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VIA ELECTRONIC FILING

Mr. Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, PA 17120

July 10, 2026

**Re: Distributed Energy Resources Participation in Wholesale Markets
L-2023-3044115**

Dear Secretary Homsher,

On June 10, 2026, Duquesne Light Company (“Duquesne Light” or “Company”) filed Comments in the above referenced proceeding. The Company approaches this topic with a focus on balancing affordability, reliability, and safety for all customers with the potential benefits that can come from increasing distributed energy resource (“DER”) penetration and participation in wholesale markets.

The Company respectfully submits this letter in lieu of Reply Comments. As a member of the Energy Association of Pennsylvania (“EAP”), Duquesne Light participated in the drafting of EAP’s Reply Comments. While the Company has elected not to file individual Reply Comments, instead supporting those of EAP, it does wish to highlight a few key observations based on its review of all Comments filed, as follows:

- Duquesne Light urges the Pennsylvania Public Utility Commission (“Commission”) to recognize and be persuaded by the strong alignment among diverse commenters on the **need for critical customer protections**. The comments of the Office of Consumer Advocate, Coalition for Affordable Utility Service and Efficiency in Pennsylvania (“CAUSE-PA”), Earth Justice Advocates, Philadelphia Energy Authority (“PEA”), Energy Association of Pennsylvania (“EAP”), PPL, and Duquesne Light all include



similar themes, calling for the PUC to exert its authority to enact protections for retail customers participating in DER aggregations.

- Similarly, several Commenters note the **lack of guidance on cost recovery**, particularly for utility expenditures that cannot be allocated to a specific customer or aggregation. This sentiment was shared by commenters representing different industries and interests, including CAUSE-PA, Keystone Energy Efficiency Alliance (“KEEA”), PECO, PPL, and Duquesne Light, and deserves additional consideration.
- Recognizing the **evolving nature of DER aggregation**, the Commission should resist recommendations that risk “making perfect the enemy of the good,” instead focusing on standing up practices and mechanisms that allow for implementation of FERC Order 2222 in the near term, and can evolve over time as DER aggregation levels increase. In particular, calls to stand up a standardized platform for data exchange would require significant investment and costly IT integrations on the part of the utility in the near term, at a time of heightened focus on customer affordability. (See comments of Voltus, Mission:Data; and Utility API.) Duquesne Light supports working through this topic via the Electronic Data Exchange Working Group (“EDEWG”) for initial implementation, with a goal of realizing future optimizations over time, which could include use of a standard platform in the future.
- Finally, Duquesne Light finds the recommendation for a **potential “value of DER” proceeding**, as called for in the comments of CAUSE-PA, worth additional consideration (see CAUSE-PA at 6). While the Company opposes the suggestion that the ability of an EDC to set fees for aggregation via its tariff should be postponed until the outcome of such a proceeding, a future technical proceeding to evaluate the benefits and costs of DER integration could serve all stakeholders. Should the Commission act on this recommendation, Duquesne Light intends to be an active participant.



In closing, the Company appreciates the opportunity to provide high-level feedback via this letter. While the Company has elected not to file Reply Comments, it reserves the right to provide additional input on this topic in future forums.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "LIBQ", with a long horizontal flourish extending to the right.

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