

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	Docket No. R-2018-3000124
	:	
	:	
<b>v.</b>	:	
	:	
	:	
<b>Duquesne Light Company</b>	:	

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**PRE-HEARING MEMORANDUM OF NATURAL RESOURCES DEFENSE COUNCIL**

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The Natural Resources Defense Council (“NRDC”) filed a petition to intervene in this matter contemporaneously with the filing of this Memorandum, on May 2, 2018.

NRDC is an environmental organization and not-for-profit corporation with more than 1.4 million members, including more than 16,000 in Pennsylvania and more than 1,600 in Duquesne’s service area. Since 1970, NRDC’s attorneys, scientists, and other environmental specialists have worked to protect the world’s natural resources, public health, and the environment. NRDC’s top institutional priority is building an equitable clean energy future, among other things through the increased use of energy efficiency, renewable energy, and renewables-based transportation electrification, with the ultimate goal of reducing air pollution from the combustion of fossil fuels.

NRDC has not yet finally determined which issues it will raise in this matter. Currently, NRDC believes that it will raise issues related to proposed increases in fixed customer charges and back-up rates, and how those increase may affect the ability and willingness of NRDC members and other Duquesne customers to use energy efficiency and renewable energy, as well as to sub-metering, electric vehicle charging, and the collection of data in relation to the benchmarking of buildings.

With respect to witnesses, NRDC has not yet determined what witnesses will present testimony on behalf of NRDC. NRDC will work with the other parties in this matter on a schedule to be presented to the Administrative Law Judge, for this case and is open to settlement discussions.

Respectfully submitted,

/s/ Mark C. Szybist

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