



March 9, 2026

**Via E-Mail Only**

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

**Re: Duquesne Light Company's Customer Outreach & Education Plan Annual Update:  
March 1, 2026, Docket No. M-2019-3008227**

***Letter of the Coalition for Affordable Utility Services and Energy Efficiency in  
Pennsylvania (CAUSE-PA) in Response to DLC's Compliance Filing***

Dear Secretary Homsher:

CAUSE-PA, through its counsel at the Pennsylvania Utility Law Project, submits this letter in response to Duquesne Light Company's (DLC's or the Company's) compliance filing, which contains its Customer Outreach & Education Plan Annual Update: March 1, 2026.<sup>1</sup> This compliance filing was submitted by DLC on February 27, 2026, pursuant to the Pennsylvania Public Utility Commission's ("Commission") Order entered April 14, 2022, at this docket, which directed the

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<sup>1</sup> Duquesne Light Company's Customer Outreach & Education Plan Annual Update: March 1, 2026, PUC Docket No. M-2019-3008227 (filed Feb. 27, 2026), <https://www.puc.pa.gov/pcdocs/1916211.pdf> (hereinafter, DLC's CEOP 2026). Note that the file name for DLC's CEOP 2026 was labeled: "Act 129 Marketing Plan Compressed.pdf." We presume this was an error, and that DLC's CEOP 2026 is not the same as DLC's Act 129 Marketing Plan.

Company to file annual updates to its Universal Services Customer Education and Outreach Plan CEOP.<sup>2</sup>

DLC indicates that its filing is an outline of key highlights of the Company's 2025 efforts and a presentation of their proposed plans for 2026. The DLC filing reads largely as a brochure-style overview of the Company's outreach materials and activities. It includes an announcement about their New Customer Assistance Program Booklet, examples of their Outreach Event Table Sign, Outreach Poster, QR codes, and an overview of its Community Events with photos.<sup>3</sup> DLC also provided a summary of the eligibility and contents of the Income Eligible Customer Kit, which it asserts was designed to help reduce customer energy usage and improve efficiency in their homes.<sup>4</sup>

CAUSE-PA is concerned, however, that DLC's filing is not a CEOP as required by Commission Order. For example, the filing does not provide specific or measurable outreach activities or goals for the coming year, nor does it contain any performance metrics or an evaluation framework to assess whether the described activities are effectively increasing customer awareness or participation in available programs.

CAUSE-PA notes that the Company briefly states that its aspirational goal for 2026 is to "expand outreach event participation and energy-efficiency education while deepening community engagement and driving higher program enrollment."<sup>5</sup> We are concerned that this statement does not include measurable benchmarks. For example, the Company should, at a minimum, identify: (1) a target number of outreach events to be conducted in 2026; (2) a goal for the number of customers directly engaged through these events; and (3) a measurable target for increased enrollment in Act

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<sup>2</sup> Order on Duquesne Light Company's Proposed 2020–2025 Universal Service and Energy Conservation Plan, PUC Docket No. M-2019-3008227, Order (Apr. 14, 2022), <https://www.puc.pa.gov/pdocs/1741465.pdf> (hereinafter April 14 2022 Order) at 52.

<sup>3</sup> DLC's CEOP 2026 at 3-7.

<sup>4</sup> *Id.* at 8.

<sup>5</sup> *Id.* at 6.

129 energy-efficiency programs attributable to outreach activities beyond the distribution of their Kits.

CAUSE-PA is also concerned that the Company does not describe their proposed communications strategy. For example, they do not provide updates on their use of bill inserts, email, text message, social media, direct mail or community partner communications. A clear communication strategy is particularly important for reaching low income households and other customers who may not attend in-person outreach events and may not have access to the same technology and communication tools available to higher income households. We encourage the Company to include more detailed outreach strategies that identify specific customer segments and describe how communications will be tailored to reach those groups.

In addition, the Company should include a timeline for implementation and reporting, such as quarterly tracking outreach activities and program enrollment outcomes that they can report at its Income Eligible Advisory Group meetings. Establishing these types of measurable benchmarks would make the Company's goals more specific and allow for clearer evaluation of whether the outreach efforts are successfully increasing customer awareness and participation in the Company's programs.

While CAUSE-PA appreciates that DLC created a Customer Assistance Program booklet that consolidates the Company's offerings into a single guide, accessible in print and online,<sup>6</sup> we maintain that the creation of a unified booklet is not, alone, a CEOP without a clear and measurable plan for distributing the resource.

The Company's filing also highlights several outreach activities conducted throughout 2025, including participation in 104 community outreach events across Allegheny and Beaver counties and

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<sup>6</sup> Id. at 3.

distributing 8,556 energy-efficient measures to local residents.<sup>7</sup> The Company does not describe what “participation” entails – nor does it define what the Company means by the “energy-efficient measures” it reports distributing to local residents, as it is unclear whether these refer to the Income Eligible Customer Kits or other types of energy efficiency measures. The Company gives a list of community events that they participated in during 2025, which demonstrate the Company’s efforts to engage directly with customers and increase awareness of available programs.

CAUSE-PA regards the Company’s continued participation in community events across its service territory as a positive step, and we are encouraged to see the inclusion of several photographs depicting community outreach activities. However, we recommend the Company report additional information, including the number of customers directly engaged at each event, the event locations, the target customer groups, whether the outreach resulted in customer enrollment in programs or other measurable outcomes, and brief photo captions. These details would offer helpful context and allow stakeholders to better understand the Company’s approach to outreach and offer informed recommendations for improvement. In turn, we strongly recommend that DLC revise its CEOP to outline its plans for engagement in the coming year. Overall, CEOPs should be more forward looking and identify the Company’s proposed plans for future outreach efforts, rather than serving primarily as a retrospective account of past activities.

The absence of necessary details, such as specific and measurable outreach goals and objectives, a defined communications strategy, and a timeline for implementing and reporting, makes it difficult to assess whether the Company’s proposed activities will meaningfully advance the Company’s stated goals for expanding outreach, education, and program enrollment. We recommend the Commission direct DLC to develop a fully articulated CEOP that provides further details on its

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<sup>7</sup>Id. at 6.

outreach and education plans for the coming year and clearly articulates DLC's proposal to both identify target communities and perform robust outreach and education across communities it serves. CAUSE-PA recommends that the Commission direct DLC to revise its filing to include a formalized priority to continue to work collaboratively with the diverse members of its Income Eligible Advisory Group and coordinate with community-based organizations that serve low income households.

Respectfully Submitted,

*Counsel for CAUSE-PA*



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Lauren N. Berman, Esq., PA ID: 310116  
Elizabeth R. Marx, Esq., PA ID: 309014  
Patrick M. Cicero, Esq., PA ID: 89039  
Ria M. Pereira, Esq., PA ID: 316771  
John W. Sweet, Esq., PA ID: 320182

**Pennsylvania Utility Law Project**

118 Locust Street  
Harrisburg, PA 17101  
Tel.: 717-236-9486  
[PULP@pautilitylawproject.org](mailto:PULP@pautilitylawproject.org)

CC: *Certificate of Service*  
*Joseph Magee, BCS, [jmagee@pa.gov](mailto:jmagee@pa.gov)*  
*Jennifer Johnson, BCS,*  
*Louise Fink-Smith, Esq., Law Bureau, [finksmith@pa.gov](mailto:finksmith@pa.gov)*

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Duquesne Light Company Universal : Docket No. M-2019-3008227  
Service and Energy Conservation Plan  
for 2020-2025

**CERTIFICATE OF SERVICE**

I hereby certify that I have, on this day, served copies of the **Letter of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

**VIA EMAIL**

Michael Brechlin, Esq. Duquesne Light Company 411 Seventh Avenue, 15-7 Pittsburgh, PA 15219 <a href="mailto:mbrechlin@duqlight.com">mbrechlin@duqlight.com</a>	Scott B. Granger, Esq. Bureau of Investigation & Enforcement Commonwealth Keystone Building 400 North Street, 2nd Floor West PO Box 3265 Harrisburg, PA 17105 <a href="mailto:sgranger@pa.gov">sgranger@pa.gov</a>
Christy Appleby, Esq. Office of Consumer Advocate 555 Walnut Street, Fifth Floor Harrisburg, PA 17101 <a href="mailto:cappleby@paoca.org">cappleby@paoca.org</a>	Rebecca Lyttle, Esq. Office of Small Business Advocate 555 Walnut Street, 1st Floor Harrisburg, PA 17101 <a href="mailto:rlyttle@pa.gov">rlyttle@pa.gov</a>

Respectfully Submitted,

**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



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Lauren N. Berman, Esq., PA ID: 310116  
118 Locust Street  
Harrisburg, PA 17101  
(717) 236-9486  
[PULP@pautilitylawproject.org](mailto:PULP@pautilitylawproject.org)

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