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March 16, 2026

Via Electronic Filing

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

**RE: Petition of FirstEnergy Pennsylvania Electric Company for Approval of its
Default Service Program for the Period June 1, 2027 to May 31, 2031
Docket No. P-2026-3060298**

Dear Secretary Homsher:

Enclosed for filing please find Duquesne Light Company's Petition to Intervene in the above-referenced matter.

Copies of this filing have been served in accordance with the attached Certificate of Service. Thank you for your attention to this matter, and if you have any questions, please feel free to contact me.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Aron J. Beatty', is written over a light blue horizontal line.

Aron J. Beatty, Esq.
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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):

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Date: March 16, 2026



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of FirstEnergy Pennsylvania
Electric Company for Approval of Its Default : Docket No. P-2026-3060298
Service Program for the Period June 1, 2027 to
May 31, 2031

**DUQUESNE LIGHT COMPANY
PETITION TO INTERVENE**

Pursuant to 52 Pa. Code. §§ 5.71-5.76, the Duquesne Light Company (“Duquesne Light”) files this Petition to Intervene in the Petition of the FirstEnergy Company of Pennsylvania (FirstEnergy PA) for approval of its Default Service Program for the Period of June 1, 2027 through May 31, 2031 (Petition). As discussed herein, the Pennsylvania Public Utility Commission (Commission) should permit Duquesne Light, the Commission-approved default service provider of its service territory under the Public Utility Code and Commission’s regulations, to intervene in this proceeding.

Recent price increases in the wholesale market have placed heightened awareness on customer affordability. FirstEnergy PA has proposed several modifications in its DSP that are matters of first impression to the Commission. Importantly, FirstEnergy PA’s default service schedule is on a different four-year cycle from *all other major electric utilities*. As such, issues raised for the first time in this proceeding will likely not be addressed by other utilities for an additional two years. Duquesne Light’s participation in this proceeding, at this time, will help to ensure that the Commission has a complete and timely record of the issues that are affecting all Pennsylvanians today.

I. BACKGROUND

1. On February 3, 2026, FirstEnergy PA filed its DSP Petition for the upcoming four-year period beginning June 1, 2027. The FirstEnergy PA Petition proposes major modifications to the interaction of retail shopping with default service. FirstEnergy PA proposes to modify the consent requirement for customers taking electric service from an Electric Generation Supplier. See, FirstEnergy PA St. 1 at 20-23.

2. Specifically, under the Petition, FirstEnergy PA proposes changes that would require EGSs to return residential customers to default service at the conclusion of their fixed duration contracts, unless that customer provides affirmative consent to remain with the EGS. FirstEnergy PA St. 1 at 20-21.

3. The Petition further proposes a new requirement that residential customers must “provide an attestation of affirmative consent” every quarter to be served by variable-priced month-to-month products. FirstEnergy PA St. 1 at 23.

4. In addition, FirstEnergy PA has also included a new proposal to address abuses of its Purchase of Receivable (POR) program required for consolidated billing. Throughout DSP VII, FirstEnergy PA would require that EGSs wanting to receive the benefits of consolidated billing, use “rate ready billing” and charge a rate that is at or below the PTC at the time of enrollment. FE PA argues that this will reduce FE PA’s and customers’ exposure to unreasonable and excessive EGS-driven write-offs. FirstEnergy PA St. 1 at 27.

5. Duquesne Light submits that these provisions have the potential to provide substantial affordability benefits to customers, and should be considered in the context of default service throughout the entire Commonwealth.

6. Duquesne Light is a public utility as defined under Section 102 of the Public Utility Code, 66 Pa. C.S. § 102, certificated by the Commission to provide electric service in the City of Pittsburgh and in Allegheny and Beaver Counties in Pennsylvania.

7. Duquesne Light is the Commission-designated Default Service Provider for its service territory.

8. Duquesne Light is represented in this matter by the following counsel:

Aron J. Beatty
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Duquesne Light requests that the Commission and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders and any documents issued in this proceeding on counsel for Duquesne Light at the above address. Duquesne Light requests that such service be made via electronic mail.

II. PETITION TO INTERVENE

9. Duquesne Light Company respectfully requests that it be granted intervenor status in this proceeding. Duquesne Light provides default service to over 440,000 residential customers. The proposed affordability provisions have applicability throughout the state, as all customers in Pennsylvania are subject to recent increases in wholesale energy costs.

10. The Commission's regulations at 52 Pa. Code. § 5.72 provide in relevant part:

(a) *Persons*. A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

(1) A right conferred by statute of the United States or of the Commonwealth.

(2) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.

(3) Another interest of such nature that participation of the petitioner may be in the public interest.

...

11. Duquesne Light has an ongoing issue of ensuring affordability for its customers.

This interest is “of such nature that participation of the petitioner may be in the public interest” under 52 Pa. Code. § 5.72(a)(3). As discussed above, FirstEnergy is under a different DSP timetable than Pennsylvania’s other major electric utilities. Duquesne Light’s currently approved default service plan expires on May 31, 2029.

12. The FirstEnergy PA Petition directly affects Duquesne Light’s interests in several respects, and the Commission’s action on the Petition may set a binding precedent on Duquesne Light in its future default service filings.

13. Duquesne Light’s participation also serves the public interest as it has extensive experience and industry knowledge that may assist in the development of a complete record on the reasonableness and prudence of programs proposed in the FirstEnergy Petition.

14. Duquesne Light reserves the right to address these issues and any others that may arise throughout the course of this proceeding.

15. Duquesne Light’s interests in this proceeding differ from those of all other parties, and cannot be adequately represented by any other party to the proceeding.

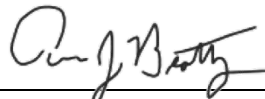
16. Duquesne Light’s intervention in this proceeding is in the public interest. Duquesne Light is the Commission-designated default service provider in its service territory. As a default service provider, Duquesne Light’s participation will contribute to the development of the record in this matter regarding the important consumer protections that have been

proposed by FirstEnergy PA. Duquesne Light therefore respectfully requests that the Commission grant its intervention in this proceeding.

III. REQUESTED RELIEF

WHEREFORE, for all of the foregoing reasons, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission grant its intervention in this proceeding as discussed herein.

Respectfully Submitted,



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Dated: March 16, 2026

VERIFICATION

I, C. James Davis, Director, Rates, Energy Procurement and Federal/RTO Affairs for Duquesne Light Company, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and that I expect that Duquesne Light Company will be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S § 4904 related to unsworn falsification to authorities.

C. James Davis

Dated: March 16, 2026