



Michael Brechlin
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March 31, 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 Duquesne Light Company for the Implementation of Automatic
Enrollment for LIHEAP Recipients in Customer Assistance Program
Docket Nos. R-2024-3046523
P-2026-_____**

Dear Secretary Homsher:

Enclosed for filing, please find the Petition of Duquesne Light Company for Approval to Automatically Enroll Eligible LIHEAP Recipients in its Customer Assistance Program.

Should you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

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

Michael Brechlin
Assistant General Counsel,
Regulatory

Enclosure

cc: Certificate of Service (w/ Enclosure)

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of §1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

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DATE: March 31, 2026



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Duquesne Light Company for
the Implementation of Automatic Enrollment
for LIHEAP Recipients in Customer Assistance
Program** : **Docket Nos.
R-2024-3046523
P-2026-_____**

**PETITION OF DUQUESNE LIGHT COMPANY
FOR APPROVAL TO AUTOMATICALLY ENROLL ELIGIBLE LIHEAP
RECIPIENTS IN ITS CUSTOMER ASSISTANCE PROGRAM**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Pennsylvania Public Utility Commission’s (Commission) November 7, 2024 Order approving the Duquesne Light Company’s (Duquesne Light or Company) base rate settlement¹, Duquesne Light hereby petitions the Commission for approval of the attached Customer Assistance Program (CAP) enrollment modifications. For the reasons set forth below, Duquesne respectfully requests that the Commission approve its proposal as described herein and in the appended attachment.

I. INTRODUCTION

1. Duquesne Light is a public utility as the term is 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. Duquesne Light is also an electric distribution company (“EDC”) and a default service provider as those terms are defined under Section 2803 of the Public Utility Code. 66 Pa.C.S. § 2803. Duquesne Light provides electric distribution service to over 600,000 customers.

¹ *Pa PUC v. Duquesne Light Company*, Docket No. R-2024-3046523, (Order entered on November 7, 2024) (“Rate Case Order”).

2. Duquesne Light's attorneys are:

Aron J. Beatty, Esq.
Counsel, Regulatory
Michael Brechlin, Esq.
Assistant General Counsel, Regulatory
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Duquesne Light's attorneys are authorized to receive all notices and communications regarding this proceeding.

3. In 2024, Duquesne Light and the parties to its base rate proceeding entered into a settlement. The Commission approved the settlement in its *Rate Case Order*, on November 7, 2024.

4. Paragraph 53 of the settlement contained the following provision:

DLC agrees to hold at least one meeting with its IEAG to obtain feedback about the use of DHS LIHEAP data for purposes of autoenrollment into CAP. DLC will file a Petition that includes amended budget projections, identifies a proposed process and timeframe for autoenrollments, and propose any amendments to its USECP which are necessary to facilitate autoenrollments within one-year after the effective date of rates in this proceeding

See, *Pa. PUC v. Duquesne Light Company*, Docket No. R-2024-3046523 (Recommended Decision of Administrative Law Judge Mark A. Hoyer issued October 1, 2024 at 22) (*Rate Case R.D.*).

5. Pursuant to the settlement the Company addressed the issues contained in Paragraph 53 in its IEAG collaboration process. Stakeholders were given the opportunity to provide feedback about the use of LIHEAP data for purposes of auto enrollment into CAP. Feedback was received and considered for implementation of the proposed autoenrollment procedures contained herein.

II. DUQUESNE LIGHT COMPANY'S PROPOSED CAP ENROLLMENT MODIFICATIONS

A. OVERVIEW OF THE PROPOSED AUTOMATIC ENROLLMENT PROCEDURES

6. Duquesne's automatic enrollment plan is attached hereto and marked as "Exhibit 1".

7. The Company will receive data files from DHS with information from LIHEAP grant recipients who have consented to share data.

8. The Company will identify customers upon receipt of the DHS LIHEAP data file and determine which are not currently enrolled in CAP. Eligible customers with an outstanding current balance equal to or greater than \$250 will be automatically enrolled in CAP, while eligible customers with a balance less than \$250 will be offered enrollment through a consent-based, streamlined process. The Company will refer to this streamlined process as expedited enrollment.

9. Eligible customers will receive communication from the Company based on which enrollment path they are on. Customers in the autoenrollment path will receive information about CAP and an opportunity to opt-out of enrollment within 30 days. Customers in the expedited enrollment path will receive information about CAP and how to provide consent to enroll via written, verbal, phone, or electronic authorization.

10. The Company will collaborate with its Income Eligible Advisory Group to obtain feedback on customer-facing communications associated with this process.

11. Additionally, the Company has included a process to use the LIHEAP data to automatically recertify income for customers who are already enrolled in CAP, and identify and contact customers who have defaulted from CAP and may be eligible for reinstatement.

12. Further details are contained in Exhibit 1.

B. PROPOSED TIMELINE AND BUDGET IMPACTS

13. The Company requests permission to implement auto-enrollment and expedited enrollment for customers who have opted to share their household income through the LIHEAP data sharing process, based on income received within the past 12 months. Enrollment will occur in two phases. Initially, the Company will manually enroll eligible accounts within 30 days of receiving the shared data from DHS, using a designated report. Beginning 180 days following approval of the petition, the Company will transition to a fully automated process, allowing the system to complete enrollments without manual intervention.

14. The Company currently conducts direct outreach via phone to advise eligible customers who have received a LIHEAP grant and are not enrolled in CAP that they are eligible.

15. Under the Rate Case Order paragraph 53, the Company was required to include amended budgeted projections based on this filing. The table below reflects only the recently filed Universal Services budget for 2026 and 2027, submitted under Docket No. M-2019-3008227, and includes the projected program increase based on estimates using LIHEAP data-share files the Company has already received, along with an assumption of 100% enrollment for customers with outstanding balances of \$250 or greater:

Year	USECP Filed Budget	CAP Budget Increase	Total Est. USECP Budget
2026	\$60,272,887	\$1,130,734	\$61,403,621
2027	\$62,986,088	\$1,130,734	\$64,116,882

16. The Company developed the attached plan with the feedback of IEAG members pursuant the 2024 rate case settlement, paragraph 53. Importantly, CAUSE-PA developed the primary testimony on this issue in the underlying rate case. *Rate Case R.D.* at 70. Duquesne Light has worked extensively with CAUSE-PA to develop a model that will respect customer autonomy,

while ensuring that those customers with significant arrearages receive expedited enrollment in CAP.

III. THE PROPOSED MODIFICATIONS REPRESENT AN IMPROVEMENT ON EXISTING CAP ENROLLMENT AND WILL BENEFIT CONSUMERS

17. Duquesne Light submits that its proposed automatic enrollment plan is in the public interest and in compliance with all Commission regulations. Importantly, the proposed procedure is consistent with the Company's 2024 rate case settlement approved by the Commission.

WHEREFORE, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission approve the Automatic Enrollment Plan, without modification, as set forth in this petition and the attachment hereto.

Respectfully submitted,



Aron J. Beatty, Esq.
Counsel, Regulatory

Michael Brechlin, Esq.
Assistant General Counsel, Regulatory

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Attorneys for Duquesne Light Company

Dated: March 31, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for : **Docket Nos.**
the Implementation of Automatic Enrollment : **R-2024-3046523**
for LIHEAP Recipients in Customer Assistance : **P-2026-_____**
Program

VERIFICATION

I, Tuesday N. Simok, being the Universal Services Specialist of Duquesne Light Company (“Duquesne Light”) hereby state that the facts set forth in the foregoing Petition are true and correct to the best of my knowledge, information and belief. I further state that the information set forth in the Duquesne Light Automatic Enrollment Plan is true and correct to the best of my knowledge, information and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Tuesday Simok

Tuesday N. Simok

Date: March 31, 2026

Amendments to Duquesne Light's Current USECP

The Company will identify customers upon receipt of the LIHEAP data file and determine which are not currently enrolled in CAP. Customers with an outstanding current balance equal to or greater than \$250 will be automatically enrolled in CAP, while customers with a balance less than \$250 will be offered enrollment through a consent-based, streamlined process. The Company will refer to this streamlined process as expedited enrollment.

Enrollment

1. Customer Notification

- The Company will send a letter and/or electronic communication (email and/or text message, where available) informing the customer that, based on DHS/LIHEAP data, the customer may be eligible for the Customer Assistance Program (CAP). When income information is received directly from DHS, the customer will not be required to complete a separate CAP application.

- The communication will explain the applicable enrollment path based on the customer's outstanding current balance and will include the following information (at a minimum):
 - An overview of the CAP program and the value provided to participating customers

 - The customer's calculated PIPP amount based on DHS-reported household income

 - Any applicable CAP credit and/or consumption limits, and how those limits may affect the customer's CAP bill.

 - The balance amount that would be frozen upon enrollment, if applicable

 - The steps the customer must take to update their information if household composition or income changes.

 - Program recertification requirements, including applicable timeframes.

- Current supplier information, including notice that, upon enrollment, the customer will be returned to default service, and the supplier will be automatically removed.
- Notice that any existing payment arrangement will be terminated upon CAP enrollment and will not count toward the customer's overall payment arrangement limit.
- Notice that the communication will include instructions applicable to the customer's enrollment path, including how to provide consent, decline enrollment, or request a review, as applicable.
- Any restrictions associated with CAP participation, including the requirement that customers enrolled in CAP may not have an alternate supplier and will be returned to default service while participating in the program.
- Instructions on how the customer may opt out of CAP enrollment, including the timeframe in which the customer must notify the Company.
- Information on how the customer may contact the Company (e.g., by phone, email, or other available methods) if additional questions arise.

1. Enrollment Path Based on Outstanding Balance

- a. *Auto-Enrollment (Outstanding Balance \geq \$250):*

 - i. Customers with an outstanding balance equal to or greater than \$250 will be notified that they will be automatically enrolled in CAP unless they decline participation or request a review within 30 days of the notification.
 - ii. If the customer does not opt out within the 30-day period, enrollment will proceed and applicable CAP benefits, including frozen arrearages and billing credits (where applicable), will be applied to the account.

- iii. The notification will include instructions on how the customer may decline enrollment or request a review within the 30-day notice period.

- b. *Expedited Enrollment (Outstanding Balance < \$250):*
 - i. Customers with an outstanding balance of less than \$250 will be offered enrollment through a consent-based, streamlined process referred to as expedited enrollment.

 - ii. Under this process, the customer will not be automatically enrolled. Instead, enrollment will occur upon receipt of the customer's affirmative consent within the timeframe outlined in the notification.

 - iii. The notification will include instructions on how the customer may provide consent, decline participation, or request a review prior to enrollment.

- o **Customer Consent**
 - Consent may be obtained via written, verbal, phone, or electronic authorization.
 - The Company will maintain a record of consent within CC&B.

2. Customer Communication Development

- o The Company will collaborate with its Income Eligible Advisory Group to obtain feedback on customer-facing communications associated with this process; however, final approval of all communications will remain with the Company.

Auto-Recertification Process

The Company is currently in the process of utilizing DHS data to auto recertify certain CAP customers where appropriate.

1. Use of DHS Data

- The Company will use DHS income data for purposes of auto-recertification only when it is the most recent information available.
- If the Company has newer income documentation on file from the customer, that information will take precedence.

2. Customer Notification

- The Company will notify the customer that DHS data was used to process their recertification and include the date of their next recertification.
- The communication will advise the customer to contact the Company if there have been any changes in household size or income since the reported data was submitted.

Reinstatement and Default

1. Reinstatement Outreach

- The Company will use DHS data to proactively identify and contact customers who previously defaulted from CAP due to:
 - Failure to complete recertification
 - Over-income
 - Final bill (where service has since been restored)
 - Final bill DNP (where service has since been restored)

2. Default

- The Company may initiate a default review when newly received, verified DHS income data indicates that a customer's household income exceeds CAP eligibility thresholds.
- Prior to any default action, the Company will make good faith efforts to contact the customer to confirm whether the DHS-reported income accurately reflects current household circumstances, such as outreach via phone, text message, or written communication.

Disputes

- If a customer disputes the income we received from DHS, they have 30 days to reach out to a CAP Case Manager or submit new income online. If the income received is the most recent income and is favorable to the customer, the Company will update the income on file with the income provided by the customer

- The Company will always accept updated income after enrollment, recertification, or reinstatement, but the Company will not backdate billing credits to align with the new income if the income is received after 30 days.

Additional Considerations

1. Household Updates

- In instances where the household occupancy reflected in DHS data differs from the information currently on file with the Company, the Company will rely on the DHS-provided household data for preliminary eligibility determination. The customer will be notified that the Company has updated the household information based on DHS data and will be advised to contact the Company to confirm, correct, or provide the most up-to-date household details.

2. Data Accuracy & Consistency

- The Company reserves the right to determine whether DHS income data is sufficiently current and reliable for program use. In circumstances where the data appears outdated, inconsistent, or otherwise unreliable, the Company may decline to use such data for purposes of:
 - CAP enrollment
 - CAP recertification
 - CAP reinstatement
- In some instances, the customer may be required to provide updated income documentation in accordance with standard CAP eligibility.

3. Contingencies

- This process will be reviewed as part of the upcoming USECP plan filing.
- Implementation and execution of this petition are contingent upon the terms of the data-sharing agreement with DHS.

Budget Impacts

Year	USECP Filed Budget	CAP Budget Increase	Total Estimated USECP Budget
2026	\$60,272,887	\$1,130,734	\$61,403,621

2027	\$62,986,088	\$1,130,734	\$64,116,822
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The table above reflects only the recently filed Universal Services budget for 2026 and 2027, submitted under Docket No. M-2019-3008227, and includes the projected program increase based on estimates using LIHEAP data-share files the Company has already received, along with an assumption of 100% enrollment for customers with outstanding balances of \$250 or greater.

At this time, the Company does not have a reliable basis to project the extent of any incremental increase in participant enrollment in 2027. Accordingly, the 2027 estimate assumes no material change from the 2026 projection other than continued participation at the projected 2026 level and does not include a separate growth factor for additional enrollment. To the extent participant volume increases, actual program costs may vary from the projected amount.

An updated budget for subsequent program years will be included with the Company's required USECP filing on November 1, 2026, at which time the Company will update its projections based on actual enrollment and program cost experience.

Miscellaneous

- The Company will identify customers who have opted to share their household income through the LIHEAP data sharing process, and are not currently enrolled in CAP. Customers with an outstanding balance greater than \$250 will be automatically enrolled in CAP, while customers with a balance of \$250 or less will be offered enrollment through a consent-based, streamlined process. The Company will refer to this streamlined process as expedited enrollment.
- The Company currently conducts direct outreach via phone to advise customers who have received a LIHEAP grant and are not enrolled in CAP that they are eligible.
- The Company requests permission to implement auto-enrollment and expedited enrollment for customers who have opted to share their household income through the LIHEAP data sharing process, based on income received within the past **12 months**. Enrollment will occur in two phases. Initially, the Company will manually enroll eligible accounts within 30 days of receiving the shared data from DHS, using a designated report. Beginning 180 days following approval of the petition, the

Company will transition to a fully automated process, allowing the system to complete enrollments without manual intervention.

- The Company will collaborate with its Income Eligible Advisory Group to obtain feedback on customer-facing communications associated with this process; however, final approval of all communications will remain with the Company.

- The Company has engaged its information technology team in reviewing the current recertification design to determine what changes are required in order to implement auto recertification for LIHEAP recipients utilizing LIHEAP data sharing information.