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| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  P.O. BOX 3265, HARRISBURG, PA 17105-3265 | **IN REPLY PLEASE REFER TO OUR FILE**  M-2015-2515375 |

January 23, 2019

Mr. Michael Zimmerman

Duquesne Light Company

411 Seventh Avenue

Mail Drop 15-7

Pittsburgh, PA 15219

**Re:** **Duquesne Light Company – Phase III Energy Efficiency and Conservation Plan Petition for Minor Modification**

**Docket No. M-2015-2515375**

Dear Mr. Zimmerman:

On December 17, 2018, Duquesne Light Company (Duquesne or Company) filed a *Duquesne Light Company – Phase III Energy Efficiency and Conservation Plan Petition for Minor Modification**Docket No. M-2015-2515375*(Petition). The Petition seeks approval of minor changes to the programs contained in its amended Act 129 Phase III Energy Efficiency and Conservation Plan (EE&C Plan) through the Commission’s expedited process set forth in its June 10, 2011 Final Order at Docket No. M-2008-2069887 (Expedited Process Order). Duquesne served the Petition on all parties of record. For the reasons discussed below, Staff will grant Duquesne’s Petition.

Comments were due by January 1, 2019. No comments were filed.

In its Expedited Process Order, the Commission delegated its authority to review and approve minor EE&C Plan changes to staff of the Bureau of Technical Utility Services (Staff), with assistance from staff of the Law Bureau.[[1]](#footnote-1) The Expedited Process Order directs Staff to issue a Secretarial Letter approving, denying, or transferring to the Office of Administrative Law Judge for hearings, some or all of a petition’s proposed minor plan changes. With this Secretarial Letter, Staff is approving Duquesne’s Petition.

**Residential Energy Efficiency Program**

In its Petition, Duquesne proposes a change to its Residential Energy Efficiency Program. Specifically, Duquesne proposes to add residential connected thermostats as a measure eligible for rebates and to increase the maximum allowable rebate from $25 to $100. Connected thermostats are programmable thermostats (which are currently eligible), but connected thermostats also have internet connectivity, enhanced monitoring features, and/or adaptive programming. Duquesne states that connected thermostats are already an approved Interim Measure Protocol (IMP)[[2]](#footnote-2) with default savings values ranging from 288% to 450% (depending upon building type heat) of savings of conventional programmable thermostats.

Duquesne asserts that the proposed change will not materially affect the Residential Energy Efficiency Program’s budget, nor increase the Company’s projected expenditures under that Program, nor have an impact on the overall costs to any customer class.

**Update Lighting Measures for Newer Technology**

In its Petition, Duquesne proposes to eliminate certain obsolete Compact Fluorescent Lights (CFL) lamps and fixtures that are eligible for rebate under its Commercial & Industrial (C&I) Programs, and replace them with equivalent, current Light Emitting Diode (LED) technologies. At the time that Duquesne’s EE&C Plan was written, these were current technologies, but have since become obsolete in the face of LED technology.

Duquesne asserts that the proposed change will not materially affect any Program’s budget, nor increase the Company’s projected expenditures under any Program, nor have an impact on the overall costs to any customer class.

**Update Figure 26 to Clarify Rebate Eligibility for LED Reflectors**

In its Petition, Duquesneproposes to remove LED Reflectors from the list of measures eligible for rebates under the C&I Programs. This is to clarify that this rebate is already available for upstream rebates through the Company’s Non-Residential Upstream Lighting Program and removing this from the C&I Programs prevents “double-dipping” on this rebate.

Duquesne asserts that the proposed change will not materially affect any Program’s budget, nor increase the Company’s projected expenditures under any Program, nor have an impact on the overall costs to any customer class.

**Minor Text Revisions**

In its Petition, Duquesne proposes to make some minor typographical and clerical revisions to their EE&C Plan. The first is to correct an inadvertent transposition of numbers in Figures 5 and 56. The second is to revise the title of Figure 9 to read “Commercial Building Type Energy Consumption” and to update that Figure’s second column header to read “Sector Energy Use %”.

Duquesne asserts that these proposed changes will not materially affect any Program’s budget, nor increase the Company’s projected expenditures under any Program, nor have an impact on the overall costs to any customer class.

**Conclusion**

In view of the above, the Staff has determined that the *Duquesne Light Company – Phase III Energy Efficiency and Conservation Plan Petition for Minor Modification*, filed on December 17, 2018, at Docket No. M-2015-2515375, satisfies the requirements of Act 129 and the prior related Orders of the Commission. Staff finds that the minor changes proposed in the Petition should enable Duquesne to meet or exceed the energy consumption and demand reduction requirements of Act 129 in a cost-effective manner. Therefore, Staff finds that the December 17, 2018, minor changes are approved. Duquesne is directed to file with the Secretary a revised plan, consistent with this Secretarial Letter, within 30 days of the date of this Letter and post the same on its website.

As directed in the Commission’s Expedited Process Order, petitions for appeal from this Staff action must be filed within ten (10) days after service of this Secretarial Letter in accordance with 52 Pa. Code § 5.44.[[3]](#footnote-3)



Sincerely,

Rosemary Chiavetta

Secretary

cc: Chairman Brown

Vice Chairman Sweet

Commissioner Kennard

Commissioner Place

Commissioner Coleman

Parties of Record

Paul Diskin, TUS

Darren Gill, TUS

Joseph Sherrick, TUS

David Edinger, TUS

Kriss Brown, LAW

Kathryn Sophy, OSA

Robert Marinko, OSA

1. In the Expedited Process Order, the Commission delegated its authority to staff of the Bureau of Conservation, Economics and Energy Planning, with assistance from staff of the Bureau of Fixed Utility Services and the Law Bureau. *See*, Expedited Process Order at 22. In a Final Procedural Order entered on August 11, 2011, at Docket No. M-2008-2071852, the Commission transferred the staff and functions of the Bureaus of Fixed Utility Services and Conservation, Economics and Energy Planning to the Bureau of Technical Utility Services. *See Implementation of Act 129 of 2008 Organization of Bureaus and Offices*, Final Procedural Order at 4. [↑](#footnote-ref-1)
2. Interim Measure Protocols serve to add measure savings protocols to the current PA TRM and to modify existing TRM measures savings protocols. IMP procedures were in Phase II SWE Guidance Memo Number GM-008 (July 15, 2011). [↑](#footnote-ref-2)
3. Expedited Process Order at 19. [↑](#footnote-ref-3)