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January 20, 2021

**Via Electronic Filing**

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

Please accept for electronic filing in the above-referenced matter the enclosed Petition to Intervene of Peoples Natural Gas Company LLC. Please also direct any questions regarding this filing to me by calling 412 208-6527 or by email to [william.h.roberts@peoples-gas.com](mailto:william.h.roberts@peoples-gas.com).

Very truly yours,

William H. Roberts II

cc: Hon. Mark A. Hoyer w/enc.  
Hon. Emily DeVoe w/enc.  
Certificate of Service w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the Petition to Intervene of Peoples Natural Gas Company LLC upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email and/or First Class Mail**

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Dated: January 20, 2021

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for :  
Approval of its Act 129 Phase IV Energy : M-2020-3020818  
Efficiency and Conservation Plan :

**PETITION TO INTERVENE OF  
PEOPLES NATURAL GAS COMPANY LLC**

Pursuant to 52 Pa. Code §§ 5.72 - 5.75, Peoples Natural Gas Company LLC (“Peoples”) petitions to intervene in the above-captioned matter. In support of this petition, Peoples states as follows:

1. On November 30, 2020, Duquesne Light Company (DLC or Petitioner) filed the Petition of Duquesne Light Company for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan (“Petition”) with the Pennsylvania Public Utility Commission pursuant to Act 129 of 2008 (Act 129), 66 Pa.C.S. §§ 2806.1 and 2806.2 and the Commission’s Implementation Order entered on June 18, 2020 at Docket No. M-2020-3015228. Notice of the filing was published in the *Pennsylvania Bulletin* on January 2, 2021, 51 Pa.B. 116. The Notice provided that in accordance with the Energy Efficiency and Conservation Program Implementation Order, entered on June 18, 2020, at Docket No. M-2020-3015228, responsive pleadings, along with comments and recommendations, are to be filed with the Commission within 20 days of the publication of the notice.

2. Peoples is a natural gas distribution company (NGDCs) certificated by the Pennsylvania Public Utility Commission to provide natural gas service in all or parts of seventeen counties in western and southwestern Pennsylvania. Combined, Peoples serves approximately 629,000 residential, commercial and industrial customers. Peoples maintains approximately 120

electric accounts with DLC in Allegheny and Beaver Counties through which Peoples receives electric distribution service from DLC at approximately 115 separate locations.

3. Peoples' attorneys in this matter are:

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4. Section 5.72 of the Commission's regulations governing formal proceedings allows intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3).

5. Peoples meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As an NGDC customer of DLC, Peoples satisfies the standard for intervention because Peoples possesses an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(1).

6. Moreover, as an NGDC, Peoples possesses an additional, unique interest in that DLC plans to partner with NGDCs in DLC's service territory in order to facilitate CHP opportunities as part of its proposed program. At page 22 of its Act 129 Phase IV Energy Efficiency and Conservation Plan ("Plan"), DLC states:

In addition, during Phase IV, Duquesne Light will place increased emphasis on CHP installations while maintaining high standards for screening, qualification, and delivering projects. The objectives include increasing customers' awareness of and understanding the benefits from CHP, helping customers explore opportunities to deploy CHP technologies in their facilities, and providing technical assistance to help customers overcome financial and technical barriers to CHP deployment. *Duquesne Light and its non-residential CSP(s) will continue to partner with NGDCs serving Duquesne Light's territory to jointly facilitate CHP opportunities.* (Emphasis added.)

And, on page 84 of the Plan, in describing how stakeholders will be engaged throughout Phase IV, DLC states:

During Phase IV, Duquesne Light proposes to hold stakeholder meetings to update as needed and required as well as continuing the dialogue with partnerships developed as a result of the meetings held during the course of planning the Phase IV programs. For example, *Duquesne Light and the gas distribution companies will continue to work together to encourage participation beyond the current Smart Comfort low income program* by holding IEAG meetings in conjunction with other scheduled stakeholder group meetings to facilitate efficiency in time and travel. (Emphasis added.)

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Based upon input from NGDCs, Duquesne Light and its non-residential CSP(s) will hold additional stakeholder meetings after plan approval to discuss the logistics around *continued partnership with the NGDCs to increase awareness of CHP rebate opportunities under the Phase IV plan.* (Emphasis added.)

7. Peoples embraces the opportunity to work with, indeed, to partner with, DLC in these program areas, and to that end, its interests in this proceeding are distinguished from those of other parties who are not NGDCs.

8. Peoples will be bound by the Commission's action in this proceeding both in the matter of the rates Peoples will pay for electric service and in the matter of how DLC's proposal may affect CHP development and low income programs on DLC's and Peoples' systems.

Peoples' interests in this proceeding, therefore, cannot be adequately represented by other parties who do not share those same interests, and Peoples' participation in the case is in the public interest.

9. Peoples acknowledges that a Prehearing Conference has already been held, a Prehearing Order has been issued that established a procedural schedule, a motion has been filed to extend the procedural schedule, and an order has issued denying that motion but modifying the originally approved procedural schedule. Peoples takes no position on the procedural schedule, so the approval of this petition to intervene and Peoples subsequent participation in this proceeding will not disrupt procedural activity to date with respect to this issue. Peoples does not intend to file direct testimony, but Peoples reserves the right to raise and address issues identified through its review and analysis of the Plan and DLC's supporting information and testimony, or as other issues that may impact Peoples' interests are raised by other parties.

**WHEREFORE**, Peoples Natural Gas Company LLC respectfully requests that the Commission approve this Petition to Intervene and grant Peoples full rights of participation as an intervening party in this case.

Respectfully submitted,



William H. Roberts II  
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375 North Shore Drive  
Pittsburgh, PA 15212  
412 208-6527

Attorney for Peoples Natural Gas Company LLC

Date: January 20, 2021

### Verification

I, Carol Scanlon, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that 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).

Date: 1/13/2021



(Signature)