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March 19, 2025

VIA ELECTRONIC FILING

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

**Re: Duquesne Light Company's Petition for Approval of
Minor Changes to its Act 129 Energy Efficiency and
Conservation Plan Pursuant to the Expedited Review
Process**
Docket No. M-2020-3020818

Dear Secretary Chiavetta:

Enclosed for filing please find Duquesne Light Company's Petition for Approval of Minor Changes to its Act 129 Energy Efficiency and Conservation Plan Pursuant to the Expedited Review Process. **This Petition is being filed in accordance with the Commission's expedited review process, which was established in its June 10, 2011, Final Order at Docket No. M-2008-2069887 (the "Expedited Process Order").**

Duquesne Light Company is seeking expedited approval to make minor changes to its EE&C Plan to (1) increase the program incentives to participate in the Large Commercial Business Solutions Program by up to 0.02 cents/kWh; and (2) include up to \$250/kW of peak demand reduction. No modifications to rates or the EE&C Plan are necessary to make these adjustments, which can be achieved through the existing budget.

As set forth in the Petition, the Duquesne Light Company respectfully submits that each of these modifications constitutes a "minor change" under the Expedited Process Order, and that they are each in the public interest. The Company therefore respectfully requests that this Petition be considered and approved pursuant to the expedited review process set forth in the Expedited Process Order.



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Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Aron J. Beatty".

Aron J. Beatty, Esquire

PA ID #86625

Enclosures
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for Approval :
Of its Act 129 Phase IV Energy Efficiency and : Docket No. M-2020-3020818
Conservation Plan :

**PETITION OF DUQUESNE LIGHT COMPANY
FOR APPROVAL OF MINOR CHANGES TO ITS ACT 129
ENERGY EFFICIENCY AND CONSERVATION PLAN
PURSUANT TO THE EXPEDITED REVIEW PROCESS**

I. INTRODUCTION

The Duquesne Light Company (the "Company" or "Duquesne Light") hereby petitions the Pennsylvania Public Utility Commission ("Commission") for approval of minor changes to the Company's Act 129 Phase IV Energy Efficiency and Conservation Plan ("EE&C Plan"). The Company is filing this Petition for Minor Changes pursuant to the Commission approved expedited review process. Energy Efficiency and Conservation Program, Docket No. M-2008-2069887 (Final Order entered June 10, 2011)(the "*Expedited Process Order*"). Specifically, the Company seeks to modify its EE&C Plan to (1) increase the program incentives to participate in the Large Commercial Business Solutions Program by up to 0.02 cents/kWh; and (2) include up to \$250/kW of peak demand reduction. No modifications to rates or the EE&C Plan are necessary to make these adjustments, which can be achieved through the existing budget.

The Company submits that the modifications requested herein are "minor changes" as defined by the Commission in its *Expedited Process Order*. Duquesne Light respectfully

requests that this Petition be considered and approved pursuant to the expedited review process to more efficiently meet the needs of its customers under its Phase IV EE&C Plan.

II. EXPEDITED REVIEW PROCESS

Through the Expedited Process Order, the Commission delegated authority to review “minor changes” to EE&C Plans to the Bureau of Conservation, Economics and Energy Planning (since reorganized into the Bureau of Investigation and Enforcement), with assistance from staff of the Bureau of Fixed Utility Services (since reorganized into the Bureau of Technical Utility Services) and the Law Bureau. *Expedited Process Order* at 18. Minor changes include:

1. The elimination of a measure that is underperforming, no longer viable for reasons of cost-effectiveness, savings or market penetration or has met its approved budgeted funding, participation level or amount of savings;
2. The transfer of funds from one measure or program to another measure or program within the same customer class; and
3. Adding a measure or changing the conditions of a measure, such as its eligibility requirements, technical description, rebate structure or amount, projected savings, estimated incremental costs, projected number of participants, or other conditions so long as the change does not increase the overall costs to that customer class.

Expedited Process Order at 19-20. The Expedited Process Order directs Commission staff to issue a Secretarial Letter approving, denying, or transferring to the Office of Administrative Law Judge some or all of the proposed minor changes within 35 days of their filing with the Secretary. *Expedited Process Order* at 19.

III. BACKGROUND

1. Duquesne Light is a public utility and electric distribution company (“EDC”) as defined in Sections 102 and 2803 of the Public Utility Code. 66 Pa.C.S. §§102, 2803. Duquesne Light provides electric supply service to approximately 600,000 customers in its service

territory, which includes the City of Pittsburgh and portions of Allegheny and Beaver Counties.

2. The name and address of Duquesne Light's attorney for purposes of this filing is:

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Counsel, Regulatory
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3. On October 15, 2008, Act 129 was signed into law, and was subsequently codified in the Pennsylvania Public Utility Code at Sections 2806.1 and 2806.2. On January 16, 2009, the Commission entered an Order providing standards and guidance for implementing the requirements of Act 129. See Docket No. M-2008-2069887.
4. In relevant Part, Act 129 directs EDCs with at least 100,000 customers to adopt and implement EE&C plans to achieve a schedule of energy and demand reduction targets. Act 129 further provides that some of these reductions must be derived from certain customer groups.
5. The Company's current Phase IV EE&C Plan, covering the period June 1, 2021 through May 31, 2026, was approved by the Commission by Order entered March 25, 2021 at Docket Nol. M-2020-3020818.
6. The *Expedited Process Order* requires the Petitioner of a Minor Change to include in its Petition, "the affected pages of the plan, a redlined version of the affected pages and an explanation of how the proposed minor changes affect the previously approved plan." *Expedited Process Order* at 18. In this instance, however, Duquesne Light's proposed

changes are not included in the written Phase IV plan, and as such, there are no redlines attached.

IV. PROPOSED MINOR CHANGES TO EE&C PLAN

7. Duquesne offers Duquesne Light’s Large Commercial Business Solutions Program a downstream incentive energy efficiency program for customers with peak demand at or above three hundred kilowatts (>300kW). This program provides a set of simple solutions for customers interested in reducing their energy consumption by installing highly efficient technologies and improving operational processes that produce verifiable energy and demand savings. This program influences the selection of high-efficiency equipment in retrofit, new construction, and end-of-life equipment replacement scenarios.
8. The program is underperforming when compared with the approved EE&C Plan projections. The table below captures the program’s performance Phase IV, to-date:

Large Commercial Downstream	Savings kWh	Savings kW	Incentives	Incentive \$/kWh
Large Commercial Business Solutions - Plan	97,434,775	18,123	\$11,226,934	\$0.1152
Performance to-date	50,081,190	9,594	\$3,767,845	
Percentage Target Achieved	51.4%	52.9%	33.6%	
<i>Phase IV Time Elapsed</i>	<i>73.3%</i>			

9. The office segment has been slow to recover due to a variety of reasons. The pandemic impacted offices initially, as well as other economic and socioeconomic reasons. Offices that were open and thriving are non-existent.
10. **To increase customer participation Duquesne Light proposes to increase program incentive rates, offering an up to \$0.02/kWh increase above the current incentive rates of \$0.08/kWh, plus an up to \$250/kW of peak demand reduction.**

11. Duquesne Light anticipates the proposed incentive rates will stimulate the market and not overspend the program budget:

Large Commercial Downstream	Savings kWh	Savings kW	Incentives	Incentive \$/kWh
Large Commercial Business Solutions - Plan	97,434,775	18,123	\$11,226,934	\$0.1152
Performance to-date (2/26/2025)	50,081,190	9,594	\$3,767,845	\$0.0752
Savings Needed to Reach Plan Target	47,353,585	8,529		
Proposed Incentive up to \$/kWh-kW	\$0.1000	\$250		
Proposed Incentive Amount	\$4,735,358	\$2,132,162	\$6,867,520	
Projected Total	97,434,775	18,123	\$10,635,365	\$0.1092

12. No changes to the budget, surcharges or impacts to the large commercial program or to any other customer classes and programs will result from this modification request.

Duquesne Light Company wishes to provide an additional incentive starting April 2025 and continuing for the remainder of the Act 129 Phase IV performance period.

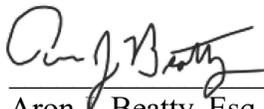
V. NOTICE

13. Pursuant to the *Expedited Process Order*, the Company is serving copies of this filing on the Pennsylvania Office of Consumer Advocate, the Pennsylvania Office of Small Business Advocate, the Commission’s Bureau of Investigation and Enforcement, and all parties of record in the Company’s Phase IV EE&C Plan proceeding (M-2020-3020818).
See Expedited Process Order at 19.

VI. CONCLUSION

Based on the foregoing, including the attached Exhibit A, the Company respectfully requests that Commission staff grant this Petition and enter a Secretarial Letter approving the Company's proposed Minor Changes to its EE&C Plan.

Respectfully submitted,



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DATE: March 19, 2025

VERIFICATION

I, David Defide, being the Senior Manager of Customer Programs of Duquesne Light Company (“Duquesne Light”) hereby state that the information set forth in the foregoing Petition is 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.

Date: March 18, 2025



David Defide

Senior Manager of Customer Programs

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for Approval :
Of its Act 129 Phase IV Energy Efficiency and : Docket No. M-2020-3020818
Conservation Plan :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the enclosed Petition for Approval of Minor Changes to its Act 129 Energy Efficiency and Conservation Plan Pursuant to the Expedited Review Process have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA ELECTRONIC MAIL AND FIRST-CLASS U.S. MAIL

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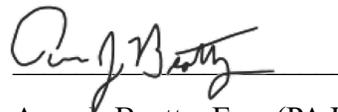
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March 19, 2025

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