

STEVENS & LEE
LAWYERS & CONSULTANTS

17 N. 2nd Street, 16th Fl.
Harrisburg, PA 17101
www.stevenslee.com

Direct Dial: (717) 255-7365
Email: mag@stevenslee.com

January 13, 2021

VIA ELECTRONIC FILING

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

**RE: Petition of Duquesne Light Company for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan
Docket No. M-2020-3020818**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Duquesne Light Company is its Response to the Interim Order Directing Parties to Respond to Joint Expedited Motion and OALJ's Proposed Revised Schedule.

Copies of this filing have been served in accordance with the attached Certificate of Service.

Thank you, and please contact me if you have any questions or concerns.

Sincerely,

STEVENS & LEE



Michael A. Gruin

Enclosures

cc: Certificate of Service
Administrative Law Judges Mark A. Hoyer and Emily I. DeVoe (via email)
Chief Administrative Law Judge Charles Rainey (via email)

Allentown • Bala Cynwyd • Cleveland • Fort Lauderdale • Harrisburg • Lancaster • New York
Philadelphia • Princeton • Reading • Rochester • Scranton • Valley Forge • Wilkes-Barre • Wilmington
A PROFESSIONAL CORPORATION

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|---------------------------|
| Petition of Duquesne Light Company | : | |
| for Approval of its Act 129 Phase IV Energy | : | Docket No. M-2020-3020818 |
| Efficiency and Conservation Plan | : | |
| | : | |

**RESPONSE OF DUQUESNE LIGHT COMPANY TO INTERIM ORDER DIRECTING
PARTIES TO RESPOND TO JOINT EXPEDITED MOTION AND OALJ'S REVISED
SCHEDULE**

Pursuant to the Interim Order Directing Parties to Respond to Joint Expedited Motion and OALJ's Proposed Revised Schedule issued on January 11, 2021, Duquesne Light Company ("Duquesne Light" or "Company") submits its response in the above-docketed proceeding.

Duquesne Light has conferred with the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), the Community Action Association of Pennsylvania ("CAAP"), the Office of Consumer Advocate ("OCA"), and the Office of Small Business Advocate ("OSBA") regarding the proposed procedural schedule. Duquesne Light, CAUSE-PA, CAAP, and OCA have agreed to the following proposed litigation schedule, which is provided in the right-hand column of the table, below:¹

¹ OSBA has indicated that it will be filing a response whereby it may request a different schedule than the one proposed herein.

| | OALJ's Proposed Revised Schedule | January 8, 2021 Prehearing Order | New Proposed Schedule |
|------------------------------|---|---|------------------------------|
| Direct testimony | | January 13, 2021 | January 26, 2021 |
| Rebuttal testimony | | January 20, 2021 | February 4, 2021 |
| Evidentiary Hearing | February 8, 2021 | January 21, 2021 | February 8, 2021 |
| Briefs filed on or before | February 18, 2021 | January 29, 2021 | February 18, 2021 |
| Reply comments/ revised plan | March 1, 2021 | February 10, 2021 | March 1, 2021 |
| Certification of Record | March 2, 2021 | February 11, 2021 | March 2, 2021 |

This proposed schedule accomplishes the goal of CAUSE-PA, CAAP, OCA, and OSBA (“Joint Movants”), as stated in the Joint Expedited Motion for Extension of Procedural Schedule filed with the Commission on January 9, 2021. The proposed schedule, above, resolves the Joint Movants’ concerns relating to possible due process violations to those parties who may decide to intervene in this proceeding on or near the January 22, 2021 deadline as established by the Commission’s Implementation Order and the notice filed in the Pennsylvania Bulletin on January 2, 2021. More specifically, the proposed schedule effectively allows for possible intervening parties to fully participate in the litigation for this proceeding and have an opportunity to be heard at the hearing. In addition, the proposed schedule preserves March 30, 2021 as the date the Commission shall approve or disapprove of Duquesne Light’s Phase IV EE&C Plan. By preserving this date, a decision will be reached within 120 days of Duquesne Light’s submission of its Phase IV EE&C Plan.

For the foregoing reasons, Duquesne Light respectfully requests that the following litigation schedule be adopted in this proceeding:

| | |
|-----------------------------|-------------------|
| Direct testimony | January 26, 2021 |
| Rebuttal testimony | February 4, 2021 |
| Evidentiary Hearing | February 8, 2021 |
| Briefs filed on or before | February 18, 2021 |
| Reply comments/revised plan | March 1, 2021 |
| Certification of Record | March 2, 2021 |

Respectfully submitted,



Michael A. Gruin (PA. I.D. No. 78625)
Timothy K. McHugh (PA. I.D. No. 317906)
17 North Second Street, 16th Floor
Harrisburg, PA 17101
Tel: 717.255.7365
Fax: 610.988.0852
mag@stevenslee.com
Counsel for Duquesne Light Company

DATED: January 13, 2021

