



Michael Brechlin
Assistant General Counsel, Regulatory

411 Seventh Avenue
Mail drop 15-7
Pittsburgh, PA 15219

Tel: 412-393-6431
mbrechlin@duqlight.com

May 1, 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:

This letter is filed to correct the effective date below to match the previously filed Supplement 91. The original letter erroneously listed June 2, 2025 as the effective date. 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 should become effective June 6, 2025, if approved. Below this line, the remainder of the letter is the same as originally filed.

- 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)

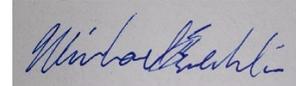
- (1) The specific reasons for each change.
See above for the three (3) primary reasons for change.
- (2) The total number of customers served by the utility.
Duquesne Light Company serves more than 600,000 customers.
- (3) A calculation of the number of customers, by tariff subdivision, whose bills 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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|---|---|
| <p><i>Carrie B. Wright, Prosecutor</i> <i>Bureau of Investigation & Enforcement</i> <i>Commonwealth Keystone Building</i> <i>400 North Street, 2nd Floor West</i> <i>P.O. Box 3265</i> <i>Harrisburg, PA 17105-3265</i> carwright@pa.gov</p> | <p><i>Ria M. Pereira, Esquire</i> <i>John Sweet, Esquire</i> <i>Lauren N. Berman, Esquire</i> <i>Pennsylvania Utility Law Project</i> <i>118 Locust Street</i> <i>Harrisburg, PA 17101-1414</i> <i>Counsel for Coalition for Affordable Utility Services and Energy Efficiency in PA (CAUSE-PA)</i> pulp@pautilitylawproject.org</p> |
| <p><i>Christy M. Appleby, Esquire</i> <i>Darryl Lawrence, Esquire</i> <i>David Evrard, Esquire</i> <i>Office of Consumer Advocate</i> <i>555 Walnut Street</i> <i>Forum Place, 5th Floor</i> <i>Harrisburg, PA 17101-1923</i> cappleby@paoca.org dlawrence@paoca.org devrard@paoca.org OCADuquesne2024@paoca.org</p> | <p><i>Robert A. Eberle, Esquire</i> <i>Amanda B. Bundick, Esquire</i> <i>Eberle & Bundick, LLC</i> <i>P.O. Box 44290 Pittsburgh, PA 15205</i> bob@eblaborlaw.com amanda@eblaborlaw.com <i>Counsel for Intervenor IBEW Local 29</i></p> |
| <p><i>Sharon E. Webb, Esquire</i> <i>Rebecca Lyttle, Esquire</i> <i>Office of Small Business Advocate</i> <i>555 Walnut Street</i> <i>Forum Place, 1st Floor</i> <i>Harrisburg, PA 17101</i> swebb@pa.gov relyttle@pa.gov</p> | <p><i>Derrick Price Williamson, Esquire</i> <i>Barry A. Naum, Esquire</i> <i>Steven A. Lee, Esquire</i> <i>Spilman Thomas & Battle, PLLC</i> <i>1100 Bent Creek Boulevard, Suite 101</i> <i>Mechanicsburg, PA 17050</i> dwilliamson@spilmanlaw.com bnaum@spilmanlaw.com slee@spilmanlaw.com <i>Counsel for Intervenor Walmart Inc.</i></p> |
| <p><i>Joseph L. Vullo, Esquire</i> <i>1460 Wyoming Avenue</i> <i>Forty Fort, PA 18704</i> jlvullo@bvrrlaw.com <i>Counsel for Pennsylvania Weatherization Providers Task Force</i></p> | <p><i>Kryisia M. Kubiak, City Solicitor</i> <i>Jesse I. Exilus, Deputy City Solicitor</i> <i>City of Pittsburgh Department of Law</i> <i>313 City-County Building</i> <i>414 Grant Street</i> <i>Pittsburgh, PA 15219</i> Kryisia.kubiak@pittsburghpa.gov Jesse.exilus@pittsburghpa.gov <i>Counsel for Intervenor City of Pittsburgh</i></p> |
| <p><i>Robert Knecht</i> <i>Industrial Economics, Incorporated</i> <i>5 Plymouth Road</i> <i>Lexington, MA 02421</i> rdk@indecon.com <i>Consultant for OSBA</i></p> | |

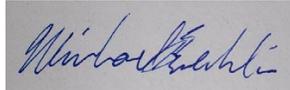
VIA EMAIL AND FIRST-CLASS
MAIL

David Anglero
5702 Hampton Street
Pittsburgh, PA 15206
daveanglero@gmail.com

Ronald T. Bernick
34 Lodge Street
Pittsburgh, PA 15227
Rbernick1970ss@gmail.com

Robert Nesmith
118 McGuire Street
New Brighton, PA 15066
rnesmith@outlook.com

Date: May 1, 2025



Michael Brechlin
Duquesne Light Company
411 Seventh Avenue, 15-7
Pittsburgh, PA 15219
Phone: 412-393-6431
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