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February 20, 2025

**Via Electronic Filing**

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

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

Dear Secretary Chiavetta:

Please accept this letter on behalf of The Retail Energy Supply Association (“RESA”)<sup>1</sup> in response to Duquesne Light Company’s (“DLC”) Tariff Supplement No. 89 filed on February 10, 2025 pursuant to the Commission’s January 14, 2025 Order in the above captioned proceeding (“Commission Order”). RESA was an active party in the litigation involving DLC’s tenth default service plan (“DSP X”) which resulted in a full settlement approved by the Commission (“Settlement”).<sup>2</sup> RESA recognizes, however, that DLC’s Tariff Supplement No. 89 is being made in direct response to the directive in the Commission’s Order. As such, RESA has elected not to request that the Commission permit it to further pursue its concerns related to this proposal through a further expedited hearing as contemplated by Ordering Paragraph 5 of the Commission Order. However, RESA does request that the Commission consider the issues discussed further below in reviewing the filing.

Consistent with the testimony of RESA witness Frank Caliva III during the DSP X proceeding, RESA fully supports offering consumers the ability to avail themselves of Time of Use Rates but does not support doing so through the continued expansion of the electric distribution company’s

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

<sup>2</sup> RESA explained its non-opposition in a letter filed on October 1, 2024 explaining “that a broader shift needs to occur beyond what may be accomplished in a default service proceeding.”

default service product. As Mr. Caliva testified, such expansion “implicates competitive market concerns and creates further pressures on the ability of the competitive market to innovate in response to the ever-changing market demands.”<sup>3</sup> For these reasons, RESA recommends that the Commission consider the following suggestions as it reviews DLC’s filing:

- DLC should advise customers in advertising materials/TOU website that additional TOU options may be available in the competitive market.
- DLC should recover all costs associated with the TOU rate from default service customers as they propose.

RESA appreciates the Commission’s consideration of these concerns.

Sincerely,



Deanne M. O’Dell

DMO/lww

cc: Hon. Mary D. Long (via email)  
Hon. John M. Coogan (via email)  
Certificate of Service

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<sup>3</sup> RESA St. No. 1, Direct Testimony of Frank Caliva III dated July 12, 2024 at 25-29.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA's Letter, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Date: February 20, 2025

A handwritten signature in cursive script that reads "Deanne M. O'Dell". The signature is written in black ink on a light blue rectangular background.

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Deanne M. O'Dell, Esq.