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DUQUESNE LIGHT CO.
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August 7, 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") Reply 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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August 7, 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

REPLY 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

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

Energy Assistance Program ("LIHEAP") grants to confirm eligibility for CAP, including expedited recertification and auto-enrollment. The intent of this proposal is to increase the accessibility of CAP 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 Order set the deadline for Duquesne Light's Comments for July 8, 2026, Party Comments July 28, 2026, and Reply Comments August 7, 2026.

On July 8, 2026, Duquesne Light filed responsive Comments pursuant to the Commission's Order. On July 28, 2026, DHS and CAUSE-PA each filed timely Comments. Also on July 28, 2026, the Pennsylvania Office of Small Business Advocate filed a letter indicating that it would not be filing comments, while reserving the right to file Reply Comments.

Duquesne Light hereby provides these Reply Comments for the Commission's consideration.

II. USE OF LIHEAP DATA

Duquesne Light and DHS signed a data sharing agreement under which DHS provides LIHEAP recipient data to Duquesne Light. In its Comments, DHS makes it clear that DHS data is to be used only for the purpose of enrollment or recertification, and not for initiation of a process to default customers from CAP.[3] DHS also states that it will pursue termination of the

[2] See Commission's Order, P-2026-3061673, June 18, 2026, p. 12.
[3] See DHS Comments filed July 28, 2026.

agreement if Duquesne Light's plan is adopted including the provisions regarding the use of LIHEAP data to initiate an eligibility review that could result in a customer being defaulted from CAP.

In response to DHS' comments, Duquesne Light confirms that it will not use LIHEAP data to default a customer from CAP. LIHEAP data will be used as follows:

1. **For customers not already enrolled in CAP**, LIHEAP data will be used for auto-enrollment and expedited enrollment.
2. **For existing CAP customers who are within the recertification period**, LIHEAP data can be used to confirm continued eligibility. CAP benefits and required monthly payments when recertified will be based on the data. This may cause customer benefits to increase, remain the same, or decrease based on household size and income. If the LIHEAP data does not confirm continued eligibility, the customer will not be subject to action based solely on that data, and will proceed through the **existing** CAP recertification process.
3. **For existing CAP customers who are not within the recertification period**, no action will be taken based on LIHEAP data. When the customer enters the recertification period, based on their individual account timing, LIHEAP data will be reviewed as described above.

III. OPT-OUT TIMEFRAME

In its Comment filing, CAUSE-PA recommended two sequential opt-out windows of 30 and 60 days, adding additional steps and complexity to the previously proposed processes.[4] It is

[4] See Comments of CAUSE-PA, filed July 28, 2026, pp 3-4.

also unclear what CAUSE-PA means by "withdraw without penalty" when referring to opting out of CAP after enrollment.[5]

Duquesne Light's original opt-out proposal provided information to eligible customers, with a 30-day window of time to choose to opt-out before the customer would be automatically enrolled. Based on the response filed and the Commission's June 18, 2026 Order, Duquesne Light expressed its willingness to move to 60-days' notice before a customer is enrolled, and clarified the process with more detail.

In Duquesne Light's Comment filing, draft notification letters were provided for both opt-in and opt-out scenarios. Per Duquesne Light's originally filed proposed modifications, and as supported by the Commission's June 18, 2026 Order, Duquesne Light reviewed these draft communications with its Income Eligible Advisory Group ("IEAG") on July 28, 2026 and gathered additional feedback. The draft and final versions will contain information specific to the individual customer, including: 1. Calculated Percentage of Income Payment Program amount; 2. Maximum Annual CAP Assistance; and 3. Past-Due Balance Eligible for Forgiveness.

Duquesne Light's 60-day opt-out provides the customer sufficient time to make an informed decision, and opt-out or proceed with auto-enrollment. If the customer wants to enroll earlier than the 60 days, they can contact the Company, and the enrollment can proceed immediately under the expedited path instead. Whether the customer waits for the 60 days to pass for automatic enrollment, or the customer pursues expedited enrollment, benefits will be backdated to the date of the letter. Any customer participating in CAP may unenroll at any time if they no longer wish to participate. Automatically enrolled CAP customers do not need a separate

[5] Id. at p. 4.

window of time to unenroll, and putting one in place adds unnecessary confusion to the process, counter to the intent of creating a simplified and streamlined process.

A customer would have the same set of responsibilities if they manually enrolled with CAP, then decided to unenroll. In either scenario, a customer who withdraws from CAP will be responsible for paying their ongoing regular electric bill, paying their past-due balance (frozen arrears from CAP), paying any past-due balances accrued while in CAP, and applying for a payment plan if desired by customer. Any CAP benefits received will not be retroactively removed.

IV. ELIGIBILITY REVIEW

In its Comments, CAUSE-PA brought up concerns with the use of LIHEAP data to default customers from CAP.[6] To alleviate those concerns, Duquesne Light refers to the "USE OF LIHEAP DATA" section above to clarify.

While DHS has the same eligibility threshold of 150% of Federal Poverty Level ("FPL"), it utilizes certain deduction criteria to adjust gross income, creating a scenario where an applicant may be eligible for LIHEAP but not Duquesne Light's CAP. CAUSE-PA, in its Comments, asked that DHS standards be used for Duquesne Light's CAP program, so that any customer eligible for a LIHEAP grant would be eligible for CAP.[7]

Duquesne Light's CAP eligibility reviews were evaluated and approved by the Commission as part of its Universal Service and Energy Conservation Plan ("USECP") [8] . The

[6] Id. at pp. 5-6.
[7] Id. at pp. 6-8.
[8] Order conditionally approving USECP Plan, Docket No. M-2019-3008227, at p. 92 (April 14, 2022); Secretary Letter, Docket No. M-2019-3008227, at p. 2 (August 4, 2022).

approved USECP established the 150% of FPL eligibility criteria for CAP, consistent with previous versions of the USECP, in place for more than a decade.

To adopt the deduction methodology used by DHS, which has not been reviewed and approved by the Commission, is problematic. LIHEAP data is intended to help streamline the enrollment and recertification process, not supplant eligibility criteria.

Further, adopting CAUSE-PA's suggestion that LIHEAP eligibility automatically implies CAP eligibility, would have an inappropriate discriminatory effect on customers who have not applied for a LIHEAP grant. If a customer who is above 150% of FPL is accepted due to the LIHEAP grant, and a customer who applies with the same income, but without a LIHEAP grant, is denied, that is unfairly discriminatory. Duquesne Light declines to accept the recommendation of CAUSE-PA on this matter and will continue to evaluate CAP eligibility in compliance with its Commission-approved USECP.

V. TIMEFRAME FOR CONSENTING TO EXPEDITED ENROLLMENT

Duquesne Light's proposed 60-day timeframe for expedited enrollment is intended to provide customers with sufficient time to make an informed decision while helping eligible households access CAP benefits as quickly as possible. The timeframe also helps ensure enrollment decisions are based on the most current household information available, reducing the risk of relying on outdated LIHEAP data.

Pursuant to the DHS data sharing agreement, customer data may be used only if it was received by DHS during the current LIHEAP Program Year or within the preceding 12 months. As a result, the usable life of the data can vary significantly. For example, DHS may have received customer information 11 months before it is shared with Duquesne Light, leaving only one month before the data becomes ineligible for program use. Similarly, a customer who receives an expedited enrollment offer based on six-month-old LIHEAP data and elects to enroll seven months later would be relying on information that is no longer valid for enrollment purposes. In these situations, customers could receive inaccurate information regarding their eligibility and potential benefits, creating confusion and unmet expectations.

The proposed 60-day enrollment period helps ensure that eligible customers can be connected to available assistance while the underlying LIHEAP data remains current and actionable. This approach is also consistent with Duquesne Light's existing CAP practices, which allow customers to use income information from the previous 12 months when it is beneficial to the customer. Finally, establishing a uniform enrollment period for all customers promotes consistency in program administration, simplifies customer communications, and provides clear and predictable expectations regarding enrollment opportunities.

Additionally, the Order cited by CAUSE-PA requires an Electric Distribution Company ("EDC") to file a letter indicating participation in DHS data sharing, and that the public utility will use a simplified/streamlined process, not that it already used such a process.[9] The Order did not provide a date by which all EDCs would need to have a process in place. Useable data was not available from DHS until July of 2025, and Duquesne Light has since been developing its simplified and streamlined process. Duquesne Light will report on its process in its next USECP plan filing, as required by the Order,[10] as well as provide updates when available to CAUSE-PA and stakeholders.

[9] 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, Order, Docket No. M-2023-3038944, at p. 3 (June 13, 2024)
[10] Id. at pp. 4, 6.

VI. AUTO-ENROLLING ACCOUNTS WITH AN ELECTRIC GENERATION SUPPLIER ("EGS")

Duquesne Light agrees with CAUSE-PA's comments regarding auto-enrolling accounts with an EGS, filed July 28, 2026, and has no additional comments.[11]

VII. TRACKING AND IMPACT EVALUATION

In its Comments filed July 8, 2026, Duquesne Light did not 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 maintains its reasoning from the originally filed Comments, 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; and 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

Duquesne Light has no further comments regarding the alternative recommendation originally provided in its July 8, 2026 Comments.

IX. CONCLUSION

[11] Comments of CAUSE-PA, filed July 28, 2026, pp 10-11.

Duquesne Light thanks the Commission for the opportunity to provide Reply Comments regarding LIHEAP customer auto-enrollment in CAP, and requests that the proposed USECP amendments be approved as filed, with modifications based on Comments and Reply Comments filed by the Company.

Respectfully Submitted,

August 7, 2026

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