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July 8, 2026

Via Electronic Filing

Mr. Matthew 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. P-2026-3061673, M-2019-3008227, R-2024-3046523**

Dear Secretary Homsher:

Enclosed please find Duquesne Light Company's ("Duquesne Light") Comments responsive to the Pennsylvania Public Utility Commission's June 18, 2026 Order.

Please do not hesitate to contact me with any questions.

Respectfully Submitted,

Michael Brechlin
Assistant General Counsel,
Regulatory

Enclosures
Cc: Certificate of Service

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).

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July 8, 2026

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BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company Universal Service and Energy Conservation Plan for 2020-2025	M-2019-3008227
Petition to Amend Duquesne Light Company Universal Service and Energy Conservation Plan for 2020-2025	P-2026-3061673
Pennsylvania Public Utility Commission, *et al*. v. Duquesne Light Company	R-2024-3046523

COMMENTS OF DUQUESNE LIGHT COMPANY

I. INTRODUCTION AND BACKGROUND

Pursuant to the Pennsylvania Public Utility Commission's ("PUC" or "Commission") November 7, 2024 Order approving Duquesne Light Company's ("Duquesne Light" or "Company") base rate settlement,[1] Duquesne Light petitioned the Commission for approval of modifications to its Customer Assistance Program ("CAP") enrollment on March 31, 2026. Specifically, the Company proposed to use data shared by the Pennsylvania Department of Human Services ("DHS") for Duquesne Light customers who have received Low-Income Home Energy Assistance Program ("LIHEAP") grants to confirm eligibility for its CAP program,

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

including expedited recertification and auto-enrollment. The intent of this proposal is to increase the accessibility of the CAP program by making enrollment less burdensome to income-eligible customers. The Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania ("CAUSE-PA") filed an Answer to the Petition on April 20, 2026, and an amended Answer on April 22, 2026.

On June 18, 2026, the PUC issued an Order which, in part, instructed Duquesne Light to file comments responsive to questions posed in the Commission's Order.[2] Additionally, Chairman DeFrank offered a statement expressing concern and a need for clarification on aspects of the Company's petition. The Company hereby offers responses as directed by the Order. Duquesne Light believes these clarifications satisfy the Commission's concerns. Should the PUC continue to have concerns with the Company's auto-enrollment proposal, Duquesne Light offers an alternative approach for the Commission's consideration.

II. OPT-OUT TIMEFRAME

In its filing, the Company proposed using DHS data on LIHEAP grant recipients to auto-enroll income-eligible customers. Upon identification of income-eligible customers, Duquesne Light proposed sending the customer CAP program information and providing the customer with 30 days to opt-out before the account would be automatically enrolled. If the customer opts out during that period, no further action is taken and the customer is not enrolled in CAP. If the customer does not take action to opt-out, the customer would be automatically enrolled in CAP upon expiration of the opt-out window.

[2] See Commission's Order, P-2026-3061673, June 18, 2026, p. 12.

The Commission's Order references the Answer filed by CAUSE-PA which "recommends that Duquesne extend the opt-out timeframe for customers to a minimum of 60 days to give customers auto-enrolled in CAP a chance to see the impacts of enrollment."[3] Similarly, Chairman DeFrank's June 18th Statement expresses concern about "whether and how customers subject to opt-out auto-enrollment would be notified of their payment arrangement forfeiture in advance of enrollment." The Company wishes to clarify that customers are not auto-enrolled until *after* the expiration of the opt-out window. The opt-out period is intended to allow a customer time to review program information and determine if participation is right for them. No changes will be made to the account until after the opt-out period expires.

In its Order the Commission requested comments on the feasibility of a 60-day opt-out window instead of a 30-day opt-out. Duquesne Light has no objection to expanding the opt-out window to 60 days to allow customers additional time to review program materials and make an informed decision.

Additionally, Duquesne Light respectfully declines to adopt the recommendation to flag customer accounts for exclusion from future LIHEAP data-sharing enrollment communications following a prior opt-out election. Duquesne Light believes customers should continue to receive information regarding potential CAP eligibility in future program years, as household circumstances, arrearage levels, and program eligibility may change over time. Accordingly, if qualifying LIHEAP data is received during a subsequent LIHEAP season, Duquesne Light may again communicate CAP enrollment opportunities to the customer.

The June 18th Order further asks the Company to clarify "whether customers will be eligible for payment arrangements on CAP arrears if they opt-out of CAP after receiving CAP

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[3] Order, p. 6

benefits." When a customer opts out of auto-enrollment, they will not be enrolled in CAP. Thus, there are no CAP arrears accrued. For customers who do not opt-out and are auto-enrolled in CAP but subsequently remove themselves or default from the CAP program, CAP arrears are treated like any other arrearage and would be eligible for a Duquesne Light payment arrangement under the same criteria as a non-CAP customer.[4]

III. ELIGIBILITY REVIEW

Upon receipt of data from DHS, the Company reviews all customers receiving LIHEAP grants to determine income-eligibility for Duquesne Light's CAP program. The Company, pursuant to its approved Universal Service and Energy Conservation Plan ("USECP"), sets income eligibility for CAP at 150% or below of the Federal Income Poverty Guidelines, based on family size. While DHS's LIHEAP program generally follows this guideline as well, the data set of LIHEAP recipients provided to the Company contained records from 614 households with income above 150% of federal poverty guidelines. This represents 4.7% of the customers in the data set. The Company does not know why DHS approved the LIHEAP applicants who reported income above 150% of federal poverty guidelines. Of the customers already enrolled in CAP for whom LIHEAP data indicated ineligibility due to income level, the Company called one customer to verify income eligibility. The verification confirmed income ineligibility and the customer was defaulted from CAP, consistent with program rules. Upon additional consultation with the Pennsylvania Utility Law Project the Company discontinued using DHS data to confirm eligibility of existing CAP participants

[4] Duquesne Light is mindful that the Commission is restricted from providing payment plans on CAP arrears. Duquesne Light does not consider whether arrears are from CAP when determining eligibility for standard payment plans for customers who are not currently enrolled in CAP.

IV. TIMEFRAME FOR CONSENTING TO EXPEDITED ENROLLMENT

Duquesne Light's petition proposed establishing an expedited enrollment process for customers identified as eligible based on DHS data with an outstanding balance of less than $250. Consistent with the Order, the Company clarifies that customers who are eligible for expedited enrollment will be provided 60 days to opt-in to CAP. Customers who do not utilize expedited enrollment may still manually apply to the CAP program.

The June 18th Order further requests that the Company provide copies of its draft customer notification. Duquesne Light has attached a preliminary draft of the opt-in letter, as well as the opt-out letter as Attachment 1 and Attachment 2. The draft communications provide information to the customer on the potential benefits of CAP enrollment as well as their responsibilities. The communications further provide information on how access to PUC payment arrangements and the ability to choose an EGS will be impacted by enrollment, responsive to points raised in Chairman DeFrank's statement. The Company notes that the current USECP amendment proposal states that the Company will consult with the Income Eligible Advisory Group ("IEAG") to develop communications such as these. The Company has not yet consulted with the IEAG regarding these draft notices, thus they are subject to change based on input received in the future.

V. AUTO-ENROLLING ACCOUNTS WITH AN EGS

The Company's proposal to auto-enroll customers in CAP includes those enrolled with an electric generation supplier ("EGS"). Customers are provided with an opt-out period to review information about CAP and decide whether to opt-out of enrollment. After expiration of the opt-out period, if the customer has not opted out, the customer is enrolled in CAP and moved from the EGS to default service. The pre-enrollment information provided to the customer will clearly explain that should they proceed with auto-enrollment in CAP, their service will be transitioned from their EGS to default service, and that termination fees due to CAP enrollment are prohibited. Importantly, Duquesne Light's approved supplier tariff prohibits EGSs from charging termination fees[5] to customers returning to default service due to CAP enrollment. Thus, auto-enrolled customers are protected from any additional charges. Duquesne Light has an established process to notify EGSs when a customer enrolls in CAP and returns to default service. These notifications identify the customer as enrolling in CAP, which informs the EGS that cancellation or early termination fees should not be assessed. In addition, Duquesne Light provides annual communications to participating EGSs reminding them of this requirement and the protections applicable to CAP customers.

Automatic enrollment also gives EGS customers the opportunity for additional savings if switching to default service as part of CAP enrollment results in a lower rate than what they paid with their supplier. Of the 4,182 CAP eligible LIHEAP recipients received between July 14, 2025 – June 29, 2026, 340 are EGS customers. These 340 income-eligible overpaid for electricity by approximately $89,751, averaging $263.98 per person per year compared to the Duquesne Light Price to Compare (default service rate).

Income-eligible customers should be provided as much help as possible to have affordable energy costs and maintain utility service. Automatic enrollment provides the easiest path to enroll in CAP and enjoy bill savings. During the opt-out window, there is no risk to the customer; they have time to review the CAP program and can decide to take action to opt-out.

[5] See PaPUC Order entered January 14, 2025 at Docket Number P-2024-3048592 and Duquesne Light Company tariff PA P.U.C. No. 3s, Rule 5.4.1.1.

Income-eligible customers should not be overpaying for electricity when there is an easy, automatic method to enroll customers in CAP. For these reasons, Duquesne Light is not seeking affirmative consent to automatically enroll the class of customers identified in its filing.

VI. CAP ENROLLMENT LEVELS AND COSTS RECOVERED FROM RATEPAYERS

In its Order, the Commission directs Duquesne Light to clarify its projected CAP enrollment levels for 2026 and 2027. Please see the below table for the requested information.

Year	USECP Filed Budget	Participation Increase (# of Customers)*	CAP Budget Increase	Total Estimated USECP Budget
2026	$60,272,887	1100	$1,291,671	$61,564,557
2027	$62,986,088	1100	$1,291,671	$64,277,759

*Estimated participation increase using January-May actuals and assumes consistent growth rate during months when LIHEAP is open.

VII. TRACKING AND IMPACT EVALUATION

The Commission directed Duquesne Light to identify whether it will have a process in place to track and report on auto-enrolled customers consistent with the Commission's recommendations, below:

(1) the number of customers auto enrolled (broken down by FPIG level), (2) the number of customers who opt-out, (3) impact of auto enrollment on payment behavior and

debt forgiveness, (4) the reasons auto-enrolled customers opt-out, and (5) the timing of the opt-out requests. [6]

The Company will have a process in place to track and report on its CAP auto-enrollment program. Specifically, the Company will track:

- The number of customers automatically enrolled in CAP, including a breakdown by (FPIG) level; and
- The number of customers who opt-out of auto-enrollment.

These statistics will be reported in the existing annual report provided to the PUC covering the CAP program.[7] Duquesne Light does not, however, propose to implement additional tracking related to: (1) the impact of auto-enrollment on customer payment behavior and debt forgiveness outcomes; (2) the reasons customers elect to opt out of auto-enrollment; or (3) the timing of customer opt-out requests. Duquesne Light notes that payment behavior and debt forgiveness metrics are influenced by numerous factors beyond auto-enrollment itself, making it difficult to attribute changes directly to the auto-enrollment initiative. Additionally, the collection and categorization of customer opt-out reasons, as well as tracking the timing of opt-out requests, would require the development of new processes and systems that are not necessary for administration of the CAP auto-enrollment program.

VIII. ALTERNATIVE RECOMMENDATION

[6] See Order at p.11. Note: the list included in the Commission's recommendations has been reformatted for continuity.

[7] Duquesne Light's Universal Service Annual Report.

On June 18, 2026, PUC Chairman DeFrank issued a statement expressing concern with Duquesne Light's opt-out CAP enrollment process.[8] Commissioner Coleman has previously expressed a similar sentiment in response to auto-enrollment proposals.[9] While Duquesne Light believes it has addressed many of the Chairman's concerns in the comments above, it has not yet directly addressed the Chairman's concerns with the lack of affirmative consent in the automatic enrollment process. Given the concerns expressed in the Chairman's statement, as well as the theme of the questions in the Commission's June 18th Order, Duquesne Light makes the following alternative proposal for Commission consideration if the Commission is not inclined to approve Duquesne Light's proposed opt-out process:

The opt-out automatic enrollment category set forth in Duquesne Light's proposed amendment would be removed. Instead, all customers identified as income-eligible via the DHS data would be offered expedited enrollment. Duquesne Light would track and report annually on opt-in enrollments. Duquesne Light does not have any information indicating that enrollment levels under this alternative would change from those projected in section VI above.

IX. CONCLUSION

The Company believes all income-eligible customers deserve an opportunity to efficiently avail themselves of any programs to maintain affordable utility service. DHS data sharing provides an opportunity to further simplify this process. Duquesne Light thanks the Commission for the opportunity to provide more information about its proposed amendments to

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[8] See Statement of Chairman Stephen M. DeFrank, p. 1, June 18, 2026, Docket Nos. M-2019-3008227, P-2026 3061673, R-2024-3046523.
[9] See the March 26, 2026 Statement of Commissioner John Coleman at Docket No. P-2024-3052324.

its USECP regarding LIHEAP customer auto-enrollment in the CAP program, as well as a potential alternative plan for expedited enrollment.

Respectfully Submitted,

July 8, 2026

Michael Brechlin
Assistant General Counsel, Regulatory
Duquesne Light Company
Nova Place
100 South Commons, Suite 118
Pittsburgh, PA 15212
Email: mbrechlin@duqlight.com

Duquesne Light Company
Nova Place
100 S Commons, Suite 118
Pittsburgh, PA 15212

Attachment 1

Sample Text: Expedited Enrollment
(For illustrative purposes only and subject to revisions)

Service Address:
123 MAIN ST
PITTSBURGH, PA 15222

CUSTOMER NAME
123 MAIN ST
PITTSBURGH, PA 15222

Account Number: 1234-567-890

[Month, Date, Year]

Subject: You Qualify for Lower Electricity Bills Through Duquesne Light Company's Customer Assistance Program

Dear Customer,

We've reviewed information provided through Pennsylvania's Low-Income Home Energy Assistance Program (LIHEAP), and it appears your household qualifies for Duquesne Light Company's Customer Assistance Program (CAP).

How to Opt-In to CAP
To opt-in to CAP, please provide your consent to Duquesne Light by **[Month, Date, Year]** through the following methods:

- Web: www.XXX.com
- Phone: XXX-XXX-XXXX
- Written correspondence

How CAP Can Help
CAP is designed to make energy costs more affordable for income-eligible households. Depending on your situation, CAP may help by:

- Lowering your monthly electric bill.
- Forgiving certain past-due account balances over time.
- Helping you stay current on your electric account.
- Connecting you with other programs and community resources that may be available to you.

Your Estimated CAP Benefits
Based on the information available through LIHEAP, your estimated CAP benefits include:

- [Calculated Percentage of Income Payment Program amount]: $_______
- [Maximum Annual CAP Assistance]: $_________
- [Past-Due Balance Eligible for Forgiveness]: $_______

Your Responsibilities as a CAP Customer
To remain enrolled and continue receiving CAP benefits, you will need to:

- Pay your monthly CAP bill by the due date.
- Apply for available energy assistance grants when eligible.
- Participate in energy education programs if required.
- Accept weatherization services if you qualify.
- Report changes in your household income, address, or number of household members.

Duquesne Light Company
Nova Place
100 S Commons, Suite 118
Pittsburgh, PA 15212

Important Information Before You Enroll

If You Have a Past-Due Balance
CAP may change how your existing account balance is handled.

Enrolling in CAP means you will give up the right to certain Pennsylvania Public Utility Commission payment arrangements that may otherwise be available for past-due balances.

Before deciding whether to enroll, please contact Duquesne Light if you have questions about your existing balance, payment arrangements, or how CAP participation may affect your account.

If You Choose Your Electric Supplier
Some customers purchase electricity from a company other than Duquesne Light.

If you enroll in CAP, your electric generation service must return to Duquesne Light's default service program. This means your current supplier agreement would end.

Customers enrolled in CAP are protected from supplier termination or cancellation fees related to returning to default service. We still encourage you to review your supplier agreement and contact your supplier if you have questions about your account.

Ready to Enroll?
We must receive your written consent by **[Month, Date, Year]** to enroll you in CAP and begin your benefits.

If you have questions or would like help understanding your options, please contact us at XXX-XXX-XXXX

Thank you for choosing Duquesne Light Company to be your trusted energy partner.

Sincerely,

Customer Service Department

SAMPLE

Duquesne Light Company
Nova Place
100 S Commons, Suite 118
Pittsburgh, PA 15212

Attachment 2

Sample Text: Auto-Enrollment
(For illustrative purposes only and subject to revisions)

Service Address:
123 MAIN ST
PITTSBURGH, PA 15222

CUSTOMER NAME
123 MAIN ST
PITTSBURGH, PA 15222

Account Number: 1234-567-890

[Month, Date, Year]

Subject: You Qualify for Lower Electricity Bills Through Duquesne Light Company's Customer Assistance Program

Dear Customer,

We've reviewed information provided through Pennsylvania's Low-Income Home Energy Assistance Program (LIHEAP), and it appears your household qualifies for Duquesne Light Company's Customer Assistance Program (CAP).

How to Opt-Out of CAP
To opt-out of CAP, please provide your consent to Duquesne Light by **[Month, Date, Year]** through the following methods:

- Web: www.XXX.com
- Phone: XXX-XXX-XXXX
- Written correspondence

If we don't hear from you by this date, you will be automatically enrolled into CAP.

How CAP Can Help
CAP is designed to make energy costs more affordable for income-eligible households. Depending on your situation, CAP may help by:

- Lowering your monthly electric bill.
- Forgiving certain past-due account balances over time.
- Helping you stay current on your electric account.
- Connecting you with other programs and community resources that may be available to you.

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Based on the information available through LIHEAP, your estimated CAP benefits include:

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SAMPLE

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SAMPLE

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If you enroll in CAP, your electric generation service must return to Duquesne Light's default service program. This means your current supplier agreement would end.

Customers enrolled in CAP are protected from supplier termination or cancellation fees related to returning to default service. We still encourage you to review your supplier agreement and contact your supplier if you have questions about your account.

Want to Opt-Out?
If you do not want to be automatically enrolled in CAP, please notify us by **[Month, Date, Year]**.

If you have questions or would like help understanding your options, please contact us at XXX-XXX-XXXX

Thank you for choosing Duquesne Light Company to be your trusted energy partner.

Sincerely,

Customer Service Department