

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE
Interim Acting Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

February 21, 2025

Via Electronic Filing

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

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

OCA Letter in Support of Compliance Filing

Dear Secretary Chiavetta,

On February 10, 2025, Duquesne Light Company (Duquesne Light or Company) filed its Supplement No. 89 to Duquesne Light's Tariff Electric PA PUC No. 25 to become effective June 1, 2025. The Company filed Supplement No. 89 in compliance with the Pennsylvania Public Utility Commission's Order entered on January 14, 2025, in the above-referenced docket. The Commission's January 14, 2025, Order required the Company to make available to residential and commercial customers a Time of Use (TOU) program available to residential and commercial customers with smart meters under 200 kW of demand. The Compliance Filing adds the required TOU program for residential and commercial customers. The TOU 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. Duquesne Light Compliance Filing at ¶ 12.

In order to comply with the Commission's Order, Duquesne Light will expand the EV TOU pilot program that was included in the Settlement of the above-referenced docket to

drop the EV requirements and to expand to all eligible residential and small and medium commercial and industrial customers with less than 200 kW of demand. *Id.* at ¶ 14. Customer Assistance Program (CAP) participants, virtual meter aggregation customers, and budget billing customers will be ineligible for the program for the reasons set forth in the Compliance Filing. Duquesne Light Compliance Filing at ¶ 15. The time period will remain the same as approved in the DSP Settlement. Duquesne Light Compliance Filing at ¶ 16. The Company will also engage with customers to provide educational messaging, tools and resources to help customers to assess the available rate options. Duquesne Light Compliance Filing at ¶¶ 20-24. The TOU program will go into effect on June 1, 2025, or approximately six weeks after PUC approval, whichever is later. In its filing, Duquesne requests that the Commission approve Supplement No. 89 by April 10, 2025, in order to have time to implement the revised TOU program by June 1, 2025. The Office of Consumer Advocate (OCA) was a party to the case below and a signatory to the DSP Settlement in the above-referenced docket. The OCA has reviewed the compliance filing and supports the Company's filing. The OCA also supports Duquesne's request that the matter be expeditiously approved by April 10, 2025, in order to allow for the program to go into effect by June 1, 2025, and to avoid unnecessary costs related to adding the program at a later date.

Respectfully Submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824

Counsel for:
Darryl A. Lawrence
Interim Acting Consumer Advocate

cc: The Honorable Mary D. Long (mlong@pa.gov)
The Honorable John M. Coogan (jcoogan@pa.gov)
Certificate of Service
Office of Special Assistants (ra-osa@pa.gov)

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Letter in Support of Duquesne Light Company's Compliance Filing, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 21st day of February 2025.

SERVICE BY E-MAIL ONLY

Rebecca Lyttle, Esquire
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov
Counsel for OSBA

Elizabeth Marx, Esquire
John Sweet, Esquire
Ria Pereira, Esquire
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

Karen O. Moury, Esq.
Deanne M. O'Dell, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Fl.
Harrisburg, PA 17101
kmoury@eckertseamans.com
dodell@eckertseamans.com
Counsel for RESA

Anthony D. Kanagy, Esquire
Nicholas Stobbe, Esquire
Lisa Grimenstein, Esquire
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
akanagy@postschell.com
nstobbe@postschell.com
lgrimenstein@duqlight.com
Counsel for DLC

John F. Lushis, Jr., Esquire
Norris McLaughlin P.A.
515 West Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-law.com
Counsel for Calpine Retail

James H. Laskey, Esquire
Norris McLaughlin P.A.
400 Crossing Boulevard, 8th Floor
Bridgewater Township, NJ 08807
jlaskey@norris-law.com
Counsel for Calpine Retail

James M. Van Nostrand, Esquire
Keyes & Fox LLP
275 Orchard Drive
Pittsburgh, PA 15228
jvannostrand@keyesfox.com
Counsel for ChargePoint, Inc.

Andrew J. Karas, Esquire
Fair Shake Environmental Legal Services
647 East Market Street
Akron, OH 44304
akaras@fairshake-els.org
Counsel for NRDC

Robert D. Knecht
Industrial Economics Incorporated
5 Plymouth Road
Lexington, MA 02421
Consultant for OSBA

Michael P. Pest, Esquire
Duane Morris LLP
625 Liberty Avenue, Suite 1000
Pittsburgh, PA 15222-3112
mpest@duanemorris.com
*Counsel for Constellation NewEnergy Inc.
and Constellation Energy*

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
717-783-5048

Dated: February 21, 2025

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for RESA

Sophia Browning
Day Pitney LLP
555 11th Street, NW
Washington, DC 20004
sbrowning@daypitney.com
*Counsel for Constellation NewEnergy, Inc.
and Constellation Energy Generation LLC*

Alexander Judd, Esq.
Day Pitney LLP
225 Asylum St.
Hartford, CT 06103
ajudd@daypitney.com
*Counsel for Constellation NewEnergy, Inc.
and Constellation Energy Generation LLC*

Elizabeth Sher, Esq.
Day Pitney, LLP
One Jefferson Road
Parsippany, NJ 07054
esher@daypitney.com
*Counsel for Constellation NewEnergy, Inc.
and Constellation Energy Generation LLC*

/s/ Christy M. Appleby
Christy M. Appleby
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
cappleby@paoca.org