



April 20, 2026

VIA E-File

Secretary Matthew Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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-2026-3061673

CAUSE-PA Answer to Petition

Dear Secretary Homsher:

Please find attached **the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) Answer** to the above-captioned Petition, which is respectfully submitted for filing in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only unless otherwise noted.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "L.N. Berman".

Lauren N. Berman, Esq.
Counsel for CAUSE-PA

CC: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company for the :
Implementation of Automatic Enrollment for : Docket No. R-2024-3046523
LIHEAP Recipients in Customer Assistance :
Program : Docket No. P-2026-3061673

**COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY
IN PENNSYLVANIA (CAUSE-PA) ANSWER TO PETITION**

PENNSYLVANIA UTILITY LAW PROJECT

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I. INTRODUCTION

Pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC or Commission), 52 Pa. Code §§ 5.61-5.76, the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA), through its legal counsel at the Pennsylvania Utility Law Project (PULP), hereby files the foregoing Answer to the Petition of Duquesne Light Company (DLC) for the Implementation of Automatic Enrollment for LIHEAP Recipients in Customer Assistance Program (hereinafter, Petition) in the above-captioned proceeding.

For more than ten years, the LIHEAP Advisory Committee (LAC) to the Department of Human Services (DHS), which includes representatives from the Commission’s Bureau of Consumer Services, utilities, consumers, and consumer advocates, has worked collaboratively to develop a data sharing policy permitting the exchange of detailed household income and household composition data for the express purpose of streamlining enrollment in utility-run assistance programs – to the benefit of LIHEAP recipients.¹ DHS launched the policy in Fall 2024.

On June 13, 2024, consistent with the consensus-based recommendations included in the March 2024 Universal Service Working Group Report,² the Commission issued an Order encouraging energy utilities to participate in the DHS data sharing program.³ The Commission set forth a number of temporary and partial waivers designed to “relieve an energy public utility from the obligation to file and serve a petition to amend its existing USECP” to implement various procedures utilizing LIHEAP data to streamline enrollment and

¹ Members of the LAC include a broad range of stakeholder interests, including representatives from the PUC, the Energy Association of Pennsylvania, and the Office of Consumer Advocate.

² Pa. PUC, Universal Service Working Group Report, Docket No. M-2023-3038944 (March 2024).

³ 2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs, Order, Docket No. M-2023-3038944 (June 13, 2024).

recertification.⁴ While the Order addressed certain pre-approved data policies that did not require a separate petition, it did not foreclose the ability of an energy utility to petition the Commission for approval to implement other data sharing policies.

In October 2024, DHS began sharing detailed household income and composition data with the utilities pursuant to the data sharing policy. On December 18, 2024, DHS identified a technical issue with the data and advised utilities not to rely on the data until the technical issues were resolved.⁵ DHS addressed the technical issues and restarted the data exchange on July 14, 2025.⁶

Using language developed through consensus recommendations from the LAC, LIHEAP applicants are now affirmatively asked whether they wish to allow DHS to share their income and household data with the applicant’s utility “to help enroll your household in a utility or energy assistance program.”⁷ This section of the LIHEAP application provides, in full⁸:

Do you want DHS to share information from your application with your utility to help enroll your household in a utility or energy assistance program? Yes No

Many Pennsylvania gas and electric utilities offer programs that help low-income customers reduce monthly bills, save energy, and eliminate past-due balances. DHS can share information from your application with your utility, including your income and household members (such as names and dates of birth) to help you enroll in these programs if you want us to share it. Your information will be kept confidential.

This is optional. You can get a LIHEAP grant if you qualify even if you do not want DHS to share your information with your utility.

The income and household data relied upon by DHS to determine LIHEAP eligibility, and subsequently shared with the utility company, includes the household’s current, verified income and household documentation - shared with the explicit consent of the applicant.

⁴ Id.

⁵ December 18, 2024 Email from DHS to the LIHEAP Advisory Committee.

⁶ LIHEAP Advisory Committee, August 2025 LAC Meeting Minutes (approved Nov. 19, 2025).

⁷ LIHEAP Application – PY 2025-2026, Q.17.

⁸ Id.

The importance of this data sharing process is underlined by data presented through the course of DLC’s 2024 Rate Case, from which the instant Petition arises. In that proceeding, CAUSE-PA highlighted data showing that Customer Assistance Program (CAP) enrollment substantially improves collections and termination rates and raised deep concerns about the chronic undersubscription in universal service programs and high rate of removals for failure to recertify.⁹ Data presented in that proceeding also clearly demonstrated that enrollment in CAP is a significant factor driving reduced collections and terminations. For example, in 2023, the termination rate amongst DLC’s Confirmed Low Income customers was 42.38%, more than ten times higher than the termination rate for residential customers as a whole.¹⁰ For those customers enrolled in CAP over the same time period, the termination rate was reduced to 11.26%.¹¹

Through this Petition, DLC is attempting to fulfill the purpose of years of dedicated work by both the LAC and DHS, as outlined above, and agreed to in the Settlement stemming from the aforementioned rate case.¹² As stated clearly by Chairman Stephen M. DeFrank and Commissioner Kathryn L. Zerfuss in a Joint Statement:

LIHEAP data sharing promotes efficiencies and eliminates paperwork redundancies by allowing customers, who are eligible for LIHEAP, to enroll or recertify in energy utilities’ universal service programs without submitting new applications. ... **These improvements will result in cost savings and reduce ‘red tape’ bureaucracy to the benefit of customers and energy utilities alike.**¹³

⁹ Pa PUC v. Duquesne Light Company, Docket No. R-2024-3046523, CAUSE-PA Statement 1 at 62.

¹⁰ Id. at 19.

¹¹ Id.

¹² Pa PUC v. Duquesne Light Company, Docket No. R-2024-3046523, Order at 2, (Order approving Joint Petition for Settlement issued November 7, 2024).

¹³ 2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs, Joint Statement of Chairman Stephen M. DeFrank and Commissioner Kathryn L. Zerfuss, Docket No. M-2023-3038944 (June 13, 2024) (emphasis added).

DLC's proposal will serve a critically needed preventative role to help address the growing number of struggling consumers, easing their enrollment in CAP to improve payment coverage and frequency rates, thereby reducing attendant uncollectible expenses and other far-ranging consequences of utility insecurity. Utilizing LIHEAP data to automate CAP enrollment is a common-sense solution to help alleviate rising energy insecurity for low income households, while at the same time helping cut down on unnecessary, costly, and duplicative administrative processes. It is essential that the Commission swiftly approve DLC's Petition, so that it may implement auto-enrollment for LIHEAP recipients who have already affirmatively indicated their desire to enroll in utility-run assistance programs, provided consent to share detailed income and household data with DLC for this purpose, and demonstrated their eligibility for the program by completing the rigorous LIHEAP application process.

II. STANDING

Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72, which provides in relevant part that “[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.” 52 Pa. Code § 5.72(a).

Section 5.72 further provides that the right or interest may be one “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.” 52 Pa. Code. § 5.72(a)(2).

Even though section 5.72 speaks of the rights of a “person” to intervene, the Commonwealth Court has consistently stated that “an association may have standing as a representative of its members ... as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved,

the organization] has standing.” Energy Cons. Council of Pa. v. Pa. PUC, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (citing Tripps Park v. Pa. PUC, 415 A.2d 967 (Pa. Commw. 1980); Parents United for Better Schools v. School District of Philadelphia, 646 A.2d 689 (Pa. Commw. 1994)).

CAUSE-PA is an unincorporated association of low- and moderate-income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating and telecommunication services. CAUSE-PA membership is open to moderate and low- income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low-income families maintain affordable access to utility services and achieve economic independence. Its primary office is located at 118 Locust St, Harrisburg, Pennsylvania.

CAUSE-PA has a significant interest in the impact that the instant Petition may have on low and moderate income residential customers and asserts that other participants in this proceeding do not adequately represent these interests.

Members of CAUSE-PA are located within DLC’s service territory and will be directly affected by the outcome of this proceeding. Particularly, this proceeding will affect the ability of CAUSE-PA members to reasonably access the Company’s Customer Assistance Program (CAP). As a signatory to the underlying settlement, CAUSE-PA also has a direct interest in ensuring the intent and purpose of the settlement is satisfied.

CAUSE-PA has standing to intervene because at least one of its members have or will suffer a direct, immediate, and substantial injury to an interest as a result of this proceeding. See Energy Cons. Council of Pa., 995 A.2d at 476.

III. BACKGROUND

As part of the settlement in DLC's 2024 base rate proceeding, to which CAUSE-PA was a party, the Company agreed to the following:

DLC agrees to hold at least one meeting with its [Income Eligible Advisory Committee] 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

The Commission approved the settlement, including this provision, in its Order issued November 7, 2024.¹⁴

Through the IEAG collaborative process, and several additional discussions, CAUSE-PA provided feedback to DLC about the use of LIHEAP data for purposes of auto enrollment into CAP.

On March 31, 2026, DLC filed its Petition seeking authorization to initiate auto-enrollment of LIHEAP recipients with balances equal to or greater than \$250 into its CAP, to offer an expedited enrollment process for customers with a lesser balance, to permit an auto-recertification process, and to reinstate those who have defaulted from CAP.¹⁵

IV. ANSWER

1. Admitted.
2. Admitted.
3. Admitted. By way of further Answer, CAUSE-PA was a party to the cited Settlement.
4. Admitted.
5. Admitted.

¹⁴ Pa. PUC v. Duquesne Light Company, Docket No. R-2024-3046523, Joint Petition for Settlement at P. 53. (Order approving Joint Petition for Settlement issued November 7, 2024).

¹⁵ DLC Petition, Exhibit 1.

6. Admitted.

Of note, while CAUSE-PA admits that additional details of DLC’s proposal are included in Exhibit 1, as stated in this paragraph of DLC’s Petition, CAUSE-PA denies that certain aspects of DLC’s proposal are just and reasonable, and opposes their inclusion. See paragraph 12, below, regarding DLC’s proposal to utilize LIHEAP data to remove households from CAP in violation of the DHS data sharing policy and the express terms of the DHS data sharing agreement.

7. Admitted.

By way of further Answer, CAUSE-PA notes that in addition to requiring participant consent, DLC will only receive data from DHS for households *approved* for a LIHEAP grant that was directed to DLC (as opposed to the LIHEAP recipients’ gas utility or deliverable fuel vendor). In other words, only a subset of LIHEAP recipients are included in the DHS data sharing program.

8. Admitted.

By way of further Answer, CAUSE-PA submits that DLC does not need further Commission authorization to implement its proposed “consent-based, streamlined process” for expedited enrollment.¹⁶ As noted above, in its June 13, 2024 Order, the Commission set forth a number of temporary and partial waivers designed to “relieve an energy public utility from the obligation to file and serve a petition to amend its existing USECP” to implement various procedures utilizing LIHEAP data to streamline enrollment and recertification.¹⁷ CAUSE-PA notes that the terms of the Settlement required DLC to file a Petition regarding autoenrollment – not streamlined enrollment, and questions DLC’s decision to delay implementation of streamlined enrollment consistent with the Commission’s June 13, 2024 Order. Given the acute affordability crisis facing Pennsylvania families, DLC must be working to

¹⁶ 2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs, Order, Docket No. M-2023-3038944 (June 13, 2024).

¹⁷ Id.

implement all available policies and procedures to improve access to and enrollment in CAP as quickly as possible and without delay.

Further, regarding DLC's auto-enrollment proposal, CAUSE-PA supports DLC's proposal to utilize a \$250 debt threshold. Given the minimum LIHEAP grant is set at \$200, DLC's auto-enrollment proposal will target households with recent debt levels exceeding \$450 – and often much higher, as the combined maximum cash and crisis grant can be as high as \$2,000. Households with this level of debt demonstrate a clear, undeniable need for assistance through CAP to reduce monthly rates and improve collections through comprehensive arrearage management available through the program.

9. Admitted.

By way of further Answer, CAUSE-PA again notes that the Company does not need further Commission approval to implement a streamlined enrollment process, as such a process was already approved by the Commission in its June 13, 2024 Order.

Further, regarding DLC's proposed auto-enrollment process, CAUSE-PA recommended through its collaboration with DLC that the grace period be extended to a minimum of 60 days. While DLC has not chosen to incorporate this recommendation, CAUSE-PA continues to believe this recommendation would measurably improve DLC's proposal. This timeframe would give auto-enrolled CAP participants an opportunity to see the billing and arrearage impacts of their enrollment and make an informed decision about continued enrollment without risking loss of CAP benefits or precluding future enrollment. CAUSE-PA notes that adoption of a 60-day grace period following auto-enrollment in CAP would squarely address concerns raised by Chairman Stephen DeFrank regarding a similar auto-enrollment proposal of Peoples Gas.¹⁸ Specifically, a

¹⁸ Peoples Gas Company, LLC Universal Service and Energy Conservation Plan for 2019-2024, Docket No. M-2020-3021343; Petition of Peoples Natural Gas Company to Amend 2019-2023 Universal Service and Energy Conservation Plan, Docket No. P-2024-3052324, Statement of Chairman M. DeFrank (Issued March 26, 2026).

60-day grace period would ensure that households are given ample opportunity to remove themselves from CAP if the program does not serve their needs – without eroding the benefits of auto-enrollment to prevent further accrual of unmanageable arrears and to eliminate administrative burdens and costs.

In addition, to assist with evaluation of DLC’s auto-enrollment program, CAUSE-PA recommends that DLC track the reason for opt-out and whether customers opted out before or after the opt-out grace period as proposed in its Petition.

Further, CAUSE-PA has been actively collaborating with DLC and other stakeholders to help refine and finalize communications targeted to low income shopping customers that are otherwise eligible for auto-enrollment in CAP following receipt of a LIHEAP grant. Competitive market data has continually shown that low income shopping customers pay substantially more than the default service price and have a correspondingly higher risk of involuntary termination.²⁵ Of particular concern, as noted in testimony served in DLC’s most recent DSP proceeding, confirmed low income shopping customers who were not enrolled in CAP – a subset of DLC’s most vulnerable customers – were charged substantially higher charges for electricity each and every year, totaling over \$1.8 million in excess of the default service price since 2017.¹⁹

As part of the settlement in that proceeding, the parties agreed to several provisions intended to streamline CAP enrollment for shopping customers. First, DLC agreed to amend its CAP rules and supplier tariff to prohibit suppliers from charging termination or cancellation fee(s) to CAP applicants who return to default service upon entry into CAP.²⁰ Second, Duquesne Light

¹⁹ Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2025 through May 31, 2029, Docket No. P-2024-3048592 (hereinafter DSP X), CAUSE-PA Statement No. 1 at 7 (Filed July 12, 2024).

²⁰ DSP X, Joint Petition for Approval of Settlement at ¶ 29 (Filed October 1, 2024), (Opinion and Order approving Joint Petition issued January 14, 2025).

agreed to modify its CAP application to clearly indicate that CAP customers must be enrolled in default service and that, by applying for CAP, the applicant is affirmatively electing to return to default service if they are shopping with an EGS. As such, Duquesne Light is required to return CAP applicants to default service upon enrollment in the program, without further action required by the CAP applicant and without imposition of fees or charges by the supplier.²¹

Consistent with the settlement provisions above, CAUSE-PA strongly supports DLC's proposal to provide shopping customers, who would otherwise be auto-enrolled in CAP, the opportunity to enroll in CAP through a streamlined process by providing written, verbal, phone, or electronic consent for such. This streamlined process, which would not require the customer to attempt to contact the EGS and cancel an existing contract themselves, will help improve timely enrollment in CAP – prior to the accrual of unnecessarily high debts that ultimately serve to increase the cost of the program for other customers.

10. Admitted.

11. Admitted.

12. Admitted.

By way of further Answer, while CAUSE-PA admits that additional details of DLC's proposal are included in Exhibit 1, as stated in this paragraph of DLC's Petition, CAUSE-PA denies that certain aspects of DLC's proposal are just and reasonable, and opposes their inclusion. Specifically, CAUSE-PA strongly objects to the default process proposed in DLC Exhibit 1, as it would violate the DHS data sharing policy and the terms of the DHS data sharing agreement by taking adverse action against a LIHEAP recipient.²² The Company's use of DHS LIHEAP data

²¹ *Id.* at ¶ 30.

²² See Appendix A, DHS Data Sharing Agreement. Paragraph 4 provides: "The Department will provide the Organization [e.g., the utility] with information as described in Rider 1, Data Sharing Summary, which is attached to and made part of this agreement. The Organization may not use information disclosed by the Department for any

must be for the *benefit* of the LIHEAP recipient – either to enroll or recertify a household into a utility’s assistance programs.²³ DLC’s proposal seeks to expand its use of DHS data to take adverse action against a LIHEAP recipient, in violation of the terms of the DHS data sharing agreement.²⁴ CAUSE-PA submits that DLC must refrain from taking any adverse action, including removing a customer from CAP, based solely on DHS-reported income and/or household information. If DHS data received on behalf of a LIHEAP recipient suggests that a household may be ineligible for CAP, the Company should seek to enroll or recertify the household through other means – but under no circumstances should it be permitted to utilize LIHEAP data to take affirmative negative action against a LIHEAP recipient. CAUSE-PA notes that this situation should be exceedingly rare, given LIHEAP and CAP use the same eligibility threshold (150% FPL) and DHS data only includes households approved for LIHEAP.²⁵ Nevertheless, even in rare circumstances where reported data from DHS suggests a household may be ineligible for CAP, DLC should be expressly prohibited from utilizing LIHEAP data to take adverse action against a

purpose other than those set forth in this agreement.” Rider 1, Data Sharing Summary in turn provides: “The Organization shall use the data provided by DHS only to enroll or recertify its eligible LIHEAP recipients into one of its UEAPs, in accordance with applicable law, regulation, policy, the Organization’s authorized Universal Service and Energy Conservation Plan (USECP), or the Organization’s program rules if the Organization does not have a USECP. Provided the household recipient is not currently barred from participation in a UEAP pursuant to applicable law, regulation, policy, or USECP, the Organization will make a good faith attempt to enroll or recertify the LIHEAP household without seeking an application or income documentation for the UEAP from the LIHEAP household.” See Appendix A, Rider 1, para. 5.

The terms of the DHS Data Sharing Agreement are in furtherance of the consensus data sharing framework developed through the LIHEAP Advisory Committee. See Appendix B, Proposed LAC Data Sharing Framework (dated May 4, 2022):

How Data is Used:

Members of the subcommittee reached general consensus that LIHEAP participant data shared by DHS should be used for the singular purpose of streamlining enrollment of and facilitating outreach to LIHEAP recipients regarding the utility’s low income assistance programs – and should not be used by utilities for any other purpose. This provision can be included in the vendor agreement to ensure participating utilities explicitly agree to comply with the limited use of this data.

²³ See Appendix A and B.

²⁴ See Appendix A. Nothing in the DHS data sharing agreement permits a utility to use the data to take adverse action against a LIHEAP recipient, and the explicit terms restrict the use of such data to affirmatively enroll or recertify the household – not to remove them from a program.

²⁵ See Appendix A, Rider 1.

LIHEAP recipient, as doing so would put DLC in direct violation of the DHS policy. As such, CAUSE-PA submits that this aspect of DLC's Petition should be expressly denied.

13. Admitted.

By way of further Answer, CAUSE-PA again notes that the Company does not need further Commission approval to implement a streamlined enrollment process, as such a process was already approved by the Commission in its June 13, 2024 Order.

14. Admitted.

15. Admitted.

By way of further Answer, to help assist with evaluation of DLC's auto-enrollment program, CAUSE-PA recommends that DLC track and report on actual enrollment rates to ensure that future USECP budgets reflect realistic participation levels. CAUSE-PA notes that this tracking is already required as a condition of participation in the DHS data sharing policy.²⁶

16. Admitted in part.

By way of further Answer, DLC accurately acknowledges that CAUSE-PA developed testimony on this issue in the context of its last rate case. CAUSE-PA also acknowledges that Duquesne Light collaborated with IEAG members, including CAUSE-PA, in developing the proposed auto-enrollment model pursuant to paragraph 53 of the 2024 rate case settlement. CAUSE-PA appreciates DLC's efforts to incorporate stakeholder feedback acknowledges that several of CAUSE-PA's recommendations were incorporated into DLC's final proposal. That said, as indicated throughout this Answer, not all of CAUSE-PA's concerns were fully addressed, and CAUSE-PA has consistently reserved the right to raise recommendations and concerns to

²⁶ See Appendix A.

ensure that the final program design fully protects low income consumers and operates in the public interest.

17. Denied in part.

By way of further Answer, CAUSE-PA agrees that a majority of DLC's proposal will serve the public interest and should be approved. However, as explained above in paragraph 12, CAUSE-PA is concerned that the default provisions of DLC's proposed auto-enrollment process would violate the terms of the DHS data sharing policy and agreement and would harm LIHEAP recipients, as it would permit DLC to utilize LIHEAP data to take adverse action against a LIHEAP recipient. Thus, while CAUSE-PA strongly supports the primary purpose and the majority of the programmatic aspects of DLC's proposal, the Commission should amend DLC's proposal to expressly prohibit DLC from utilizing DHS LIHEAP data to take adverse action against a LIHEAP recipient. In turn, as discussed above, the Commission should further amend DLC's proposal to include a minimum 60-day grace period, and require key data and information to be tracked and reported on an ongoing basis.

V. CONCLUSION

WHEREFORE, CAUSE-PA urges the Commission to approve DLC to initiate a CAP auto-enrollment process for LIHEAP recipients who meet the criteria outlined above, and who consent to sharing their data with DLC for that express purpose, consistent with our recommended modifications above, including the extended grace period and tracking and reporting requirements. In turn, the Commission should expressly prohibit DLC from utilizing LIHEAP data to take adverse action against a LIHEAP recipient.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
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Dated: April 20, 2026

Verification

I, **Elizabeth R. Marx**, legal counsel for the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to 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 (relating to unsworn falsification to authorities).



On behalf of the Coalition for Affordable Utility
Services and Energy Efficiency in Pennsylvania

Date: April 20, 2026

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company for the :
Implementation of Automatic Enrollment for : Docket No. R-2024-3046523
LIHEAP Recipients in Customer Assistance :
Program : Docket No. P-2026-3061673

Certificate of Service

I hereby certify that I have this day served copies of the **Answer to the Petition Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

VIA EMAIL ONLY

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Respectfully Submitted,

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