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PA PUBLIC UTILITY COMMISSION
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Michael Zimmerman
Counsel, Regulatory

November 15, 2019

Via Electronic Filing and Overnight Mail

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

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**Re: Duquesne Light Company – Revised Phase III Energy Efficiency and Conservation Plan – Petition for Modification
Docket No. M-2015-2515375**

Dear Secretary Chiavetta:

Enclosed for filing, please find an original copy of Duquesne Light Company's ("Duquesne Light" or the "Company") *Petition for Modification of its Act 129 Energy Efficiency & Conservation Plan* ("Petition") and supporting documentation. The Petition is filed pursuant to the Commission's *Minor Plan Change Order* entered June 10, 2011, at Docket No. M-2008-2069887,¹ and the Joint Petition for Settlement ("Settlement") approved by Commission Order entered March 10, 2016, at Docket No. M-2015-2515375, which provides in relevant part:

38. Duquesne Light will make a good faith effort to implement a combined EE&C [(Energy Efficiency and Conservation)] Surcharge for the Small & Medium Commercial Class and Small & Medium Industrial Class prior to the end of Phase III. Duquesne Light will make the appropriate filing to the Commission to implement the change and will notify parties to this case prior to making that filing.

By this Petition, the Company proposes to revise its Revised Phase III EE&C Plan and Rider No. 15A of its retail Tariff to implement a combined EE&C surcharge for the Small &

¹ See Energy Efficiency and Conservation Program, Docket No. M-2008-2069887 (Order Entered June 10, 2011) ("*Minor Plan Change Order*"), pp. 14-15, 20 ("EDCs seeking approval of changes that do not fit within the Minor EE&C Plan change criteria . . . must file a petition requesting that the Commission rescind and amend its prior order approving the plan.").



Medium Commercial Class and Small & Medium Industrial Class. The Company projects that this combined surcharge will yield a modest rate decrease for Small & Medium Industrial customers, in return for a small-to-negligible rate increase for Small & Medium Commercial customers. The Company is not proposing any other change to its Revised Phase III EE&C Plan.

This proposed change to the Company's Revised Phase III EE&C Plan falls outside the categories of "minor" changes eligible for expedited review under the Commission's *Minor Plan Change Order*. The Company therefore requests that this Petition and the proposed EE&C Plan modification be reviewed under the procedural schedule established in the *Minor Plan Change Order* for "non-minor" changes – comments, answers, or both are to be filed within 30 days of service, and all parties will have 20 days to file replies to any comments or answers.

Consistent with the Settlement, on November 12, 2019, the Company notified parties to this proceeding that this Petition was forthcoming. The Company is also posting a red-line Further Revised Phase III EE&C Plan to its website, www.duquesnelight.com.

Should you have any questions, please do not hesitate to contact me.

Respectfully Submitted,

Michael Zimmerman
Counsel, Regulatory

Enclosure

Cc: Certificate of Service²

² The red-line and final proposed Further Revised Phase III EE&C Plans accompanying this filing are each 158 pages in length. This Petition proposes to modify only 2 of these pages (viz., pages 12 and 98). Therefore, for the copies of this filing served on parties via first-class mail, the Company is providing only pages 12 and 98 (in red-line and final versions) in lieu of entire copies of the Further Revised Phase III EE&C Plan. The Company is also providing this Petition, including entire red-line and final copies of the Further Revised Phase III EE&C Plan, to all parties via electronic mail.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Cover Letter and Certificate of Service has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).¹

FIRST-CLASS MAIL¹ & ELECTRONIC MAIL

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Pennsylvania Public Utility Commission
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PO Box 3265
Harrisburg, PA 17105-3265

Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Pennsylvania Public Utility Commission
Bureau of Audits
Commonwealth Keystone Building
400 North Street, 3rd Floor, F East
Harrisburg, PA 17120

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¹ For copies served via first-class mail, the Company is providing only pages 12 and 98 (in red-line and final versions) of the proposed Further Revised Phase III EE&C Plan included with this filing. The Company is also providing a complete copy of this filing, including entire red-line and final copies of the Further Revised Phase III EE&C Plan, to all parties via electronic mail. Please see cover letter accompanying this filing.

Theodore S. Robinson, Esq.
Citizen Power Inc.
2121 Murray Avenue
Pittsburgh, PA 15217

Dated: November 15, 2019



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