Michael Brechlin
Assistant General Counsel, Regulatory

Nova Place, 100 S Commons
Suite 118, OGC-L1
Pittsburgh, PA 15212

DUQUESNE LIGHT CO.
mbrechlin@duqlight.com

June 18, 2026

Via Electronic Filing

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

Re: Duquesne Light Company – Supplement No. 106 to Tariff Electric - PA. P.U.C. No. 25. Commercial to Residential Conversion Pilot.
Docket No. R-2026-

Dear Secretary Homsher:

Enclosed please find Duquesne Light Company's ("Duquesne Light") Supplement No. 106 to Tariff Electric - Pa. P.U.C. No. 25, Statement of Reasons, Responses pursuant to 52 Pa. Code § 53.52 (a), and letters of support. Supplement No. 106 sets forth a new Commercial to Residential Conversion Pilot for Duquesne Light's customers. The proposed effective date is August 17, 2026, which is 60 days from the date of this filing.

Copies will be provided as indicated on the certificate of service.

Please direct any questions to the undersigned,

Respectfully Submitted,

Michael Brechlin
Assistant General Counsel,
Regulatory

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):

ELECTRONIC MAIL

Bureau of Investigation & Enforcement
Carrie Wright
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265
carwright@pa.gov

Office of Small Business Advocate
Sharon E. Webb
Steven C. Gray
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov
sgray@pa.gov
ra-sba@pa.gov

Office of Consumer Advocate
Lauren R. Myers
555 Walnut Street
Forum Place, 5th Floor Harrisburg,
PA 17101-1923
lmeyers@paoca.org
ra-oca@paoca.org

June 18, 2026

Michael Brechlin
Duquesne Light Company
411 Seventh Avenue, 15-7
Pittsburgh, PA 15219
Phone: 412-393-6431
Email: mbrechlin@duqlight.com

Attachment 1

SUPPLEMENT NO. 106
TO ELECTRIC – PA. P.U.C. NO. 25

SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY
Nova Place
100 South Commons, Suite 118
Pittsburgh, PA 15212

Kevin E. Walker
President and Chief Executive Officer

ISSUED: June 18, 2026 EFFECTIVE: August 17, 2026

NOTICE

THIS TARIFF SUPPLEMENT ADDS A NEW STANDARD CONTRACT RIDER

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF

CHANGES

List of Modifications Made By This Tariff — **Original Page No. 141C through Original Page No. 141E**

Original Page No. 141C through Original Page No. 141E have been added to Tariff No. 25 to accommodate a new standard contract rider, Rider No. 24 – Commercial to Residential Conversion Pilot.

Table of Contents– (Continued) — **Seventh Revised Page No. 3A**
Cancelling Sixth Revised Pages No. 3A

Page No. 141C through Page No. 141E have been added to new standard contract Rider No. 24 – Commercial to Residential Conversion Pilot and, therefore, to Tariff No. 25 to the Table of Contents in Tariff No. 25.

Standard Contract Riders – (Continued) — **Fourth Revised Page No. 87A**
Cancelling Third Revised Pages No. 87A

Rider No. 24 – Commercial to Residential Conversion Pilot has been added to the Rider Matrix.

Rider No. 24 – Commercial to Residential Conversion Pilot — **Original Page No. 141C through Original Page No. 141E**

Original Page No. 141C through Original Page No. 141E have been added to Tariff No. 25 to accommodate a new standard contract rider, Rider No. 24 – Commercial to Residential Conversion Pilot. Applicable Rate Schedules, Purpose, Pilot Description, Applicability, Special Terms and Conditions, and Continuation of Service Upon Termination sections have been added to the new standard contract rider.

TABLE OF CONTENTS – (Continued)

Page Number

STANDARD CONTRACT RIDERS: – (Continued)

APPENDIX A:

(C) – Indicates Change

STANDARD CONTRACT RIDERS – (Continued)

RIDER MATRIX – (Continued)

	RS	RH	RA	GS/GM	GMH	GL	GLH	L	HVPS	AL	SE	SM	SH	UMS	PAL
Rider No. 20	X	X	X	X	X	X	X	X	X	X					
Rider No. 21	X	X	X	X	X	X	X	X							
Rider No. 22	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 23	X	X	X												
Rider No. 24				X	X	X	X	X							
Appendix A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

(C)

Rider Titles:

Rider No. 20 — Smart Meter Charge
Rider No. 21 — Net Metering Service
Rider No. 22 — Distribution System Improvement Charge ("DSIC")
Rider No. 23 — Behavioral Load Management Pilot
Rider No. 24 — Commercial to Residential Conversion Pilot (C)
Appendix A — Transmission Service Charges

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 24 – COMMERCIAL TO RESIDENTIAL CONVERSION PILOT (C)

(Applicable to Rate Schedules GS/GM, GMH, GL, GLH, & L)

PURPOSE (C)

This Rider sets forth the eligibility, terms, and conditions applicable to commercial customers who elect to collaborate with the Company to support new housing creation, reduce upfront development costs and advance a more vibrant, livable downtown while maintaining safe, reliable electric service. This Pilot is intended to evaluate a specific configuration or approach on a limited, temporary basis to assess feasibility, operational impacts, and compliance considerations. The Pilot is available to properties that are currently commercial or mixed-use proposed for full or substantial multi-unit residential conversion. Participants must sign a customer agreement.

PILOT DESCRIPTION (C)

Customers who elect to participate in the Commercial to Residential Conversion Pilot will support the conversion of underutilized commercial buildings to residential housing without requiring developers to undertake extensive commercial voltage reconfiguration throughout the building. Participation is limited to the customer(s) and configuration(s) expressly identified in the Customer Agreement. Non expansion in locations or configurations is permitted without separate approval. The Pilot is not intended to establish precedent or modify existing Company practices on a permanent basis. The Company may terminate the Pilot at any time upon notice if Pilot conditions are no longer met or if material risks are identified.

APPLICABILITY (C)

This Rider is available to customers that satisfy, and will satisfy for the duration of the customer agreement, the following conditions: (i) customer is a non-residential customer and account holder for electric service at the project location; (ii) customer owns or leases the project location; (iii) customer has full authority to make decisions regarding the authority to execute the Customer Agreement and fulfill customer's obligations; and (iv) customer is developing a project that meets the following: (a) project location must be within the Downtown Pittsburgh Business Improvement District (as defined by the Pittsburgh Downtown Partnership website) (b) project location must be currently commercial or mixed-use with a predominantly commercial electrical configuration and proposed for full or substantial residential conversion (c) project must result in net new residential units, not solely renovation or unit reconfiguration of existing residential space (d) project building existing electrical configuration must be 277/480V service commercial voltage and require significant redesign under traditional approaches to support residential unit metering at 120/208V service (e) project must show that it uses state or local public financial support that has already been awarded, approved, or contractually committed and clearly includes an affordable housing component, such as affordability requirements, income-restricted units, or other housing affordability obligations required by the funding source (f) project serves all residential dwelling units by heating systems served or supplemented by electric heat (g) project construction must start within six months after the customer agreement execution. The Company may waive requirement (iv)(a) above upon customer application and consideration of location and impact of housing creation at proposed project. Waiver shall be at sole discretion of the Company.

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 24 – COMMERCIAL TO RESIDENTIAL CONVERSION PILOT– (Continued) (C)

(Applicable to Rate Schedules GS/GM, GMH, GL, GLH, & L)

SPECIAL TERMS AND CONDITIONS (C)

1. Metering Infrastructure: To participate, the project location shall be served through the following metering configuration:
    a. Parent Residential Meter: A utility meter that measures total electricity delivered to all residential dwelling units. This meter will serve as the reference point for system balancing and loss calculation.
    b. Floor Aggregation Meters: These meters are used as part of the billing calculation for the residential load. These meters will measure the subtracted total aggregate of the residential usage by floor and installed after each 120/208 step down transformer determining the loss measurement of the subtractive metering calculations.
    c. House Meter: A utility meter at voltage levels of 277/480V or 120/208V serving the building for usage of common areas, including but not limited to the elevator, common area lighting, and as applicable ground floor commercial load (if not separately metered).
    d. Individual Residential Meters: These meters are billed meters installed to measure individual residential tenant usage for each dwelling unit per Company tariff.
    e. The Company shall provide the above metering equipment (collectively the "Metering Infrastructure") for installation by Customer or Customer's qualified contractor. In addition to installing the Metering Infrastructure, Customer, at Customer's cost and expense, is responsible for the preparation of the Project Location to support the Metering Infrastructure, including current transformer cabinets, riser diagrams, ring bus, step down transformers, and customer switchgear with utility metering compartments (collectively the "Customer Owned Equipment"). Customer is fully responsible for all continued maintenance and repair of all Customer Owned Equipment.

2. Billing Structure: The Company shall bill each residential tenant directly based on their individual meter; shall bill customer for the Parent Residential meter covering all line losses, and the House Meter; and shall bill each commercial tenant directly based on their individual meter (if appliable).

3. Subtractive /Loss Calculation Framework: To participate, (a) Customers acknowledge that electrical losses may occur within the Project Location's internal distribution system, including but not limited to wiring losses, transformer losses, and submeter inaccuracies. All differences between The Parent Residential Meter, and the sum of all Floor Aggregation Meters shall be deemed internal electrical losses ("Line Losses"); (b) The Company shall not be responsible for any Line Losses occurring downstream of the Parent Residential Meter and the Company shall have no obligation to reconcile, validate, or adjust for such differences; and (c) the customer shall bear full financial responsibility for all Line Losses downstream of the Company's delivery points, whether known or unknown.

4. To participate, Customer must complete the following, either directly or through qualified contractor:
    a. Submit a completed Electric Service Request, including all required drawings and construction project schedule.
    b. The Subtractive Metering Infrastructure and applicable Customer Owned Equipment must comply with the Company's Installation Guidelines and Metering Addendum.
    c. In accordance with Rule No. 8, Customer is responsible for all other nonstandard service costs associated with this Agreement including but not limited to Floor Aggregation Meter costs, all non-metering construction costs, and any electrical upgrades unrelated to the commercial-to-residential metering conversion.

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 24 – COMMERCIAL TO RESIDENTIAL CONVERSION PILOT– (Continued) (C)

(Applicable to Rate Schedules GS/GM, GMH, GL, GLH, & L)

SPECIAL TERMS AND CONDITIONS – (Continued) (C)

d. With the exception of electric service delivered to the Individual Residential Meters, the customer must pay for all other electric service delivered to the Project Location and abide by all other applicable requirements of the Company's retail tariff for the duration of the Agreement.
e. For each Individual Residential Meter, service shall remain in place under a continuance of service agreement with the Company. Upon a tenant vacancy, all billing responsibility shall revert to Customer and Customer shall be responsible for all usage until a new tenant establishes service. The Continuance of Service Agreement will be executed by Customer with their Agreement.
f. The Company may install communications, or data collection equipment associated with the Individual Residential Meters ("Metering Communication Equipment"). Customer shall provide suitable space for such equipment and shall not interfere with operation or signal transmission. Customer grants the Company and its representatives continuous physical access to the Subtractive Metering Infrastructure and Metering Communication Equipment in accordance with the Company's retail tariff. Customer and the Company must enter into a mutually acceptable formal easement agreement memorializing the Company's rights of access, installation, operation, maintenance, and removal of the Metering Infrastructure and Metering Communication Equipment, which easement shall be recorded as appropriate.

CONTINUATION OF SERVICE UPON TERMINATION (C)

In the event that this Pilot Program is terminated, discontinued, or expires for any reason, any Customer that is taking service under this Pilot Program as of the effective date of such termination ("Existing Customer") shall be permitted to continue receiving service under the terms and conditions of this Pilot Program, subject to the provisions herein.

Such continuation shall remain in effect until the earlier of:

a. the Customer's voluntary election to terminate service under this Pilot Program;
b. the Customer's failure to comply with the terms and conditions of this tariff; or
c. such time as the Commission authorizes a successor rate schedule or otherwise orders modification or discontinuation of service.

No new Customers shall be eligible to enroll in the Pilot Program following its termination date unless otherwise authorized by the Commission.

Attachment 2

DUQUESNE LIGHT COMPANY
SUPPLEMENT NO. 106 TO TARIFF ELECTRIC – PA.P.U.C. NO. 25

STATEMENT OF REASONS

Duquesne Light Company ("Duquesne Light" or the "Company") hereby submits this Statement of Reasons in support of Supplement No. 106 to Tariff Electric – PA. P.U.C. No. 25 ("Supplement No. 106") of the Company's Electric Tariff. In Supplement No. 106, Duquesne Light proposes to add Rider No. 24 – Commercial to Residential Conversion Pilot to the Company's Electric Tariff, as further provided below. The proposed Pilot is intended to support commercial-to-residential conversion projects by allowing eligible customers to use a subtractive metering configuration that maintains safe and reliable electric service, preserves individual residential customer metering, and reduces certain upfront electrical reconfiguration costs that may otherwise delay or prevent viable housing projects from proceeding. Customer participation in the Pilot is voluntary and subject to the eligibility requirements, customer agreement, and terms and conditions set forth in Rider No. 24.

For the reasons that follow, approval of Supplement No. 106 is proper and in the public interest. Also attached to this filing is the supporting data required by 52 Pa. Code § 53.52(a). 52 Pa. Code § 53.52(b) is not applicable to this filing because the proposed tariff change will not increase or decrease the bills of the Company's customers.

A. Description of the Change

The Company proposes to add Rider No. 24 – Commercial to Residential Conversion Pilot to its Electric Tariff. The Rider would establish a limited pilot for eligible non-residential customers undertaking full or substantial conversion of commercial or mixed-use buildings into multi-unit residential housing. The Pilot is designed to address a specific electrical service challenge that may arise when existing commercial buildings served at 277/480V are converted to residential use and would otherwise require significant redesign to support individual residential metering at 120/208V.

Under the proposed Rider, eligible projects would be permitted to use a subtractive metering configuration. In this configuration, the Company's primary service supplied to the site would remain at

277/480V, while the customer would install 120/208V step-down transformers to serve individual residential meters. The configuration would preserve the Company's requirement that residential dwelling units be individually metered and directly billed, thereby maintaining residential customer protections and access to applicable programs and service options. The building owner/operator would remain responsible for the Parent Residential Meter account and for electric service associated with building loads not billed through individual residential meters, including applicable losses captured through the subtractive metering calculation.

The proposed Rider includes eligibility criteria intended to ensure that the Pilot remains targeted and limited in scope. Among other requirements, the project must involve a commercial or mixed-use building with a predominantly commercial electrical configuration, result in net new residential units, require significant redesign under traditional approaches to support residential unit metering at 120/208V, use state or local public financial support that includes an affordable housing component, and serve residential dwelling units by heating systems served or supplemented by electric heat. The Rider also requires the participating customer to enter into a customer agreement with the Company and comply with applicable metering, access, construction, and operational requirements.

B. Effects of the change

The proposed change is expected to have no adverse effect on the Company's retail customers and may provide broader public benefits. Participation in the Pilot is voluntary and limited to eligible customers that satisfy the Rider's criteria and execute a customer agreement. The participating customer remains responsible for the costs associated with any customer-side electrical work necessary to support the Pilot configuration, including installation of step-down transformers and related building infrastructure. No infrastructure costs will be spread to other Duquesne Light customers.

The Pilot is intended to reduce a specific barrier to commercial-to-residential conversions by avoiding, where appropriate, the need for extensive commercial voltage reconfiguration throughout a building. This may improve the feasibility of conversion projects, support the creation of new residential housing units, and contribute to community and economic development objectives in the Company's service territory. The Pilot may also support more productive use of existing distribution grid assets and may result in incremental load and associated revenue from new residential occupancy, while maintaining safe and reliable service.

Importantly, the proposed change maintains the Company's prohibition on residential master metering. Individual residential meters will continue to be used for dwelling units, preserving residents' ability to establish service directly with the Company and access applicable residential customer protections, assistance programs, payment arrangements, energy efficiency offerings, and rate options. The subtractive metering configuration is intended to ensure that all electricity delivered to the project location is accounted for, including losses between the 277/480V service and the 120/208V residential metering points.

All individually metered residential customers participating under the proposed Pilot will retain the right to select their electric generation supplier consistent with Commission requirements. The building owner's or operator's generation supply decisions will not impact tenants' ability to shop for generation service or take default service, and service will function in the same manner as any other individually metered multi-family building under the Company's tariff.

Individual residential meter usage data will not be available to the pilot customer, maintaining residential customer privacy. Because this proposal is structured as a limited pilot, the Company will be able to monitor operational, billing, metering, safety, reliability, and customer impacts before considering whether any broader tariff application is appropriate. The Company may terminate or discontinue the Pilot consistent with the terms of the Rider, customer agreement, and applicable Commission requirements.

C. Conclusion

For these reasons, Duquesne Light Company respectfully requests that the Commission approve Supplement No. 106 to the Company's Tariff Electric – PA. P.U.C. No. 25, without modification, and that Supplement No. 106 be permitted to become effective on August 17, 2026.

Attachment 3

DUQUESNE LIGHT COMPANY
Responses to 52 Pa. Code § 53.52 (a)
Supplement No. 106 to Tariff Electric – PA. P.U.C. No. 25

§ 53.52 Applicability; public utilities other than canal, turnpike, tunnel, bridge and wharf companies.

(a) Whenever a public utility, other than a canal, turnpike, tunnel, bridge or wharf company files a tariff, revision or supplement effecting changes in the terms and conditions of service rendered or to be rendered, it shall submit to the Commission, with the tariff, revision or supplement, statements showing all of the following:

(1) The specific reasons for each change.

Response:

See the Statement of Reasons that is included with this filing.

(2) The Total number of customers served by the utility.

Response:

616,800 as of May 31, 2026

(3) A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.

Response:

No existing customer bills will be affected by the change.

(4) The effect of the change on the utility's customers.

Response:

The proposed change is expected to have a positive effect on the utility's customers by increasing service availability and enabling expanded access to electric service for new residential customers through the conversion of underutilized commercial buildings. Existing customers will not be negatively impacted by the proposed change.

(5) The direct or indirect effect of the proposed change on the utility's revenue and expenses.

Response:

May result in de minimis incremental revenue from the conversion of underutilized commercial buildings.

(6) The effect of the change on the service rendered by the utility.

Response:

See the Statement of Reasons that is included with this filing.

(7) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each. This subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308 (relating to voluntary changes in rates).

Response:

The Company considered a range of technical, regulatory, customer, and public interest factors in determining to propose the Downtown Commercial-to-Residential Conversion Pilot. Foremost among these were technical feasibility and safety, and compliance with existing tariff and regulatory requirements, which were given the highest priority due to the Company's obligation to ensure safe, reliable service and adherence to Commission rules. The Company also placed significant weight on customer cost impacts and project feasibility, recognizing that current requirements to reconfigure buildings from commercial to residential service can impose substantial costs that may delay or prevent otherwise viable conversion projects. In addition, the Company evaluated the potential impact on the broader customer base, prioritizing a pilot design that avoids cost shifting and maintains equitable treatment of non-participating customers. Specifically, the Company also evaluated residential customer impacts, including customer protections and availability of Company programs. The Company prioritized a pilot design that ensured tenants of any pilot participant would be Duquesne Light residential customers and have the same protections and access to programs that any other residential customer would have.

Secondary, but still important, considerations included alignment with economic development and housing policy objectives, demonstrated customer demand, and the potential for incremental load growth associated with new residential development. The Company's analysis reflects stakeholder feedback that electrical service requirements are a key barrier to downtown conversions and that targeted flexibility could enable additional projects to proceed. Finally, the Company determined that implementing the proposal as a limited pilot is an appropriate means of balancing innovation with risk management, allowing the Company and the Commission to evaluate outcomes before considering broader application. Collectively, these factors support the Company's conclusion that the proposed tariff change is a reasonable, measured response to a defined customer need and is consistent with the public interest.

(8) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308.

Response:

No studies were conducted by the Company to draft the proposed change.

(9) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

Response:

To gauge relevant customer interest in the proposed change, the Company contacted customers who would be eligible for the proposed pilot to understand electrical service barriers faced in commercial to residential building conversions. These learnings were incorporated into the pilot as designed. The Letters of Support accompanying this filing indicate the need for and value of the proposed change.

(10) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

Response:

The Company plans to introduce and implement the proposed Downtown Commercial-to-Residential Conversion Pilot through a customer-focused approach designed to ensure clarity, transparency, and ease of participation for eligible customers. Upon Commission approval, the Company will initiate targeted customer outreach and education efforts, including coordination with developers, direct communication with eligible customers, and broader stakeholder engagement – including through the Pittsburgh Downtown Partnership's Downtown Residential Development Working Group – to ensure awareness of the pilot and its benefits. The Company will administer the pilot on a limited basis with defined eligibility criteria, enabling structured participation and effective oversight, and will provide clear guidance on enrollment, program requirements, and customer responsibilities through established Business Services customer service communication channels. Throughout implementation the Company will monitor program outcomes and operational impacts to ensure continued system reliability and equitable treatment of affected non-participating customers.

(11) FCC, FERC or Commission orders or rulings applicable to the filing.

Response:

The Company is not aware of any FCC or FERC orders or rulings applicable to this filing.

Other than procedural requirements for the filing of a proposed tariff revision, the Company is not aware of any Commission orders or rulings applicable to this filing.

Attachment 4

June 9, 2026

Dear Pennsylvania Public Utility Commission:

On behalf of the Allegheny Conference on Community Development and its affiliates, I am writing to express support for Duquesne Light Company's proposed pilot program to allow subtractive metering for commercial-to-residential building conversions.

As Pittsburgh continues to prioritize the revitalization of downtown and the activation of underutilized office space, this proposal represents a practical and timely solution to a key barrier facing adaptive reuse projects. Expanding residential opportunities in the urban core is critical to strengthening our regional economy, supporting population growth, and enhancing the vibrancy of our central business district.

Commercial-to-residential conversion has emerged as an important regional priority, supported by coordinated efforts at both the state and local levels to increase housing supply, stabilize the tax base, and reinvigorate legacy office assets. However, developers are consistently encountering significant and costly electrical barriers when planning these conversions.

Duquesne Light Company's proposed pilot offers a practical and cost-effective solution to this challenge. By allowing a subtractive metering configuration, buildings can maintain their existing 277/480V service while stepping down voltage by floor to enable individual residential metering at 120/208V. This approach addresses the core infrastructure constraint without requiring a full system redesign, significantly reducing costs for developers and improving project feasibility. Importantly, the proposal does not introduce socialized costs to the broader customer base and maintains all existing safety and reliability standards.

Equally important, the pilot preserves strong consumer protections. Each residential tenant would remain a direct Duquesne Light customer, with individually metered accounts and access to all applicable programs, including those supporting low-income households. This ensures that the program advances housing goals while safeguarding ratepayer interests.

For these reasons, we respectfully encourage the Commission to approve this pilot program. Doing so will help unlock critical housing investments, advance downtown revitalization efforts, and support innovative solutions that modernize the use of existing buildings.
Thank you for your time and consideration.

Sincerely,

Stefani Pashman
Chief Executive Officer
Allegheny Conference on Community Development

PO Box 1434
Pittsburgh, PA 15230
412-261-2328
www.bomapgh.org

June 10, 2026

Dear Pennsylvania Public Utility Commission:

I am writing to express support for Duquesne Light Company's proposed pilot program to allow subtractive metering for commercial-to-residential building conversions. As Pittsburgh works to reactivate underutilized downtown office space and expand housing opportunities, the proposed pilot will help remove a meaningful barrier to adaptive reuse while maintaining consumer protections and system reliability.

Commercial-to-residential conversion has become a regional priority, supported by state and local initiatives aimed at strengthening the tax base, increasing housing supply, and revitalizing the urban core. In many cases, existing commercial building electrical configurations are not aligned with the voltage and metering structure required to serve a building redesigned for residential use. Allowing subtractive metering on a pilot basis would provide a practical and cost-effective pathway to advance housing-creation projects that might not otherwise be feasible.

Importantly, the proposed pilot maintains strong customer protections by ensuring that each residential tenant is a direct DLC customer with an individually metered account and access to applicable programs, including low-income assistance.

For these reasons, I support the Commission's consideration of this pilot and encourage its approval.

Thank you for your time and consideration.

Sincerely,

Alicia McGhee
Executive Director
BOMA Pittsburgh

FOREFRONT
DEVELOPMENT GROUP

June 9, 2026

Dear Pennsylvania Public Utility Commission:

I am writing to express support for Duquesne Light Company's proposed pilot program to allow subtractive metering for commercial-to-residential building conversions. As Pittsburgh works to reactivate underutilized downtown office space and expand housing opportunities, the proposed pilot will help remove a meaningful barrier to adaptive reuse while maintaining consumer protections and system reliability.

Commercial-to-residential conversion has become a regional priority, supported by state and local initiatives aimed at strengthening the tax base, increasing housing supply, and revitalizing the urban core. In many cases, existing commercial building electrical configurations are not aligned with the voltage and metering structure required to serve a building redesigned for residential use. Allowing subtractive metering on a pilot basis would provide a practical and cost-effective pathway to advance housing-creation projects. The potential savings on a residential conversion of an existing commercial building could be millions of dollars, which is a material difference on the project's viability.

Importantly, the proposed pilot maintains strong customer protections by ensuring that each residential tenant is a direct DLC customer with an individually metered account and access to applicable programs, including low-income assistance.

For these reasons, I support the Commission's consideration of this pilot and encourage its approval.

Thank you for your time and consideration.

Sincerely,

Chad Wheatley
Principal

ForeFront Development Group, LLC
PO Box 62026
Pittsburgh, PA 15241

OXFORD

June 9, 2026

Dear Pennsylvania Public Utility Commission:

I am writing to express support for Duquesne Light Company's proposed pilot program to allow subtractive metering for commercial-to-residential building conversions. As Pittsburgh works to reactivate underutilized downtown office space and expand housing opportunities, the proposed pilot will help remove a meaningful barrier to adaptive reuse while maintaining consumer protections and system reliability.

Commercial-to-residential conversion has become a regional priority, supported by state and local initiatives aimed at strengthening the tax base, increasing housing supply, and revitalizing the urban core. In many cases, existing commercial building electrical configurations are not aligned with the voltage and metering structure required to serve a building redesigned for residential use. Allowing subtractive metering on a pilot basis would provide a practical and cost-effective pathway to advance housing-creation projects. The potential savings on a residential conversion of an existing commercial building could be millions of dollars, which is a material difference on the project's viability.

Importantly, the proposed pilot maintains strong customer protections by ensuring that each residential tenant is a direct DLC customer with an individually metered account and access to applicable programs, including low-income assistance.

For these reasons, I support the Commission's consideration of this pilot and encourage its approval.

Thank you for your time and consideration.

Sincerely,

Shawn Fox
President and CEO

2865 Railroad Street, Suite 202
Pittsburgh, Pennsylvania 15222

412.261.1500 | www.oxforddevelopment.com

June 5, 2026

SUBJECT: Support for Duquesne Light Company's Pilot Program

Dear Pennsylvania Public Utility Commission:

Formed by Downtown businesses, professionals, civic organizations, foundations, and residents, the Pittsburgh Downtown Partnership (PDP) is a non-profit place management organization that develops and implements programs and initiatives to enhance the Downtown neighborhood. The PDP serves as the City-designated Registered Community Organization for the Downtown community, the State-designated Transportation Management Association for Downtown Pittsburgh, and the Business Improvement District (BID) for Downtown Pittsburgh -- the second largest BID service area in Pennsylvania.

Office-to-residential conversion has become a regional priority, supported by state and local initiatives aimed at revitalizing Downtown while increasing housing supply. In many cases, existing electrical configurations in office buildings are not aligned with the voltage and metering structure required to serve a building redesigned for residential use. Allowing subtractive metering on a pilot basis would provide a practical and cost-effective pathway to advance housing-creation projects that might not otherwise be feasible.

I am writing to express our support for Duquesne Light Company's proposed pilot program to allow subtractive metering for these complex building conversions. The program will help remove a critical barrier for these redevelopments while maintaining consumer protections and system reliability. Through this program, residential tenants will be direct DLC customers with individually metered accounts and access to applicable programs, including low-income assistance.

PDP's vision is to double the residential population in Downtown Pittsburgh by 2035. This ambitious vision can only be accomplished through innovative partners willing to try programs such as this. Only by converting obsolete office buildings will the Downtown real estate market be fully occupied, optimized for modern use, and therefore economically stable for our region's tax base.

Thank you for your time, and we encourage the Commission to approve of this proposal.

Sincerely,

Aaron Sukenik
Vice President of District Development

asukenik@downtownpittsburgh.com

RIDC
Regional Industrial Development Corporation

June 8, 2026

Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: DLC's Commercial-to-Residential Conversion Pilot

To Whom it May Concern:

We are writing to express support for Duquesne Light Company's proposed pilot program to allow subtractive metering for commercial-to-residential building conversions. As Pittsburgh works to reactivate underutilized downtown office space and expand housing opportunities, the proposed pilot will help remove a meaningful barrier to adaptive reuse while maintaining consumer protections and system reliability.

Commercial-to-residential conversion has become a regional priority, supported by state and local initiatives aimed at strengthening the tax base, increasing housing supply, and revitalizing the urban core. In many cases, existing commercial building electrical configurations are not aligned with the voltage and metering structure required to serve a building redesigned for residential use. Allowing subtractive metering on a pilot basis would provide a practical and cost-effective pathway to advance housing-creation projects that might not otherwise be feasible.

Importantly, the proposed pilot maintains strong customer protections by ensuring that each residential tenant is a direct DLC customer with an individually metered account and access to applicable programs, including low-income assistance.

For these reasons, RIDC supports the Commission's consideration of this pilot and encourage its approval.

Thank you for your time and consideration.

Sincerely,

Timothy F. White

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