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November 12, 2025

Via Electronic Filing

Mr. Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd
Floor 400 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 documentation of a DLC training program. This procedure is being 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"). The procedure was approved and implemented February 24, 2025, but due to an oversight, it was not filed in this Docket at the time. It is now being filed pursuant to Paragraph 83 of the settlement agreement.

Should you have any questions, please contact me or Jamie Profaizer, Senior Manager of Credit Field Operations, at 412-393-6376 or jprofaizer@duqlight.com.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Michael Brechlin", is placed over a grey rectangular background.

Michael Brechlin
Assistant General Counsel, Regulatory

Enclosures

Cc: Certificate of Service
Procedures for Field Employees on site when Disconnecting Power at Residential Premises.pdf

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:

<p><i>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</i></p>	<p><i>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</i></p>
<p><i>Christy M. Appleby, Esquire Darryl Lawrence, 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</i></p>	<p><i>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</i></p>
<p><i>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</i></p>	<p><i>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.</i></p>
<p><i>Joseph L. Vullo, Esquire 1460 Wyoming Avenue Forty Fort, PA 18704 jlvullo@bvrrlaw.com Counsel for Pennsylvania Weatherization Providers Task Force</i></p>	<p><i>Jesse I. Exilus, Deputy City Solicitor City of Pittsburgh Department of Law 313 City-County Building 414 Grant Street Pittsburgh, PA 15219 Jesse.exilus@pittsburghpa.gov Counsel for Intervenor City of Pittsburgh</i></p>
<p><i>Robert Knecht Industrial Economics, Incorporated 5 Plymouth Road Lexington, MA 02421 rdk@indecon.com Consultant for OSBA</i></p>	

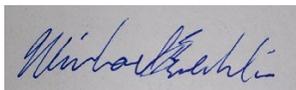
VIA EMAIL AND FIRST-CLASS MAIL

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DATE: November 12, 2025

A rectangular box containing a handwritten signature in blue ink, which appears to read "Michael Brechlin".

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Procedures for Field Collections Employees on-site when Disconnecting Service at Residential Customer Premises:

Contact attempt immediately prior to termination

Post-termination notice delivery



Process Description

1.0 Process Overview

A. Process Objective

This process describes the contact attempt procedures completed by field collections employees who are on site at a residential customer premise to perform a service disconnection for non-payment immediately prior to disconnecting service as well as the steps to ensure the customer has been provided critical information related to the service disconnection by delivering the post-termination notice. Any time a field employee is at a residential customer's property to disconnect power for non-payment, they must attempt to make personal contact with the customer and notify the customer of the reason for their visit. If evidence is presented which indicates that payment has been made, a serious illness or medical condition exists, or a dispute or complaint is properly pending, then termination will not occur. Additionally, field employees must deliver a post termination notice to a responsible adult.

Successful completion of this process will result in the customer being notified of the pending or completed service termination as well as provided details on how to restore service including a notice regarding emergency medical condition support. The safe execution of all documented process steps by the field personnel will be documented in DLC's systems. The Company will hold customers accountable for delinquent balances and prompt payment.

B. Process Scope

This process covers the actions a field collections employee takes when on site at a residential customer premise to perform a service disconnection for non-payment field activity. The employee must attempt to make personal contact with a responsible adult at the customer's residence to notify them of the reason for their visit and deliver the appropriate notice to the adult occupant. If evidence is presented which indicates that payment has been made, a serious illness or medical condition exists, or a dispute or complaint is properly pending, then termination will not occur. A post-termination notice including the reason for service disconnection, the requirements to have the service restored, and an emergency medical notice is either conspicuously posted or delivered to a responsible adult person or occupant at the residence of the customer at the affected premise. The field activity will either be completed by the field collections employee after disconnecting the service or dispositioned by the Scheduler if evidence is presented to avoid or defer the service disconnection.

C. Regulatory Requirements

56.94. Procedures immediately prior to termination
56.96. Post-termination notice

D. Process Steps

#	Description	Responsible Group	System / Interface
1.0	Attempt to knock on front door: An employee on site to disconnect service for non-payment must attempt to knock on the front door, specific apartment number door or unit door. If the customer's premise is an apartment building with no access to the apartment unit's front door, proceed to step 1a, otherwise proceed to step 2.	Field Collections	NA
1a.	Attempt to gain access through apartment building: For an apartment complex or building with multiple units, the employee will attempt to gain access through the main building doors to access	Field Collections	NA

Process Description

#	Description	Responsible Group	System / Interface
	the apartment number or unit door for the contact attempt. If access to the front door is gained, complete step 1. If not, proceed to step 1b.		
1b.	Attempt to call customer's phone: The employee will place a phone call to the customer if possible. Customer contact information can be found on the Field Activity in the MCP. If contact is made with the customer, proceed to step 2c. If no contact is made, proceed to step 1c.	Field Collections	MCP
1c.	Visit apartment building office and deliver post-termination notice. The notice may be left with front office in care of the customer (if applicable) or the notice may be left on the main building door. Proceed to step 3.	Field Collections	NA
2.0	<p>Making Contact at the door: If contact is made with an adult occupant at the door, Explain reason for visit and provide post-termination notice to the adult occupant.</p> <p>If only a minor is home, proceed to step 2a.</p> <p>If evidence is presented by the customer which indicates that payment has been made, a serious illness or medical condition exists, or a dispute or complaint is properly pending, then termination will not occur. Employee will tell the customer that the service will not be immediately disconnected. Proceed to step 4 to contact Scheduling.</p> <p>If no evidence has been provided by the customer that would prevent service disconnection, proceed to step 3.</p> <p>If no one answers the door after an attempt to make contact by knocking on the door has been made, proceed to step 2b.</p>	Field Collections	NA
2a.	Ask when an adult will be present and contact Scheduling. The employee will inquire when an adult will be present. Termination will not occur, and no notice will be provided. Employee will proceed to step 4 to contact Scheduling.	Field Collections	NA
2b.	Post the post-termination notice on the door. It is to be folded for confidentiality and placed into a plastic door hanger. Proceed to step 3.	Field Collections	NA
2c.	If employee reaches the customer by phone, the employee will notify the customer of the reason for the visit and inform the customer we are leaving a posting explaining the actions the customer needs to take and the location where the posting can be located.	Field Collections	MWM/MCP

Process Description

#	Description	Responsible Group	System / Interface
	If evidence is presented which indicates that payment has been made, a serious illness or medical condition exists, or a dispute or complaint is properly pending, then termination will not occur. Employee will tell the customer that the service will not be immediately disconnected. Employee will contact Scheduling to disposition the field activity appropriately. Proceed to step 4.		
3.0	<p>Employee will issue the remote command to complete the Field Activity and notate where they left the post-termination notice if applicable using a Remark Type:</p> <ul style="list-style-type: none"> - Posted-Delivered to Adult Occupant - Posted-Front Door - Posted-Other (requires a Comment with the specific location the posting was left) <p>Additionally, if the employee contacted the customer by phone the employee will document the number called and that personal contact was made by phone. This completes the process.</p>	Field Collections	CCB/MWM/MCP/RCD Smart Essentials
4.0	<p>Contact Scheduling by calling (412-393-4388) and notify the Scheduler of the actions taken. Advise that the customer presented evidence to cancel or defer the service termination if applicable. Scheduler will review account and either hold or cancel the Field Activity or advise employee to proceed with issuing the remote disconnect command and complete the field activity in the MCP. This completes the process.</p>	Field Collections Scheduling	CCB/MWM/MCP/RCD Smart Essentials

E. Dependencies

Only trained field collections employees will carry out this procedure. This procedure is trained to employees new to position in the Field Collections Position Overview Training during their first week in the role. It is also trained at least twice annually during Spring Field Collections Procedures training held between March and April and Winter Field Collections Procedures training held between October and November.

F. Definitions

CCB – stands for Customer Care and Billing and refers to the customer information system

MCP – stands for Mobile Computing Platform including Portable electronic devices having hardware and software capabilities to execute typical desktop and Web applications. Examples include laptop computers, tablets, and netbooks.

MWM – stands for Mobile Workforce Management (MWM) refers to the tools and software used to manage remote, field, and other employees who work via mobile device.

G. Document Control

Date	Version	Description of Change	Changed By
10/14/2024	1.0	Initial Creation	██████████
2/14/2025	2.0	Refined for clarity, added training schedule to dependencies section and process flow diagram	██████████ ██████████

Process Description

Date	Version	Business Process Owner Approval	Department
10/14/2024	1.0	[REDACTED]	Credit & Collections
02/24/2025	2.0	[REDACTED]	Credit Field Operations

Process Flow Diagram:

Procedures for Field Employees on site when Disconnecting Power at Residential Premises

