Michael Brechlin
Assistant General Counsel, Regulatory

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

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

May 7, 2025

Via Electronic Filing

Mr. Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd
Floor400 North Street
Harrisburg, PA 17120

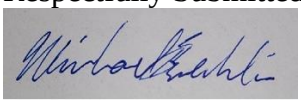
Re: Pennsylvania Public Utility Commission, et al. v.
Duquesne Light Company
Docket Nos. R-2024-3046523, et al.

Dear Secretary Homsher:

Enclosed for filing, please find a compliance filing filed in compliance with the Order of the Pennsylvania Public Utility Commission ("Commission") entered in the above-referenced proceeding on November 7, 2024 ("Rate Case Order"). In the Rate Case Order, the Commission stated that Duquesne Light was to consult with stakeholders to develop a Transportation Electrification evaluation plan and submit it to the PUC as a compliance filing within 6 months of settlement, pursuant to the Joint Petition for Approval of Settlement. A copy of the plan is attached.

Should you have any questions, please contact me.

Respectfully Submitted,



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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):

VIA EMAIL

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

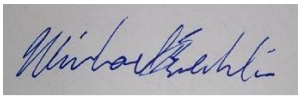
VIA EMAIL AND FIRST-CLASS MAIL

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 7, 2025



Michael Brechlin
Duquesne Light Company
411 Seventh Avenue, 15-7
Pittsburgh, PA 15219
Phone: 412-393-6431
Email: mbrechlin@duqlight.com

Transportation Electrification Portfolio Evaluation and Assessment Plan

April 2024

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Introduction

Duquesne Light Company (the "Company") hereby submits this Transportation Electrification (TE) Portfolio Evaluation and Assessment Plan ("Evaluation Plan"). pursuant to the *Joint Petition for Approval of Settlement Stipulation* ("Settlement"), approved in relevant part by the Pennsylvania Public Utility Commission by Order entered November 7, 2024 at Docket No. R-2024-3046523. The Company will include its TE Portfolio Evaluation and Assessment ("Evaluation Report") as part of its report on its TE programs in its next base rate proceeding filing.

Evaluation and Assessment Overview

The Evaluation Report will employ the following high-level structure: executive summary, TE Portfolio summary and goals, offering-by-offering evaluation methodology and results, and conclusion.

The Executive Summary will detail major TE Portfolio successes, challenges, key findings, and opportunities for improvement.

This section will be followed by a high-level summary of the TE Portfolio and the overarching goals of the Company's work.

The Company will provide a description of its work to target the equitable apportionment of its efforts so that they benefit customers across geographic and socio-economic lines.

Next, the Company will detail an offering-by-offering evaluation of the TE Portfolio. For each offering, the Company will provide an overview of the initiative, outline the initiative's objectives, and detail the initiative's evaluation methodology and evaluation results, including key findings.

Finally, the report will include a conclusion and identify key recommendations.

The Company may adjust offering implementation as it evaluates program[1] performance. Program adjustments will be discussed in the Evaluation Report.

Data Sources and Methodology

To produce its Evaluation Report, the Company will use a variety of data sources. Relying on a variety of data sources will enable the Company to assess offering results, but also to assess the program design and process which produced the results. Data sources will include:

Customer surveys

To assist with the evaluation, the Company will survey its customers to understand their views about electric vehicles (EVs) and assess the ways they have utilized Company provided resources. The Company will also interview or survey residential and commercial customers who participated in its program offerings to gain additional quantitative and qualitative insights.

[1] The term "program" is used throughout this report to generally signify pilot, educational resources, incentives, etc the Company offers to customers as part of its TE Portfolio.

Program materials, data, and tracking systems

The Company will share and evaluate the program materials it produced to educate customers and disseminate information about its offerings. Additionally, the Company will use information from its internal and relevant vendor systems to help inform analysis, such as project costs and timelines for key milestones, program enrollment levels, and program event participation and energy reduction. The Company will also leverage data from platforms like Google Analytics to report on website and program resources usage.

Company advanced metering infrastructure and billing data

The Company will use advanced metering infrastructure (AMI) and billing data to inform revenue and net project benefit calculations. AMI data will also be used to help validate charging station utilization data.

Charging station utilization data

For the stations installed through its Charging Infrastructure Offerings that are networked, the Company will collect and analyze this data, as available, to assess station use and produce load curves. This data will also help to identify usage differences among customer types (public, workplace, multi-family, fleet) and vehicle types (light, medium, and heavy-duty vehicles).

The Company anticipates that there may be gaps, errors, or potential inconsistencies in some of the charging station data. The Company will report on its data collection, verification and cleaning processes and identify notable data omissions in its Evaluation Report for charging station data and any other data sources as relevant.

Equitable Apportionment

The Company will target the equitable apportionment of its program budgets across geographic and socio-economic lines. The Company will include a section describing its efforts towards equitable apportionment of its TE Portfolio.

The Company has designated certain communities in its service territory as Electric Mobility Priority Areas, based on criteria including median family income, poverty rate, environmental vulnerability as determined by the PennEnviroScreen Composite Score, and more. The Company will target that 35% of the Community, Fleet & Transit Pilot will be in or serving Electric Mobility Priority Area projects. The Company will also evaluate its TE Portfolio's equitable apportionment from a range of other factors including:

- Urban, suburban and rural
- Inside or outside of the City of Pittsburgh
- County (Allegheny or Beaver)
- Use case (public, workplace, multi-family, fleet)

In its Evaluation Report, the Company will explain each factor used in assessing equitable apportionment, and how the corresponding data were assessed. It will also report on the number of charging projects and the portion of its Charging Infrastructure Offerings' budgets that was spent across each criterion.

Additionally, the Company will describe:

- Awareness, outreach and recruiting efforts to achieve equitable apportionment.
- Successes and challenges with achieving equitable apportionment.
- Lessons learned and recommendations for future efforts.

Evaluation Approaches

Below, the Company describes in detail its evaluation approach for each TE offering, including a summary of the offering, key objectives, contents of the evaluation, and key performance indicators (KPIs), targets, and data sources.

Awareness, Education and Engagement

Initiative Summary

Through its Awareness, Education, and Engagement (AEE) activity, the Company aims to increase customer awareness and adoption of EVs. The Company will provide online educational resources for customers and will hold and attend in-person and virtual events to educate customers about EVs and EV charging.

Although a range of factors will ultimately guide a customer's decision-making about purchasing an EV or installing charging infrastructure, the Company aims to be a trusted source for high-quality information that can help customers in that process.

Due to the often-difficult nature of assessing the direct impact of AEE activities, the Company will rely on surveys of customer attitudes about EVs, along with feedback of Company resources when possible.

Key Objectives

- Increase customer awareness of EVs and EV charging.
- Increase customer likelihood of EV adoption.
- Increased purchase and use of EVs.
- Increase customer awareness of publicly available incentives for EVs and EV charging.
- Be viewed as a trusted partner for our customers seeking information about EVs.
- Identify barriers that impede EV adoption among customers.

Evaluation Components

- Provide a description of AEE activities undertaken, including the target audience, channel, and results by year.
- Provide a budget breakdown by major categories by year.
- Provide a description of activities that were targeted toward low-income customers and/or Electric Mobility Priority Areas by year.
- Summarize annual customer EV survey results, including customer familiarity with EVs, likelihood of adoption, and adoption concerns.
- Describe key takeaways from customer feedback on Company-provided resources and events.

KPIs, Targets and Data Sources

In addition to the evaluation components described above, the Company has established and will report on the below metrics and targets.

KPI	2025 Target	2026 Target	2027 Target	Measurement/ Data Source
Customer familiarity of EVs	76%	80%	84%	Annual EV Customer Survey (Customer Panel)
Customers that agree DLC Has the Tools and Resources Needed to Make Informed Decisions about EVs	33%	36%	39%	Annual EV Customer Survey (Customer Panel)
Events Supported (virtual and in-person)	25	25	25	Tracked during offering administration
EV Guide Annual Views	50,000	60,000	72,000	Google analytics

Electric Fleet Advisory Service

The Company's Electric Fleet Advisory Service will provide customers with information to make the transition to EVs. The service will give the Company advanced intelligence about customers that are considering electrifying their fleet. It will also provide an opportunity for the Company to provide technical assistance to customers, including, where applicable, helping customers participate in the Fleet Charging Program.

Key Objectives

- Increase fleet customer awareness of cost-effective EV options.
- Increase the number of electric vehicles deployed by fleets.
- Help customers understand the total cost-of-ownership impacts from converting to electric.
- Help customers understand other impacts (environmental, operational) from converting to electric.
- Deepen Company knowledge of the operational considerations and impacts as fleets convert to electric.
- Gain advanced knowledge of potential charging installations to assist with grid planning.

Evaluation Components

- Report on the number of customers participating by year, including the type of entity.

- Report on the number of fleet vehicles evaluated and the number of vehicles identified as cost-effective to deploy as electric.
- Report on the estimated total cost of ownership savings by type of entity.
- Report on the estimated GHG savings from fleet conversions.
- Report, to the extent known, the number of EVs deployed by customers after participating in the advisory service.
- Report challenges, including operational and financial, customers faced when considering converting to electric vehicles and how the advisory service helped to address those challenges.
- Report on customer satisfaction with the advisory service.
- Provide a budget breakdown by year.

KPIs, Targets and Data Sources

In addition to the evaluation components described above, the Company has established and will report on the below KPIs and targets.

KPI	2025 Target	2026 Target	2027 Target	Measurement/ Data Source
Number of unique customers participating	18	18	18	Fleet assessments
Number of vehicles evaluated	500	500	500	Fleet assessments

EV Registration Incentive

The Company's EV Registration Incentive will enable the Company to know where EV customers live in its service territory and will help the Company to communicate with those customers. The survey customers complete when claiming the registration incentive will provide the Company with additional information about EV driving customers, including when they charge their vehicles, where they work, and the type of charging they have in their home. This information can help with grid planning and provide a deeper understanding of customer charging behavior.

Key Objectives

- Identify EV driving customers in the Company's service territory.
- Use EV registration incentive data to help communicate with EV-driving customers.
- Use EV registration incentive data to inform grid planning.

Evaluation Components

- Report the number of EV registration incentives claimed, including by year, Federal Poverty Level (FPL) ranges (based on voluntary customer responses), confirmed low-income, and CAP customers.

- Report aggregated information about registration incentive recipients, including geographic area, and zip code; and based on customer self-reporting, the time-of-day customers charge and the type of charging they have (Level 1 or Level 2).
- Report on customer feedback about the EV registration incentive, as data is available.
- Describe how EV registration data enabled the Company to reach EV driving customers.
- Describe how EV registration data helped to inform the Company's grid planning efforts.

KPI, Targets and Data Sources

In addition to the evaluation components described above, the Company has established and will report on the below KPI and targets.

KPI	2025 Target	2026 Target	2027 Target	Measurement/ Data Source
Incentives issued (cumulative)	20% of EVs in Company's service territory	20% EVs in Company's service territory	20% EVs in Company's service territory	Incentive data

Community, Fleet, & Transit Pilot

The Company's Community, Fleet, & Transit Pilot is designed to reduce cost and project management burden to customers, increase the charging infrastructure available to fleets and publicly available charging infrastructure at public parking facilities, workplaces and multi-family housing, and support Pittsburgh Regional Transit's (PRT) efforts to electrify its bus fleet. The pilot will also provide the Company with greater insight into customer challenges with installing charging infrastructure and fleet vehicle operations, along with a better understanding of project costs, revenue, and station usage.

Objectives

- Increase charging station installations serving fleet, public parking facilities, workplace, multi-family and transit customers.
- Increase charging station installations serving Electric Mobility Priority Areas.
- Reduce costs to participating customers.
- Reduce greenhouse gases and other air pollutant emissions.
- Understand the energy consumption and the incremental distribution revenue attributable to charging.
- Evaluate charging behavior by market segment.
- Better understand customer barriers to installing charging infrastructure.
- Use charging data to help inform grid planning.

Evaluation Components

For its evaluation of its Community, Fleet, & Transit Pilot, the Company will assess the degree of success of the pilot, along with the benefits and costs accrued to participating customers and the Company. For the evaluation, the Company will include the following evaluation components:

- Report on average/median project timelines for major project milestones, including by project phase:
    - Application review and agreement execution
    - Pre-construction
    - Construction and energization.
- Report on the number of charging ports enabled, including by:
    - Project status (Plant in Service, Activated, Installed, Energized, Make-Ready Complete)[2]
    - Station type (Level 1, Level 2, or Direct Current Fast Charging "DCFC")
    - County
    - Sites collocated with e-micromobility stations
    - Site host type (community, fleet, or transit)
    - Year
    - Census tract
    - Five-digit zip code
    - Electric Mobility Priority Area
- Report on charging station usage, by site host type (community, fleet, or transit), when data are available, including:
    - Total Number of charging sessions
    - Total amount of energy (kWh) dispensed
    - Average number of sessions per day
    - Average kWh per charging session
    - Estimated environmental impacts from charging station usage, including reductions in GHG emissions and other air pollutants
- Report on incremental Company distribution revenues from charging stations[3], including by:
    - Site host type (community, fleet, or transit)
    - Rate class
- Report on charging station infrastructure installation costs, by site host type (community, fleet, or transit), including by:
    - Year
    - Project status
    - Average cost per site
- Average cost per port Report on overall Charging Program costs by major categories.
- Report the number of charging station rebates issued, including by (community, fleet, or transit).

[2] A completed project status of 'Plant in Service' means that the charging stations are online and usable, and the Company's make-ready asset has been placed in use for the purpose of accounting. A completed project status of 'Activated' means that the charging stations are online and usable, but the Company's make-ready asset has not yet been placed in use for the purpose of accounting. A completed project status of 'Installed' means that the charging stations are in place but have not been activated by the network service provider. A completed project status of 'Energized' means that the make-ready infrastructure has been installed and electricity service has been activated but the customer has not yet installed their charging stations. A completed project status of "Make-Ready Complete" means that the make-ready infrastructure has been installed but the electricity service has not been activated.
[3] Only applicable to stations built as part of the Company's make-ready ownership pathway.

- Produce EV charging load curves, including size and timing of peak, and average load shape by site host type (community, fleet, or transit).
- Describe how charging data has helped inform grid planning.

KPIs, Targets and Data Sources

In addition to the evaluation components described above, the Company has established and will report on the below KPIs and targets.

KPIs	2025 Target (ports)	2026 Target (ports)	2027 Target (ports)	Measurement/ Data Source
Plant in Service Installations	150	175	175	Program materials, data, and tracking systems
% of Projects in or serving EMPA	35%	35%	35%	

Managed Home Charging Pilot

The Company's Managed Home Charging Pilot is designed to increase EV adoption and throughput while encouraging off-peak charging to mitigate increased peak demand. The pilot will provide the Company insights into customer response to, administration of, and efficacy of active load management solutions, allowing it to leverage data to help inform its on-going load management strategy.

Objectives

- Assess degree to which EV managed charging can be a reliable and meaningful load management asset for the grid.
- Assess customer participation and response to incentives.
- Compare customer experience, participation, and response to incentives with the other load management pilots addressed in this evaluation plan.
- Assess the ability of technological devices to successfully manage charging reductions and the use of a third-party platform to keep customers informed of their progress.

Evaluation Components:

- Report on the number of customers who enrolled, including by:
  - Year and month
  - Census tract
  - Five-digit zip code
  - Vehicle type (i.e., BEV vs. PHEV)
  - Technology pathway (charging station, vehicle, etc.)
  - Household income
- Report on the event participation, including by:
  - Event
  - Technology pathway
  - Vehicle Type
  - Device status

- Report on the event impact, including by:
  - Event
  - Device
  - Customer vs. Control group
  - Vehicle Type
- Produce EV charging load curves, including average hourly load shapes by:
  - Household
  - Rate Class
  - Season
  - Weekday/Weekend
- Report on total dollar amount of incentives provided by year.
- Report on customer satisfaction with the Pilot.
- Report on success directly managing charging through end-devices. Describe any challenges encountered and how they were addressed.
- Report on success of leveraging a third-party platform to enroll, facilitate customer participation, and keep customers informed of progress. Describe any challenges encountered and how they were addressed.
- Report on differences in impact between participants and control group.

KPIs, Targets and Data Sources

In addition to the evaluation components described above, the Company has established and will report on the below KPIs and targets.

KPIs	2025 Target	2026 Target	2027 Target	Measurement/ Data Source
Number of customers enrolled	50	150	200	Program materials, data, and tracking systems
Number of events called	4	10	10	
% of customers reporting being satisfied or greater with the pilot program	80%	80%	80%	Pilot participant survey

EV TOU Distribution Rate Pilot

The Company's EV TOU Distribution Rate Pilot is designed to encourage off-peak charging to mitigate increased peak demand. The pilot will provide the Company insights into customer response to, administration of, and efficacy of passive load management solutions, allowing it to leverage data to help inform its on-going load management strategy.

Objectives

- Assess degree to which an EV TOU Distribution Rate can be a reliable and meaningful load management asset for the grid.
- Assess customer participation and response to rate price signals.

- Compare customer experience, participation, and response to incentives with the other load management pilots addressed in this evaluation plan.

Evaluation Components:

- Report on the types of customers who enrolled, including by:
  - Rate class
  - Year
  - Census tract
  - Five-digit zip code
  - Vehicle type (i.e., BEV vs. PHEV)
  - Household income
- Report on customer impacts and behavior by:
  - EV drivers enrolled in rate
  - EV drivers not enrolled in rate
- Report on net customer bill impacts as compared to the standard distribution rate by:
  - Rate class
- Report on energy usage shifted from on-peak hours (for those customers for whom the Company has sufficient historical usage data) from pre- to post-enrollment by:
  - Rate class
  - Supply rate type enrollment (EGS, POLR, WholeHome, etc.).
- Produce EV charging load curves, including average load shape by:
  - Household
  - Rate Class
  - Season
  - Weekday/Weekend
- Report on customer satisfaction with the Pilot
- Report on customer usage of pre-enrollment tools
- Report on customer interaction with post-enrollment behavioral load shaping communications
- Describe how pilot results have been used to estimate longer-term grid impacts and benefits

KPIs, Targets and Data Sources

In addition to the evaluation components described above, the Company has established and will report on the below KPIs and targets.

KPIs	2025 Target	2026 Target	2027 Target	Measurement/ Data Source
Participants	300	425	675	Program materials, data, and tracking systems
Share of energy consumed by participants during off-peak periods	65%	65%	65%	
Customer Satisfaction – % of	80%	80%	80%	

customer reporting being satisfied or greater with the pilot program				