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April 7, 2025

Via Electronic Filing

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

**Re: Duquesne Light Company – Rider No. 23 – Behavioral Load Management
Supplement No. 91 to Tariff Electric – PA. P.U.C. No. 25
Docket No. R-2025-_____**

Dear Secretary Chiavetta:

Enclosed for filing, please find an original copy of Supplement No. 91 to Duquesne Light Company's ("Company") Tariff-Electric, PA. P.U.C. No. 25, which amends Rider No. 23 – Behavioral Load Management to become effective June 2, 2025.

- Language has been revised under the Applicability and Definition sections of the Rider to provide additional customer clarity on when they can expect to be notified about Peak Events and how often Peak Events may occur.
- Language has been revised under the Applicability and Definition sections of the Rider to simplify and provide customer clarity on how the Baseline Consumption Level is calculated aligned with industry standards.
- Language has been revised under the Special Terms and Conditions section of the Rider to clarify that customers enrolled in the Time-of-Use Supply Rate Pilot under Rider No. 8 are not eligible to participate since those customers already receive peak and off-peak price signals.

Pursuant to 52 Pa. Code § 53.52, the following information is provided: (Duquesne Light Company responses in underlined italics below)

(1) The specific reasons for each change.

See above for the three (3) primary reasons for change.

(2) The total number of customers served by the utility.

Duquesne Light Company serves more than 600,000 customers.

(3) A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.

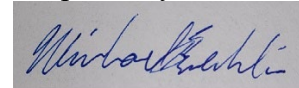
As of the date of filing, zero customers bills will be affected by this change. This program is a pilot that has not started yet.

- (4) The effect of the change on the utility's customers.
See above. Additionally, these changes only affect future participants in the pilot.
- (5) The direct or indirect effect of the proposed change on the utility's revenue and expenses.
During the work preceding implementation of this pilot, Duquesne Light Company discovered that the cost to implement the program, as originally written, would be higher than expected. Implementing the proposed changes in this filing will avoid the increased costs. Otherwise, revenue and expenses are not affected.
- (6) The effect of the change on the service rendered by the utility.
The change does not affect the service rendered by Duquesne Light Company.
- (7) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each. This subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308 (relating to voluntary changes in rates).
Duquesne Light considered the cost to implement the pilot, including reconfiguration of contractor systems. This was the most important factor. Duquesne Light Company also considered how the proposed changes would affect the functioning of the pilot, and concluded that the pilot could function as originally designed as long as the calculation methodology was modified.
- (8) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308.
Internal calculations were performed using basic assumptions to ensure that the program remained functional as designed. Studies were not performed.
- (9) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.
Customer polls were not conducted. No such documents exist.
- (10) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.
The changes will be implemented before customers sign up for the pilot. The changes will be reflected in the tariff, and online documentation as applicable.
- (11) FCC, FERC or Commission orders or rulings applicable to the filing.
Not applicable.

Accordingly, Supplement No. 91 updates the Behavioral Load Management rider.

Should you have any questions, please do not hesitate to contact me with any questions.

Respectfully Submitted,



Michael Brechlin
Assistant General
Counsel,
Regulatory

Enclosures

cc: 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):

ELECTRONIC MAIL

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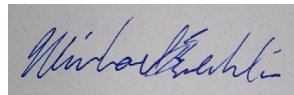
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Date: April 7, 2025



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