



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET
HARRISBURG, PENNSYLVANIA 17120

IN REPLY PLEASE
REFER TO OUR FILE
M-2020-3020818

April 7, 2025

Mr. Aron J. Beatty, Esq,
Counsel, Regulatory
Duquesne Light Company
800 N. Third Street, Suite 203
Harrisburg, PA 17102

**Re: Duquesne Light Company – Phase IV Energy Efficiency and Conservation Plan
Petition for Minor Modification
Docket No. M-2020-3020818**

Dear Mr. Beatty:

On March 19, 2025, Duquesne Light Company (Duquesne or Company) filed a *Duquesne Light Company – Phase IV Energy Efficiency and Conservation Plan Petition for Minor Modification Docket No. M-2020-3020818* (Petition). The Petition seeks approval of minor changes to the programs contained in its Act 129 Phase IV Energy Efficiency and Conservation Plan (EE&C Plan) through the Commission’s expedited process set forth in its June 10, 2011, Final Order at Docket No. M-2008-2069887 (Expedited Process Order).

In the Expedited Process Order, the Commission delegated its authority to review and approve minor EE&C Plan changes to Staff, with assistance from staff of the Law Bureau.¹ The Expedited Process Order directs Staff to issue a Secretarial Letter approving, denying, or transferring to the Office of Administrative Law Judge for hearings, some or all of a petition’s proposed minor plan changes. Duquesne served the Petition on all parties of record. For the reasons discussed below, the Bureau of Technical Utility Services (Staff) will grant Duquesne’s Petition.

¹ In the Expedited Process Order, the Commission delegated its authority to staff of the Bureau of Conservation, Economics and Energy Planning, with assistance from staff of the Bureau of Fixed Utility Services and the Law Bureau. *See*, Expedited Process Order at 22. In a Final Procedural Order entered on August 11, 2011, at Docket No. M-2008-2071852, the Commission transferred the staff and functions of the Bureaus of Fixed Utility Services and Conservation, Economics and Energy Planning to the Bureau of Technical Utility Services. *See Implementation of Act 129 of 2008 Organization of Bureaus and Offices*, Final Procedural Order at 4.

The single aspect requested in the Duquesne Petition is contained in the following summary. Comments were due by April 3, 2025. No comments were filed.

Modify its EE&C Plan to increase the program incentives to participate in the Large Commercial Business Solutions Program by up to 0.02 cents/kWh, and up to \$250/kW of peak demand reduction.

In its Petition, Duquesne states that its Large Commercial Business Solutions Program is a downstream incentive energy efficiency program for customers with peak demand at or above three hundred kilowatts (>300kW). Duquesne states that the 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. Duquesne further notes that the program influences the selection of high-efficiency equipment in retrofit, new construction, and end-of-life equipment replacement scenarios but that the program is underperforming.

To increase participation in the program, Duquesne proposes to increase incentive rates. Specifically, the Company proposes to increase the per kilowatt hour (kWh) incentive from the current \$0.08/kWh to up to \$0.10/kWh. Additionally, the Company proposes to offer a peak demand incentive of up to \$250/kW. The Company asserts that in doing so, it will not overspend the budget and will allow Duquesne to meet its planned reduction goals. Duquesne states that no changes to the budget, surcharges or impacts to the large commercial program or to any other customer classes and programs will result from the planned minor modification. Duquesne wishes to implement the proposed change in April 2025 and carry it through the remainder of Phase IV.

The aforementioned changes involve changes to projected savings that do not increase the overall costs to the affected customer class.

Conclusion

In view of the above, Staff has determined that the *Duquesne Light Company – Phase IV Energy Efficiency and Conservation Plan Petition for Minor Modification*, filed on March 19, 2025, at Docket No. M-2020-3020818, satisfies the requirements of Act 129 and the prior related Orders of the Commission. Staff finds that the minor changes proposed in the Petition should help Duquesne Light meet or exceed the energy consumption and demand reduction requirements of Act 129 in a cost-effective manner. Therefore, Staff finds that the March 19, 2025, minor changes submitted by Duquesne Light are approved. Duquesne Light is directed to file with the Secretary a revised plan, consistent with this Secretarial Letter, within 30 days of the date of this Letter and post the same on its website.

As directed in the Commission's Expedited Process Order, petitions for appeal from this Staff action must be filed within ten (10) days after service of this Secretarial Letter in accordance with 52 Pa. Code § 5.44.²

Sincerely,

A handwritten signature in black ink, appearing to read "Rosemary Chiavetta". The signature is written in a cursive style with a large initial "R".

Rosemary Chiavetta
Secretary

² Expedited Process Order at 19.