



May 2, 2018

Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17120

Re: **Pennsylvania Public Utility Commission, et al. v. Duquesne Light Company Docket  
No. R-2018-3000124**

Dear Secretary Chiavetta:

Enclosed please find Clean Air Council's Prehearing Memo for the above captioned matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Otis Minott".

Joseph Otis Minott, Esquire

A handwritten signature in black ink, appearing to read "Ernest Logan Welde".

Ernest Logan Welde, Esquire

Attorneys for Clean Air Council

**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>	:	

**Prehearing Memorandum**

Pursuant to a Prehearing Conference Order issued by the Honorable Katrina L. Dunderdale, Administrative Law Judge, a Prehearing Conference is scheduled for May 3, 2018. The Order set forth specifications to direct the course of litigation and ordered parties to provide information about certain aspects of the proceedings to be resolved at the Prehearing Conference. In response, Clean Air Council (“CAC”), hereby files this Prehearing Conference Memorandum.

**I. Background**

1. On March 28, 2018, Duquesne Light Company (“DLC”) submitted a rate filing to increase rates by approximately \$133.8 million, an overall increase of 17% in annual distribution revenues. This would result in an average increase for residential customers, those using approximately 600 kilowatt hours, of approximately 8.82%, commercial users by 2.92%, and industrial users by 2.32%.

Clean Air Council filed its Petition to Intervene on May 2, 2018.

**II. Issues to be Presented**

Based upon its initial review of these proposals CAC has identified the following issues that have the potential to impact CAC members (all are rate payers in DLC's service territory):

- a. Financial impact on low- and moderate-income CAC members;
- b. Impact on CAC members who have considered, installed, or will plan to install renewable energy sources, including, but not limited to photovoltaic panels (solar);
- c. Impact on CAC members who have considered, installed, or will plan to install energy efficiency products or take any action to reduce energy consumption through practicing energy efficiency.

Clean Air Council reserves the right to raise other issues as those may arise.

**III. Witnesses**

Clean Air Council has not identified a witness that it may call, however, CAC reserves the right to call a witness, or witnesses.

**IV. Proposed Schedule**

Clean Air Council will work with all parties to establish a reasonable schedule.

**V. Settlement**

Clean Air Council will engage in settlement discussions with any and all parties in an attempt to resolve or narrow the issues in this proceeding.

**VI. Public Input Hearings**

Due to the potential impact on all affected rate payers, including CAC members, CAC suggests that at least four (4) public hearings (two in each county) be held in order to allow the maximum input from affected rate payers. DLC's proposed rate increases have the potential to deeply impact low- and moderate-income members and those who intend to, or have taken steps to implement energy efficiency measures and/or have considered or installed renewable energy

sources. The public's input in this proposal is extremely critical and should be considered by the Commission.

**VII. Service on Clean Air Council**

Electronic service only of all documents should be served on CAC as follows:

Joseph O. Minott, Esq.  
E-Mail: joe\_minott@cleanair.org  
Logan Welde, Esq.  
E-Mail: lwelde@cleanair.org  
Telephone: 215-567-4004 - 126

WHEREFORE, Clean Air Council respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,



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Joseph O. Minott, Esq., PA ID 36463  
Logan Welde, Esq., PA ID: 315012  
135 S. 19<sup>th</sup> Street, Suite 300  
Philadelphia, Pennsylvania 19103

May 2, 2018

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Clean Air Council's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

### Via Electronic Service

The Honorable Katrina L. Dunderdale Administrative Law Judge Pennsylvania Public Utility Commission Piatt Place Suite 220 301 5 <sup>th</sup> Avenue Pittsburgh, PA 15222	Gina L. Miller, Esq. John M. Coogen, Esq. Bureau of Investigation & Enforcement Pa. Public Utility Commission 400 North Street Harrisburg, PA 17120 <a href="mailto:ginmiller@pa.gov">ginmiller@pa.gov</a> <a href="mailto:jcoogen@pa.gov">jcoogen@pa.gov</a>
Patrick M. Cicero, Esq. Kadeem G. Morris, Esq. Elizabeth R. Marx, Esq. Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 <a href="mailto:pulp@palegalaid.net">pulp@palegalaid.net</a>	David P. Zambito, Esq. Jonathan P. Nase, Esq. Cozen O'Connor 17 North 2 <sup>nd</sup> Street, 14 <sup>th</sup> Floor Harrisburg, PA 17101 Counsel for People's Natural Gas Company, LLC
Anthony D. Kanagy, Esq. Post & Schell 17 North 2 <sup>nd</sup> Street, 12 <sup>th</sup> Floor Harrisburg, PA 17101 <a href="mailto:akanagy@postschell.com">akanagy@postschell.com</a> Counsel for Duquesne Light Company	Jason Dolby 409 Anawanda Avenue Pittsburgh, PA 15228
Phillip D. Demanchick, Esq. David T. Evrad, Esq. Aron J. Beatty, Esq. Office of Consumer Advocate 555 Walnut Street, 5 <sup>th</sup> Floor Harrisburg, PA 17101-1923	Joseph L. Vullo., Esq. Burke Vullo Reilly Roberts 1460 Wyoming Ave Forty Fort, PA 18704 Counsel for Community Action Association of PA(CAAP)
Scott J. Rubin, Esq. Public Utility Consulting 333 Oak Lane Bloomsburg, PA 17815 Counsel for International Brotherhood of Electrical Workers, Local 29	Daniel G. Asmus, Esq. Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 <a href="mailto:dasmus@pa.gov">dasmus@pa.gov</a>

<p>Anthony C. DeCusatis, Esq. Morgan, Lewis &amp; Bockius LLC 1701 Market Street Philadelphia, PA 19103 <a href="mailto:adecusatis@morganlewis.com">adecusatis@morganlewis.com</a> Counsel for Duquesne Light Company</p>	<p>William H. Roberts, II, Esq. PNG Companies, LLC 375 North Shore Drive Pittsburgh, PA 15212 Counsel for People's Natural Gas Company, LLC</p>
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Ernest Logan Welde, Esquire