Duquesne Light
Our Energy...Your Power

411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Tel 412-393-1541
Fax 412-393-1418
gjack@duqlight.com

Gary A. Jack
Assistant General Counsel

March 8, 2006

VIA OVERNIGHT DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

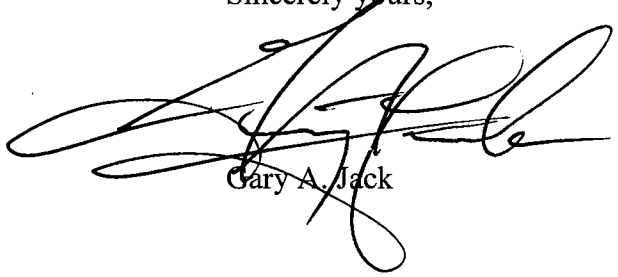
Re: Docket No. M-00051865
Implementation of the Alternative Energy Portfolio Standards Act of 2004

Docket No. L-00040169
Rulemaking Re Electric Distribution Companies' Obligation to Serve Retail Customers at the Conclusion of the Transition Period Pursuant to 66 Pa. C.S. § 2807(e)(2)

Dear Secretary McNulty:

Enclosed please find for filing an original and fifteen (15) copies of Comments of Duquesne Light Company in the above-referenced cases. A copy this day has been sent by electronic mail to Carrie Beale of your office.

Sincerely yours,



Gary A. Jack

Enclosures

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of the Alternative Energy Portfolio Standards Act of 2005	:	Docket No. M-00051865
Rulemaking Re Electric Distribution Companies' Obligation to Serve Retail Customers at the Conclusion of the Transition Period Pursuant to 66 Pa.C.S. § 2807(e)(2)	:	Docket No. L-00040169

COMMENTS OF DUQUESNE LIGHT COMPANY TO FEBRUARY 8, 2006 ISSUES LIST

By Order entered November 18, 2005, the Pennsylvania Public Utility Commission ("Commission") reopened the public comment period for the Commission's proposed default service regulations. The default service regulations are to define the obligation of electric distribution companies to serve retail customers at the end of the restructuring transition period. By Secretarial Letter dated February 8, 2006, the Commission issued for comment a list of questions identifying specific alternative energy issues and Energy Policy Act issues and inviting additional comments on other default service issues. Duquesne Light Company ("Duquesne") hereby submits these comments in response.

GENERAL COMMENTS

A. Background & Experience

Duquesne can offer a unique and informed perspective on the proposed regulations because of its extensive experience with post-transition period default service. Duquesne completed the transition period for most customers in 2002 and, since that time, has successfully implemented two post-transition period Provider of Last Resort ("POLR") programs.

Each POLR plan has dealt with different and changing circumstances as the market for purchasing wholesale power and retail markets have evolved. Flexibility to react to changing circumstances has proven critical to establishing successful default service plans for Duquesne's customers.[1]

In developing its post-transition plans, Duquesne has been particularly cognizant of its duty to serve the public. Default service plans must be developed to provide service to customers at fair and reasonable prices for customers who rely on default service for electric generation service. As markets continue to evolve, small customers, in particular, continue to have limited competitive options and need protection from volatile markets. While Duquesne has been successful in developing conditions that support competitive market development, the majority of Duquesne's customers continue to rely on Duquesne for electric generation service. Duquesne's ability to provide such service on reasonable terms is both critical to Duquesne's management, its customers and the community it serves.

B. The Proposed Default Service Regulations Are Seriously Flawed and Should Not Be Adopted.

The Default Service regulations are seriously flawed. Adopting a competitive wholesale auction or RFP process as the only model for procuring default service supply and determining default service prices is a fundamental error. Such model has proven to be flawed by the recent experiences of Pike County Light & Power where default service prices have risen 129%.

[1] Duquesne continues to provide small customers with stable rates at levels well below those in effect at the time of restructuring and has the highest customer migration levels within the Commonwealth.

The competitive wholesale auction process should not be the model mandated by the regulations, especially when it has failed for Pike County and where Duquesne has demonstrated in three post-transition POLR plans that POLR supplies can be obtained at reasonable prices and default service rates for customers can be developed that are reasonably stable.

A critical issue in developing default service regulations, acquiring default service supplies and in designing default service plans is the interpretation of the requirement that default service be provided at "prevailing market prices." While the Competition Act requires that the default service provider to supply electricity at prevailing market prices, it does not define such prices or identify how they should be determined. A competitive wholesale auction is not the only way to obtain such supplies and EDCs and their customers should not be limited to what falls out of such an auction process as their only alternative. The Commission should arrive at the process for determining prevailing market prices in the context of the entire Competition Act and the Public Utility Code. Default service customers remain customers of Duquesne and they deserve nothing less.

Duquesne therefore recommends that the Commission re-examine its proposed default service regulations and incorporate greater flexibility in the acquisition of default service generation.[2] A "one size fits all" approach would fail to reflect important differences among EDCs and would severely limit the ability of EDCs to develop and propose creative alternatives for obtaining default service supply which could benefit customers, competition and the Commonwealth. The Commission should revise its proposed regulations to provide that a

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[2] The Commission also acknowledged the importance of ensuring that "regulations promulgated now be flexible enough to accommodate markets as they continue to evolve. . . . Consequently, the Commission seeks to avoid overly prescriptive language that may infringe on both its and all other interested parties' ability to manage the default service obligations." Default Rulemaking at 6. Further, the proposed rules provide that "each default service provider should have the option of proposing a default service implementation plan best suited to its service territory." Default Rulemaking at 10. However, the prescriptive competitive procurement process destroys these objections.

wholesale competitive solicitation is not the *only* way to procure power for default service customers.[3] A competitive solicitation process is *one* way to procure power, but it is not necessarily the *most* reasonable method for all utilities under *all* market conditions.[4] Ignoring other available methods for discerning the prices that prevail in a given market exposes the Commission and the Commonwealth's consumers to a mandatory competitive solicitation process that may produce significant price increases for customers, as was the case in Pike County.

The Commission should also provide flexibility in establishing default service plans and default service prices. The statutory provision that default service energy be acquired at "prevailing market prices" should not be interpreted to limit default service implementation plans establishing default prices to short-term prices established by auctions. Instead, the Commission should revise its proposed regulations to make clear that EDCs may employ a variety of strategies to establish retail rates at prevailing market prices. For example, prevailing market prices may be established through benchmarking to other prices in the region, through a market price index formula, or through other means. Indeed, in Duquesne's POLR III proceeding, the Commission explicitly recognized that "a competitive procurement process is not the exclusive method to arrive at a prevailing market price." Reconsideration Order at 26. During the Commission hearings, extensive review of the proposed prices was performed through a benchmarking process, *i.e.*, the Commission compared the prices proposed by Duquesne with

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[3] Implementation of a mandatory competitive wholesale procurement process may result in a significant step backward in retail competition in Duquesne's service territory. Duquesne has the highest level of customer shopping in the Commonwealth, with over 50 percent of its customer load receiving service from an EGS. The default service regulations should enhance this development while balancing the needs of customers. Duquesne's POLR plans have demonstrated that default service customers can receive the price protection they need while retail competition is promoted. The Commission should not tie Duquesne's hands after it has achieved such superior results.

[4] Duquesne does not oppose the use of competitive procurement processes in all circumstances; indeed, Duquesne proposed such a process for its large customers in its POLR III plan.

retail prices developed in other jurisdictions. The Commission ultimately concluded that Duquesne provided sufficient market evidence to demonstrate that the proposed default service rates represented prevailing market prices for the first three years. *See* Reconsideration Order at 26 ("we relied on the record evidence to determine that the proposed rates reflected prevailing market prices for energy for a three-year term"). Importantly, the Commission ruled that it "is possible that a second three-year term with a price adjustment as proposed will be adopted." POLR III Order at 17. The Commission, by adopting a strict competitive-solicitation-only rule, could foreclose the possibility that such a case may be made again in the future.

Adopting an interpretation of prevailing market prices that reflects longer-term market prices and contracts is in the interest of customers to provide stability of rates and to avoid some of the problems of the competitive procurement process.

Duquesne's proposal to inject greater flexibility into the default service regulations also is responsive to the needs of the alternative energy market. Duquesne believes that, at least initially, alternative energy projects will need the commitment of long-term contracts in order to be financially viable. Additionally, EDCs may decide that they want to include alternative energy contracts in their default service supply portfolio, without reconciliation. To do that, however, the default service regulations and Act 213 regulations must provide the flexibility for EDCs to voluntarily waive Act 213 reconciliation and to enter into long-term contracts for a portion of their default service requirements.

In summary, the Commission should revise its proposed default service regulations to adopt greater flexibility in supply procurement and in allowing alternative methodologies to establish rates at prevailing market prices. This greater flexibility is particularly important in an evolving market, especially when most customers in the state would not be subject to such rules

until 2011, almost five years from now. Furthermore, the Commission should provide that any default service regulations will not become effective until after all major EDCs have completed their transition periods. Until then, EDCs should be permitted to present Interim Plans that are not subject to the default service regulations and that would remain in effect until the beginning of the PJM ISO plan year immediately following the effective date of the regulations (June 1, 2011).

The Commission, therefore, must revisit the regulations and reject the conclusion that the competitive wholesale procurement model is the sole or even best default service model.

C. If Default Service Regulations Are Adopted Now They Should Not Be Made Effective Until 2011

Duquesne understands the need for advance planning of implementation strategies. However, adopting a default service model that is flawed will not assist default service providers or customers or advance competition. Further, Duquesne notes that the transition periods of the major EDCs, other than Duquesne, will not expire until 2010 and 2011. Therefore, even if Final regulations are adopted now, they simply should not become effective until all major EDCs' transition periods have expired and there is a statewide market for acquiring power to serve default service customers. As the Independent Regulatory Review Commission stated:

> Having commended the PUC for undertaking this difficult task, we question the need for the rulemaking at this time. We base this question on the following. First, the PUC has noted that the retail and wholesale energy markets will continue to evolve between now and the expiration of the last EDC rate caps in 2010. Drafting regulations today that match tomorrow's markets is an imprecise and difficult task. Second, the PUC has also stated that changes to federal and state law could affect this rulemaking. To illustrate this point, the Alternative Energy Portfolio Standards Act (AEPS), which became law in 2004, and the implementing regulations to be developed by the PUC will have a dramatic affect on how energy companies acquire electricity. Third, knowledge could be gained from the experience of other states that are making the transition from a regulated to a competitive electric market. Fourth, the experiences

> gained by both the PUC and the EDCs, whose rate cap periods have ended and are operating under interim guidelines, could be useful when crafting regulations at a future date. Additionally, the continuing use of interim guidelines would provide the PUC an opportunity to consider various pilot programs before it finalizes these regulations. For these reasons, we urge the PUC to carefully consider the value of delaying the promulgation of these regulations until a date closer to conclusion of the rate cap periods of the major EDCs.

As the Commission is well aware, there are concerns about the present competitiveness of the electric energy market. If default service regulations are placed into effect now, they would apply only to a very limited number of Pennsylvania customers. The vast majority of customers, including those served by the five largest EDCs in the Commonwealth, PECO, PPL, West Penn, Penelec and Met Ed, would not be served by generation procured under the default service regulations until 2011.[5] Duquesne is concerned that until the transition period has ended for all EDCs, the market for acquiring default service energy may not be fully functional, with the result that the competitive procurement process envisioned by the proposed default service regulations may be adversely affected, with resulting high prices for default service. The Commission is undoubtedly aware of the high prices resulting from recent auctions held by Pike County Light & Power, and in neighboring states of New Jersey and Delaware. For these reasons, Duquesne recommends that the Commission provide that the default service regulations will not become effective until all of the major EDCs have completed their transition periods.

Prior to that date, EDCs should be permitted to present interim default service plans ("Interim Plans") that will remain in effect until the beginning of the PJM ISO plan year immediately following the effective date of the default service regulations (June 1, 2011). The

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[5] PPL's generation rate cap is scheduled to expire December 31, 2009, while the other four EDCs will be subject to generation rate caps through December 31, 2010.

Commission also should acknowledge that each Interim Plan will stand on its own and will not bind parties that later litigate plans offered by other EDCs.[6]

Nevertheless, if regulations are adopted in 2007, Duquesne requests that such regulations do not become effective until 2011. Furthermore, the early adoption of regulations would make it even more important that the regulations contain broad flexibility to react to changes in market conditions.[7]

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6 Duquesne is concerned that its planning process and litigation process for default service rates effective January 1, 2008, will be occurring at the same time as these rulemakings.

7 If, however, the Commission decides to make the default service regulations effective at some earlier date (e.g., 2008), then Duquesne urges the Commission to state that Interim Plans filed prior to the effective date of final regulations will not be subject to the regulations.

Issues List

1. **Should Act 213 cost recovery be addressed in the Default Service Regulations as opposed to a separate rulemaking? Is it necessary to consider Act 213 cost recovery regulations on a different time frame in order to encourage development of alternative energy resources during the "cost recovery period?"**

Duquesne recommends that the proceedings to adopt regulations to implement Act 213 and the proceedings to adopt default service regulations be developed during the same timeframe, if not in the same proceeding. The regulations should be developed together because alternative energy acquired in compliance with Act 213 will be used by the EDC to meet a portion of its default service requirements. Moreover, the Commission must recognize that there will be substantial overlap between default service and ongoing initiatives involving compliance with Act 213. Some of these overlapping issues could include:

- The term of the default supplier's supply contracts,
- Whether EDCs and EGSs, only EDCs, or wholesale suppliers in a competitive procurement process should be responsible for providing alternative energy,
- Which customers will be responsible for paying the costs of alternative energy,
- How associated costs will be recovered, and
- The frequency of default service rate adjustments.

As a result, the Commission must ensure that its default service regulations are coordinated with its Act 213 regulations. Duquesne believes the best way to achieve that coordination is to develop the Act 213 regulations simultaneously with the default service regulations.

2. Do the prevailing market conditions require long-term contracts to initiate development of alternative energy resources? May Default Service Providers employ long-term fixed price contracts to acquire alterative energy resources? What competitive procurement process may be employed if the Default Services Provider acquires alternative energy resources through a long-term fixed price contract?

At this time, it is difficult to determine the extent to which long-term contracts will be necessary for the development of the various types of alternative energy sources identified in Act 213, although Duquesne anticipates that long-term contracts will be needed in at least some instances in order for alternative energy projects to be financially viable. It is therefore critical that flexibility to enter into such long-term contracts be incorporated into the default service regulations.

Duquesne believes that default service providers should be given discretion in how they choose to manage supply procurement both for Act 213 and other default service supply resources. Long-term contracts should remain an option for the default service provider, and should be neither prohibited nor required in the regulations. With respect to the competitive procurement of alternative energy, Duquesne recommends that EDCs be permitted to include in their default service implementation plans a process for satisfying its alternative energy requirements, which may or may not include long-term contracts. Duquesne also urges the Commission to provide default service providers with the flexibility to enter into long-term contracts even where such contracts do not involve alternative energy. Requirements that rely solely on short-term contracts are likely to result in highly volatile prices, may not be in the interest of all customers and are not required by the prevailing market price standard.

With respect to cost recovery, Duquesne believes that alternative recovery mechanisms may be necessary depending on how the EDC chooses to obtain supply for Act 213. For

example, default service providers could enter into long-term alternative energy contracts, and recover costs using a separate non-bypassable cost recovery mechanism. Alternatively, EDCs may require wholesale suppliers to include renewable energy and the associated costs in their supply bids, which will result in the EDC recovering such costs through the generation charge rather than a separate automatic adjustment clause. In any event, the Commission should issue rules in advance so that EDCs can avoid after the fact prudency reviews. The industry's experience with PURPA demonstrates that the economics of long-term contracts can change dramatically over long periods of time. The Commission should promulgate cost-recovery rules that would protect EDCs and customers from such prudency reviews. In addition, Duquesne believes that flexibility is necessary in this area to allow EDCs to design cost recovery mechanisms that are best suited to their supply arrangements. If they choose, EDCs should have the flexibility to waive the use of an automatic adjustment clause for some period of time in their default service implementation plan.[8]

3. **Should the force majeure provisions of Act 213 be integrated into the Default Service procurement process? Should Default Service Providers be required to make force majeure claims in their Default Service implementation filing? What criteria should the Commission consider in evaluating a force majeure claims? How may the Commission resolve a claim of force majeure by an electric generation supplier?**

Act 213 provides, in pertinent part, that:

> "Upon its own initiative, or upon a request . . . [the] Commission shall determine if alternative energy resources are reasonably available in the market place in sufficient quantities for the [EDCs and EGSs] to meet their obligations for that reporting period under this act."

There are two issues that must be considered by the Commission. The first is to develop a standard for what is "reasonably available." Duquesne considers this statutory provision to go

[8] The Commission should recognize that the term of some alternative energy contracts may extend beyond the term of an EDC's default service implementation plan.

beyond the matter of physical availability. In determining whether alternative energy is reasonably available, the Commission also must consider reliability and price. A physically existing alternative energy resource cannot be considered "reasonably available" if there are substantial doubts concerning its commercial reliability. With respect to price, the Commission should not drive the cost of default electric service to unacceptable levels by directing EDCs to purchase alternative energy at prices well in excess of market prices for traditional generation. The second issue to be considered is when and how a claim of force majeure is to be made. Default service providers should not be limited to making force majeure claims only as part of an implementation filing. Act 213 clearly places no limit on when a force majeure claim may be submitted. An EDC may, in good faith, believe that alternative energy supplies will be available at the time they submit an implementation plan, but subsequently discover, through contract negotiations or competitive solicitations, that alternative energy is not "reasonably available." Additionally, the EDC could contract for alternative energy supplies, and then the generator could fail to perform. An EDC should be permitted to seek a force majeure declaration at any time during a reporting period. Further, a force majeure declaration should apply equally to EDCs and EGSs in the same geographic area. Neither an EDC default supplier nor an EGS should avoid additional costs related to acquiring alternative energy (or avoid an alternative energy compliance payment) if the other is relieved of an alternative energy requirement.

Finally, Duquesne believes the Commission should allow the default service provider to specify in their implementation plans other types of unforeseen circumstances (not related to alternative energy requirements) that could dramatically affect costs and trigger a need to revise

retail rates. These circumstances potentially could include supplier default, material changes in law or taxes, or significant changes in PJM rules.[9]

4. Given that Act 213 includes a minimum solar photovoltaic requirement as part of Tier I, should these resources be treated differently from other alternative energy resources in terms of procurement and cost recovery?

Duquesne believes it is premature to determine whether different procurement or cost recovery procedures are needed for the solar photovoltaic ("PV") requirement under Section 1643(b)(2) of Act 213. The Act effectively establishes three separate requirements for Tier I, Tier I photovoltaic, and Tier II resources. Separate tracking mechanisms to ensure compliance and separate tradable alternative energy credit markets must be established consistent with each requirement. With respect to cost recovery, mechanisms to recover costs for the PV requirement could be combined with other alternative energy resources, and possibly, even other default service supply. Duquesne notes that PV is virtually non-existent as an alternative energy resource at this time, and thus appropriate claims of force majeure may need to be made with respect to PV.

5. Should the Commission integrate the costs determined through a § 1307 process for alternative energy resources with the energy costs identified through the Default Service Provider regulations? How could these costs be blended into the Default Service Providers tariff rate schedules?

Duquesne supports flexibility with respect to procurement of default service supplies and alternative energy supplies, as well as how alternative energy related costs are integrated with the energy costs identified through the default service regulations. Various factors may affect whether to integrate the recovery of alternative energy costs with default service costs. Duquesne notes that various parties have proposed that the Commission allow EDCs to propose

[9] As another example, Maryland utilities are permitted a volumetric rate mechanism that would adjust rates to more appropriately reflect the default service provider's increased costs of obtaining supply if there is a material shift in customer migration.

full reconciliation of generation supply charges as part of their implementation plans. Other EDCs may only seek to reconcile their alternative energy requirements, while others may be willing to manage the risk of all energy supplies, including alternative energy supplies, through non-reconciled default service rates. Each of these alternatives may produce a different conclusion regarding integration of cost recovery for alternative energy supplies and default service. Under one method, an EDC could elect to obtain all of the renewable resources for their customers in their service area and recover the cost from all distribution customers through a separate non-bypassable charge subject to reconciliation. Under another method, compliance with Act 213 may be borne by each load serving entity ("LSE"), EDCs and EGSs, with appropriate rate recovery from their respective customers. EDCs, in their supply contracts, could require that wholesale suppliers include qualifying alternative energy supplies in their bids for default service, thereby integrating supply charges. With all of these and other options possible, and current uncertainty about how the market will develop, the Commission should allow EDCs to design cost recovery mechanisms that are best suited to their supply arrangements as well as the EDC's willingness to assume and manage risks.

6. May a Default Service Provider enter into a long-term fixed price contract for the energy supplies produced by coal gasification based generation if the resulting energy costs reflected in the tariff rate schedules are limited to the prevailing market prices determined through a competitive procurement process approved by the Commission?

As explained previously, Duquesne believes that EDCs should have discretion in how they choose to supply default service, subject to the alternative energy requirements in Act 213. Further, Duquesne does not support a definition of "prevailing market price" that requires the default service supplier to rely solely upon hourly or other short-term price criteria. At any point in time, prevailing market prices exist for a variety of supply products, including short-term, intermediate, and long-term products. A default service provider should be permitted (but not

required) to enter into a long-term fixed price contract for the energy supplies produced by coal gasification based generation. As Duquesne did in its POLR III plan, EDCs should bear the burden of proof in their default service implementation plans that the proposed tariff rate schedules represent "prevailing market prices," taking into account any alternative energy requirements and associated cost recovery mechanisms pursuant to Act 213.

Regardless of how "prevailing market price" is defined, the Commission may not require an EDC to enter into a contract for alternative energy supplies without allowing the EDC to recover the full cost of the alternative energy supplies. Section 1648.3(a) of Act 213 clearly provides that any direct or indirect costs to comply with Act 213 shall be recoverable. As noted previously, the Commission should issue cost recovery rules that avoid after the fact prudency reviews if market prices later turn out to be lower than when the contract was signed. Prior to entering into an alternative energy contract, if the Commission concludes that alternative energy supply prices are "too high" (as ultimately determined by the Commission in its force majeure provisions contemplated in question #2), it should declare a force majeure condition. Default service suppliers, at their option, should be allowed to waive their right to full cost reconciliation of alternative energy costs for some defined period as part of their default service implementation plans. Further, once an alternative energy contract has been signed, the cost of such contract must be recoverable in future implementation plans even if it is concluded that such costs exceed future determinations of "prevailing market price."

7. Should the Commission delay the promulgation of default service regulations until a time nearer the end of the transition period, as suggested by the Independent Regulatory Review Commission in its comments on the proposed regulations?

As explained previously, Duquesne supports a delay in the effective date for default service regulations until all major EDCs have completed their transition periods. Prior to that effective date, EDCs should be permitted to present Interim Plans that establish default service

rates that will remain effective until the beginning of the first PJM ISO plan year following the effective date of the regulations. The Commission should continue to recognize that the approval of Interim Plans will not set precedent for future plans.

8. Does the Commission need to make any revisions to its proposed default service regulations to reflect the mandates of the Energy Policy Act of 2005?

Subtitle E of The Energy Policy Act of 2005 ("EPAct 2005") amended the Public Utility Regulatory Policies Act of 1978 ("PURPA") and set forth new standards that states meet within a specified time frame. The standards apply to areas of regulation such as net metering, interconnection, energy-efficiency and time-based metering. Section 1252 of EPAct 2005 also contains provisions regarding the types of time-based rate schedules that utilities could offer retail customers. These provisions, in particular, could significantly affect default service regulations in Pennsylvania in several ways. First, they could affect default service rate design as well as influence the products obtained in any competitive procurement process. Second, Section 1252 states that "each electric utility shall offer each of its customer classes, and provide individual customers upon customer request, a time-based rate schedule..." This language suggests that not all customers in a particular rate class must be exposed to time-based rates, especially if a customer does not make a request for time-based rates. As a result, utilities potentially could be required to offer multiple default service product options to customers in a particular rate class. This could further complicate any competitive procurement process. Third, smart metering and time-based rates may not be cost effective for all utilities and customers within Pennsylvania. Therefore, Duquesne believes that such requirements should be tailored to the particular situation of the utility and its customer base. This requires that the Commission develop a tailored response at the state level rather than apply a "one-size fits all" approach imposed at the federal level.

To this end, EPAct 2005 includes a "prior state action" provision that exempts states from further federal action if the state can demonstrate that it has implemented or initiated a proceeding to consider a comparable standard. The Commission should make certain that it clearly complies with this mandate. In order to affirmatively demonstrate its compliance, the Commission should consider opening a separate docket listing the standards referenced in EPAct 2005 and detailing the proceedings where they have considered and/or implemented comparable standards.

Dated this 8th day of March 2006.

Respectfully submitted,

Frederick J. Eichenmiller
Director, Rates and Regulatory Affairs

Gary A. Jack, Esq.
Assistant General Counsel
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219
412-393-1541
gjack@duqlight.com