



Lindsay Baxter
Senior Manager, Energy Policy and
Public Affairs

Nova Place
100 South Commons, Suite 118
Pittsburgh, PA 15212

Tel: 412-393-6224
lbaxter@duqlight.com

May 18, 2026

VIA Electronic Mail

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

**Re: TUS Data Request Set 3, Duquesne Light Company
Electric Load Forecast Accountability
Docket M-2025-3058814**

Dear Secretary Homsher:

In response to the April 22, 2026 Secretarial Letter, enclosed for filing please find the Responses of Duquesne Light Company to the TUS Data Request Set 3 - Electric Load Forecast Accountability. Upon review, should you have any questions, please feel free to contact me at lbaxter@duqlight.com or 412-393-6224.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'LBQ', is positioned above the typed name.

Lindsay Baxter
Senior Manager
Energy Policy and Public Affairs

Enclosures: Data Request Responses and Verification

Attachment 1
TUS Data Request Set 3
ELECTRIC LOAD FORECAST ACCOUNTABILITY
at Docket No. M-2025-3058814

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

M-7. Please provide copies of all materials submitted to PJM in response to the April 17, 2026, RFI.

Response by: Christin M. Domian, Sr. Manager, FERC/RTO Affairs

Response: Please see copy attached.

Duquesne Light Company – Response to TUS Data Request Set 3
Electric Load Forecast Accountability
Docket No. M-2025-3058814

Verification

I, Christin M. Domian, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, 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).

Date: May 18, 2026

Signed,

Christin Domian

Christin M. Domian
Sr. Manager, FERC/RTO Affairs

1 Respondent & Jurisdiction Information

RT1 Respondent Information*

Organization	Duquesne Light Company
Primary contact	Christin Domian
Email	cdomian@duqlight.com
Phone	412-216-2049
Role	EDC

RT2 Jurisdiction(s) Covered*

Scope

State Coverage (if applicable)

<input type="checkbox"/> DE	<input type="checkbox"/> NC
<input type="checkbox"/> IL	<input type="checkbox"/> OH
<input type="checkbox"/> IN	<input checked="" type="checkbox"/> PA
<input type="checkbox"/> KY	<input type="checkbox"/> TN
<input type="checkbox"/> MD	<input type="checkbox"/> VA
<input type="checkbox"/> MI	<input type="checkbox"/> WV
<input type="checkbox"/> NJ	<input type="checkbox"/> DC

Service-territory Coverage (if applicable)

Consistency

Additional Comments PA is a deregulated state that requires PA Commission approval for changes to the tariff. DLC also clears at the RTO zonal level.

2 Existing Tariff Framework & Current Capabilities

RT3 Existing Large Load Tariff / Service Options*
 Cite Tariff Sections (if possible)

RT4 Ability to Support Load Self-Procurement Today*
 Please describe key conditions

DLC would not support a self-procurement solution if it uses existing generation. The self-procurement solution would need to be a bilateral agreement that is served by an EGS/LSE.

RT5 Ability to Support Utility-Facilitated Bilateral Contracting*

RT6 Cost Pass-Through Mechanism Available Today*
 Please specify what is missing

DLC does not have an existing mechanism to pass-through specific costs to large load or data center customers.

Additional Comments RT3 - RT6: Distribution Rate Schedule HVPS (Transmission Voltage). Default service customers (those who do not shop with an Electric Generation Supplier) would also be served from Rider 9 Day Ahead Hourly Priced Service and Appendix A Transmission Service Charge.

3 Cost Allocation & Structural Treatment

RT7 Ability to Allocate Costs to Incremental Large Load*

Please specify conditions

See comments below.

RT8 Curtailment Tariff Tools Available*

No

RT9 Credit / Security Requirements Under Tariffs*

Needs modification

RT10 Treatment of Transmission/Network Upgrades for Large Loads

Standard rules apply

RT7 - Allocation of costs to LL and Data Centers for interconnection study costs are directly assigned. Currently are not able to directly assign wholesale market costs directly to incremental large load. May need legislative and/or regulatory changes.
 RT8 - Not under current tariff or proposed rules. DLC does not have an interruptible rate.
 RT10 - DLC does have specific tariff rules for T/N Upgrades for LL and Data Centers. Note Duquesne Light requires developers of large loads that interconnect to the Duquesne Light transmission system to fund all system upgrades required for their interconnection. Because of this, Duquesne Light executes Guarantee Agreements with developers after Duquesne Light has received the results of PJM's "Do no harm" study as part of the M-3 process.

Additional Comments

4 Market Structure & Regulatory Authority

RT11 Retail Choice / LSE Structure Considerations

Retail access

RT12 Authority to Implement New Rate Class / Rider for Large Loads*

Conditional

The Company would have to seek Commission approval for any new rate class/rider for large loads.

Please specify conditions (e.g., Commission approval)

Additional Comments

5 Timeline & Regulatory Constraints

RT13 Expected Timeline for Tariff Changes (If Needed)*

12-24 mo

RT14 Key Regulatory Constraints / Risks (Select Top 1-2)*

- Cost allocation
- Prudence
- Affiliate restrictions
- Competitive bidding rules
- Term limits
- Other

RT15 Coordination Requirements with State Policymakers

Significant

As a PA utility, legislative and/or regulatory changes are needed.

Please describe coordination requirements with state policymakers

Additional Comments

6 PJM Pathway Compatibility

RT16 Ability to Support PJM-Facilitated Bilateral Matching*

No

RT17 Ability to Support PJM-Administered Mechanism (If Adopted)*

No

RT18 Readiness to Engage / Implementation Posture*

>12 mo

Additional Comments

RT16 - DLC supports PJM facilitated Bilateral matching but does not have tariff language or other mechanisms in place today to manage the results.