splitting costs with distribution EV TOU. Year 1 includes configuration fees for the behavioral load shaping communications. Year 4 reflects the expected end of the distribution EV TOU rate and the full absorption of the cost by the TOU supply pilot.
Post-Enrollment Behavioral Load Shaping Communication	\$ 45,000	\$ 45,000	\$ 45,000	\$ 60,000	\$ 195,000	Based on historical costs and vendor quotes. Splitting costs with distribution EV TOU. Year 4 reflects the expected end of the distribution EV TOU rate and the full absorption of the cost by the TOU supply pilot.
Implementation						
IT & Billing Administration	\$ 31,250	\$ -	\$ -	\$ -	\$ 31,250	Based on historical costs. Splitting costs with distribution EV TOU.
Customer Outreach						
Webpage (Design and Development)	\$ 5,000	\$ -	\$ -	\$ -	\$ 5,000	Based on historical costs.
Print Materials (Design and Printing)	\$ 7,500	\$ 1,000	\$ 3,000	\$ 1,000	\$ 12,500	Based on historical costs.
Advertising	\$ 15,000	\$ 15,000	\$ 15,000	\$ 10,000	\$ 55,000	Based on historical costs.
Email Deployments	\$ 5,000	\$ 5,000	\$ 5,000	\$ -	\$ 15,000	Based on historical costs.
Customer Research						
Surveys (Non-Enrolled, Enrolled, and Exit)	\$ 15,000	\$ 10,000	\$ 2,000	\$ 2,000	\$ 29,000	Based on historical costs.
TOU Effectiveness Study	\$ 10,000	\$ 15,000	\$ 25,000	\$ -	\$ 50,000	Based on historical costs. Splitting costs with distribution EV TOU.
Total	\$ 358,486	\$ 122,728	\$ 126,728	\$ 136,455	\$ 744,397	

Customer Class - TOU Supply Rate Pilot	Year 1	Year 2	Year 3	Year 4	Total
Residential	\$ 322,653	\$ 112,061	\$ 108,061	\$ 135,788	\$ 678,564
Small C&I	\$ 17,917	\$ 5,333	\$ 9,333	\$ 333	\$ 32,917
Medium C&I	\$ 17,917	\$ 5,333	\$ 9,333	\$ 333	\$ 32,917
Total	\$ 358,486	\$ 122,728	\$ 126,728	\$ 136,455	\$ 744,397

Category - TOU Supply Rate Pilot	Year 1	Year 2	Year 3	Year 4	Total
Customer Tools	\$ 269,736	\$ 76,728	\$ 76,728	\$ 123,455	\$ 546,647
Implementation	\$ 31,250	\$ -	\$ -	\$ -	\$ 31,250
Customer Outreach	\$ 32,500	\$ 21,000	\$ 23,000	\$ 11,000	\$ 87,500
Customer Research	\$ 25,000	\$ 25,000	\$ 27,000	\$ 2,000	\$ 79,000
Total	\$ 358,486	\$ 122,728	\$ 126,728	\$ 136,455	\$ 744,397

Budget Comparisons

EV TOU Supply Rate Pilot Budget (as approved)*					
Category - EV TOU Supply Rate Pilot	Year 1	Year 2	Year 3	Year 4	Total
Customer Tools	\$ 120,600	\$ 65,600	\$ 65,600	\$ 65,600	\$ 317,400
Implementation	\$ 31,250	\$ -	\$ -	\$ -	\$ 31,250
Customer Outreach	\$ 32,500	\$ 16,000	\$ 18,000	\$ 11,000	\$ 77,500
Customer Research	\$ 11,000	\$ 16,000	\$ 21,000	\$ 1,000	\$ 49,000
Total	\$ 195,350	\$ 97,600	\$ 104,600	\$ 77,600	\$ 475,150

*Removes EV-only implementation costs since EV-only was not included in settlement

Incremental Cost Increase Over EV TOU Supply Rate Pilot Budget (as approved)					
Category Difference	Year 1	Year 2	Year 3	Year 4	Total
Customer Tools	\$ 149,136	\$ 11,128	\$ 11,128	\$ 57,855	\$ 229,247
Implementation	\$ -	\$ -	\$ -	\$ -	\$ -
Customer Outreach	\$ -	\$ 5,000	\$ 5,000	\$ -	\$ 10,000
Customer Research	\$ 14,000	\$ 9,000	\$ 6,000	\$ 1,000	\$ 30,000
Total	\$ 163,136	\$ 25,128	\$ 22,128	\$ 58,855	\$ 269,247

TOU Supply Rate Pilot Budget if Final Order not Issued by early April*					
Category Difference	Year 1	Year 2	Year 3	Year 4	Total
Customer Tools	\$ 269,736	\$ 76,728	\$ 76,728	\$ 123,455	\$ 546,647
Implementation	\$ 121,250	\$ -	\$ -	\$ -	\$ 121,250
Customer Outreach	\$ 32,500	\$ 21,000	\$ 23,000	\$ 11,000	\$ 87,500
Customer Research	\$ 25,000	\$ 25,000	\$ 27,000	\$ 2,000	\$ 79,000
Total	\$ 448,486	\$ 122,728	\$ 126,728	\$ 136,455	\$ 834,397

*as described in DLC Statement No. 5-5

Exhibit No. SO-3S



Time-of-Use Supply Rate Pilot Evaluation and Assessment Plan

Dated: February 10, 2025

TOU Supply Rate Pilot

The Company's TOU Supply Rate Pilot is designed to encourage off-peak energy consumption to mitigate increased peak demand. The pilot will provide the Company insights into customer response to, administration of, and efficacy of passive load management solutions, allowing it to leverage data to help inform its on-going load management strategy.

Objectives

- Assess the degree to which a TOU Supply Rate can be a reliable and meaningful load management asset for the grid.
- Assess customer participation and response to rate price signals.

Evaluation Components:

- Report on the types of customers who enrolled, including by:
 - Rate class
 - Year
 - Census tract
 - Five-digit zip code
- Report on net customer bill impacts as compared to the standard default service supply rate by rate class
- Report on energy usage shifted from on-peak hours (for those customers for whom the Company has sufficient historical usage data) from pre- to post-enrollment by:
 - Rate type
 - Rate class
 - Distribution rate type enrollment (e.g., Standard or time-of-use distribution rate).
- Report on customer satisfaction with the Pilot.
- Report on customer usage of pre-enrollment tools.
- Report on customer interaction with post-enrollment behavioral load shaping communications.
- Describe how pilot results have been used to estimate longer-term grid impacts and benefits.

KPIs, Targets and Data Sources

In addition to the evaluation components described above, the Company has established and will report on the below KPIs and targets.

KPIs	2025-26 Target	2026-27 Target	2027-28 Target	2028-29 Target	Measurement/ Data Source
Cumulative Participants	2,881	3,746	4,741	5,842	Enrollment based on

					capturing a baseline of 9% of EVs in Operation and 5% of net metering customers
Share of energy during off-peak periods	50%	50%	50%	50%	Customer meter data
Customer Satisfaction – % of customers reporting being satisfied or greater with the pilot	80%	80%	80%	80%	Customer surveys

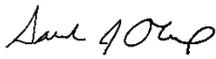
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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	:	

VERIFICATION

I, Sarah J. Olexsak, being General Manager, Electrification Solutions for Duquesne Light Company, hereby state that the testimony set forth in Duquesne Light Company Statement No. 5-S is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I am also sponsoring Duquesne Light Exhibit Nos. SO-1S and SO-3S. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

February 10, 2025 _____
Date


Sarah J. Olexsak