



Emily M. Farah
Counsel, Regulatory

411 Seventh Avenue
Mail drop 15-7
Pittsburgh, PA 15219

Tel: 412-393-6431
efarah@duqlight.com

August 25, 2020

Via Electronic Filing

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

**Re: Public Utility Service Termination Proclamation of Disaster Emergency- Duquesne Light Company's Petition to Intervene to Joint Petition of CAUSE-PA and TURN-et al for Due Process Relief
Docket M-2020-3019244**

Dear Secretary Chiavetta:

Attached for filing, please find Duquesne Light Company's Petition to Intervene in the above-referenced proceeding. Copies of this document and the enclosed filing have been provided to the parties in accordance with the Certificate of Service. Please contact me with any questions, concerns or comments.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Emily M. Farah", is written over a faint, larger version of the signature.

Emily M. Farah
Counsel, Regulatory

Enclosure

cc: Certificate of Service (w/ encl.)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Public Utility Service Termination :
Proclamation of Disaster Emergency - : **Docket No. M-2020-3019244**
COVID-19 :

PETITION TO INTERVENE OF DUQUESNE LIGHT COMPANY

Pursuant to 52 Pa. Code §§ 5.71 *et seq.*, Duquesne Light Company (“Duquesne Light” or the “Company”) hereby files this Petition to Intervene in the above-captioned proceeding, and in support of its Petition states as follows:

1. Duquesne Light Company is a “public utility” and an “electric distribution company” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803, and provides electric service to more than 605,000 customers throughout its certificated territory, which includes portions of Allegheny and Beaver counties in western Pennsylvania.

2. Duquesne Light Company will be represented in this matter by:

Emily M. Farah, Esq.
Tishekia Williams, Esq.
Michael Zimmerman, Esq.
411 7th Avenue, MD 15-7
Pittsburgh, PA 15219
(412) 393-6431
efarah@duqlight.com
twilliams@duqlight.com
mzimmerman@duqlight.com

3. Pursuant to 52 Pa. Code § 1.54(b)(3), counsel consents to the electronic service of all documents at the e-mail addresses stated above.

4. The Pennsylvania Public Utility Commission’s (“Commission”) Emergency

Order entered on the above-captioned docket, issued on March 6, 2020 and ratified on March 13, 2020, prohibited Duquesne Light and all electric, natural gas, water, waste water, telecommunications, and steam utilities from terminating electric service in light of the COVID-19 pandemic.

5. On July 16, 2020, upon Motion by Commission Chairman Gladys Brown Dutrieuille, permitted utilities to begin the process of informing customers they are behind in payment and at risk of termination but upheld the termination moratorium.

6. On August 5, 2020, the Tenant Union Representative Network (“TURN”), Action Alliance of Senior Citizens of Greater Philadelphia (“Action Alliance”), and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) (collectively, “Low Income Advocates”) filed a Joint Petition for Due Process Relief, requesting the Commission initiate a public review process to evaluate whether lifting the extended moratorium is within the public interest.

7. As a public utility certificated by the Commission to provide electric service to more than 605,000 customers in western Pennsylvania, Duquesne Light has a direct and substantial interest in the outcome of this matter.

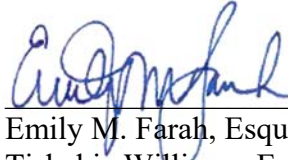
8. Duquesne Light’s interests in this proceeding are unique from and not adequately represented by any other party.

9. Duquesne Light intends to participate as a party in this matter to address its interests related to the moratorium on utility termination, accrual of account arrearages, and availability of financial assistance programs for customers, among other things.

10. If granted party status, Duquesne Light reserves the right to address any additional issues as may be necessary throughout the course of this proceeding.

WHEREFORE, Duquesne Light Company respectfully requests that the
Commission grant this Petition to Intervene.

Respectfully submitted,
DUQUESNE LIGHT COMPANY



Emily M. Farah, Esquire
Tishekia Williams, Esquire
Michael Zimmerman, Esquire
411 7th Avenue, MD 15-7
Pittsburgh, PA 15219
(412) 393-1541
efarah@duqlight.com
twilliams@duqlight.com
mzimmerman@duqlight.com
Counsel for Respondent,
Duquesne Light Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene 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):

VIA ELECTRONIC MAIL

Bureau of Investigation & Enforcement
Richard Kanaskie
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265
rkanaskie@pa.gov

Energy Association of Pennsylvania
Terrance J. Fitzpatrick
Donna Clark
800 North Third Street
Harrisburg, PA 17102
tfitzpatrick@energypa.org
dclark@energypa.org

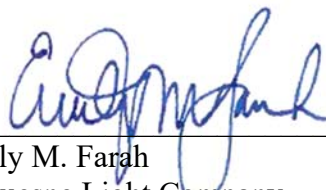
Office of Consumer Advocate
Tanya McCloskey
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
TMcCloskey@paoca.org

Bureau of Audits
Pennsylvania Public Utility Commission
Barbara Sidor
Commonwealth Keystone Building
400 North Street, 3rd Floor East
Harrisburg, PA 17120
bsidor@pa.gov

Pennsylvania Utility Law Project
Elizabeth R. Marx
John Sweet
Ria Pereira
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Community Legal Services
Robert W. Ballenger
Josie B. Pickens
Joline R. Price
1424 Chestnut Street
Philadelphia, PA 19102-2505
jpickens@clsphila.org
rballenger@clsphila.org
jprice@clsphila.org

Dated: August 25, 2020



Emily M. Farah
Duquesne Light Company
411 Seventh Avenue, 15-7
Pittsburgh, PA 15219
Phone: 412-393-6431
Email: efarah@duqlight.com