



Duquesne Light
Our Energy...Your Power

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August 4, 2010

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Interim Guidelines for Eligible Customer Lists
Docket No. M-2010-2183412

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Comments of Duquesne Light Company in the above-referenced proceeding.

Sincerely yours,



Gary A. Jack

Enclosure

cc: Office of Competitive Market Oversight

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: Interim Guidelines for : **Docket No. M-2010-2183412**
Eligible Customer Lists :
Default Service :

**COMMENTS OF
DUQUESNE LIGHT COMPANY**

I. Introduction

The Pennsylvania Public Utility Commission issued a Tentative Order (“Order”) on July 15, 2010, seeking public comment on draft interim guidelines for Electric Distribution Companies’ (EDCs) Eligible Customer Lists (ECL). The Order stems from a proposal from the Commission’s Office of Competitive Market Oversight (OCMO) and a team of various EDC and electric generation supplier (EGS) representatives (“Team”) tasked with determining which ECL issues could be solved by consensus between EDCs and EGSs and which would need to be resolved with Commission guidance. In the Order, the Commission addressed elements of the ECL under two headings: Consensus Issues and Non-Consensus Issues. Duquesne Light Company (“Duquesne” or “Duquesne Light”) offers the following comments, in a format similar to the Commission’s Order.

II. Comments

Duquesne Light supports the Commission's attempt to ensure that, through the ECL, EGSs have consistent access to the data necessary to foster retail competition. Comments on each of the areas addressed in the Order are listed below.

A. General Comments

On July 30, 2010, the Commission entered an order on information to be provided in customer lists in Duquesne's POLR V proceeding. (Duquesne's Petition for Approval of Default Service Plan for the Period January 1, 2011 through May 31, 2013 at Docket No. P-2009-2135500 ("July 30 Order")). Several directives in the July 30 Order involve the same issues as in this proceeding – the potential exclusion of customer phone numbers, service addresses, and historical billing data. Duquesne is in agreement with that recent July 30 Order and supports it in these comments.

Duquesne Light currently provides a thorough and informative ECL, which is available to registered EGSs to utilize in their business practices. Duquesne largely believes that the information provided on the ECL is sufficient for EGS marketing purposes, but understands the requests to provide even more information. In some instances, Duquesne believes that provision of such information is acceptable, as discussed below.

Duquesne also concurs with Vice Chairman Christy with respect to the customer privacy issues that he raised in his Statement dated July 15, 2010. In that statement, Vice Chairman Christy solicited comments on whether customers should be given the right to restrict the release of all of their private customer information if they so choose.

Duquesne Light agrees that customers should have the right to restrict information about themselves and their account. Duquesne believes it should honor the wishes of their customers on the release of customer information – even if that request is not to release any information to third parties.

B. Consensus Issues

ECL Monthly Update

In the Order, the Commission noted the Team’s findings that the frequency with which the ECL should be updated is not uniform across EDCs, and that EGSs believe that monthly updates are required to ensure that they have fresh information. Order at 3. Consequently, the Commission adopted the Team’s resolution to have EDCs that are not in compliance with monthly updates reprogram their systems to provide monthly updates of the ECL. *Id.* Duquesne Light is in compliance with the resolution, as it updates its ECL once per month, on the fourth Sunday of the month. Additional updates are performed on January 1 and June 1 of every year to recalculate the Peak Load Contribution and Network Service Peak Load, respectively.

Minimum Requirements

With respect to the minimum requirements of the ECL, identified on pages 3 and 4 of the Order, Duquesne Light currently provides all of the minimum requirements identified, including: the Revision Date, Meter Read Cycle, Customer Name, Customer Account Number, Service Address, Billing Address, Utility Rate Class, Load Profile Group Indicator, and Usage.

Requirements If Information Is Available

The Order, on page 4, also identified several items that should be required in the ECL, to the extent that such information is available. Duquesne currently provides the following: the Billing Country Code, the Utility Rate Class (additional to main rate class), and the Registered Demand Period 1...12 (monthly), which Duquesne characterizes as peak demand. The Order also indicates that EDCs should provide the Rate Subclass/Rate Subcode. Duquesne is unclear as to what this exact designation is, but assumes that it is the same thing as the Rate Plan Number and the Revenue Code, which Duquesne already provides. Further, the Order indicates that EDCs should provide On Peak kWh Period 1...12 (monthly) and Off Peak kWh Period 1...12 (monthly). Duquesne does not provide on and off peak data, and does not believe that such data is necessary at this time as Duquesne has neither Time of Use rates implemented yet nor its smart meter deployment, which is expected to be finalized in 2018. Duquesne currently provides usage and billed demand for 12 months for customers.

Information Applicable To Certain EDCs

The Order indicates that EDCs should provide the Procurement Classification Indicator (for EDCs whose rate codes and procurement classification do not directly map). Duquesne does not believe this issue is applicable to it as it does not have a Procurement Classification Indicator. The data available adequately defines the type of customer for EGSs.

Optional Items For The ECL

The Order also provided that several items should be optional in the ECL, at the discretion of the EDC, including the Revenue Code, Load Factor, and Fixed Price

Election. Duquesne Light currently provides the Revenue Code and the Load Factor. With respect to the Fixed Price Election, that is not applicable to Duquesne Light at this time. There is no election based on its current and future approved POLR plans.

Restrict Service Address

The Order suggests that there should be a mechanism in place for customers involved in domestic violence or other dangerous situations to restrict access to their service address. Order at 5. Duquesne Light fully supports this proposition. In the July 30 Order, the Commission similarly directed Duquesne to honor the requests of those residential customers who do not want their service addresses released. July 30 Order at 7.

C. Non-Consensus Issues

Customer Telephone Number

In the July 30 Order, the Commission directed Duquesne to permit customers to opt out of providing historical billing data and telephone numbers, consistent with the Commission's customer privacy and protection rules. July 30 Order at 8.

Old Account Numbers

The Commission recommends that EDCs provide "one-to-one mapping of accounts in the case of system-wide account number changes, rather than including a field in the ECL." Duquesne Light agrees to this, and in the event of a system wide account number change, Duquesne Light will provide a mapping file to EGSs.

Contact Name and Address

EGSs have requested that the ECL include a name, address and phone number for account contacts, specifically in the case of commercial and industrial accounts. The Commission has tentatively found that this element should not be included in the ECL. Duquesne agrees with this proposal.

Rate Mitigation Plan Indicator

EGSs have requested that the ECL should include fields to indicate whether a customer is enrolled in either a rate mitigation pre-payment plan, or a rate mitigation deferral/phase-in plan. These are temporary programs offered by EDCs to ease the transition to higher prices. The Commission has indicated that this element should not be included in the ECL, as these programs are temporary in nature and are not necessary for the ECL. Duquesne Light does not operate such plans, and therefore this issue is not applicable to it.

POLR Indicator

EGSs have requested that the ECL provide a field indicating whether a customer is currently receiving provider of last resort (POLR) service from the EDC, and the Commission has agreed that this element should be included in the ECL. Duquesne Light currently provides this information on its ECL for residential customers. While we do not provide such information for Medium and Large POLR customers, this is information that could be added to the ECL.

Interval Meter Indicator

EGSs have requested that the ECL should include an indicator for accounts that have an interval meter. The Commission agrees, as the notation of an interval meter is

crucial to the types of services an EGS may be able to provide to these types of customers. Duquesne Light does not have a specific field on its ECL indicating whether a customer has an interval meter or not, as such information is currently available through EDI and can be discerned to some extent through the rate codes. However, Duquesne could add a field onto the ECL to indicate whether the customer has an interval meter or not.

Capacity and Transmission Obligations

EGSs would like to see the current and future values for Capacity and Transmission Obligations on the ECL. Order at 9. The Commission believes that this is appropriate. Id.

Duquesne Light provides the current 5 CP and 1 CP on its ECL. With respect to providing this information for the “future,” this raises certain feasibility and practicality issues. Both the 5CP and 1CP are calculated in December. With respect to the 1CP, it is calculated in December, and uploaded to PJM two business days prior to January 1, which is when it becomes current. Thus, with respect to the 1 CP, there is really no such thing as “future” data. With respect to the 5 CP, it is calculated in December, but not utilized until the following June. Thus, Duquesne Light could post this information in December, and indicate that it is effective in June, and would thus be considered “future” data. Further, the calculations that are performed in December are only for existing customers. Thus, for new customers that are added after December, their calculations are not performed until 2 business days prior to the effective date (January for the 1 CP, and June for the 5 CP), thus there would be no “future” data.

III. Conclusion

Duquesne Light appreciates the opportunity to comment on this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "G. Jack", written over a horizontal line.

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Dated: August 4, 2010