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August 28, 2026

VIA ELECTRONIC FILING

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

Re: Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Address Payment Arrangements
L-2025-3058767

Dear Secretary Homsher:

Enclosed for filing please find Duquesne Light Company's Comments in the above referenced proceeding. If you have any questions regarding the information contained in this filing, please feel free to contact me.

Sincerely,

Lindsay A. Baxter
Senior Manager, Energy Policy and Public Affairs

Cc:
Stephanie A. Wilson, stepwilson@pa.gov
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Address Payment Arrangements	: : :	Docket No. L-2025-3058767

COMMENTS OF
DUQUESNE LIGHT COMPANY

I. INTRODUCTION

On December 31, 2025, the former Chapter 14 of the Public Utility Code expired due to the sunset provision embedded within. The former Chapter 14 aimed to eliminate opportunities for customers capable of paying utility bills to avoid paying their bills on time and to facilitate public utilities' efforts to reduce their uncollectible accounts. As a result of the sunset, on December 24, 2024, the Pennsylvania Public Utility Commission ("PUC" or "Commission") entered a Statement of Policy, at Docket No. M-2024-3052328, to provide clarification regarding payment arrangements and public utility service termination. At its February 19, 2026 Public Meeting, the PUC adopted a Notice of Proposed Rulemaking Order ("NOPR") regarding a proposal to amend provisions of 52 Pa. Code, Chapter 56 to address payment arrangements.

The February 19, 2026 NOPR, which proposes the PUC's regulatory changes, was published in the May 30, 2026, *Pennsylvania Bulletin* at 52 Pa.B. 3136, establishing a 60-day public comment period, followed by a 30-day reply period. On June 5, 2026, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") and the Tenant Union Representation Network ("TURN") filed a request for extension of comments and reply comments. The PUC issued a Secretarial Letter on June 18, 2026 granting an extension of 45 days, making comments due August 28, 2026, with reply comments due October 13, 2026.

Duquesne Light Company ("Duquesne Light" or "Company") is a public utility as the term is defined under Section 102 of the Public Utility Code, 66 Pa. C.S. § 102, and is certificated by the Commission to provide electric distribution service in portions of Allegheny and Beaver Counties in southwestern Pennsylvania. Duquesne Light is an electric distribution company ("EDC") and provides electric service to approximately 605,000 customers in and around the City of Pittsburgh. The Company hereby offers these comments for the Commission's consideration.

II. COMMENTS

Duquesne Light approaches this topic through the lens of affordability and with a dedication to customer service. Over the past several years the Company has evolved its offerings to provide customers more options to manage their energy use and bills, including expanded payment arrangement options; tailored customer outreach and interactions; increased accessibility for customer assistance programs; expanded time-of-use rates; new load management offerings; enhanced energy efficiency options; and additional self-serve functionality to reduce barriers to enrollment in programs.

These offerings take on greater importance in the current energy landscape, where Pennsylvanians' electric bills have risen 20% over the last two years, primarily due to increased capacity and wholesale energy costs.[1] Duquesne Light approaches affordability with the intent of

[1] Independent Fiscal Office "Pennsylvania Electricity Update" July 2026 www.ifo.state.pa.us/download.cfm?file=Resources/Documents/PA_Electricity_Update_RB_2026_07.pdf

supporting both payment-troubled customers and the larger customer base. The Order provides context on the history of Chapter 14 of 2004, noting that the legislation "sought, among other things, to eliminate opportunities for customers capable of paying public utility bills to avoid paying those bills on time." The Order quotes the "declaration of policy" as follows:

> "the General Assembly determined that the Commission's prior rules had not successfully managed the issue of bill payment and that increasing amounts of unpaid bills threatened paying customers with higher rates due to other customers' delinquencies. Accordingly, the goal of the former Chapter 14 was to increase timely collections, while ensuring that service is available to all customers based on equitable terms and conditions."

The Company supports the PUC's intent in the instant proceeding to "expeditiously amend the Chapter 56 regulations … and provide prompt regulatory certainty in light of the expiration of Chapter 14 of the Code."[2] Expiration of the enabling legislation introduces risk and uncertainty for all parties. Codifying the existing practices via this rulemaking "will instill a consistent regulatory framework for utilities, utility customers, and all other interested parties"[3] in the absence of legislative action to renew or amend the prior Chapter 14. In keeping with the direction in the Order, Duquesne Light has limited its comments to only the requested elements of Chapter 56, recognizing the time-sensitivity of providing regulatory certainty. However, the Company encourages the Commission to consider opening a more fulsome review of all of Chapter 56, and offers some suggested topics for consideration at the conclusion of its comments.

With this framing in mind, Duquesne Light offers feedback on the proposed regulations, organized by section heading, as outlined in the Order.

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[2] Order at 12.
[3] Motion of Chairman Stephen M. DeFrank, November 20, 2025, Docket No. M-2024-3052328.

<u>Comments by Order Section:</u>

Subchapter A. Preliminary Provisions For Utilities And Customers Subject To Chapter 14 Of The Public Utility Code

Duquesne Light perceives this change to be administrative and not impactful to customer programming, and thus has no comments.

§ 56.2. Definitions

Duquesne Light does not have any comment on the Definitions as proposed.

§ 56.22. Accrual Of Late Payment Charges

Duquesne Light does not have any comment on § 56.22 Accrual Of Late Payment Charges as proposed.

§ 56.102. Residential Field Visit Charge

Duquesne Light does not have any comments on this section as it is not applicable to the Company.

§ 56.153. Public Utility Duties

Duquesne Light has no comments on the proposed § 56.153 as it is consistent with current practice.

§ 56.171. General Rule

The Company does not have any comments on the proposed § 56.171.

§ 56.181. Duties Of Parties; Disputing Party's Duty To Pay Undisputed Portion Of Bills; Public Utility's Duty To Pay Interest Whenever Overpayment Found

The Company supports proposed § 56.181.

§ 56.182. Payment Arrangement Procedures

DLC supports the establishment of clear payment arrangement parameters. Payment arrangements are most effective when they create a realistic path for customers to pay for current service while addressing prior arrearages over time. The Commission should continue to evaluate whether extremely long-term payment arrangements promote sustainable repayment outcomes and customer success.

§ 56.225. Surcharges For Uncollectible Expenses Prohibited

Duquesne Light has no comments on proposed § 56.225.

§ 56.251. Statement Of Purpose And Policy

Duquesne Light perceives this change to be administrative and not impactful to customer programming, and thus has no comments.

Financial Impact

The Order requests jurisdictional utilities "to identify in their comments any financial or economic impact on their operations that may be associated with the proposed regulations" including "specific estimates of the costs and/or savings associated with compliance." Because the proposed provisions reflect existing practices implemented under the previous Chapter 14, Duquesne Light has not quantified any expected implementation costs. The Company's systems and practices are configured for the parameters previously established under Chapter 14.

The Company notes, however, that while maintaining the status quo for these specific provisions of Chapter 56 will not result in increased costs, there is a missed opportunity for efficiencies and cost savings that could result from modernizing other aspects of Chapter 56. Understanding that the instant proceeding is intended to be an expedited rulemaking focused on only a portion of the provisions in Chapter 56, the Company encourages the Commission to subsequently open a more comprehensive review of this chapter.

In particular, Chapter 56 includes significant cost drivers, including requirements for field activities that reflect outdated practices. There are opportunities to modernize this section of the code to recognize technology evolutions and changes in customer preferences since regulations were first established.

In pursuit of improved affordability, the Commission should consider opportunities for updates including clarifying certain definitions (e.g. "written communication") to greater leverage electronic communications, including termination notices and digital enrollment processes. Specific sections of the code to be reviewed include, but are not limited to, § 56.91. General notice provisions and contents of termination notice and § 56.93. Personal contact. The existing regulations pre-date electronic communication methods and the prevalence of smart phones, as well as Advanced Metering Infrastructure ("AMI"), also known as smart meters, which have capabilities to reduce unnecessary field activity, limiting customer costs and risks to worker safety, and enable timely remote reconnection.

III. CONCLUSION

In closing, Duquesne Light supports the Commission's intent to provide stability and certainty to all stakeholders, while encouraging it to open a more fulsome review of Chapter 56 in the near future, to enable opportunities for efficiencies and savings, to the benefit of utility customers. The Company appreciates the opportunity to provide these comments for consideration and looks forward to continued dialogue on this topic.

Respectfully submitted,

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