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October 8, 2019

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**Re: Duquesne Light Company – New Tariff Electric – PA P.U.C. No. 25  
Docket No. R-2019-3013287**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's responses to the Data Requests Propounded by the Bureau of Technical Utility Services ("TUS") Set I in the above-captioned proceeding.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Zimmerman", is written over a light blue horizontal line.

Michael Zimmerman

Enclosures

cc: Stephen Jakab, TUS ([sjakab@pa.gov](mailto:sjakab@pa.gov))

**Bureau of Technical Utility Services**  
**Data Requests**  
Docket No. R-2019-3013287

**Data Request:** Please provide further details for why Rule No. 44 was removed from Tariff Electric – PA P.U.C. No. 25.

**Response:**

Rule No. 44 was removed because it no longer serves a function.

Rule No. 44 in the Company's current retail tariff, Tariff Electric – PA P.U.C. No. 24, pertains to the Surge Protection Service program that concluded on September 30, 2013. Specifically, Rule No. 44 (i) describes the Company's removal of surge protection devices from customer premises; and (ii) set a deadline of December 29, 2013, for any customer to file a claim for damages related to such devices.

Rule No. 44 provides in part that the Company will remove the surge protection device upon the earlier of:

- (a) a request by the customer,
- (b) a Company representative performs work at the customer's meter or is otherwise available to remove the device, or
- (c) **the replacement of the customer's meter with a smart meter.**

(Emphasis added.) Consistent with its Smart Meter Procurement and Installation Plan (Docket Nos. M-2009-2092655 *et. al.*), the Company has substantially completed all smart meter deployments in its service territory, in the process of which the Company also removed all known surge protection devices from customer premises. The Company is not aware of any surge protection devices remaining in the field.

Rule No. 44 has thus become obsolete, so the Company proposes to remove it as part of this housekeeping update.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Duquesne Light Company	:	
Tariff Electric PA P.U.C. No. 25	:	
Canceling Tariff Electric	:	Docket No. R-2019-3013287
PA P.U.C. No. 44	:	
	:	

**VERIFICATION**

I, David Defide, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

  
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Dated: October 8, 2019