

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

February 12, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
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:

In accordance with the requirements of Section 5.412a of the Commission's regulations, 52 Pa. Code § 5.412a, and the attached *Interim Order Adopting Joint Stipulation For Admission of Evidence and Admitting Evidence Into the Record* in the above referenced proceeding, please find attached copies of Duquesne Light Company's admitted evidence. This filing consists of the following documents:

- Duquesne Light Statement No. 1 (Direct Testimony of David Defide);
- Duquesne Light Statement No. 1-R (Rebuttal Testimony of David Defide);
- Duquesne Light Statement No. 2 (Direct Testimony of David Ogden), and accompanying Exhibits DBO-1 through DBO-5;
- Duquesne Light Statement No. 2-R (Rebuttal Testimony of David Ogden), and accompanying Exhibits DBO-1R through DBO-5R; and
- *Interim Order Adopting Joint Stipulation For Admission of Evidence and Admitting Evidence Into the Record*, Docket No. M-2020-3020818 (February 8, 2021).

Copies of this filing are being served on the parties of record in accordance with the attached Certificate of Service.

STEVENS & LEE
LAWYERS & CONSULTANTS

Secretary Chiavetta
February 12, 2021
Page 2

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

Sincerely,
STEVENS & LEE

A handwritten signature in blue ink that reads "Michael A. Gruin". The signature is written in a cursive style with a large initial "M".

Michael A. Gruin

cc: Certificate of Service
Administrative Law Judges Mark Hoyer and Emily DeVoe (via electronic mail only)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the enclosed *Duquesne Light Company's § 5.412a filing of admitted evidence* have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA ELECTRONIC MAIL ONLY

Ria Pereira, Esq.
Elizabeth Marx, Esq.
CAUSE-PA
118 Locust Street
Harrisburg, PA 17101
Pulp@palegalaid.net

Sharon E. Webb, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov

Aron Beatty, Esquire
Lauren E. Guerra, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
ABeatty@paoca.org
LGuerra@paoca.org

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Ave.
Forty Fort, PA 18704
jlvullo@bvrrlaw.com

William H. Roberts II, Esquire
Michael Turzai, Esquire
Peoples Natural Gas Company, LLC
375 North Shore Dr.
Pittsburgh, PA 15212
william.h.robertsii@peoples-gas.com
michael.turzai@peoples-gas.com

Michael A. Guin

February 12, 2021

Michael A. Guin

Duquesne Light
Statement No. 1
(Direct Testimony of
David Defide)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Duquesne Light Company for
Approval of its Energy Efficiency and
Conservation Plan, Phase IV**

Docket Nos. P-2020-_____
M-2020-_____

Direct Testimony

Witness: David Defide

Subject: EE&C Phase IV Plan Development

DIRECT TESTIMONY OF DAVID DEFIDE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Q. Please state your full name and business address.

A. My name is David Defide. My business address is 411 Seventh Avenue, Pittsburgh Pennsylvania 15219.

Q. By whom are you employed and in what capacity?

A. I am employed by Duquesne Light Company (“Duquesne Light” or the “Company”) as the Senior Manager of Customer Programs.

Q. What are your current responsibilities as the Manager of Customer Programs?

A. As the Senior Manager of Customer Programs, I am responsible for the development and implementation of Duquesne Light’s Energy Efficiency and Conservation (“EE&C”) programs for Act 129 Phase IV. I have been responsible for implementing the Company’s EE&C Phase I, Phase II and Phase III Plans. I also assist with the implementation of related customer programs such as universal services, including through the Income Eligible Advisory Group (“IEAG”), to facilitate coordination among the participants.

Q. Please state your educational and professional qualifications.

A. I received a Bachelor of Arts degree in Administration and Management in 1994 from LaRoche College. In 1997, I received a Master of Business Administration degree from Robert Morris University. I have been working for Duquesne Light Company since August 2009 as the Manager of Customer Programs. In August 2019 I was promoted to Senior Manager of Customer Programs. In that position, I currently manage a staff of four

Duquesne Light Company Statement No. 1

1 professionals. Prior to my work with Duquesne Light, I was the Chief Finance/Operating
2 Officer for Conservation Consultants, Inc. for ten years. Prior to working for Conservation
3 Consultants, I was the Finance Director and Special Assistant to the Executive Director for
4 the Housing Authority City of Pittsburgh. Prior to this position, I worked for National City
5 Bank as an Operations Supervisor.

6
7 **Q. What is the purpose of your direct testimony?**

8 A. The purpose of my testimony is two-fold. First, I will briefly explain Duquesne Light's
9 energy efficiency plan requirements pursuant to Act 129 of 2008 ("Act 129") and the
10 Public Utility Commission ("Commission") Implementation Order issued June 18, 2020 at
11 Docket No. M-2020-3015228. Second, I will explain the methodology used to design,
12 develop, analyze, and implement Duquesne Light's Energy Efficiency and Conservation
13 Phase IV Plan ("EE&C Phase IV Plan").

14
15 **Q. Are you sponsoring any exhibits as part of your direct testimony?**

16 A. Yes. Duquesne Light's Energy Efficiency and Conservation Phase IV Plan is attached to
17 the Company's Petition and has been marked as Exhibit 1.

18
19 **Q. Have you previously testified before the Pennsylvania Public Utility Commission?**

20 A. Yes. I provided direct testimony on behalf of Duquesne Light in *Petition of PECO Energy*
21 *for an Evidentiary Hearing on the Energy Efficiency Benchmarks*, at Docket No. P-2012-
22 2320334,; in support of Duquesne Light's Energy Efficiency and Conservation Petition for
23 Approval of Modifications to its Demand Response Programs and at Docket No. M-2009-

1 2093217; in support of Duquesne Light’s Energy Efficiency and Conservation Phase II
2 and Phase III Plans at Docket Nos. M-2012-2334399 and Phase III Plan at Docket No. M-
3 2014-2424864; and on behalf of Duquesne Light in *Petition of Peoples Natural Gas*
4 *Company, LLC for Approval of its Energy Efficiency and Conservation Plan*, Docket No.
5 M-2017-2640306.

6
7 **I. BACKGROUND**

8 **Q. Please explain the Company’s energy efficiency conservation and demand response**
9 **obligations under Act 129 of 2008 (“Act 129”).**

10 A. Pursuant to Act 129 of 2008 (“Act 129”) Electric Distribution Companies (“EDCs”) with
11 at least 100,000 customers are required to achieve consumption reductions of at least one
12 percent (1%) by May 31, 2011, and at least three percent (3%) by May 31, 2013. 66 Pa.C.S.
13 § 2806.1(c)(1), (2). Additionally, pursuant to section § 2806.1(d), EDCs are required to
14 achieve a four and one-half (4.5%) percent peak demand reduction of the one hundred
15 (100) highest hours by May 31, 2013. These energy consumption and demand response
16 targets applied to Phase I of the EEC&DR Program. Act 129 further required the
17 Commission to evaluate the cost and benefits of the EE&C plans by November 30, 2013,
18 and implement additional incremental consumption and peak demand reductions only if
19 the benefits of the EE&C plans exceed the costs. 66 Pa.C.S. § 2806.1(c)(3). The energy
20 consumption reduction target for the Phase II three-year energy efficiency consumption
21 was 276,722 MWh. The Phase III five-year energy efficiency consumption target was
22 440,916 MWh and the demand reduction target was 42 MW. The Phase IV five-year energy
23 efficiency consumption target is 348,126 MWh and 62 MW. In compliance with the

Duquesne Light Company Statement No. 1

1 requirements of Act 129 and the Commission's Orders implementing Phase IV, Duquesne
2 has used the energy consumption reductions established by the Commission to develop its
3 energy efficiency and conservation plan, which is submitted herewith.

4
5 **Q. Did the Commission order EDCs to develop and implement a plan to achieve**
6 **additional energy efficiency conservation targets beyond those required by Act 129**
7 **for Phase III?**

8 A. Yes. Having found the Phase I program to be cost effective, on August 3, 2012, the
9 Commission entered its Energy Efficiency and Conservation Phase II Implementation
10 Order ("*Phase II Implementation Order*"). The Commission's EE&C Phase II Order
11 provided that Duquesne Light was required to achieve a 2.0% energy consumption target,
12 or 276,722 MWhs, over a three year period spanning June 1, 2013 through May 31, 2016
13 ("*Phase II*"). *Phase II Implementation Order* at p. 24. The Statewide Evaluator (SWE)
14 was directed by the Commission to provide a Demand Response (DR) Potential Study to
15 analyze the cost effectiveness of the legislative peak demand reduction requirements and
16 of potential improvements to the peak demand reduction program. In addition, SWE was
17 tasked with performing an Energy Efficiency (EE) Potential Study to determine the cost
18 effective consumption reduction potential in the Commonwealth. After issuing a Tentative
19 Order and receiving Comments and Reply Comments from a number of interested parties,
20 the Commission issued its Energy Efficiency and Conservation Phase III Implementation
21 Order ("*Phase III Implementation Order*") on June 11, 2015. The Commission
22 subsequently issued a Clarification Order on August 20, 2015, to clarify certain aspects of
23 the *Phase III Implementation Order*. After issuing a Tentative Order and receiving

Duquesne Light Company Statement No. 1

1 Comments and Reply Comments from a number of interested parties, the Commission
2 issued its Energy Efficiency and Conservation Phase IV Implementation Order (“*Phase IV*
3 *Implementation Order*”) on June 18, 2020.

4
5 **Q. Please summarize the Phase IV consumption reduction and demand reductions that**
6 **the Commission adopted for Duquesne Light.**

7 A. The Commission has adopted for Duquesne Light a consumption reduction for the five
8 year Phase IV period of 348,126 MWh and demand reduction target of 62 MW.

9
10 **Q. Does Duquesne Light’s Phase IV EE&C Plan meet these targets?**

11 A. The Company’s Phase IV EE&C Plan is designed to exceed these levels, and includes a
12 consumption reduction target of 383,733 MWh and a demand reduction target of 68.7 MW.

13
14 **Q. Provide your rationale for developing savings targets above the mandatory amounts.**

15 A. The Phase IV EE&C Plan exceeds kWh and kW savings mandate by 10% to provide a
16 minimum buffer. There are several reasons for this design. At the writing of this testimony,
17 it is anticipated that there will be no Phase III carry-over savings into Phase IV as there has
18 been in the previous two phases. Moreover, Phase IV represents the first phase in which
19 residential lighting savings potentials will fully reflect the effects of federal Energy
20 Independence and Security Act of 2007 (“EISA”). Historically, residential upstream
21 lighting contributed between 40 and 60 percent of annual savings in the previous 11 years.
22 Due to changes to the TRM based upon those changes in federal law, the Company will
23 have considerably less opportunity to realize comparable savings from lighting projects in

Duquesne Light Company Statement No. 1

1 Phase IV. Given impacts of the 2021 TRM baseline requirements, no residential upstream
2 lighting is planned. Total Residential (lighting and all other measures) Phase IV impacts
3 are projected at 17 percent of the portfolio. This contrasts sharply from the previous three
4 Act 129 phases.

5 Making the savings and demand reductions forecast in the EEPDR Phase IV
6 Forecast will be difficult, given the removal of Residential Upstream Lighting savings. As
7 stated in Duquesne's comments in the Tentative Implementation Order, the absence of
8 residential lighting will make it more difficult to achieve the mandated reductions.
9 Planning to exceed the mandate by ten percent accounts for increased uncertainty
10 associated with untested program options.

11
12 **Q. How will Duquesne Light's EE&C Phase IV Plan achieve demand reduction targets?**

13 A. In the Phase IV Implementation Order, the Commission chose to exclude dispatchable
14 demand response ("DDR") from Phase IV goal-setting. Duquesne Light's Phase IV EE&C
15 Plan therefore does not include a demand response program. The Company will instead
16 achieve its demand reduction targets through its energy efficiency programs described in
17 the Plan.

18
19 **Q. Does Act 129 provide guidance on EDCs' allowable spending levels for their EE&C
20 Plans?**

21 A. Yes. Act 129 provides that "[t]he total cost of any plan required under this section shall
22 not exceed 2% of the electric distribution company's total annual revenue as of December
23 31, 2006." An EDC's total annual revenue is defined as "[a]mounts paid to the electric

Duquesne Light Company Statement No. 1

1 distribution company for generation, transmission, distribution and surcharges by retail
2 customers.” The Commission has interpreted this to include amounts paid to the EDC for
3 generation service, including generation revenues collected by an EDC for an electric
4 generation supplier that uses consolidated billing.

5
6 **Q. Has the Commission provided further guidance on the definition of “EDC total
7 annual revenue?”**

8 A. Yes. On January 16, 2009, the Commission issued its EEC&DR Phase I Implementation
9 Order at Docket No. M-2008-2069887 (“*Phase I Order*”). On pages 34-35 of the *Phase I*
10 *Order*, the Commission stated:

11 “...[T]he Commission interprets “amounts paid to the [EDC] for
12 generation, transmission, distribution and surcharges by retail customer,”
13 set forth as the definition of EDC total annual revenue in 66 Pa. C.S. §
14 2806.1(m), **to include all amounts paid to the EDC for generation
15 service, including generation revenues collected by an EDC for an EGS
16 that uses consolidated billing.** This result will bring Duquesne’s program
17 budget closer to a level of parity with the other EDCs, and ensure that it has
18 a more meaningful opportunity to comply with the EE&C provisions of Act
19 129.”

20 The Commission retained its interpretation of EDC total annual revenues provided in Phase
21 I, Phase II, Phase III and now Phase IV.

22
23 **Q. What is Duquesne Light’s budget for its Phase IV EE&C Plan?**

24 A. Duquesne Light’s total 2006 annual revenues were \$723,299,451. EGS total generation
25 and transmission revenues in Duquesne Light’s service territory in December 2006 were
26 \$253,998,128. Combined, Duquesne Light and EGS 2006 annual revenues totaled
27 \$977,297,579. Applying simple arithmetic, 2% of \$977,297,579 equals \$19,545,951.58.

1 Therefore, Duquesne Light’s annual budget is \$19,545,951.58, and the total five year
2 program spending cap is \$97,739,968.

3
4 **II. EE&C PHASE IV PLAN DEVELOPMENT**

5 **Q. How will Duquesne Light measure energy savings for the programs it proposes to**
6 **implement?**

7 A. Under Act 129, the Commission was required to implement an energy efficiency program
8 that includes a process to monitor and verify data collection and plan results. In the Phase
9 I Order, the Commission adopted the *Energy Efficiency and DSM Rules for Pennsylvania’s*
10 *Alternative Energy Portfolio Standard, Technical Reference Manual* (“TRM”) as a
11 component of the EE&C Program evaluation process. The Commission continued its use
12 of the TRM for the Phase II, Phase III and will do the same for Phase IV programs. The
13 TRM in Phase I and Phase II was updated annually and used to measure and verify
14 applicable energy efficiency measures used by EDCs to meet the Act 129 consumption
15 reduction targets. For Phase III, the Commission applied the 2016 TRM, as periodically
16 amended, for the entirety of Phase III. The Commission is following a similar approach in
17 Phase IV. For Phase IV, the Implementation Order at page 98 states that the 2021 TRM be
18 applicable for the entirety of Phase IV unless a mid-phase TRM update is deemed
19 necessary. In addition, in its Final Order issued August 8, 2019 at Docket No. M-2019-
20 3006867 (“TRM Final Order”), the Commission adopted a new process for incorporating
21 updates to codes, standards and Energy Star specifications occurring during Phase IV
22 without undertaking a new TRM update. Based on the extent of code updates, the SWE
23 will recommend whether to open the TRM for a code refresh for the following program

1 year. Code updates that are not finalized before July 1 of a program year will not be
2 considered for inclusion in the TRM for that update cycle. The expected savings discussed
3 later in this testimony are based on the 2021 TRM.

4
5 **Q. Duquesne Light’s EE&C Phase IV Plan must be cost effective. How did Duquesne**
6 **Light determine if its EE&C Phase IV plan is cost effective?**

7 A. Under Act 129, the Commission is required to use a Total Resource Cost (“TRC”) test to
8 analyze the costs and benefits of EDC energy efficiency and conservation plans. Act 129
9 defines the TRC as “a standard test that is met if, over the effective life of each plan not to
10 exceed 15 years, the net present value of the avoided monetary cost of supplying electricity
11 is greater than the net present value of the monetary cost of energy efficiency conservation
12 measures.” Under Act 129, EDCs must demonstrate that its Phase IV EE&C Plan is cost
13 effective using the TRC test. Use of the TRC test was specified in a series of five (5)
14 Commission TRC Orders, issued sequentially, each partially modifying its predecessor.

- 15 1. *TRC Test Order*, June 18, 2009 Docket No. M-2009-2108601
- 16 2. *TRC Test Order*, July 28, 2011, Docket No. M-2009-2108601
- 17 3. *TRC Test Order*, August 20, 2012, Docket No. M-2012-2300653, M2009-
18 2108601
- 19 4. *TRC Test Order*, June 11, 2015, Docket M-2015-2468992
- 20 5. *TRC Test Order*, December 19, 2019, Docket M-2019-3006868

21
22 Duquesne Light measured the cost effectiveness of its EE&C Phase IV Plan based on all
23 of the applicable provisions of all of these TRC Test Orders. The results of the TRC are
24 expressed as the net present value and benefit/cost (“B/C”) ratio. Consistent with the
25 aforementioned TRC Test Orders, a B/C ratio greater than one indicates that the program

Duquesne Light Company Statement No. 1

1 is beneficial to the utility and its ratepayers on a total resource cost basis. Duquesne Light's
2 proposed EE&C Phase IV Plan overall TRC score is 1.31. Accordingly, the Plan is cost
3 effective as a whole.
4

5 **Q. Please describe the process used to develop Duquesne Light's EE&C Phase IV Plan.**

6 A. The Company's EE&C Phase IV Plan was developed in partnership with prospective
7 implementation providers to leverage industry expertise and streamline the transition from
8 Phase III. The EE&C Plan forecast measure detail is directly linked to prospective CSP
9 responses to competitive solicitations, issued by Duquesne Light, for the design and
10 implementation of the programs presented in this Plan. Accordingly, the measure mix was
11 taken from proposals selected based on CSP expertise and innovation. The Plan measure
12 content was reconciled with content of the 2021 Technical Reference Manual (TRM) and
13 information provided in the SWE saturation studies and potential forecast (2021 Statewide
14 EE Potential Study¹). Measure deemed savings were updated consistent with the 2021
15 TRM. Measure costs were documented using the SWE incremental costs database,
16 contractor values, EDC research and specific measure cost web research. Incentive
17 amounts were established starting with baseline assumptions applied in the 2021 Statewide
18 EE Potential Study. These were adjusted based upon historic incentives provided by
19 Duquesne Light, the other six Pennsylvania EDCs, escalated for the Phase IV performance
20 period and adjusted as required to achieve budgetary requirements. Avoided cost
21 assumptions were updated consistent with the Total Resource Cost Test (TRC) Order and
22 applied to render measure, program, portfolio and Plan level cost-effectiveness as

¹ *Pennsylvania Act 129 - Phase IV Energy Efficiency and Peak Demand Reduction Market Potential Study Report*, submitted by Optimal Energy, Inc., et. al., February 28, 2020.

Duquesne Light Company Statement No. 1

1 expressed by the TRC ratio. Programs were defined based upon delivery channels within
2 each customer sector.

3 Duquesne Light worked with CSPs to establish program definitions. Residential
4 sector programs retain the successful downstream and upstream rebate offerings. The
5 Commercial and Industrial portfolios retain proven customer market segment engagement
6 channels. The Small Commercial Direct-Install Program and Multifamily Housing Retrofit
7 Program were both successful in Phase III and are continued in Phase IV. Such programs
8 demonstrate Duquesne Light's commitment to providing comprehensive measures to
9 under-served market segments.

10 Program goal allocation and associated program budgets were designed based upon
11 SWE Energy Efficiency Potential Study and adjusted to accommodate the Commission's
12 Implementation Order, which required segment carve-outs for the low income segment and
13 specified program comprehensiveness requirements. Goal allocation for the remaining
14 customer segments was based on segment energy use, as well as requirements to achieve
15 mandated reductions at authorized budgets.

16
17 **Q. What carve-outs for the low income customer segment did the Commission establish**
18 **for Duquesne Light?**

19 **A.** The Phase IV Implementation Order provides that Duquesne Light's Phase IV Plan must
20 obtain at least 18,566 MWh in energy savings from the low-income customer segment.
21 Phase IV Implementation Order p. 35. This constitutes approximately 5.3% of the energy
22 savings from the residential customer class. Additionally, the Company's Phase IV Plan
23 must provide a "proportionate number of measures equivalent to the low-income sector's

Duquesne Light Company Statement No. 1

1 share of usage,” or 8.40 measures. Phase IV Implementation Order pp. 27, 35. As discussed
2 further below, the Company’s Phase IV Plan exceeds both these required carve-outs.

3
4 **Q. You mentioned that the Company considered stakeholder input. Please describe the
5 process used to gather stakeholder input on the Company’s EE&C Phase IV Plan.**

6 A. During the planning process, individual stakeholder meetings were held to discuss
7 Duquesne Light’s program plans for Phase IV. Participants included and invitations were
8 extended to regulatory parties such as Office of Consumer Advocate, Office of Small
9 Business Advocate, Duquesne Industrial Intervenors, Duquesne Light’s Income Eligible
10 Advisory Group (“IEAG”), lighting vendors, Conservation Service Providers, EM&V
11 contractor, gas distribution companies, KEEA, and CAUSE PA.

12
13 **Q. Did the stakeholder meetings influence the Company’s EE&C Phase IV Plan
14 development?**

15 A. Yes. Based on stakeholder input, Duquesne’s Phase IV Plan proposes continuing with the
16 Income Eligible Advisory Group meetings throughout the Phase. Members of this group
17 include community based organizations, NGDCs, OCA, CAUSE-PA, and various non-
18 profit social service agencies. At these meetings marketing material and outreach
19 opportunities will be discussed. Furthermore, DLC will conduct a stakeholder meeting
20 with the Housing Alliance of Pennsylvania, PHFA, other interested affordable housing
21 trade groups, and other interested stakeholders in Phase IV to coordinate and tailor the
22 measures targeted in the development of affordable housing opportunities.

Duquesne Light Company Statement No. 1

1 Moreover, during Phase IV, the Company plans to continue to work with NGDCs
2 in conjunction with the IEAG to encourage participation beyond the current Smart Comfort
3 low income program. Duquesne Light and its non-residential CSP(s) also plan to hold
4 additional meetings after plan approval to discuss the logistics around continued
5 partnership with the NGDCs to increase awareness of CHP rebate opportunities under the
6 Phase IV plan.

8 **III. EE&C PHASE IV PLAN PROGRAMS**

9 **Q. What programs are proposed in the Company’s EE&C Phase IV Plan?**

10 A. Generally, Duquesne Light’s proposed EE&C Phase IV Plan is designed to educate
11 customers about energy efficiency and conservation and lower customer energy
12 consumption. The Phase IV Plan is largely composed of home energy audits, building
13 retrofits, lighting programs, appliance recycling and rebates program that have been
14 customized to meet the needs of specific customer segments within Duquesne Light’s
15 service territory. The programs are organized to facilitate participation by three broad
16 customer sectors: residential, commercial, and industrial customers. Additionally, each of
17 the three customer sectors are offered additional programs tailored to meet the specific
18 needs of certain customer segments, such as income eligible customers, small to medium
19 commercial and industrial customers, and large commercial and industrial customers. In
20 addition, Behavioral Energy Efficiency Program reports will be sent to residential and
21 income eligible residential customers.

23 **Q. Please describe the Residential Energy Efficiency program (“REEP”).**

Duquesne Light Company Statement No. 1

1 A. The REEP includes these programs: 1) REEP Rebate Program with Downstream,
2 Midstream and Upstream delivery channels; 2) Residential Appliance Recycling Program
3 (“RARP”); 3) Residential and Low Income Behavioral Energy Efficiency Programs (“R-
4 BEEP” and “LI-BEEP”); and 4) the Residential Low Income Energy Efficiency Program
5 (“LIEEP”). These programs are explained in detail in Section 3 of the Company’s Phase
6 IV EE&C Plan, but I will provide a brief summary:

REEP Rebate Program

7
8
9 The REEP rebate program encourages customers to make an energy efficient choice
10 when purchasing and installing household appliances and equipment by offering
11 educational materials on energy efficiency options and rebate incentives. This
12 rebate program is offered via three channels, upstream, midstream and downstream.
13 Program educational materials and rebates are provided in conjunction with the
14 Duquesne Light on-line home energy audit and other programs offered to
15 residential customers.
16

Residential Appliance Recycling Program (“RARP”)

17
18
19 The Residential Appliance Recycling Program encourages residential customers in
20 Duquesne Light’s service territory to turn in their older refrigerators, dehumidifiers,
21 air conditioners, and freezers to be recycled. To encourage participation in this
22 program, this program provides no-cost pickup and disposal as well as a small
23 rebate for each appliance recycled.
24

Residential Behavioral Energy Efficiency Programs (“R-BEEP” and “LI-BEEP”)

25
26
27
28 The R-BEEP and LI-BEEP programs send, via direct mail, home energy use reports
29 that compare recipient customer’s energy use to the use of customers with similar
30 home type and size. The programs provide for comparison the last two months of
31 energy consumption by 1) the most efficient of the peer group, 2) the BEEP
32 recipient, and 3) the entire peer group. The reports generate verifiable savings
33 ranging from 1.5%-3.5% of total home energy use.
34
35

Residential Low Income Energy Efficiency Program (“LIEEP”)

36
37
38 LIEEP is an income-qualified program providing services designed to assist low-
39 income households to conserve energy and reduce electricity costs. LIEEP relies
40 on several, low income segment-specific, contributing programs to achieve

1 projected savings impacts and program cost-effectiveness. The Company intends
2 to achieve the mandated 5.3% of its energy consumption reduction savings from
3 this program and LI-BEEP.
4

5 **Q. What are the projected energy consumption savings and demand reductions for the**
6 **residential programs?**

7 A. The Company expects to achieve 37,900,182 kWhs in energy savings and 4,148 kW in
8 demand reductions from the REEP rebate program; 8,447,770 kWhs in energy savings and
9 1,210 kW in demand reductions from the Residential Appliance Recycling program;
10 57,200,000 kWhs in energy savings and 7,757 kW in demand reductions from the
11 Residential and Low Income Behavioral Efficiency programs; and 21,386,149 kWhs in
12 energy savings and 2,494 kW in demand reductions from LIEEP.
13

14 **Q. Are the residential energy efficiency programs described herein cost effective?**

15 A. Yes. The residential programs offered are collectively cost-effective. Except for LI-BEEP,
16 each program achieved a TRC score at or above 1. Specifically, the REEP rebate program
17 TRC scores for upstream, midstream, and downstream incentives are 1.00, 1.22, and 2.09,
18 respectively; the Residential Appliance Recycling Program TRC score is 1.06; the
19 Residential Behavioral Efficiency Program TRC score is 1.09; and the Low Income
20 Behavioral Efficiency Program TRC score is 0.61. The LIEEP TRC score is 1.02. The
21 overall residential energy efficiency TRC score in aggregate is 1.27.
22

23 **Q. Are any of the residential customer programs currently in operation as part of**
24 **Duquesne Light's Phase III programs?**

Duquesne Light Company Statement No. 1

1 A. Yes. Programs currently in place as part of Duquesne Light’s Phase III program include:
2 REEP Rebate Program; Residential Behavioral Energy Efficiency and Low Income
3 Behavioral Energy Efficiency; Residential Appliance Recycling Program; and the
4 Residential LIEEP.

5
6 **Q. Are there any REEP downstream measures that you would like to describe in more
7 detail?**

8 A. Yes. The student energy efficiency education component is designed to challenge students
9 to think about energy, learning where it comes from, why we need it, and how we can use
10 it more efficiently. The program seeks to help advance a positive energy efficiency
11 lifestyle. Key features of the student energy efficiency education component are school
12 presentations with hands-on activities for the students and teachers, Poster Contests,
13 provisions for energy efficiency kits for participating students and teachers, and a data
14 collection and tracking process used to compile, analyze, and report electric energy
15 savings.

16
17 **Q. Do LIEEP and LI-BEEP satisfy the low-income carve-outs established in the Phase
18 IV Implementation Order?**

19 A. Yes. The Plan will obtain approximately 28,886 MWh of energy savings from the low-
20 income customer segment, as compared to the Phase IV Implementation Order’s
21 corresponding target of 18,566 MWh. The Plan will also meet the “proportionate number
22 of measures” carve-out of 8.40 measures. Of the 329 measures provided under the Plan, 30
23 of them – or about 9.1% percent – will be available to low-income customers.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35

Q. Please describe the energy consumption reduction programs available for Small/Medium Commercial and Industrial customers.

A. Customers served under this sector are small/medium commercial and industrial customers with demands less than 300 kW. They will have the opportunity to participate in four (4) programs: Small Business Direct Install Program; Small Business Solutions Program; Small Midstream Program, and Small Virtual Commissioning Program. These programs are explained in detail in Section 3 of the Company’s Phase IV EE&C Plan, but I will provide a brief summary:

Small Business Direct Install Program (“SBDI”)

The SBDI Program is a direct install program that offers Duquesne Light’s small business customers the opportunity to retrofit existing equipment with more energy-efficient technologies. The program’s incentives are designed to encourage early equipment replacement and target discretionary retrofit opportunities. Energy-efficient lighting remains the focus of the program, along with refrigeration and electric water heater measures. The program is turnkey that offers customers a single source of information, technical assistance, and financial incentives. Turnkey programs incorporate an end-to-end approach, from initial marketing and the resulting audit process through to final equipment installation conducted by a third-party implementation contractor.

Small Business Solutions Program (“SBS”)

The SBS Program helps Duquesne Light’s small and medium C&I customers and/or their trade allies select the most efficient electric technologies when they consider purchasing new equipment or retrofitting existing inefficient technologies. The SBS Program offers two core participation tracks: prescriptive and custom. Program components include energy use auditing, provision of targeted financing and incentives, project management and retrofit measure installation, training, and technical assistance. Energy audit results provide business customers a readily available, reliable source of information about their energy use and outline ways to save energy.

Small Midstream Program

1 The Small Midstream Program provides incentives directly to distributors and
2 manufacturers, rather than to end users, for efficient products, offsetting the higher
3 costs and effectively driving uptake of the most efficient equipment options.
4 Incentives are structured to mitigate the price premium between conventional and
5 high-efficiency products at the point of purchase, which places efficient products
6 in direct competition with conventional products based on quality and efficiency
7 alone. By working with market actors directly, equipment stocking patterns are
8 altered over time to move inefficient products off the shelves and to enable faster
9 adoption and decreased customer costs for efficient equipment.

10
11 **Small Virtual Commissioning Program (“SVCx”)**
12

13 The SVCx Program leverages advanced metering infrastructure's (“AMI”)
14 advanced data analytics to identify and qualify customers with significant potential
15 for energy savings. The prospect identification process uses data modeling
16 techniques (e.g., weather normalization, etc.) to selectively, and without bias,
17 pinpoint individual meters and accounts with energy usage conditions that indicate
18 the potential for operational savings; this process does not exclude or diminish
19 opportunities based on business industry, size, or location. Once identified, the
20 program implementer offers customers personalized remote engagement by phone
21 and email to help them understand their energy usage and provide instructions for
22 self-correction. Upon successful program participation, the customer’s electric
23 usage at the meter is continuously monitored to ensure savings persistence; if
24 predetermined level of savings drift is detected, customers are re-engaged.
25 Participants are encouraged to take part in additional energy efficiency programs
26 offered by Duquesne Light upon a successful SVCx Program engagement. Under
27 this program, customers also receive 1) real-time standalone energy monitoring
28 equipment, 2) payments towards the installation costs for monitoring and control
29 systems, and 3) energy management software.
30
31

32 **Q. What are the projected energy consumption savings and demand reductions expected**
33 **from the small/medium commercial and industrial programs?**

34 A. The SBDI Program is projected to achieve 23,133,399 kWhs of energy savings and 4,475
35 kW in demand reductions. The SBS Program is projected to achieve 50,212,478 kWhs of
36 energy savings and 8,590 kW in demand reductions. The Small Midstream Program is
37 expected to achieve 27,491,056 kWhs of energy savings and 6,756 kW in demand
38 reductions. The SVCx Program is expected to achieve 6,053,739 kWhs of energy savings
39 and 2,228 kW in demand reductions.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Q. Are the energy efficiency programs available under the small/medium commercial and industrial sector cost effective?

A. Yes. All of the programs proposed except the Small Midstream Program score above 1 on the Commission’s TRC test. The SBDI Program TRC score is 1.09; the SBS Program TRC score is 1.48; the Small Midstream Program TRC score is 0.68; and the SVCx Program TRC score is 3.41. In total the programs for this sector have a TRC score of 1.10.

Q. Are any of the commercial programs currently in operation as part of Duquesne Light’s Phase III programs?

A. Yes. The Small Business Direct-Install Program and Small Midstream Program were introduced and successfully operated in Phase III.

Q. Please describe the energy consumption reduction programs available to large commercial and industrial customers.

A. Customers served under this sector are commercial and industrial customers with demands equal to or greater than 300 kW. They will have the opportunity to participate in three (3) programs: Large Business Solutions Program; Large Midstream Program; and Large Virtual Commissioning Program. These programs are explained in detail in Section 3 of the Company’s Phase IV EE&C Plan, but I will provide a brief summary:

Large Business Solutions Program (“LBS”)

The LBS Program helps Duquesne Light’s large C&I customers and/or their trade allies select the most efficient electric technologies when they consider purchasing new equipment or retrofitting existing inefficient technologies. The LBS Program offers two core participation tracks: prescriptive and custom. Program components

1 include energy use auditing, provision of targeted financing and incentives, project
2 management and retrofit measure installation, training, and technical assistance.
3 Energy audits results provide business customers a readily available, reliable source
4 of information about their energy use and outline ways to save energy that, when
5 implemented, will result in energy savings. Solutions can include
6 retrocommissioning and combined heat and power.
7

8 **Large Midstream Program**

9 The Large Midstream Program provides incentives directly to distributors or
10 manufacturers, rather than to end users, for efficient products, offsetting the
11 higher costs and effectively driving uptake of the most efficient equipment
12 options. Incentives are structured to mitigate the price premium between
13 conventional and high-efficiency products at the point of purchase, which places
14 efficient products in direct competition with conventional products based on
15 quality and efficiency alone. By working with market actors directly, equipment
16 stocking patterns are altered over time to move inefficient products off the shelves
17 and to enable faster adoption and decreased customer costs for efficient
18 equipment.

19
20 **Large Virtual Commissioning Program (“LVCx”)**

21
22 The LVCx Program leverages AMI advanced data analytics to identify and qualify
23 customers with significant potential for energy savings. The prospect identification
24 process uses data modeling techniques (e.g., weather normalization, etc.) to
25 selectively, and without bias, pinpoint individual meters and accounts with energy
26 usage conditions that indicate the potential for operational savings; this process
27 does not exclude or diminish opportunities based on business industry, size, or
28 location. Once identified, the program implementer offers customers personalized
29 remote engagement by phone and email to help them understand their energy usage
30 and provide instructions for self-correction. Upon successful program participation,
31 the customer’s electric usage at the meter is continuously monitored to ensure
32 savings persistence; if pre-specified savings drift is detected, customers are re-
33 engaged. Participants are encouraged to take part in additional energy efficiency
34 programs offered by Duquesne Light upon a successful LVCx Program
35 engagement. Under this program customers also receive 1) real-time standalone
36 energy monitoring equipment, 2) payments towards the installation costs for
37 monitoring and control systems, 3) energy management software, and 4) control
38 systems equipment tailored to large organizations and institutional accounts.
39

40
41 **Q. What are the projected energy consumption reductions and demand reductions**
42 **expected from the large commercial and industrial efficiency program?**

Duquesne Light Company Statement No. 1

1 A. The LBS Program is projected to achieve 83,696,145 kWhs and 38,846,312 kWhs of
2 energy savings for Large Commercial and Large Industrial customers, respectively. The
3 LBS Program is projected to achieve 815,377 kW and 7,137 kW in demand reductions for
4 Large Commercial and Large Industrial customers, respectively. The Large Midstream
5 Program is projected to achieve 17,300,344 kWhs and 8,029,695 kWhs of energy savings
6 for Large Commercial and Large Industrial customers, respectively. The Large Midstream
7 Program is projected to achieve 4,783 kW and 2,220 kW in demand reductions for Large
8 Commercial and Large Industrial customers, respectively. The LVCx Program is projected
9 to achieve 2,756,458 kWhs and 1,279,369 kWhs of energy savings for Large Commercial
10 and Large Industrial customers, respectively. The LVCx Program is projected to achieve
11 1,014 kW and 471 kW in demand reductions for Large Commercial and Large Industrial
12 customers, respectively.

13
14 **Q. Are the energy efficiency programs proposed under the large commercial and**
15 **industrial sectors cost effective?**

16 A. Yes. The large business sector programs offered are collectively cost-effective. Except
17 for Large Midstream Program, each program achieved a TRC score at or above 1. The
18 LBS Program TRC score is 2.16; the Large Midstream Program TRC score is 0.63; and
19 the LVCx Program TRC score is 2.85. In total, the programs for this sector have a TRC
20 score of 1.52.

21
22 **Q. Are any of the large commercial and industrial programs currently in operation part**
23 **of Duquesne Light's Phase III programs?**

1 A. Yes. The Large Business Solutions and Midstream are an evolution of Phase III express
2 efficiency programs serving the office buildings sectors, retail stores segment, primary
3 metals, chemical products and other mixed industrial segments.

4

5 **IV. PHASE IV PJM BASE RESIDUAL AUCTION PARTICIPATION**

6 **Q. Is Duquesne Light proposing to participate in the PJM Base Residual Auction in its**
7 **Phase IV EE&C Plan?**

8 A. Yes. Duquesne Light plans to offer a portion of the peak demand reductions from its Phase
9 IV Plan into PJM's Forward Capacity Market from the portfolio of programs and measures
10 that are eligible for PJM as provided in PJM Manuals 18 and 18B or their successors.

11 Duquesne Light intends to nominate EE Resource demand reductions beginning with
12 PJM's Base Residual Auction (BRA) for delivery year 2025/2026, which expected to occur
13 in early 2023. This appears to be the earliest opportunity following the portfolio launch,
14 orientation of new CSPs, refinement of tracking system interfaces and operational practices
15 as well as developing and implementing marketing outreach strategies.

16 Duquesne Light intends to create a single EE Resource modeled in PJM's Capacity
17 Exchange system representing commercial (office, retail or healthcare) interior lighting
18 with the intent of employing partially measured retrofit isolation and/or stipulated
19 measurement and verification. The measure type will render reliable summer and winter
20 demand reductions and employ proxy variables in combination with well-established
21 algorithms and/or stipulated factors, to provide an accurate estimate of Nominated EE
22 values. Duquesne Light will combine documented energy savings and demand reductions

1 with modeled annual hourly load shapes to calculate demand reductions during summer
2 and winter performance hours.

3 Additional EE Resources will be considered and modeled using PJM’s Capacity
4 Exchange system depending upon actual program activity and need to add isolated retrofit,
5 whole facility regression or calibrated simulation measured EE Resources for differing
6 types of measure end-uses. It is anticipated that all commercial and industrial sector
7 programs may contribute to annual nominations.

8 Based on projected savings impacts, Duquesne Light currently plans to nominate
9 up to 2 MW into PJM’s Forward Capacity Market beginning with the BRA for delivery
10 year 2025/2026, and continue in each successive BRA, applicable during Phase IV.

11
12 **V. PROGRAM COST**

13 **Q. What is the Company’s Phase IV spending cap?**

14 A. As I discussed previously, Duquesne Light’s Phase IV annual budget is \$19,545,951.58,
15 and the total five year program spending cap is \$97,739,968.

16
17 **Q. What is the cumulative cost of the Company’s proposed EE&C Phase IV Plan and
18 what is the implementation strategy to acquire at least 15% of the consumption
19 reduction target in each program year as directed by the Commission?**

20 A. The Company’s EE&C Phase IV Plan has a budget cap of \$97,729,760. This Plan includes
21 programs that are being continued as previously implemented, modified based on previous
22 years’ experiences, plus newly added programs. The forecast ramp-rates by projected
23 saving impacts across the five–year period are found in the proposed plan in Figure 1,

1 which provides for acquiring at least 15% of the consumption target in each of the Phase
2 IV program years.

3

4 **Q. Please provide an overview of the EE&C Phase IV Plan cost by customer sector.**

5 A. As provided in the table on Section 3.1.1 of the EE&C Phase IV Plan, residential energy
6 efficiency programs comprise 32.5% of the plan cost, or \$31,751,650. Small/Medium
7 Commercial energy efficiency programs comprise 28.3% of the plan cost, or \$27,669,963.
8 Large Commercial energy efficiency programs comprise 27.3% of the plan cost, or
9 \$26,707,373. Finally, Large Industrial energy efficiency programs comprise 11.9% of the
10 plan cost, or \$11,600,775. In his direct testimony, Duquesne St. No. 2, Mr. Ogden
11 describes how the Company will ensure that the programs are funded by the customer
12 sector that benefits from the programs and measures offered in the Plan.

13

14 **Q. Does this conclude your testimony?**

15 A. Yes.

Duquesne Light
Statement No. 1-R
(Rebuttal Testimony of
David Defide)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**Petition of Duquesne Light Company for
Approval of its Energy Efficiency and
Conservation Phase IV Plan**

Docket No. M-2020-3020818

Rebuttal Testimony

Witness: David Defide

Subject: EE&C Phase IV Plan Development

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

REBUTTAL TESTIMONY OF DAVID DEFIDE

Q. Please state your full name and business address.

A. My name is David Defide. My business address is 411 Seventh Avenue, Pittsburgh, Pennsylvania 15219.

Q. Did you proffer direct testimony in this proceeding?

A. Yes. My direct testimony provided explanation of the filed Phase IV Plan including design, development, analysis and implementation.

Q. What is the purpose of your rebuttal testimony?

A. I will respond to the direct testimonies of OCA witness Sherwood (OCA St. 1) and CAUSE-PA witness Grevatt (CAUSE-PA St. 1).

Q. Are you sponsoring any exhibits as part of your direct testimony?

A. No, I am not.

I. RESIDENTIAL BEHAVIORAL PROGRAMS

Q. Ms. Sherwood and Mr. Grevatt both comment on the Plan’s residential behavioral programs. Please summarize their comments.

A. Ms. Sherwood generally recommends that the Plan’s residential portfolio reflect a lower reliance on behavioral programs (R-BEEP and LI-BEEP), on the grounds that (1) savings from behavioral measures (also referred to as Home Energy Reports, or HERs) might be

1 lower than expected due to the impacts of COVID-19; and (2) behavioral measures yield
2 “short-lived” savings realized over a maximum of two years. OCA St. 1, p. 14, line 7 – p.
3 15, line 2. Mr. Grevatt expresses similar concerns regarding LI-BEEP, and recommends
4 that behavioral measures comprise no more than 5% of the Plan’s low income savings
5 target. CAUSE-PA St. 1, p. 25, Table 2. Ms. Sherwood does not propose a corresponding
6 target for behavioral measures, beyond her general recommendation that behavioral
7 measures be reduced.

8
9 **Q. Do you agree with Ms. Sherwood and Mr. Grevatt’s recommendation to decrease the**
10 **Plan’s share of residential behavioral measures?**

11 A. No. The rationales provided by Ms. Sherwood and Mr. Grevatt are flawed, as I describe in
12 more detail below.

13
14 **Q. Do residential behavioral measures produce real energy savings?**

15 A. Yes. The Commission has already determined the effectiveness and validity of these
16 measures. The 2021 Technical Reference Manual (TRM), which the Commission approved
17 by Order entered August 8, 2019 at Docket M-2019-3006867, provides measurement
18 protocols for residential home energy reports. *See* 2021 TRM sec. 2.7.3, Home Energy
19 Reports. These protocols employ Randomized Control Trial measurement, which is
20 recognized nationally as the gold standard for scientific accuracy in energy efficiency
21 program verification.¹ Moreover, these measures consistently earn 100% net-to-gross

¹ *See* US Department of Energy National Renewable Energy Laboratory (NREL), Uniform Methods Project Chapter 17: Residential Behavior Protocol, which recommends RCT as a best practice for estimating energy and demand savings.

1 values. No other program approach provides this level of confidence in reported impacts
2 or causal attribution. This is proof-positive not only that the savings are real and verified,
3 but also that absent the program's influence, the customer would not have adopted the
4 energy-saving behaviors.

5 Thus, Ms. Sherwood's and Mr. Grevatt's concerns regarding the efficacy of
6 behavioral measures are misplaced. Indeed, to the extent they wish to take issue with how
7 (or whether) the energy savings from behavioral measures should be measured, the
8 appropriate place to raise those concerns would be during the development of the TRM.

9
10 **Q. Are the Plan's projected savings from residential behavioral measures consistent with**
11 **achievable opportunities in the Company's service territory?**

12 A. Yes. The projected savings opportunities in the Company's service territory are generally
13 described in the Phase IV Market Potential Study (MPS), which the Statewide Evaluator
14 (SWE) submitted on February 28, 2020. The Phase IV MPS projects 43% of Duquesne
15 Light's energy efficiency residential savings potential is in Whole Building savings. Per
16 the MPS at pp. 19 and 28, Whole Building savings stem from New Building Design and
17 home energy reports (HERs).

18 Opportunities for savings in the New Building Design category are extremely
19 limited in the Company's service territory. Residential new construction in Duquesne
20 Light's service territory comprises a less than 1% annual increase in residential building
21 stock,² and as the Commission acknowledged in the Phase IV Implementation Order,³ the

² US Census Bureau American Community Survey, Housing stock population growth.

³ *Energy Efficiency and Conservation Phase IV Implementation Order*, entered June 18, 2020 at Docket No. M-2020-3015228 ("Implementation Order").

1 Company's service territory also has low electric space heating and water heating end-use
2 saturations,⁴ which renders building shell measures rare. This leaves HERs, according to
3 the MPS, as the Company's only plausible opportunity to deliver on its 43% Whole
4 Building savings projection.

5
6 **Q. Did Ms. Sherwood or Mr. Grevatt consider the achievability implications of their**
7 **recommendation to replace a portion of residential behavioral measures with other**
8 **measures?**

9 A. No. Notably, neither Ms. Sherwood nor Mr. Grevatt even mention the MPS in their
10 respective testimonies. It appears that they did not consider whether opportunities for the
11 types of savings they recommend actually exist. The MPS – which the Commission has
12 already approved – suggests that they may not.

13
14 **Q. Ms. Sherwood suggests that the COVID-19 pandemic may have limited customers'**
15 **ability to make behavioral changes in response to behavioral energy efficiency**
16 **programs, which could yield lower-than-expected savings from those programs. OCA**
17 **St. 1, p. 14, lines 7-11. Do you agree?**

18 A. No. I believe that such contention is speculative, and does not account for the design of the
19 Company's behavioral programs.

20 If anything, the impacts of COVID-19 may increase the relative importance of
21 behavioral programs. First, though the pandemic may have reduced some customers'
22 ability to implement behavioral changes, it may have the opposite effect on other

⁴ See Implementation Order, pp. 34-35.

1 customers. Many customers may have more direct control (and financial stake) over their
2 electric consumption at home as compared to their consumption at an office or at school.
3 These customers may therefore have a greater interest in, and potential benefit from, the
4 Company's behavioral programs.

5 Second, education about energy use and savings does not have lower value when
6 home occupancy increases. A customer's potential to save is directly linked to their
7 baseline energy use. The economic fallout of COVID-19 means now more than ever,
8 customers stand to benefit more from increased awareness about opportunities to save
9 energy and obtain associated bill savings.

10 Finally, the Plan's behavioral programs are uniquely designed to accommodate "no
11 touch" customer participation, which will facilitate participation without the need for in-
12 person contact. This program feature is particularly important during the COVID-19
13 pandemic, and will continue to benefit customers thereafter.

14
15 **Q. Ms. Sherwood and Mr. Grevatt briefly indicate ways in which the Plan's behavioral**
16 **programs differ from those in other EDCs' proposed Phase IV Plans. OCA St. 1, p.**
17 **15, lines 2-4; CAUSE-PA St. 1, p. 19 FN 50. Please comment.**

18 A. Those other plans are not necessarily reflective of the Company's service territory or
19 savings potential therein. The Company's plan is tailored to the specific needs and savings
20 potentials of its customers. Notably, though they mention differences in other EDCs'
21 plans, neither Ms. Sherwood nor Mr. Grevatt argue that those other EDCs' approaches
22 should dictate the Company's.

23

1 **Q. Ms. Sherwood recommends that “if either the R-BEEP or LI-BEEP does not produce**
2 **energy savings within 15% of projections, then the Company should suspend the**
3 **struggling program until market conditions improve.” OCA St. 1, p. 15, lines 19-21.**
4 **Do you agree?**

5 A. No. This requirement would be unreasonable and unnecessarily inflexible. Ms. Sherwood’s
6 recommendation would require the Company to automatically suspend a behavioral
7 program even if it were needed to achieve the Company’s mandatory savings targets. Such
8 a requirement is also unnecessary. If the Company determines that any program (including,
9 but not limited to, R-BEEP or LI-BEEP) is underperforming, the Implementation Order
10 already provides for the Company to propose modifications to the Plan to shift resources
11 to better-performing programs. The Company certainly intends to take such action where
12 it believes that such reallocation is warranted, and would provide for the Company to meet
13 its mandatory savings targets.

14

15 **II. LOW-INCOME PROGRAMS**

16

17 **Q. Before addressing specific program critiques, do you have any initial matters to**
18 **address regarding other parties’ comments on the Company’s proposed low-income**
19 **programs?**

20 A. Yes. Throughout his comments, Mr. Grevatt refers to facts and programs that are under
21 Commission review in other concurrent proceedings. These references may not be relevant
22 to this proceeding, particularly when stripped of context. For example, Mr. Grevatt cites to
23 recent increases in customer arrearages, and asserts that such customers are “eligible for

1 termination,” CAUSE-PA St. 1, p. 13, lines 13-15, without mentioning the Commission’s
2 termination moratorium that has been largely in place since March 2020. *See* Docket M-
3 2020-3019244. Similarly, Mr. Grevatt addresses “the relationship between energy
4 efficiency and CAP,” CAUSE-PA St. 1, p. 14, line 13 – p. 15, line 5, without
5 acknowledging the Company’s transition to a percent-of-income payment (PIPP) CAP
6 structure, which will significantly reduce energy consumption (and energy efficiency) as a
7 determinant of CAP bills. *See* Docket M-2019-3008227.

8 I understand that the Commission is currently considering these issues in other
9 proceedings, so I am not engaging them in depth here; rather, the remainder of my
10 testimony will focus of critiques specific to the Company’s proposed EE&C programs.

11
12 **Q. Please summarize Mr. Grevatt’s recommendations regarding the Company’s low-**
13 **income programs.**

14 A. As discussed briefly above, Mr. Grevatt recommends the Company reduce its reliance on
15 behavioral measures to account for no more than 5% of total low-income savings. He
16 proposes the below alternative allocation of low-income savings sources at p. 25:

Table 2: EFG Proposed Allocation of Low Income Savings Sources

Measure Category	EFG Proposed % of LI savings
Refrigerator, freezer, room A/C replacement	10.0%
Connected thermostat, heat pump water heater, ductless mini-split heat pump, central A/C, air source heat pump	20.0%
Air sealing and insulation	25.0%
EE kits	10.0%
Common area lighting - multifamily	30.0%
LI-BEEP	5.0%
Total	100.0%

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15

Mr. Grevatt alleges that this allocation “would be far more responsive to the Commission’s stated expectations for the EDCs’ low income programs.” CAUSE-PA St. 1, p. 25, lines 2-3.

Q. Do you agree with Mr. Grevatt’s recommendation?

A. No. As discussed further below, Mr. Grevatt’s recommendation is unsupported, unachievable, and massively expensive. I believe that Mr. Grevatt’s recommendation is not fact-based and should be rejected.

Q. As an initial matter, is Mr. Grevatt’s recommendation consistent with Duquesne Light’s low-income savings target identified in the Implementation Order?

A. No. Mr. Grevatt’s recommendation would require the Company to exceed its Commission-imposed low-income savings target by a wide margin. His recommendation can be dismissed on these grounds alone.

1 Mr. Grevatt does not provide nominal kWh savings amounts associated with each
2 of the savings percentages in his Table 2. However, his implied nominal savings amounts
3 can be inferred through simple arithmetic. As Mr. Grevatt observes, multifamily common
4 area lighting measures constitute approximately 18,250,000 kWh, or about 63% of low-
5 income savings, under the Company's proposed Plan. Mr. Grevatt recommends the
6 Company "maintain its projections for these lighting measures." CAUSE-PA St. 1, p. 24,
7 lines 16-17. He then goes on to recommend that these 18,250,000 kWh of lighting savings
8 constitute no more than 30% of the Company's total low-income savings. CAUSE-PA St.
9 1, p. 25, lines 1-5. This would necessarily yield a total low-income savings target of
10 approximately 60,833,000 kWh,⁵ or **327%** of the Company's mandatory low-income
11 savings target of 18,566,000 kWh under the Implementation Order. Mr. Grevatt does not
12 acknowledge this necessary consequence of his recommendation.

13
14 **Q. If one were to modify Mr. Grevatt's recommendation to allow for reductions to**
15 **multifamily common area lighting measures, such that the Plan's total low-income**
16 **savings projection would remain unchanged, would you agree with such modified**
17 **recommendation?**

18 A. No. Even if the Company were to reduce lighting measures to 30% of its as-filed overall
19 low-income savings projection of 28,886,149 kWh, and reallocating low-income savings
20 in the proportions Mr. Grevatt recommends at Table 2, the resulting measure mix would
21 produce significant budget overruns and would likely be unachievable from a market
22 potential perspective.

⁵ 18,250,000 kWh divided by 30% equals 60,833,000 kWh.

1

2 **Q. Please explain the projected cost impacts of Mr. Grevatt’s recommendation, as**
 3 **modified.**

4 A. Mr. Grevatt acknowledges that he has “not attempted to conduct an analysis of the costs
 5 that would be associated with my proposal, but there is little doubt that costs could increase
 6 for the LI programs if my recommendations were adopted.” CAUSE-PA St. 1, p. 25, lines
 7 8-10. Though Mr. Grevatt did not quantify the projected costs of his proposal, the Company
 8 has, by inserting Mr. Grevatt’s proposed measure categories and proportions into the
 9 Company’s model provided to parties in discovery.⁶ The below table depicts adjusted unit
 10 measure quantities in the Measure Categories reflected in Mr. Grevatt’s Table 2 to achieve
 11 his recommended percentages of low income savings. These adjustments increased low-
 12 income program cost from approximately \$15.7 million to \$42.6 million.

13

14 **Table 1: CAUSE-PA Recommended Measure Category Savings Targets and**
 15 **Program Cost Impacts**
 16

Measure Category	kWh	% of LI Savings	Total Cost	Cost Impact
Appliances	2,888,615	10%	\$4,062,662	\$2,493,318
Space cooling & heating / water heating	5,777,230	20%	\$17,786,083	\$16,328,639
Building Shell	7,221,537	25%	\$11,564,131	\$10,473,752
EE Kits	2,888,615	10%	\$1,374,155	\$690,046
Lighting	8,665,845	30%	\$6,905,164	-\$2,612,180
LI-BEEP	1,444,307	5%	\$676,869	-\$438,305
Audits			\$245,145	
Total	28,886,149	100%	\$42,614,209	\$26,935,271

17

⁶ See Company response to CAUSE-PA I-7, included within Appendix B to CAUSE-PA St. 1.

1 By nearly tripling the budget for low-income programs, Mr. Grevatt's measure mix would
2 force the Company to exceed its Phase IV budget by nearly \$27 million. Duquesne Light's
3 Act 129-imposed Phase IV budget is \$97.7 million, reflecting an acquisition cost of
4 \$281.57 \$/MWh.⁷ As shown above, to achieve Mr. Grevatt's suggested low income
5 measure mix, the Company's projected Phase IV portfolio cost would increase to \$124.7
6 million, or approximately \$26.9 million more than authorized under the Implementation
7 Order and Act 129. Such budget increase is neither reasonable nor permissible.

8
9 **Q. Did Mr. Grevatt consider the achievability of his recommendation, as modified?**

10 A. No. As I discussed earlier, Mr. Grevatt did not mention the MPS in his testimony, or
11 otherwise address achievability of his recommendation. Even setting aside budgetary
12 constraints, Mr. Grevatt's recommendation is not consistent with actual savings potential
13 in the Company's service territory.

14 The Company engaged this issue extensively in its comments on the Commission's
15 Phase IV Tentative Implementation Order. From an energy efficiency potential
16 perspective, the Commission ultimately agreed with Duquesne Light's comments⁸ that
17 end-use saturations for electric space heating and water heating were uncharacteristically
18 high in the 2018 Baseline Study. As a result, the Commission relied on average findings
19 from the 2012, 2014 and 2018 baselines studies to reduce the Company's space heating
20 and water heating potential by 35 percent in the Phase IV MPS. This reduction affects not
21 only space heating equipment measures but also building shell measures (for a single fuel
22 utility, like Duquesne Light, it is not cost-effective from a TRC perspective to insulate or

⁷ Implementation Order Table 7: Proposed Consumption Reduction Targets.

⁸ See Implementation Order Section A.3., Prescription of Low Income Measures and Carve-Out, p. 34.

1 seal homes heated by natural gas). Likewise, this 35 percent reduction affects not only
2 water heating equipment but water heating measures such as faucet aerators and
3 showerheads, as well as water heater tank and pipe insulation.

4 In practice, the Company's proposed Plan aggressively pursues any and all
5 reasonably efficacious and cost-effective opportunities for energy savings in the low
6 income sector. Mr. Grevatt, on the other hand, did not consider the availability of the
7 measure concentrations he proposed.

8
9 **Q. Does Mr. Grevatt critique the Company's application of the Commission's**
10 **"comprehensive measure" requirement?**

11 A. Yes. Mr. Grevatt suggests that the Company's interpretation of "comprehensive," as
12 employed in the Plan, may not be consistent with the Commission's use of the term in the
13 Implementation Order. CAUSE-PA St. 1, p. 18, lines 11-14. Mr. Grevatt avers that
14 "comprehensive programming refers to "a range of measures installed at the same time,"
15 and asserts, "[i]n contrast, it seems that Duquesne considers comprehensive to mean that a
16 range of measures is *available*, rather than that multiple measures are actually installed in
17 projects." CAUSE-PA St. 1, p. 18, lines 8-14.

18
19 **Q. Do you agree with Mr. Grevatt's assessment that the Company's Low Income**
20 **programs and associated multifamily delivery channels do not deliver**
21 **"comprehensive" energy efficiency opportunities?**

22 A. No. The apparent distinction Mr. Grevatt identifies is one of semantics, not substance. As
23 the Company explained in its discovery response cited by Mr. Grevatt, the Plan provides a

1 comprehensive suite of measures to the low income sector. These measures are listed at
2 EE&C Plan Section 3.2.2.1, Low Income Energy Efficiency Program (LIEEP), pp. 41-42.
3 For each LIEEP job, the Company installs as many of these measures as is warranted by
4 the customer's particular needs and savings potential. In other words, the Company already
5 installs multiple measures at the same time, as Mr. Grevatt recommends.

6
7 **Q. With respect to residential low-income programs, Ms. Sherwood asserts “outside of**
8 **LIEEP, there are cost barriers that may prevent low-income customers from**
9 **implementing [the Company’s] residential EE&C measures” OCA St. 1, p. 13,**
10 **lines 3-4. Please comment.**

11 A. Ms. Sherwood does not specify the “cost barriers” she references. In any event, the
12 Company’s proposed low-income programs are available to all low-income customers, and
13 would not impose any cost barriers on those customers. All of the Company’s proposed
14 low-income measures would be provided without cost to the low-income customer.

15
16 **III. PJM FORWARD CAPACITY MARKET**

17
18 **Q. Please summarize Ms. Sherwood’s comments regarding the Company’s plans to bid**
19 **savings into PJM’s Forward Capacity Market (FCM).**

20 A. Ms. Sherwood suggests that the following aspects of the Company’s Plan are “unclear:”
21 (1) the Company’s selection of energy efficiency measures for nomination into the FCM;
22 and (2) how underperformance on the peak demand nomination may impact ratepayers.
23 OCA St. 1, p. 16 lines 5-7, 13-16. Ms. Sherwood recommends that the Company be

1 required to file a separate plan for nominating demand reductions, including a “sensitivity
2 analysis of the impact on the EEC Surcharge by ratepayer class if various levels of penalties
3 are assessed,” with the Commission for further stakeholder review and comment. OCA St.
4 1, p. 16, line 19 – p. 17, line 3. I respond to these concerns herein.

5 Ms. Sherwood also comments on cost-recovery and surcharge aspects of the
6 Company’s FCM plans, which Company witness David Ogden also addresses in his
7 rebuttal testimony, DLC St. No. 2R.

8
9 **Q. Please describe the Company’s primary objective with respect to its PJM FCM plans.**

10 A. The Company’s foremost objective with respect to the PJM FCM is customer protection.
11 The Company was therefore very conservative in the sizing and composition of its FCM
12 proposal: it proposes to bid only up to 2 MW of peak demand savings (compared to the
13 Plan’s overall projected demand savings of 68.7MW), derived from reliable non-residential
14 interior lighting measures.

15
16 **Q. In light of the foregoing, can you address Ms. Sherwood’s concern that the Plan is
17 “unclear” with respect to which measures will be bid into the FCM?**

18 A. I do not agree with Ms. Sherwood. Section 1.6 of the Plan explains that the Company
19 intends to nominate savings derived from nonresidential interior lighting measures. Section
20 1.6 further provides that the Company will consider and model sources of demand savings
21 for potential FCM nomination, though at this time, no such other sources have been
22 identified to date.

23

1 **Q. Should the Company be required to conduct a “sensitivity analysis” of the surcharge**
2 **impacts of potential PJM penalties associated with FCM bidding?**

3 A. No; such analysis would be necessarily speculative, and is unnecessary given the relatively
4 small extent to which the Company plans to participate in the FCM.

5
6 **Q. Ms. Sherwood recommends the Company be required to state the delivery year for**
7 **the first PJM FCM nomination. Please respond.**

8 A. Section 1.6 of the Plan provides that the Company will bid demand savings into the FCM
9 “beginning with the BRA for delivery year is 2025/2026.”

10

11 **Q. Should the Company be required to file a separate PJM FCM plan, as Ms. Sherwood**
12 **suggests?**

13 A. No. Such additional plan is not required under the Implementation Order; in fact, the
14 Implementation Order adopted a reduced amount of FCM detail required in EDCs’ Phase
15 IV plans. *See* Implementation Order pp. 140-141 (“We find the suggestion made by
16 FirstEnergy persuasive and will not require detailed breakdowns by measure, program,
17 customer class, and year. Instead, as suggested by FirstEnergy, EDCs may limit EE&C
18 Plan content to a description of the strategy and approach of offering resources into the
19 PJM capacity market.”). Moreover, the separate plan Ms. Sherwood requests is
20 unnecessary in light of the details provided in the Phase IV Plan and the relatively small
21 extent to which the Company plans to participate in the FCM. Such separate plan therefore
22 would represent an undue burden on the Company.

23

1 **IV. OTHER MATTERS**

2

3 **Q. Ms. Sherwood recommends that the Company use funding allocated to the residential**
4 **class for experimental and pilot programs “to conduct research and pilot measures**
5 **to expand the residential measure offerings by considering measures such as electric**
6 **vehicle charging stations.” OCA St. 1, p. 10, lines 19-22. Do you agree?**

7 A. Yes. The Company intends to use a portion of these funds in the manner Ms. Sherwood
8 suggests. To the extent the Company identifies measures that are reasonably cost-effective,
9 achievable, implementable, and allowable under applicable law and Commission
10 directives, it may incorporate such measures into its program offerings in the future.

11

12 **Q. Does this conclude your testimony?**

13 A. Yes.

**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	:	
	:	

VERIFICATION

I, David Defide, Senior Manager of Customer Programs for Duquesne Light Company, verify that the following testimony was prepared by me or under my direct supervision and is true and correct to the best of my knowledge, information and belief:

- a. Duquesne Light Statement No. 1 (Direct Testimony of David Defide).
- b. Duquesne Light Statement No. 1-R (Rebuttal Testimony of David Defide)

I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



David Defide

Date: February 5, 2021

Duquesne Light
Statement No. 2
(Direct Testimony of
David Ogden)

Duquesne Light Company Statement No. 2

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF DUQUESNE LIGHT COMPANY
FOR APPROVAL OF ITS ENERGY EFFICIENCY AND CONSERVATION PLAN
PHASE IV

Docket Nos.

Direct Testimony

Witness: David B. Ogden

Subject: Energy Efficiency and Conservation Phase IV Plan Cost Recovery

Direct Testimony of David B. Ogden

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

I. INTRODUCTION

Q. Please state your full name and business address.

A. My name is David B. Ogden. My business address is 411 7th Avenue, Pittsburgh, PA 15219.

Q. By whom are you employed and in what capacity?

A. I am Manager, Rates & Tariff Services, for Duquesne Light Company (“Duquesne Light” or “Company”).

Q. What are your qualifications, work experience and educational background?

A. I received a Bachelor of Science in Business Administration Degree with a major in Accounting from Clarion University of Pennsylvania in 2001. I am a Certified Public Accountant. I began my career at the Company in 2008 as the Supervisor of Derivative Accounting and Special Projects. Over the last twelve years, I have held supervisory and managerial positions within Accounting, Financial Planning and Analysis and currently the Rates Department. Prior to joining Duquesne Light, I was a senior audit associate in the Pittsburgh office of PricewaterhouseCoopers LLP, a public accounting firm, where I performed attestation, advisory and compliance services for clients throughout the United States. Prior to joining PricewaterhouseCoopers, I held audit positions within the Allegheny County Controllers Office.

1 **Q. Please describe your current responsibilities.**

2 A. In my current role as Manager of Rates and Tariff Services, I am responsible for
3 overseeing the Company’s retail rates and wholesale transmission rates. In addition, it is
4 my responsibility to ensure the rates are properly distributed to Customer Billing.
5

6 **Q. Have you previously testified before the Pennsylvania Public Utility Commission**
7 **(“Commission”) or other regulatory bodies?**

8 A. Yes. I have testified in the Company’s Default Service Plan VIII (“DSP VIII”)
9 proceeding at Docket No. P-2016-2543140, the Company’s Distribution System
10 Improvement Charge (“DSIC”) proceeding at Docket No. P-2016-2540046, the
11 Company’s 2018 base rate proceeding at Docket No. R-2018-3000124, and the
12 Company’s Default Service Plan IX (“DSP IX”) proceeding at Docket No. P-2020-
13 3019522.
14

15 **Q. What is the purpose of your testimony?**

16 A. The purpose of my testimony is three-fold. First, I will provide an overview of the
17 Company’s current Energy Efficiency and Conservation (“EEC”) Phase III Plan
18 Surcharge (“EEC Surcharge”). Second, I will describe the proposed changes to the EEC
19 Surcharge to implement Duquesne Light’s proposed Phase IV EEC Plan. Third, I will
20 summarize the costs that Duquesne Light anticipates it will recover through the EEC
21 Surcharge to implement the Company’s Phase IV EEC Plan and provide an estimate of
22 the surcharges for each customer group.
23

1 Q. **Are you sponsoring any exhibits?**

2 A. Yes. I am sponsoring the following exhibits:

3 Exhibit DBO-1 – Proposed Tariff Supplement (Clean)

4 Exhibit DBO-2 – Proposed Tariff Supplement (Redline)

5 Exhibit DBO-3 – EEC Plan Cost for Planning Years 2021-2025

6 Exhibit DBO-4 – EEC Plan Surcharge Calculation Example

7 Exhibit DBO-5 – EEC Plan 1307e Reconciliation Excerpt

8

9

II. COST RECOVERY MECHANISM

10 Q. **Does Act 129 provide guidance on how the costs of providing EEC programs are to**
11 **be recovered by the Company?**

12 A. Yes. Act 129 of 2008 (“Act”) permits electric distribution companies (“EDCs”) to fully
13 recover the costs of implementing its EEC Plan. The Act permits affected EDCs to
14 recover on a full and current basis from customers, through a reconcilable adjustment
15 clause under 66 Pa. C.S. § 1307, (“Section 1307”), all reasonable and prudent costs
16 incurred in the provision or management of its plan. 66 Pa. C.S. § 2806.1(k)(1).

17

18 Q. **Please summarize the methodology used by Duquesne Light in the development of**
19 **its EEC Phase I Surcharge.**

20 A. The Act required that each EDC's plan include a Section 1307 cost-recovery tariff
21 mechanism in its EEC Plan in order to fund all reasonable and prudent costs incurred in
22 the provision and management of its EEC Plan. To that end, on July 1, 2009, the
23 Company filed its Phase I EEC Plan with the Commission pursuant to the requirements

1 of Act 129. The EEC Plan proposed five surcharges to recover costs as close as
2 reasonably possible to the customer class receiving the benefit. The five surcharges
3 associated with the customer classes were: residential, small and medium commercial,
4 small and medium industrial, large commercial, and large industrial. The Company
5 designed the EEC Surcharge and reconciliation mechanism in a manner that recovered
6 the cost of the Phase I EEC Plan via a non-bypassable charge to all of the Company's
7 customers.

8
9 **Q. Please describe the Phase I Surcharge as approved by the Commission.**

10 A. Pursuant to the Commission's order entered October 27, 2009 at Docket No. M-2009-
11 2093217, Duquesne Light submitted a Compliance Filing on November 9, 2009
12 establishing Rider No. 15 in the Company's tariff, "Energy Efficiency and Conservation
13 and Demand Response Surcharge," effective December 1, 2009, that contained the five
14 surcharges described above. The residential, small and medium commercial, and small
15 and medium industrial surcharges were designed to recover costs on a cents per kilowatt-
16 hour ("kWh") basis; and the large commercial and large industrial surcharges were
17 designed to recover administrative costs through a fixed monthly charge and recover
18 incentive costs through a variable demand charge based on the customer's Peak Load
19 Contribution ("PLC").

20
21 **Q. Is the Phase I Surcharge currently in effect?**

1 A. No. The Phase I Surcharge ended December 2014 and was completely reconciled
2 through May 31, 2015. The residual over collection was included in the e-factor
3 component of the Phase II rate that went into effect on September 1, 2015.

4

5 **Q. How does the Company assign customers to the commercial or industrial customer**
6 **classes stated in the EEC Surcharges?**

7 A. The commercial or industrial classification is based on the North American Industry
8 Classification System (“NAICS”) code or the Standard Industrial Classification (“SIC”) code
9 provided by the customer for their business. The small, medium and large
10 commercial and industrial (“C&I”) customer classifications are based on the customer’s
11 peak monthly metered demand. Small and medium C&I customers are those customers
12 with monthly metered demand less than 300 kW. Large C&I customers are those
13 customers with monthly metered demand 300 kW or more. This segmentation of
14 customers is appropriate because it aligns programs and program costs with the current
15 tariffed rates for distribution service. This segmentation has worked successfully in the
16 Company’s Phase I and II Plans and in the current EEC Phase III Plan.

17

18 **Q. Please describe the Phase II surcharge as approved by the Commission.**

19 A. On March 14, 2013 at Docket No. M-2012-2334399, the Commission issued an Opinion
20 and Order approving the Company’s EEC Phase II Plan. Duquesne Light submitted a
21 filing on April 2, 2013 establishing Rider No. 15a in the Company’s tariff, “Phase II
22 Energy Efficiency and Conservation Surcharge,” effective June 1, 2013. Having both a
23 Phase I and Phase II surcharge in the tariff ensured that expense recovery was kept

1 separate for each phase. The EEC Phase II Surcharge is essentially identical to the EEC
2 Phase I surcharge except for clarifying language to explain the reconciliation process at
3 the end of each Plan period.

4
5 **Q. Please describe the Phase III surcharge as approved by the Commission.**

6 A. On March 10, 2016 at Docket No. M-2015-2515375, the Commission issued an Opinion
7 and Order approving the Company’s EEC Phase III Plan. Duquesne Light submitted a
8 filing on April 1, 2016 that updated Rider No. 15A in the Company’s tariff, to reflect
9 “Phase III Energy Efficiency and Conservation Surcharge,” effective June 1, 2016. The
10 EEC Phase III Surcharge was essentially identical to the EEC Phase II surcharge except
11 for clarifying language to explain the reconciliation process at the end of each Plan
12 period, as well as a detailed description of the allocation methodology that is used to
13 assign costs to the various customer classes.

14 Pursuant to the parties’ settlement in Phase III, on November 15, 2019, the
15 Company filed *Duquesne Light Company – Revised Phase III Energy Efficiency and*
16 *Conservation Plan – Petition for Modification* within Docket M-2015-2515375. In its
17 Petition, Duquesne requested approval to modify its Phase III EEC Plan as well as Rider
18 No. 15A of its Retail Tariff. The Company specifically proposed to implement a single
19 EEC surcharge for its Small & Medium Commercial customers and its Small & Medium
20 Industrial customers, to go into effect on June 1, 2020. The Commission approved the
21 Company’s Petition by Order entered March 12, 2020, and the Company implemented
22 the combined Small & Medium Commercial and Industrial Phase III EEC Surcharge on
23 June 1, 2020.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Q. Please describe how the Company currently prepares its EEC Phase III Surcharge.

A. On or about May 1 of each year, the Company submits a filing to the Commission to reconcile and update the EEC Phase III Surcharge effective June 1 of that year. The Company uses the program budgets, approved by the Commission, for the Phase III EEC Plan year, June 1 to May 31. Costs are assigned to each customer class for cost recovery purposes to ensure the customer class that receives the benefits is the same customer class financing the programs. For the large commercial and large industrial classes, the budget is separated into administrative costs and incentive costs. The program budgets are then divided by the applicable billing determinants to derive per unit rates. The rates are then adjusted to recover Pennsylvania Gross Receipts Tax (“GRT”) and to establish final tariff rates.

Q. Does the EEC Phase III Surcharge include a reconciliation component?

A. Yes. The reconciliation period for Phase III is the twelve (12) months beginning April 1 of the previous year and ending March 31 of the current year. In the May 1 filing, the Company reconciles revenue collected through the EEC Surcharge for each customer class with the actual expenses incurred for that class in order to calculate an over or under recovery. The over or under collection amount, or “e-factor” is included in the derivation of the final EEC Surcharge for each class effective June 1 of each year. An over-collection is refunded through a positive e-factor and an under-collection is recovered through a negative e-factor. There is no interest on over or under collections.

1 **Q. Does the EEC Phase III Surcharge apply to all customers in the customer class?**

2 A. Yes. The EEC Phase III Surcharge is a non-bypassable charge applicable to all
3 customers in the customer class regardless of whether they are being supplied as a default
4 service customer or by an electric generation supplier.

5
6 **Q. Does the Company recover lost revenues associated with the EEC programs in the
7 EEC Phase III Surcharge?**

8 A. No. In accordance with the Act, lost revenues due to reduced energy consumption or
9 changes in energy demand that result from the Company's Act 129 EEC programs are not
10 recoverable under the adjustment clause. EDCs may reflect reduced revenue and
11 consumption in the revenue and sales data to calculate proposed rates in a distribution
12 base rate proceeding under 66 Pa. C.S. § 1308. 66 Pa. C.S. §§ 2806.1(k)(2) - (3).

13
14 **Q. Has the Commission provided direction for cost recovery for Phase IV?**

15 A. Yes. The Commission's June 18, 2020 Implementation Order at Docket No. M-2020-
16 3015228, provides further guidance for the Phase IV EEC Plans.

17
18 **Q. Please explain the Commissions guidance for cost recovery in its Implementation
19 Order for Duquesne Light's Phase IV Plan.**

20 A. The cost provisions for the Phase IV Plan are similar to those for Phase III with a few
21 changes defined in the Phase IV Implementation Order. The Commission adopted a plan
22 regarding the transition from the cost recovery methodology utilized during Phase III,
23 ending May 31, 2021, to the cost recovery methodology to be utilized during Phase IV,

1 beginning on June 1, 2021. Each EDC must reconcile its total actual recoverable EEC
2 Phase III Plan expenditures incurred through March 31, 2021, with its actual EEC Phase
3 III Plan revenues received through March 31, 2021. The net over or under recovered
4 amount shall be reflected as a separate line item of the e-factor calculation of the Phase
5 IV rates to become effective June 1, 2021. In addition, each EDC should include, as part
6 of the calculation of the Phase IV E-factor rates to become effective June 1, 2021, as
7 clearly identified separate line items, projections of the: expenses to finalize any
8 measures installed and commercially operable on or before May 31, 2021 (i.e., in April
9 2021 and May 2021); expenses to finalize any contracts; and other Phase III
10 administrative obligations. The Phase III rate that became effective June 1, 2020 will
11 remain effective through May 31, 2021. The reconciliation period for Phase IV will
12 continue to run from April 1 to March 31 of a given plan year. This reconciliation will
13 reconcile actual expenses incurred with actual revenues received in order to calculate an
14 over or under recovery. Per the Implementation Order, no interest will be charged on
15 over or under recoveries.

16
17 **Q. Please explain the cost recovery changes that were defined in the Phase IV**
18 **Implementation Order.**

19 A. Section B.2 of the Phase IV Implementation Order directs EDCs to nominate a portion of
20 the expected peak demand savings in its Phase IV EEC Plans into PJM's Forward
21 Capacity Market ("FCM"). The Commission further directed EDCs to reflect the
22 proceeds from resources that clear in the PJM FCM to be used to reduce Act 129
23 surcharges and collections from the customer classes from which the savings were

1 acquired, via the reconciliation for over or under collections. Resources that clear in the
2 FCM are subject to deficiency charges from PJM. The Commission concluded that any
3 such PJM deficiency charges be handled symmetrically with FCM proceeds and be borne
4 by the relevant customer class. As such, cost recovery from the customer class providing
5 the capacity will be adjusted to reflect the proceeds or penalties from this activity. For
6 transparency purposes, the 1307(e) reconciliation statement will clearly identify PJM
7 FCM proceeds as cost reductions and PJM FCM penalties as cost increases.

8
9 **Q. Will the Company be responsible for nominating a portion of the planned peak**
10 **demand reduction from the Company's Phase IV EEC Plan into PJM's FCM?**

11 A. Yes. As Company witness David Defide discusses in his testimony, DLC St. No. 1, the
12 Company plans to nominate a portion of the expected peak demand savings in the Phase
13 IV EEC Plans into PJM's FCM. The Company is currently predicting that its first
14 opportunity to nominate a portion of the expected peak demand savings will be in the
15 2025/2026 PJM capacity auction.

16
17 **Q. How will the Company ensure that the FCM proceeds or penalties are borne by the**
18 **relevant customer class?**

19 A. The Company is proposing to create separate PJM billing subaccounts for each applicable
20 EEC customer class (i.e. residential, small and medium commercial & industrial, large
21 commercial, and large industrial). Individual PJM billing subaccounts will help ensure
22 that resources that clear in the PJM FCM are bifurcated, and tracked separately so that
23 any applicable proceeds and/or penalties are captured by the relevant customer class.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

Q. How will the Company ensure that the cost recovery from the customer class providing the capacity will be adjusted to reflect the proceeds or penalties from this activity?

A. For transparency purposes, the Company is proposing to modify its 1307(e) reconciliation statement to clearly identify PJM FCM proceeds as cost reductions and PJM FCM penalties as cost increases. The Company proposes to reflect the PJM FCM proceeds and/or penalties as a customer class expense adjustment in the over or under collection calculation with the 1307(e) reconciliation.

Q. Has the Company prepared an illustrative exhibit that shows the inclusion of the PJM FCM proceeds/penalties in the Company’s Rider No. 15A - EEC Surcharge 1307(e) reconciliation?

A. Yes. Exhibit DBO-5 is an illustrative example showing the inclusion of the PJM FCM proceeds/penalties as red-line modifications to the Rider No. 15A 1307(e) reconciliation.

Q. Is the Company proposing to implement a new EEC Surcharge to accommodate its Phase IV EEC Plan?

A. No. The Company is proposing to continue to use its current EEC Phase III Surcharge to recover the costs remaining for Phase III and recovery of its Phase IV EEC Plan costs in accordance with the Implementation Order. Any Phase III costs that remain through the end of Phase III on March 31, 2021 will be included and reconciled separately as separate

1 line items in the April 1, 2021 through March 31, 2022 reconciliation period for Phase
2 IV.

3
4 **Q. Have you prepared any exhibits showing the proposed change to the EEC Phase IV**
5 **Surcharge to reflect this change?**

6 A. Yes. Exhibit DBO-1 is a clean version of the proposed tariff supplement and Exhibit
7 DBO-2 is a redline version of the proposed tariff supplement showing these changes.

8
9 **III. EEC PLAN SURCHARGE CALCULATION**

10 **Q. Has the Company established program costs by customer class for its proposed EEC**
11 **Phase IV Plan?**

12 A. Yes. Exhibit DBO-3 shows the estimated annual EEC Phase IV Plan costs for each
13 program for 2021 to 2026. This exhibit is based on the program costs defined in the
14 Company's EEC Plan and includes the costs for energy efficiency programs, program
15 administration, and program incentives. Additional cost detail for customer class
16 assignment and assignment of administrative costs is provided in the EEC Phase IV Plan
17 and testimony of Duquesne Light's witness David Defide.

18
19 **Q. Do the customer class costs in Exhibit DBO-3 include excess costs from current**
20 **Phase III EEC programs?**

21 A. No. The costs shown in Exhibit DBO-3 are for the Phase IV EEC Plan only.

22
23 **Q. Do the customer class costs in Exhibit DBO-3 include capital costs?**

1 A. No. The costs shown in Exhibit DBO-3 are 100% expense.

2

3 **Q. Do the customer class costs in Exhibit DBO-3 include the cost of the Statewide**
4 **Evaluator?**

5 A. No. Once actual costs are known for the Statewide Evaluator (“SWE”), the Company
6 will allocate the SWE costs to each customer class based on the forecast sales (kWh) for
7 that customer class.

8

9 **Q. How long does the Company propose to keep the EEC Surcharge in effect?**

10 A. The EEC Surcharge will remain in effect until the final reconciliation statement is
11 approved and all charges are fully recovered or refunded or until otherwise directed by
12 the Commission.

13

14 **Q. Have you prepared an exhibit showing the estimated customer class surcharges**
15 **using these proposed costs?**

16 A. Yes. Exhibit DBO-4 provides an illustrative calculation of what the surcharges for each
17 customer class would be for the June 2021 to May 2022 Phase IV EEC Plan year at the
18 estimated annual costs in Exhibit DBO-3. The estimated surcharges are calculated using
19 the forecast cost divided by the forecast billing determinants adjusted for GRT. The
20 actual surcharges will differ due to final program costs and the Phase III E-factor
21 adjustment for the period June 1, 2021 through March 31, 2022.

22

23 **Q. Does that conclude your direct testimony?**

1 A. Yes.

SUPPLEMENT NO. XX
TO ELECTRIC – PA. P.U.C. NO. 25



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY

411 Seventh Avenue
Pittsburgh, PA 15219

Steven E. Malnight
President and Chief Executive Officer

ISSUED: Xxxxxxxx XX, XXXX

EFFECTIVE: Xxxxxxxx XX, XXXX

Issued in compliance with the
Commission's Orders entered June 18, 2020, at Docket No. M-2020-3015228
and entered Xxxx XX, 20XX, at Docket No. M-20XX-XXXXXXX.

NOTICE

**THIS TARIFF SUPPLEMENT REVISES LANGUAGE IN THE
TABLE OF CONTENTS, RIDER MATRIX AND AN EXISTING RIDER**

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF

CHANGE

Table of Contents

**Second Revised Page No. 3
 Cancelling First Revised Page No. 3**

Rider Matrix

**First Revised Page No. 87
 Cancelling Original Page No. 87**

Rider No. 15A – Phase III Energy Efficiency and Conservation Surcharge has been renamed “Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge” in accordance with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228, Page No. 142, and, therefore, is being renamed in the *Table of Contents* and the *Rider Matrix*.

**Rider No. 15A – Phase IV Energy Efficiency and Conservation Surcharge Second Revised Page No. 118
 Cancelling Third Revised Page No. 118**

**First Revised Page No. 119
 Cancelling Original Page No. 119**

**First Revised Page No. 120
 Cancelling Original Page No. 120**

**First Revised Page No. 121
 Cancelling Original Page No. 121**

**First Revised Page No. 122
 Cancelling Original Page No. 122**

Rider No. 15A has been renamed “Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge” in accordance with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228, Page No. 142.

Language in Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge has been revised to comply with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228.

TABLE OF CONTENTS

	Page Number
List of Modifications.....	2
Table of Contents.....	3
List of Communities Served.....	4-5
RULES AND REGULATIONS	6-37
 RATES:	
RS Residential Service.....	38-39
RH Residential Service Heating.....	40-42
RA Residential Service Add-on Heat Pump	43-45
GS/GM General Service Small and Medium	46-49
GMH General Service Medium Heating.....	50-52
GL General Service Large.....	53-55
GLH General Service Large Heating.....	56-58
L Large Power Service	59-61
HVPS High Voltage Power Service	62-65
AL Architectural Lighting Service.....	66-68
SE Street Lighting Energy	69-71
SM Street Lighting Municipal.....	72-75
SH Street Lighting Highway.....	76-79
UMS Unmetered Service	80-81
PAL Private Area Lighting.....	82-85
 STANDARD CONTRACT RIDERS:	
General.....	86
Rider Matrix	87
No. 1 Retail Market Enhancement Surcharge	88-89
No. 2 Untransformed Service	90
No. 3 School and Government Service Discount Period.....	91
No. 4 This Page Intentionally Left Blank	92
No. 5 Universal Service Charge	93-95
No. 6 Temporary Service	96
No. 7 This Page Intentionally Left Blank	97
No. 8 Default Service Supply.....	98-105
No. 9 Day-Ahead Hourly Price Service	106-111
No. 10 State Tax Adjustment Surcharge	112
No. 11 Street Railway Service	113
No. 12 Billing Option - Volunteer Fire Companies and Nonprofit Senior Citizen Centers.....	114
No. 13 General Service Separately Metered Electric Space Heating Service.....	115
No. 14 Residential Service Separately Metered Electric Space and Water Heating	116
No. 15 These Pages Intentionally Left Blank	117
No. 15A Phase IV Energy Efficiency and Conservation Surcharge	118-122
No. 16 Service to Non-Utility Generating Facilities.....	123-124
No. 17 Emergency Energy Conservation	125-126
No. 18 Rates for Purchase of Electric Energy from Customer-Owned Renewable Resources Generating Facilities	127
No. 19 These Pages Intentionally Left Blank	128
No. 20 Smart Meter Charge.....	129-132
No. 21 Net Metering Service	133-136
No. 22 Distribution System Improvement Charge.....	137-141
 APPENDIX A:	
Transmission Service Charges	142-146

(C)

(C) – Indicates Change

STANDARD CONTRACT RIDERS – (Continued)

RIDER MATRIX

	RS	RH	RA	GS/GM	GMH	GL	GLH	L	HVPS	AL	SE	SM	SH	UMS	PAL
Rider No. 1	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 2				X	X	X	X								
Rider No. 3				X	X	X	X	X							
Rider No. 4															
Rider No. 5	X	X	X												
Rider No. 6				X											
Rider No. 7															
Rider No. 8	X	X	X	X	X					X	X	X	X	X	X
Rider No. 9				X	X	X	X	X	X						
Rider No. 10	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 11				X		X									
Rider No. 12				X	X										
Rider No. 13				X											
Rider No. 14	X														
Rider No. 15															
Rider No. 15A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 16				X	X	X	X	X							
Rider No. 17						X	X	X	X						
Rider No. 18	X	X	X	X	X	X	X								
Rider No. 19															
Rider No. 20	X	X	X	X	X	X	X	X	X	X					
Rider No. 21	X	X	X	X	X	X									
Rider No. 22	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Appendix A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Rider Titles:

- Rider No. 1 — Retail Market Enhancement Surcharge
- Rider No. 2 — Untransformed Service
- Rider No. 3 — School and Government Service Discount Period
- Rider No. 4 — Intentionally Left Blank
- Rider No. 5 — Universal Service Charge
- Rider No. 6 — Temporary Service
- Rider No. 7 — Intentionally Left Blank
- Rider No. 8 — Default Service Supply
- Rider No. 9 — Day-Ahead Hourly Price Service
- Rider No. 10 — State Tax Adjustment
- Rider No. 11 — Street Railway Service
- Rider No. 12 — Billing Option – Volunteer Fire Companies and Nonprofit Senior Citizen Centers
- Rider No. 13 — General Service Separately Metered Electric Space Heating Service
- Rider No. 14 — Residential Service Separately Metered Electric Space and Water Heating
- Rider No. 15 — Intentionally Left Blank
- Rider No. 15A — Phase IV Energy Efficiency and Conservation Surcharge
- Rider No. 16 — Service to Non-Utility Generating Facilities
- Rider No. 17 — Emergency Energy Conservation
- Rider No. 18 — Rates for Purchase of Electric Energy from Customer-Owned Renewable Resources Generating Facilities
- Rider No. 19 — Intentionally Left Blank
- Rider No. 20 — Smart Meter Charge
- Rider No. 21 — Net Metering Service
- Rider No. 22 — Distribution System Improvement Charge (“DSIC”)
- Appendix A — Transmission Service Charges

(C)

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE

(C)

(Applicable to all Rates)

The Phase IV Energy Efficiency and Conservation Surcharge (“EEC IV”) is instituted as a cost recovery mechanism to recover the costs associated with implementing Phase IV of the Company’s Energy Efficiency and Conservation Plan in effect from June 1, 2021, through May 31, 2026. Act 129 of 2008 became law on October 15, 2008, requiring the Pennsylvania Public Utility Commission (“Commission”) to develop an Energy Efficiency and Conservation Program applicable to electric distribution companies (“EDCs”) with at least 100,000 customers. This EEC IV is implemented in compliance with Docket No. M-2020-3015228 renaming the current Rider No. 15A – Phase III Energy Efficiency and Conservation Surcharge. The EEC IV is a non-bypassable Surcharge and shall be applied to all customers’ bills.

(C)
 (C)
 (C)
 (C)
 (C)
 (C)

RATES

Monthly Surcharge

Customer Class	Applicable Tariff Rate Schedule	¢/kWh	Fixed Charge \$/Month	\$/kW ⁽¹⁾
Residential	RS, RH, RA	X.XX		
Small & Medium Commercial and Industrial	GS, GM & GMH	X.XX		
Large Commercial	GL, GLH, L		\$XXX.XX	\$X.XX
Large Industrial	GL, GLH, L, HVPS		\$X,XXX.XX	\$X.XX
Lighting	AL, SE, SM, SH, PAL	X.XX		
Unmetered	UMS	X.XX		

⁽¹⁾Monthly Surcharge applicable to the customer’s Peak Load Contribution.

CALCULATION OF SURCHARGE

The rate, calculated independently for each customer class in this Tariff, shall be applied to all customers served under the Tariff. The rate shall be determined in accordance with the formulas set forth below and shall be applied to all customers served during any part of a billing month:

RESIDENTIAL CUSTOMER CLASS

$$EEC (r) = [((B - e) / S) * 100] * [(1 / (1 - T))]$$

Where: **EEC (r)** = The Energy Efficiency and Conservation Surcharge (residential) in one-hundredth of a cent which shall be added to the distribution rates for billing purposes for all residential customers.

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)**RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE – (Continued)** (C)

(Applicable to all Rates)

CALCULATION OF SURCHARGE – (Continued)**RESIDENTIAL CUSTOMER CLASS – (Continued)**

- B =** The projected costs of the EEC (r) Plan applicable to the residential customer class for the planning year June 1 through May 31.
- e =** The over or under recovery for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31.
- S =** Projected distribution sales in kWh for the residential customer class for the planning year.
- T =** The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

SMALL AND MEDIUM COMMERCIAL & INDUSTRIAL, LIGHTING AND UNMETERED CUSTOMER CLASSES

$$EEC (s) = [((B - e) / S) * 100] * [(1 / (1 - T))]$$

- Where: **EEC (s)** = The Energy Efficiency and Conservation Surcharge (small commercial & industrial) in one-hundredth of a cent. This Surcharge shall be a separate line item for billing purposes for all small and medium C&I customers.
- B =** The projected costs of the EEC (s) Plan applicable to the small and medium C&I customer class for the planning year June 1 through May 31.
- e =** The over or under recovery for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31.
- S =** Projected distribution sales in kWh for the small and medium C&I customer class for the planning year.
- T =** The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued

(C)

(Applicable to all Rates)

CALCULATION OF SURCHARGE – (Continued)LARGE COMMERCIAL & INDUSTRIAL CUSTOMER CLASSES

$$\text{EEC (I) (Fixed)} = [(B_A - e_A) / C] * [(1 / (1 - T))]$$

$$\text{EEC (I) (Demand)} = [(B_i - e_i) / L] * [(1 / (1 - T))]$$

Where: **EEC (I)** = The Energy Efficiency and Conservation Surcharge (large commercial & industrial) is a two-part Surcharge. EEC (I) (Fixed) is a monthly fixed Surcharge designed to recover projected program administrative costs and EEC (I) (Demand) is a monthly demand Surcharge designed to recover projected program incentive costs. Combined, the two components are designed to recover the total projected program costs. This Surcharge shall be shown separately for billing purposes for all large C&I customers.

B = The projected costs of the EEC (I) Plan applicable to the large C&I customer class for the planning year June 1 through May 31. B_A is the projected administrative costs applicable to each customer class and B_i is the projected incentive costs applicable to each customer class.

e = The over or under recovery for the reconciliation year. e_A is the over or under recovery of program administrative costs for the reconciliation year. e_i is the over or under recovery of program incentive costs for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31.

C = Projected distribution customers for the planning year.

L = Projected Peak Load Contribution (PLC) in kilowatts (kW) for the large C&I customer class for the planning year.

T = The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

ANNUAL UPDATE

The Surcharges defined herein will be updated effective June 1 of each year. On or about May 1 of the filing year, the Company will file revised EEC IV rates with the Commission defining rates in effect from June 1 to May 31 of the following year. The reconciliation year shall be the twelve (12) months beginning April 1 of the previous year and ending March 31 of the current year. The rates for EEC (r) and EEC (s) shall be determined based on the projected costs and sales for the planning year and the over or under collection of expenses based on actual EEC (r) and EEC (s) revenue and expense incurred for the reconciliation year.

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued (C)

(Applicable to all Rates)

ANNUAL UPDATE – (Continued)

The rates for EEC (I) shall be determined based on the projected costs and the projected Peak Load Contribution for the planning year and the over or under collection of expenses based on actual EEC (I) revenue and expense incurred for the reconciliation year. In accordance with 66 Pa. C.S. § 1307(e), a reconciliation statement filing will be made with the Commission by April 30 of each year. A final reconciliation statement will be filed with the Commission within thirty (30) days after the completion of the final over or under collection refund/recovery period.

Upon determination that any EEC IV, if left unchanged, would result in material over- or under-collection of costs incurred or expected to be incurred during the twelve (12) month period ending March 31, the Company may request that the Commission authorize interim revisions to the EEC IV to become effective upon no less than ten (10) days' notice from the date of filing upon Commission approval. (C)

MISCELLANEOUS

Rider No. 10 – State Tax Adjustment Surcharge (STAS) shall be applicable to the Surcharges defined in this Rider.

The EEC IV shall be subject to review and audit by the Commission. (C)

There shall be no interest applicable to over or under collections for the reconciliation period.

Customer class programs are designed to achieve reduction mandates in a cost effective manner using developed delivery channels. The projected program costs for the Residential, Small and Medium C&I and Large C&I customer classes are developed in proportion to their approximate annual energy consumption. Projected program costs are first directly assigned to customer classes based on eligibility and those costs applicable to more than one class are allocated according to their electric loads and history of program participation. Actual program costs will be assigned to customer classes based on customer class program participation. Non-direct program administrative costs are allocated to programs based on projected energy savings for the programs in that customer class. The Company will only recover actual program costs for each customer class based on customer participation in each program.

In compliance with Commission Order at M-2020-3015228, the EEC IV effective June 1, 2021, will include a reconciliation component for the Energy Efficiency and Conservation Phase III program costs, ending March 31, 2021. The total actual recoverable EEC Phase III Plan expenditures incurred for the twelve (12) months ended March 31, 2021, will be reconciled with actual EEC Phase III Plan revenues received for the twelve (12) months ended March 31, 2021. The net over- or under-recovered amount shall be reflected as a separate line item, without interest, as an E-factor adjustment of the EEC Phase IV rates effective June 1, 2021. In addition, as a separate line item, the Phase IV rates effective June 1, 2021, shall include projections of the: expenses to finalize any measures installed and commercially operable on or before May 31, 2021; expenses to finalize any contracts; and other Phase III administrative obligations. The reconciliation of actual Phase III expenses with actual EEC Phase III surcharge revenue for April and May 2021 shall be reconciled with EEC Phase IV revenue and expense for the twelve (12) months ending March 31, 2022. (C)

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued (C)

(Applicable to all Rates)

MISCELLANEOUS – (Continued)

In order to facilitate the termination of this Rider, the Company may propose a rate adjustment to become effective on no less than ten (10) days' notice to achieve a zero (-0-) balance at calendar year end. This interim filing will adjust the E-factor in effect June 1, 2026, for reconciliation of actual revenue and expense in April and May 2026. (C)

This Rider will remain in effect until the final reconciliation statement is approved and all charges are fully recovered or refunded or until otherwise directed by the Commission.

SUPPLEMENT NO. 44XX
TO ELECTRIC – PA. P.U.C. NO. 25



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY

411 Seventh Avenue
Pittsburgh, PA 15219

Steven E. Malnight
President and Chief Executive Officer

ISSUED: Xxxxxxxxx XX, XXXX

EFFECTIVE: Xxxxxxxxx XX, XXXX

Issued in compliance with the
Commission's Orders entered June 18, 2020, at Docket No. M-2020-3015228
and entered Xxxxx XX, 20XX, at Docket No. M-20XX-XXXXXXX.

NOTICE

THIS TARIFF SUPPLEMENT REVISES LANGUAGE IN THE
TABLE OF CONTENTS, RIDER MATRIX AND AN EXISTING RIDER

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF

CHANGE

Table of Contents Second Revised Page No. 3
Cancelling First Revised Page No. 3

Rider Matrix First Revised Page No. 87
Cancelling Original Page No. 87

Rider No. 15A – Phase III Energy Efficiency and Conservation Surcharge has been renamed “Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge” in accordance with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228, Page No. 142, and, therefore, is being renamed in the *Table of Contents* and the *Rider Matrix*.

Rider No. 15A – Phase IV Energy Efficiency and Conservation Surcharge Second Revised Page No. 118
Cancelling Third Revised Page No. 118

First Revised Page No. 119
Cancelling Original Page No. 119

First Revised Page No. 120
Cancelling Original Page No. 120

First Revised Page No. 121
Cancelling Original Page No. 121

First Revised Page No. 122
Cancelling Original Page No. 122

Rider No. 15A has been renamed “Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge” in accordance with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228, Page No. 142.

Language in Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge has been revised to comply with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228.

TABLE OF CONTENTS

	Page Number
List of Modifications.....	2
Table of Contents.....	3
List of Communities Served.....	4-5
RULES AND REGULATIONS	6-37
 RATES:	
RS Residential Service.....	38-39
RH Residential Service Heating.....	40-42
RA Residential Service Add-on Heat Pump	43-45
GS/GM General Service Small and Medium	46-49
GMH General Service Medium Heating.....	50-52
GL General Service Large.....	53-55
GLH General Service Large Heating.....	56-58
L Large Power Service	59-61
HVPS High Voltage Power Service	62-65
AL Architectural Lighting Service.....	66-68
SE Street Lighting Energy	69-71
SM Street Lighting Municipal.....	72-75
SH Street Lighting Highway.....	76-79
UMS Unmetered Service	80-81
PAL Private Area Lighting.....	82-85
 STANDARD CONTRACT RIDERS:	
General.....	86
Rider Matrix	87
No. 1 Retail Market Enhancement Surcharge	88-89
No. 2 Untransformed Service	90
No. 3 School and Government Service Discount Period.....	91
No. 4 This Page Intentionally Left Blank	92
No. 5 Universal Service Charge	93-95
No. 6 Temporary Service	96
No. 7 This Page Intentionally Left Blank	97
No. 8 Default Service Supply.....	98-105
No. 9 Day-Ahead Hourly Price Service	106-111
No. 10 State Tax Adjustment Surcharge	112
No. 11 Street Railway Service	113
No. 12 Billing Option - Volunteer Fire Companies and Nonprofit Senior Citizen Centers.....	114
No. 13 General Service Separately Metered Electric Space Heating Service.....	115
No. 14 Residential Service Separately Metered Electric Space and Water Heating	116
No. 15 These Pages Intentionally Left Blank	117
No. 15A Phase III-IV Energy Efficiency and Conservation Surcharge	118-122
No. 16 Service to Non-Utility Generating Facilities.....	123-124
No. 17 Emergency Energy Conservation	125-126
No. 18 Rates for Purchase of Electric Energy from Customer-Owned Renewable Resources Generating Facilities	127
No. 19 These Pages Intentionally Left Blank	128
No. 20 Smart Meter Charge.....	129-132
No. 21 Net Metering Service	133-136
No. 22 Distribution System Improvement Charge.....	137-141
 APPENDIX A:	
Transmission Service Charges	142-146

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS – (Continued)

RIDER MATRIX

	RS	RH	RA	GS/GM	GMH	GL	GLH	L	HVPS	AL	SE	SM	SH	UMS	PAL
Rider No. 1	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 2				X	X	X	X								
Rider No. 3				X	X	X	X	X							
Rider No. 4															
Rider No. 5	X	X	X												
Rider No. 6				X											
Rider No. 7															
Rider No. 8	X	X	X	X	X					X	X	X	X	X	X
Rider No. 9				X	X	X	X	X	X						
Rider No. 10	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 11				X		X									
Rider No. 12				X	X										
Rider No. 13				X											
Rider No. 14	X														
Rider No. 15															
Rider No. 15A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 16				X	X	X	X	X							
Rider No. 17						X	X	X	X						
Rider No. 18	X	X	X	X	X	X	X								
Rider No. 19															
Rider No. 20	X	X	X	X	X	X	X	X	X	X					
Rider No. 21	X	X	X	X	X	X									
Rider No. 22	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Appendix A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Rider Titles:

- Rider No. 1 — Retail Market Enhancement Surcharge
- Rider No. 2 — Untransformed Service
- Rider No. 3 — School and Government Service Discount Period
- Rider No. 4 — Intentionally Left Blank
- Rider No. 5 — Universal Service Charge
- Rider No. 6 — Temporary Service
- Rider No. 7 — Intentionally Left Blank
- Rider No. 8 — Default Service Supply
- Rider No. 9 — Day-Ahead Hourly Price Service
- Rider No. 10 — State Tax Adjustment
- Rider No. 11 — Street Railway Service
- Rider No. 12 — Billing Option – Volunteer Fire Companies and Nonprofit Senior Citizen Centers
- Rider No. 13 — General Service Separately Metered Electric Space Heating Service
- Rider No. 14 — Residential Service Separately Metered Electric Space and Water Heating
- Rider No. 15 — Intentionally Left Blank
- Rider No. 15A — Phase ~~III~~IV Energy Efficiency and Conservation Surcharge
- Rider No. 16 — Service to Non-Utility Generating Facilities
- Rider No. 17 — Emergency Energy Conservation
- Rider No. 18 — Rates for Purchase of Electric Energy from Customer-Owned Renewable Resources Generating Facilities
- Rider No. 19 — Intentionally Left Blank
- Rider No. 20 — Smart Meter Charge
- Rider No. 21 — Net Metering Service
- Rider No. 22 — Distribution System Improvement Charge (“DSIC”)
- Appendix A — Transmission Service Charges

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III-IV~~ ENERGY EFFICIENCY AND CONSERVATION SURCHARGE

(C)

(Applicable to all Rates)

The Phase ~~III-IV~~ Energy Efficiency and Conservation Surcharge (“EEC ~~III-IV~~”) is instituted as a cost recovery mechanism to recover the costs associated with implementing Phase ~~III-IV~~ of the Company’s Energy Efficiency and Conservation Plan in effect from June 1, ~~2016~~2021, through May 31, ~~2021~~2026. Act 129 of 2008 became law on October 15, 2008, requiring the Pennsylvania Public Utility Commission (“Commission”) to develop an Energy Efficiency and Conservation Program applicable to electric distribution companies (“EDCs”) with at least 100,000 customers. This EEC ~~III-IV~~ is implemented in compliance with Docket No. ~~M-2014-2424864~~M-2020-3015228 renaming the current Rider No. 15A – Phase ~~III-IV~~ Energy Efficiency and Conservation Surcharge. The EEC ~~III-IV~~ is a non-bypassable Surcharge and shall be applied to all customers’ bills.

(C)

(C)

(C)

(C)

(C)

RATES

Monthly Surcharge

Customer Class	Applicable Tariff Rate Schedule	¢/kWh	Fixed Charge \$/Month	\$/kW ⁽¹⁾
Residential	RS, RH, RA	0.15 X.XX		
Small & Medium Commercial and Industrial	GS, GM & GMH	0.13 X.XX		
Large Commercial	GL, GLH, L		\$216.04 \$XXX.XX	\$0.27 \$X.XX
Large Industrial	GL, GLH, L, HVPS		\$1,053.86 \$X,XXX.XX	\$0.40 \$X.XX
Lighting	AL, SE, SM, SH, PAL	0.00 X.XX		
Unmetered	UMS	0.00 X.XX		

⁽¹⁾Monthly Surcharge applicable to the customer’s Peak Load Contribution.

CALCULATION OF SURCHARGE

The rate, calculated independently for each customer class in this Tariff, shall be applied to all customers served under the Tariff. The rate shall be determined in accordance with the formulas set forth below and shall be applied to all customers served during any part of a billing month:

RESIDENTIAL CUSTOMER CLASS

$$EEC (r) = [((B - e) / S) * 100] * [(1 / (1 - T))]$$

Where: **EEC (r)** = The Energy Efficiency and Conservation Surcharge (residential) in one-hundredth of a cent which shall be added to the distribution rates for billing purposes for all residential customers.

(C) – Indicates Change

ISSUED: ~~XXXXXXXX XX, XXXX~~

EFFECTIVE: ~~XXXXXXXX XX, XXXX~~

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III~~IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE – (Continued)

(C)

(Applicable to all Rates)

CALCULATION OF SURCHARGE – (Continued)

RESIDENTIAL CUSTOMER CLASS – (Continued)

- B =** The projected costs of the EEC (r) Plan applicable to the residential customer class for the planning year June 1 through May 31.
- e =** The over or under recovery for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31.
- S =** Projected distribution sales in kWh for the residential customer class for the planning year.
- T =** The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

SMALL AND MEDIUM COMMERCIAL & INDUSTRIAL, LIGHTING AND UNMETERED CUSTOMER CLASSES

$$EEC (s) = [((B - e) / S) * 100] * [(1 / (1 - T))]$$

- Where: **EEC (s)** = The Energy Efficiency and Conservation Surcharge (small commercial & industrial) in one-hundredth of a cent. This Surcharge shall be a separate line item for billing purposes for all small and medium C&I customers.
- B =** The projected costs of the EEC (s) Plan applicable to the small and medium C&I customer class for the planning year June 1 through May 31.
- e =** The over or under recovery for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31.
- S =** Projected distribution sales in kWh for the small and medium C&I customer class for the planning year.
- T =** The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III~~IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued

(C)

(Applicable to all Rates)

CALCULATION OF SURCHARGE – (Continued)

LARGE COMMERCIAL & INDUSTRIAL CUSTOMER CLASSES

$$\text{EEC (I) (Fixed)} = [(B_A - e_A) / C] * [(1 / (1 - T))]$$

$$\text{EEC (I) (Demand)} = [(B_i - e_i) / L] * [(1 / (1 - T))]$$

Where: **EEC (I)** = The Energy Efficiency and Conservation Surcharge (large commercial & industrial) is a two-part Surcharge. EEC (I) (Fixed) is a monthly fixed Surcharge designed to recover projected program administrative costs and EEC (I) (Demand) is a monthly demand Surcharge designed to recover projected program incentive costs. Combined, the two components are designed to recover the total projected program costs. This Surcharge shall be shown separately for billing purposes for all large C&I customers.

B = The projected costs of the EEC (I) Plan applicable to the large C&I customer class for the planning year June 1 through May 31. B_A is the projected administrative costs applicable to each customer class and B_i is the projected incentive costs applicable to each customer class.

e = The over or under recovery for the reconciliation year. e_A is the over or under recovery of program administrative costs for the reconciliation year. e_i is the over or under recovery of program incentive costs for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31.

C = Projected distribution customers for the planning year.

L = Projected Peak Load Contribution (PLC) in kilowatts (kW) for the large C&I customer class for the planning year.

T = The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

ANNUAL UPDATE

The Surcharges defined herein will be updated effective June 1 of each year. On or about May 1 of the filing year, the Company will file revised EEC ~~III~~IV rates with the Commission defining rates in effect from June 1 to May 31 of the following year. The reconciliation year shall be the twelve (12) months beginning April 1 of the previous year and ending March 31 of the current year. The rates for EEC (r) and EEC (s) shall be determined based on the projected costs and sales for the planning year and the over or under collection of expenses based on actual EEC (r) and EEC (s) revenue and expense incurred for the reconciliation year.

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III~~ IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued

(C)

(Applicable to all Rates)

ANNUAL UPDATE – (Continued)

The rates for EEC (I) shall be determined based on the projected costs and the projected Peak Load Contribution for the planning year and the over or under collection of expenses based on actual EEC (I) revenue and expense incurred for the reconciliation year. In accordance with 66 Pa. C.S. § 1307(e), a reconciliation statement filing will be made with the Commission by April 30 of each year. A final reconciliation statement will be filed with the Commission within thirty (30) days after the completion of the final over or under collection refund/recovery period.

Upon determination that any EEC ~~III~~ IV, if left unchanged, would result in material over- or under-collection of costs incurred or expected to be incurred during the twelve (12) month period ending March 31, the Company may request that the Commission authorize interim revisions to the EEC ~~III~~ IV to become effective upon no less than ten (10) days' notice from the date of filing upon Commission approval.

(C)

(C)

MISCELLANEOUS

Rider No. 10 – State Tax Adjustment Surcharge (STAS) shall be applicable to the Surcharges defined in this Rider.

The EEC ~~III~~ IV shall be subject to review and audit by the Commission.

(C)

There shall be no interest applicable to over or under collections for the reconciliation period.

Customer class programs are designed to achieve reduction mandates in a cost effective manner using developed delivery channels. The projected program costs for the Residential, Small and Medium C&I and Large C&I customer classes are developed in proportion to their approximate annual energy consumption. Projected program costs are first directly assigned to customer classes based on eligibility and those costs applicable to more than one class are allocated according to their electric loads and history of program participation. Actual program costs will be assigned to customer classes based on customer class program participation. Non-direct program administrative costs are allocated to programs based on projected energy savings for the programs in that customer class. The Company will only recover actual program costs for each customer class based on customer participation in each program.

In compliance with Commission Order at ~~M-2014-2424864~~ M-2020-3015228, the EEC ~~III~~ IV effective June 1, ~~2016~~ 2021, will include a reconciliation component for the Energy Efficiency and Conservation Phase ~~II~~ III program costs, ending March 31, ~~2016~~ 2021. The total actual recoverable EEC Phase ~~II~~ III Plan expenditures incurred for the ~~ten (10)~~ twelve (12) months ended March 31, ~~2016~~ 2021, will be reconciled with actual EEC Phase ~~II~~ III Plan revenues received for the ~~ten (10)~~ twelve (12) months ended March 31, ~~2016~~ 2021. The net over- or under-recovered amount shall be reflected as a separate line item, without interest, as an E-factor adjustment of the EEC Phase ~~III~~ IV rates effective June 1, ~~2016~~ 2021. In addition, as a separate line item, the Phase ~~III~~ IV rates effective June 1, ~~2016~~ 2021, shall include projections of the: expenses to finalize any measures installed and commercially operable on or before May 31, ~~2016~~ 2021; expenses to finalize any contracts; and other Phase ~~II~~ III administrative obligations. The reconciliation of actual Phase ~~II~~ III expenses with actual EEC Phase ~~II~~ III surcharge revenue for April and May ~~2016~~ 2021 shall be reconciled with EEC Phase ~~III~~ IV revenue and expense for the twelve (12) months ending March 31, ~~2017~~ 2022.

(C)

(C)

(C)

(C)

(C)

(C)

(C)

(C)

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III~~ IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued

(C)

(Applicable to all Rates)

MISCELLANEOUS – (Continued)

In order to facilitate the termination of this Rider, the Company may propose a rate adjustment to become effective on no less than ten (10) days' notice to achieve a zero (-0-) balance at calendar year end. This interim filing will adjust the E-factor in effect June 1, ~~2024~~2026, for reconciliation of actual revenue and expense in April and May ~~2024~~2026.

(C)
(C)

This Rider will remain in effect until the final reconciliation statement is approved and all charges are fully recovered or refunded or until otherwise directed by the Commission.

(C) – Indicates Change

ISSUED: ~~XXXXXXXX XX, XXXX~~

EFFECTIVE: ~~XXXXXXXX XX, XXXX~~

Duquesne Light Company
 Energy Efficiency and Conservation Phase IV Portfolio Costs
 Act 129 Years

Exhibit DBO-3

	PY 2021 <u>6/1/21- 5/31/22</u>	PY 2022 <u>6/1/22- 5/31/23</u>	PY 2023 <u>6/1/23 - 5/31/24</u>	PY 2024 <u>6/1/24 - 5/31/25</u>	PY 2025 <u>6/1/25 - 5/31/26</u>	<u>Total</u>
<u>Annual Cost Estimate</u>						
1 Residential	\$6,032,814	\$6,350,330	\$6,350,330	\$6,350,330	\$6,667,847	\$31,751,650
2 Small & Medium Commercial & Industrial	\$4,809,180	\$5,919,963	\$6,188,883	\$6,018,189	\$4,733,747	\$27,669,963
3 Large Commercial & Industrial	\$6,785,928	\$8,355,921	\$8,605,214	\$8,236,454	\$6,324,631	\$38,308,147
4 Total Portfolio Annual Budget	\$17,627,922	\$20,626,214	\$21,144,427	\$20,604,973	\$17,726,225	\$97,729,760
<u>Assignment of Costs to Customer Classes</u>						
5 Residential	\$6,032,814	\$6,350,330	\$6,350,330	\$6,350,330	\$6,667,847	\$31,751,650
6 Small & Medium Commercial & Industrial	\$4,809,180	\$5,919,963	\$6,188,883	\$6,018,189	\$4,733,747	\$27,669,963
7 Large Commercial	\$4,730,960	\$5,825,515	\$5,999,315	\$5,742,226	\$4,409,356	\$26,707,373
8 Large Industrial	\$2,054,968	\$2,530,406	\$2,605,899	\$2,494,228	\$1,915,274	\$11,600,775
9 Total	\$17,627,922	\$20,626,214	\$21,144,427	\$20,604,973	\$17,726,225	\$97,729,760
<u>Assignment of Costs for Rate Design Purposes</u>						
10 Residential	\$6,032,814	\$6,350,330	\$6,350,330	\$6,350,330	\$6,667,847	\$31,751,650
11 Small & Medium Commercial & Industrial	\$4,809,180	\$5,919,963	\$6,188,883	\$6,018,189	\$4,733,747	\$27,669,963
12 Large Commercial (Fixed-Administrative)	\$2,298,193	\$2,829,903	\$2,914,331	\$2,789,443	\$2,141,965	\$12,973,835
13 Large Commercial (Variable-Incentive)	\$2,432,767	\$2,995,612	\$3,084,984	\$2,952,783	\$2,267,391	\$13,733,537
14 Large Industrial (Fixed-Administrative)	\$1,066,672	\$1,313,457	\$1,352,643	\$1,294,678	\$994,161	\$6,021,611
15 Large Industrial (Variable-Incentive)	\$988,296	\$1,216,949	\$1,253,255	\$1,199,549	\$921,113	\$5,579,163
16 Total	\$17,627,922	\$20,626,214	\$21,144,427	\$20,604,973	\$17,726,225	\$97,729,760

Duquesne Light Company
 Energy Efficiency and Conservation, Phase-IV
 Calculation of Proposed Surcharge, Effective June 1, 2021 (1)

Exhibit DBO-4

A	B	C	D	E	F	
			= B / C * 100	= 1 / (1 - .059)	= D * E	
			Proposed Monthly Charge	PA GRT Factor	Proposed Surcharge Rate	
<u>Customer Class</u>	<u>2021-2022 Budget</u>	<u>Forecast Billing Units June 2021-May 2022</u>	<u>Excl. GRT</u>		<u>Inc. GRT</u>	
1 Residential (RS, RH, RA)	\$6,032,814	3,933,431,388	0.15	1.0627	0.16	cents/kWh
2 Small & Medium Commercial & Industrial (GS, GM, GMH)	\$4,809,180	3,084,624,448	0.16	1.0627	0.17	cents/kWh
3 Large Commercial (GL, GLH, L) [Fixed]	\$2,298,193	7,799	\$294.66	1.0627	\$313.13	\$/Mo.
4 Large Commercial (GL, GLH, L) [Variable]	\$2,432,767	6,555,826	\$0.37	1.0627	\$0.39	\$/kW [PLC] (2)
5 Large Industrial (GL, GLH, L, HVPS) [Fixed]	\$1,066,672	2,469	\$431.94	1.0627	\$459.02	\$/Mo.
6 Large Industrial (GL, GLH, L, HVPS) [Variable]	\$988,296	3,908,764	\$0.25	1.0627	\$0.27	\$/kW [PLC] (2)
7 Total	\$17,627,922					

(1) Excludes component for Energy Efficiency and Conservation Phase III reconciliation for the period April 1, 2020 to March 31, 2021.

(2) PLC = Peak Load Contribution

Duquesne Light Company
Rider No. 15A - Phase III Energy Efficiency and Conservation Surcharge
Proposed Surcharge Effective June 1, 20xx

Expense by Month

	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>Total</u>
A. Actual Expense by Customer Class													
1 Residential (RS, RH, RA)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2 Small & Medium Commercial and Industrial (GS, GM, GMH)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3 Large Commercial (GL, GLH, L) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4 Large Commercial (GL, GLH, L) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
5 Large Industrial (GL, GLH, L, HVPS) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6 Large Industrial (GL, GLH, L, HVPS) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
7 Lighting (AL, SE, SM, SH, PAL)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
8 Unmetered (UMS)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9 Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>Total</u>
B. Actual PJM Forward Capacity Market (Proceeds)/Penalties by Customer Class													
10 Residential (RS, RH, RA)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
11 Small & Medium Commercial and Industrial (GS, GM, GMH)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12 Large Commercial (GL, GLH, L) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13 Large Commercial (GL, GLH, L) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14 Large Industrial (GL, GLH, L, HVPS) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15 Large Industrial (GL, GLH, L, HVPS) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
16 Lighting (AL, SE, SM, SH, PAL)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17 Unmetered (UMS)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
18 Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>Total</u>
C. Total by Customer Class (Section A + Section B)													
19 Residential (RS, RH, RA)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
20 Small & Medium Commercial and Industrial (GS, GM, GMH)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
21 Large Commercial (GL, GLH, L) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
22 Large Commercial (GL, GLH, L) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
23 Large Industrial (GL, GLH, L, HVPS) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
24 Large Industrial (GL, GLH, L, HVPS) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
25 Lighting (AL, SE, SM, SH, PAL)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
26 Unmetered (UMS)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
27 Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Duquesne Light
Statement No. 2-R
(Rebuttal Testimony of
David Ogden)

Duquesne Light Company Statement No. 2R

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF DUQUESNE LIGHT COMPANY
FOR APPROVAL OF ITS ENERGY EFFICIENCY AND CONSERVATION PLAN
PHASE IV

Docket No. M-2020-3020818

Rebuttal Testimony

Witness: David B. Ogden

Subject: Energy Efficiency and Conservation Phase IV Plan Cost Recovery

Rebuttal Testimony of David B. Ogden

I. INTRODUCTION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

Q. Please state your full name, title and business address.

A. My name is David B. Ogden. I currently hold the position of Manager, Rate & Tariff Services. My business address is 411 7th Avenue, Pittsburgh, PA 15219.

Q. Did you present direct testimony in this proceeding?

A. Yes, I presented my direct testimony, DLC St. No. 2.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my rebuttal testimony is to respond to comments and recommendations of OCA witness Ms. Sherwood in her direct testimony, OCA St. No. 1, regarding (1) the recovery of EE&C Phase III costs incurred after June 1, 2021; and (2) the treatment of revenues and penalties associated with the Company’s proposed bidding of peak demand reductions into the PJM Forward Capacity Market (“FCM”). Company witness David Defide addresses other issues raised by parties in their direct testimonies in his rebuttal testimony, DLC St. No. 1R.

Q. Are you sponsoring any exhibits as part of your Rebuttal Testimony?

A. Yes. I am sponsoring the following exhibits:

- Exhibit DBO-1R – Proposed Tariff Supplement (clean version)
- Exhibit DBO-2R – Proposed Tariff Supplement (red-line version)
- Exhibit DBO-3R – EEC Plan 1307e Reconciliation Excerpt

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

Q. Please summarize Ms. Sherwood’s comments and recommendations regarding recovery of Phase III costs incurred after June 1, 2021.

A. Ms. Sherwood correctly infers that the Company may incur costs associated with the close-out of EE&C Phase III (such as for evaluation, measurement and verification, or “EM&V”) following the beginning of Phase IV on June 1, 2021. Ms. Sherwood contends that I did not discuss how the Company will address such costs in my direct testimony, and recommends that the Company “file, as part of its rebuttal testimony, a clarification on how it will treat Phase III expenses in relation to this requirement.” OCA St. No. 1, p. 6, lines 9-10. She also recommends that the Company “track all Phase III expenditures separately from the Phase IV costs for transparency.” OCA St. No. 1, p. 4, lines 20-21.

Q. How will the Company treat Phase III costs incurred after June 1, 2021?

A. Consistent with previous EE&C Phases, the Company will continue to internally track Phase III costs, including those incurred after June 1, 2021, separately from Phase IV. In order to provide additional transparency, the Company will report Phase III costs (including those incurred after June 1, 2021) in a separate section of its first 1307(e) EE&C surcharge reconciliation filing in Phase IV (i.e. for the period April 2021 through March 2022). Please refer to Exhibit DBO-3R for an illustrative example showing the separation of Phase III and Phase IV costs as an additional red-line modification to the Rider No. 15A 1307(e) reconciliation that was originally proposed in my direct testimony within Exhibit DBO-5.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

Q. Please summarize Ms. Sherwood’s comments and recommendation regarding the incorporation of an FCM bidding component in the Company’s tariff.

A. Ms. Sherwood’s comments respond to my discussion in my direct testimony about the treatment of revenues and penalties resulting from bidding peak demand savings into the FCM. By way of background, I explained at pp. 10-11 of my direct testimony, DLC St. No. 2:

The Company is proposing to create separate PJM billing subaccounts for each applicable EEC customer class (i.e. residential, small and medium commercial & industrial, large commercial, and large industrial). Individual PJM billing subaccounts will help ensure that resources that clear in the PJM FCM are bifurcated, and tracked separately so that any applicable proceeds and/or penalties are captured by the relevant customer class.

For transparency purposes, the Company is proposing to modify its 1307(e) reconciliation statement to clearly identify PJM FCM proceeds as cost reductions and PJM FCM penalties as cost increases. The Company proposes to reflect the PJM FCM proceeds and/or penalties as a customer class expense adjustment in the over or under collection calculation with the 1307(e) reconciliation.

Ms. Sherwood does not appear to take issue with this method of refund/recovery; however, she appears to recommend that it be memorialized in the Company’s tariff (“I recommend that the Company include an FCM component in its tariff calculations for full transparency.”) OCA St. No. 1, p. 9, lines 8-9.

Q. Do you agree with Ms. Sherwood’s comment that the Company’s proposed surcharge recovery of FCM costs/proceeds is not fully transparent?

1 A. No, I disagree with Ms. Sherwood’s implication that the Company’s original proposal to
2 reflect FCM impacts as separate line items in its 1307(e) reconciliation statement may not
3 provide “full transparency.” The Company’s tariff Rider 15A provides, “In accordance
4 with 66 Pa. C.S. 1307(e), a reconciliation statement filing will be made with the
5 Commission by April 30 of each year.” This filing is publicly available, and a copy is
6 served on each statutory party in order to provide full transparency.

7

8 **Q. Do you accept Ms. Sherwood’s recommendation to “include an FCM component in
9 the tariff calculations for full transparency?”**

10 A. Yes. The Company is willing to accept this recommendation to modify its retail tariff for
11 additional transparency. Please refer to Exhibits DBO-1R and DBO-2R, which would
12 add language to Rider 15A expressly indicating the applicability of FCM proceeds and
13 penalties. Exhibits DBO-1R and DBO-2R respectively comprise clean and red-line
14 versions of the pro-forma tariff supplement that was originally attached to my direct
15 testimony as Exhibits DBO-1 and DBO-2.

16

17 **Q. Does this conclude your rebuttal testimony?**

18 A. Yes.

EXHIBIT
DBO-1R



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY

411 Seventh Avenue
Pittsburgh, PA 15219

Steven E. Malnight
President and Chief Executive Officer

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

Issued in compliance with the
Commission's Orders entered June 18, 2020, at Docket No. M-2020-3015228
and entered XXXX XX, 20XX, at Docket No. M-20XX-XXXXXXX.

NOTICE

**THIS TARIFF SUPPLEMENT REVISES LANGUAGE IN THE
TABLE OF CONTENTS, RIDER MATRIX AND AN EXISTING RIDER**

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF

CHANGE

Table of Contents

**Second Revised Page No. 3
 Cancelling First Revised Page No. 3**

Rider Matrix

**First Revised Page No. 87
 Cancelling Original Page No. 87**

Rider No. 15A – Phase III Energy Efficiency and Conservation Surcharge has been renamed “Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge” in accordance with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228, Page No. 142, and, therefore, is being renamed in the *Table of Contents* and the *Rider Matrix*.

Rider No. 15A – Phase IV Energy Efficiency and Conservation Surcharge **Second Revised Page No. 118
 Cancelling Third Revised Page No. 118**

**First Revised Page No. 119
 Cancelling Original Page No. 119**

**First Revised Page No. 120
 Cancelling Original Page No. 120**

**First Revised Page No. 121
 Cancelling Original Page No. 121**

**First Revised Page No. 122
 Cancelling Original Page No. 122**

Rider No. 15A has been renamed “Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge” in accordance with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228, Page No. 142.

Language in Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge has been revised to comply with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228.

TABLE OF CONTENTS

	Page Number
List of Modifications.....	2
Table of Contents.....	3
List of Communities Served.....	4-5
RULES AND REGULATIONS	6-37
 RATES:	
RS Residential Service.....	38-39
RH Residential Service Heating.....	40-42
RA Residential Service Add-on Heat Pump	43-45
GS/GM General Service Small and Medium	46-49
GMH General Service Medium Heating.....	50-52
GL General Service Large.....	53-55
GLH General Service Large Heating.....	56-58
L Large Power Service	59-61
HVPS High Voltage Power Service	62-65
AL Architectural Lighting Service.....	66-68
SE Street Lighting Energy	69-71
SM Street Lighting Municipal.....	72-75
SH Street Lighting Highway.....	76-79
UMS Unmetered Service	80-81
PAL Private Area Lighting.....	82-85
 STANDARD CONTRACT RIDERS:	
General.....	86
Rider Matrix	87
No. 1 Retail Market Enhancement Surcharge	88-89
No. 2 Untransformed Service	90
No. 3 School and Government Service Discount Period.....	91
No. 4 This Page Intentionally Left Blank	92
No. 5 Universal Service Charge	93-95
No. 6 Temporary Service	96
No. 7 This Page Intentionally Left Blank	97
No. 8 Default Service Supply.....	98-105
No. 9 Day-Ahead Hourly Price Service	106-111
No. 10 State Tax Adjustment Surcharge	112
No. 11 Street Railway Service	113
No. 12 Billing Option - Volunteer Fire Companies and Nonprofit Senior Citizen Centers.....	114
No. 13 General Service Separately Metered Electric Space Heating Service.....	115
No. 14 Residential Service Separately Metered Electric Space and Water Heating	116
No. 15 These Pages Intentionally Left Blank	117
No. 15A Phase IV Energy Efficiency and Conservation Surcharge	118-122
No. 16 Service to Non-Utility Generating Facilities.....	123-124
No. 17 Emergency Energy Conservation	125-126
No. 18 Rates for Purchase of Electric Energy from Customer-Owned Renewable Resources Generating Facilities	127
No. 19 These Pages Intentionally Left Blank	128
No. 20 Smart Meter Charge.....	129-132
No. 21 Net Metering Service	133-136
No. 22 Distribution System Improvement Charge.....	137-141
 APPENDIX A:	
Transmission Service Charges	142-146

(C)

(C) – Indicates Change

STANDARD CONTRACT RIDERS – (Continued)

RIDER MATRIX

	RS	RH	RA	GS/GM	GMH	GL	GLH	L	HVPS	AL	SE	SM	SH	UMS	PAL
Rider No. 1	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 2				X	X	X	X								
Rider No. 3				X	X	X	X	X							
Rider No. 4															
Rider No. 5	X	X	X												
Rider No. 6				X											
Rider No. 7															
Rider No. 8	X	X	X	X	X					X	X	X	X	X	X
Rider No. 9				X	X	X	X	X	X						
Rider No. 10	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 11				X		X									
Rider No. 12				X	X										
Rider No. 13				X											
Rider No. 14	X														
Rider No. 15															
Rider No. 15A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 16				X	X	X	X	X							
Rider No. 17						X	X	X	X						
Rider No. 18	X	X	X	X	X	X	X								
Rider No. 19															
Rider No. 20	X	X	X	X	X	X	X	X	X	X					
Rider No. 21	X	X	X	X	X	X									
Rider No. 22	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Appendix A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Rider Titles:

- Rider No. 1 — Retail Market Enhancement Surcharge
- Rider No. 2 — Untransformed Service
- Rider No. 3 — School and Government Service Discount Period
- Rider No. 4 — Intentionally Left Blank
- Rider No. 5 — Universal Service Charge
- Rider No. 6 — Temporary Service
- Rider No. 7 — Intentionally Left Blank
- Rider No. 8 — Default Service Supply
- Rider No. 9 — Day-Ahead Hourly Price Service
- Rider No. 10 — State Tax Adjustment
- Rider No. 11 — Street Railway Service
- Rider No. 12 — Billing Option – Volunteer Fire Companies and Nonprofit Senior Citizen Centers
- Rider No. 13 — General Service Separately Metered Electric Space Heating Service
- Rider No. 14 — Residential Service Separately Metered Electric Space and Water Heating
- Rider No. 15 — Intentionally Left Blank
- Rider No. 15A — Phase IV Energy Efficiency and Conservation Surcharge
- Rider No. 16 — Service to Non-Utility Generating Facilities
- Rider No. 17 — Emergency Energy Conservation
- Rider No. 18 — Rates for Purchase of Electric Energy from Customer-Owned Renewable Resources Generating Facilities
- Rider No. 19 — Intentionally Left Blank
- Rider No. 20 — Smart Meter Charge
- Rider No. 21 — Net Metering Service
- Rider No. 22 — Distribution System Improvement Charge (“DSIC”)
- Appendix A — Transmission Service Charges

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE

(C)

(Applicable to all Rates)

The Phase IV Energy Efficiency and Conservation Surcharge (“EEC IV”) is instituted as a cost recovery mechanism to recover the costs associated with implementing Phase IV of the Company’s Energy Efficiency and Conservation Plan in effect from June 1, 2021, through May 31, 2026. Act 129 of 2008 became law on October 15, 2008, requiring the Pennsylvania Public Utility Commission (“Commission”) to develop an Energy Efficiency and Conservation Program applicable to electric distribution companies (“EDCs”) with at least 100,000 customers. This EEC IV is implemented in compliance with Docket No. M-2020-3015228 renaming the current Rider No. 15A – Phase III Energy Efficiency and Conservation Surcharge. The EEC IV is a non-bypassable Surcharge and shall be applied to all customers’ bills.

(C)
 (C)
 (C)
 (C)
 (C)
 (C)

RATES

Customer Class	Monthly Surcharge			
	Applicable Tariff Rate Schedule	¢/kWh	Fixed Charge \$/Month	\$/kW ⁽¹⁾
Residential	RS, RH, RA	X.XX		
Small & Medium Commercial and Industrial	GS, GM & GMH	X.XX		
Large Commercial	GL, GLH, L		\$XXX.XX	\$X.XX
Large Industrial	GL, GLH, L, HVPS		\$X,XXX.XX	\$X.XX
Lighting	AL, SE, SM, SH, PAL	X.XX		
Unmetered	UMS	X.XX		

⁽¹⁾Monthly Surcharge applicable to the customer’s Peak Load Contribution.

CALCULATION OF SURCHARGE

The rate, calculated independently for each customer class in this Tariff, shall be applied to all customers served under the Tariff. The rate shall be determined in accordance with the formulas set forth below and shall be applied to all customers served during any part of a billing month:

RESIDENTIAL CUSTOMER CLASS

$$EEC (r) = [((B - e) / S) * 100] * [(1 / (1 - T))]$$

Where: **EEC (r)** = The Energy Efficiency and Conservation Surcharge (residential) in one-hundredth of a cent which shall be added to the distribution rates for billing purposes for all residential customers.

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)**RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE – (Continued)** (C)

(Applicable to all Rates)

CALCULATION OF SURCHARGE – (Continued)**RESIDENTIAL CUSTOMER CLASS – (Continued)**

- B =** The projected costs of the EEC (r) Plan applicable to the residential customer class for the planning year June 1 through May 31.
- e =** The over or under recovery for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31. This may include any applicable PJM Forward Capacity Market proceeds and/or penalties. (C)
(C)
- S =** Projected distribution sales in kWh for the residential customer class for the planning year.
- T =** The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

SMALL AND MEDIUM COMMERCIAL & INDUSTRIAL, LIGHTING AND UNMETERED CUSTOMER CLASSES

$$EEC (s) = [((B - e) / S) * 100] * [(1 / (1 - T))]$$

- Where: **EEC (s)** = The Energy Efficiency and Conservation Surcharge (small commercial & industrial) in one-hundredth of a cent. This Surcharge shall be a separate line item for billing purposes for all small and medium C&I customers.
- B =** The projected costs of the EEC (s) Plan applicable to the small and medium C&I customer class for the planning year June 1 through May 31.
- e =** The over or under recovery for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31. This may include any applicable PJM Forward Capacity Market proceeds and/or penalties. (C)
(C)
- S =** Projected distribution sales in kWh for the small and medium C&I customer class for the planning year.
- T =** The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

STANDARD CONTRACT RIDERS - (Continued)**RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued****(C)****(Applicable to all Rates)****CALCULATION OF SURCHARGE – (Continued)****LARGE COMMERCIAL & INDUSTRIAL CUSTOMER CLASSES**

$$\text{EEC (I) (Fixed)} = [(B_A - e_A) / C] * [(1 / (1 - T))]$$

$$\text{EEC (I) (Demand)} = [(B_i - e_i) / L] * [(1 / (1 - T))]$$

Where: **EEC (I)** = The Energy Efficiency and Conservation Surcharge (large commercial & industrial) is a two-part Surcharge. EEC (I) (Fixed) is a monthly fixed Surcharge designed to recover projected program administrative costs and EEC (I) (Demand) is a monthly demand Surcharge designed to recover projected program incentive costs. Combined, the two components are designed to recover the total projected program costs. This Surcharge shall be shown separately for billing purposes for all large C&I customers.

B = The projected costs of the EEC (I) Plan applicable to the large C&I customer class for the planning year June 1 through May 31. B_A is the projected administrative costs applicable to each customer class and B_i is the projected incentive costs applicable to each customer class.

e = The over or under recovery for the reconciliation year. e_A is the over or under recovery of program administrative costs for the reconciliation year. e_i is the over or under recovery of program incentive costs for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31. This may include any applicable PJM Forward Capacity Market proceeds and/or penalties.

(C)
(C)

C = Projected distribution customers for the planning year.

L = Projected Peak Load Contribution (PLC) in kilowatts (kW) for the large C&I customer class for the planning year.

T = The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

ANNUAL UPDATE

The Surcharges defined herein will be updated effective June 1 of each year. On or about May 1 of the filing year, the Company will file revised EEC IV rates with the Commission defining rates in effect from June 1 to May 31 of the following year. The reconciliation year shall be the twelve (12) months beginning April 1 of the previous year and ending March 31 of the current year. The rates for EEC (r) and EEC (s) shall be determined based on the projected costs and sales for the planning year and the over or under collection of expenses based on actual EEC (r) and EEC (s) revenue and expense incurred for the reconciliation year.

(C)**(C) – Indicates Change**

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued (C)

(Applicable to all Rates)

ANNUAL UPDATE – (Continued)

The rates for EEC (I) shall be determined based on the projected costs and the projected Peak Load Contribution for the planning year and the over or under collection of expenses based on actual EEC (I) revenue and expense incurred for the reconciliation year. In accordance with 66 Pa. C.S. § 1307(e), a reconciliation statement filing will be made with the Commission by April 30 of each year. A final reconciliation statement will be filed with the Commission within thirty (30) days after the completion of the final over or under collection refund/recovery period.

Upon determination that any EEC IV, if left unchanged, would result in material over- or under-collection of costs incurred or expected to be incurred during the twelve (12) month period ending March 31, the Company may request that the Commission authorize interim revisions to the EEC IV to become effective upon no less than ten (10) days' notice from the date of filing upon Commission approval. (C)

MISCELLANEOUS

Rider No. 10 – State Tax Adjustment Surcharge (STAS) shall be applicable to the Surcharges defined in this Rider.

The EEC IV shall be subject to review and audit by the Commission. (C)

There shall be no interest applicable to over or under collections for the reconciliation period.

Customer class programs are designed to achieve reduction mandates in a cost effective manner using developed delivery channels. The projected program costs for the Residential, Small and Medium C&I and Large C&I customer classes are developed in proportion to their approximate annual energy consumption. Projected program costs are first directly assigned to customer classes based on eligibility and those costs applicable to more than one class are allocated according to their electric loads and history of program participation. Actual program costs will be assigned to customer classes based on customer class program participation. Non-direct program administrative costs are allocated to programs based on projected energy savings for the programs in that customer class. The Company will only recover actual program costs for each customer class based on customer participation in each program.

In compliance with Commission Order at M-2020-3015228, the EEC IV effective June 1, 2021, will include a reconciliation component for the Energy Efficiency and Conservation Phase III program costs, ending March 31, 2021. The total actual recoverable EEC Phase III Plan expenditures incurred for the twelve (12) months ended March 31, 2021, will be reconciled with actual EEC Phase III Plan revenues received for the twelve (12) months ended March 31, 2021. The net over- or under-recovered amount shall be reflected as a separate line item, without interest, as an E-factor adjustment of the EEC Phase IV rates effective June 1, 2021. In addition, as a separate line item, the Phase IV rates effective June 1, 2021, shall include projections of the: expenses to finalize any measures installed and commercially operable on or before May 31, 2021; expenses to finalize any contracts; and other Phase III administrative obligations. The reconciliation of actual Phase III expenses with actual EEC Phase III surcharge revenue for April and May 2021 shall be reconciled with EEC Phase IV revenue and expense for the twelve (12) months ending March 31, 2022. (C)

(C) – Indicates Change

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued (C)

(Applicable to all Rates)

MISCELLANEOUS – (Continued)

In order to facilitate the termination of this Rider, the Company may propose a rate adjustment to become effective on no less than ten (10) days' notice to achieve a zero (-0-) balance at calendar year end. This interim filing will adjust the E-factor in effect June 1, 2026, for reconciliation of actual revenue and expense in April and May 2026. (C)

This Rider will remain in effect until the final reconciliation statement is approved and all charges are fully recovered or refunded or until otherwise directed by the Commission.

EXHIBIT
DBO-2R

SUPPLEMENT NO. 44XX
TO ELECTRIC – PA. P.U.C. NO. 25



SCHEDULE OF RATES

For Electric Service in Allegheny and Beaver Counties

(For List of Communities Served, see Pages No. 4 and 5)

Issued By

DUQUESNE LIGHT COMPANY

411 Seventh Avenue
Pittsburgh, PA 15219

Steven E. Malnight
President and Chief Executive Officer

ISSUED: Xxxxxxxxx XX, XXXX

EFFECTIVE: Xxxxxxxxx XX, XXXX

Issued in compliance with the
Commission's Orders entered June 18, 2020, at Docket No. M-2020-3015228
and entered Xxxxx XX, 20XX, at Docket No. M-20XX-XXXXXXX.

NOTICE

THIS TARIFF SUPPLEMENT REVISES LANGUAGE IN THE
TABLE OF CONTENTS, RIDER MATRIX AND AN EXISTING RIDER

See Page Two

LIST OF MODIFICATIONS MADE BY THIS TARIFF

CHANGE

Table of Contents Second Revised Page No. 3
Cancelling First Revised Page No. 3

Rider Matrix First Revised Page No. 87
Cancelling Original Page No. 87

Rider No. 15A – Phase III Energy Efficiency and Conservation Surcharge has been renamed “Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge” in accordance with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228, Page No. 142, and, therefore, is being renamed in the *Table of Contents* and the *Rider Matrix*.

Rider No. 15A – Phase IV Energy Efficiency and Conservation Surcharge Second Revised Page No. 118
Cancelling Third Revised Page No. 118

First Revised Page No. 119
Cancelling Original Page No. 119

First Revised Page No. 120
Cancelling Original Page No. 120

First Revised Page No. 121
Cancelling Original Page No. 121

First Revised Page No. 122
Cancelling Original Page No. 122

Rider No. 15A has been renamed “Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge” in accordance with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228, Page No. 142.

Language in Rider No. 15A - Phase IV Energy Efficiency and Conservation Surcharge has been revised to comply with the provisions of the Order entered June 18, 2020, at Docket No. M-2020-3015228.

TABLE OF CONTENTS

	Page Number
List of Modifications.....	2
Table of Contents.....	3
List of Communities Served.....	4-5
RULES AND REGULATIONS	6-37
 RATES:	
RS Residential Service.....	38-39
RH Residential Service Heating.....	40-42
RA Residential Service Add-on Heat Pump	43-45
GS/GM General Service Small and Medium	46-49
GMH General Service Medium Heating.....	50-52
GL General Service Large.....	53-55
GLH General Service Large Heating.....	56-58
L Large Power Service	59-61
HVPS High Voltage Power Service	62-65
AL Architectural Lighting Service.....	66-68
SE Street Lighting Energy	69-71
SM Street Lighting Municipal.....	72-75
SH Street Lighting Highway.....	76-79
UMS Unmetered Service	80-81
PAL Private Area Lighting.....	82-85
 STANDARD CONTRACT RIDERS:	
General.....	86
Rider Matrix	87
No. 1 Retail Market Enhancement Surcharge	88-89
No. 2 Untransformed Service	90
No. 3 School and Government Service Discount Period.....	91
No. 4 This Page Intentionally Left Blank	92
No. 5 Universal Service Charge	93-95
No. 6 Temporary Service	96
No. 7 This Page Intentionally Left Blank	97
No. 8 Default Service Supply.....	98-105
No. 9 Day-Ahead Hourly Price Service	106-111
No. 10 State Tax Adjustment Surcharge	112
No. 11 Street Railway Service	113
No. 12 Billing Option - Volunteer Fire Companies and Nonprofit Senior Citizen Centers.....	114
No. 13 General Service Separately Metered Electric Space Heating Service.....	115
No. 14 Residential Service Separately Metered Electric Space and Water Heating	116
No. 15 These Pages Intentionally Left Blank	117
No. 15A Phase III-IV Energy Efficiency and Conservation Surcharge	118-122
No. 16 Service to Non-Utility Generating Facilities.....	123-124
No. 17 Emergency Energy Conservation	125-126
No. 18 Rates for Purchase of Electric Energy from Customer-Owned Renewable Resources Generating Facilities	127
No. 19 These Pages Intentionally Left Blank	128
No. 20 Smart Meter Charge.....	129-132
No. 21 Net Metering Service	133-136
No. 22 Distribution System Improvement Charge.....	137-141
 APPENDIX A:	
Transmission Service Charges	142-146

(C)

(C) – Indicates Change

STANDARD CONTRACT RIDERS – (Continued)

RIDER MATRIX

	RS	RH	RA	GS/GM	GMH	GL	GLH	L	HVPS	AL	SE	SM	SH	UMS	PAL
Rider No. 1	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 2				X	X	X	X								
Rider No. 3				X	X	X	X	X							
Rider No. 4															
Rider No. 5	X	X	X												
Rider No. 6				X											
Rider No. 7															
Rider No. 8	X	X	X	X	X					X	X	X	X	X	X
Rider No. 9				X	X	X	X	X	X						
Rider No. 10	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 11				X		X									
Rider No. 12				X	X										
Rider No. 13				X											
Rider No. 14	X														
Rider No. 15															
Rider No. 15A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Rider No. 16				X	X	X	X	X							
Rider No. 17						X	X	X	X						
Rider No. 18	X	X	X	X	X	X	X								
Rider No. 19															
Rider No. 20	X	X	X	X	X	X	X	X	X	X					
Rider No. 21	X	X	X	X	X	X									
Rider No. 22	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Appendix A	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Rider Titles:

- Rider No. 1 — Retail Market Enhancement Surcharge
- Rider No. 2 — Untransformed Service
- Rider No. 3 — School and Government Service Discount Period
- Rider No. 4 — Intentionally Left Blank
- Rider No. 5 — Universal Service Charge
- Rider No. 6 — Temporary Service
- Rider No. 7 — Intentionally Left Blank
- Rider No. 8 — Default Service Supply
- Rider No. 9 — Day-Ahead Hourly Price Service
- Rider No. 10 — State Tax Adjustment
- Rider No. 11 — Street Railway Service
- Rider No. 12 — Billing Option – Volunteer Fire Companies and Nonprofit Senior Citizen Centers
- Rider No. 13 — General Service Separately Metered Electric Space Heating Service
- Rider No. 14 — Residential Service Separately Metered Electric Space and Water Heating
- Rider No. 15 — Intentionally Left Blank
- Rider No. 15A — Phase ~~III~~IV Energy Efficiency and Conservation Surcharge
- Rider No. 16 — Service to Non-Utility Generating Facilities
- Rider No. 17 — Emergency Energy Conservation
- Rider No. 18 — Rates for Purchase of Electric Energy from Customer-Owned Renewable Resources Generating Facilities
- Rider No. 19 — Intentionally Left Blank
- Rider No. 20 — Smart Meter Charge
- Rider No. 21 — Net Metering Service
- Rider No. 22 — Distribution System Improvement Charge (“DSIC”)
- Appendix A — Transmission Service Charges

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III-IV~~ ENERGY EFFICIENCY AND CONSERVATION SURCHARGE

(C)

(Applicable to all Rates)

The Phase ~~III-IV~~ Energy Efficiency and Conservation Surcharge (“EEC ~~III-IV~~”) is instituted as a cost recovery mechanism to recover the costs associated with implementing Phase ~~III-IV~~ of the Company’s Energy Efficiency and Conservation Plan in effect from June 1, ~~2016~~2021, through May 31, ~~2021~~2026. Act 129 of 2008 became law on October 15, 2008, requiring the Pennsylvania Public Utility Commission (“Commission”) to develop an Energy Efficiency and Conservation Program applicable to electric distribution companies (“EDCs”) with at least 100,000 customers. This EEC ~~III-IV~~ is implemented in compliance with Docket No. ~~M-2014-2424864~~M-2020-3015228 renaming the current Rider No. 15A – Phase ~~III-IV~~ Energy Efficiency and Conservation Surcharge. The EEC ~~III-IV~~ is a non-bypassable Surcharge and shall be applied to all customers’ bills.

(C)
(C)
(C)
(C)
(C)

RATES

Monthly Surcharge

Customer Class	Applicable Tariff Rate Schedule	¢/kWh	Fixed Charge \$/Month	\$/kW ⁽¹⁾
Residential	RS, RH, RA	0.15 X.XX		
Small & Medium Commercial and Industrial	GS, GM & GMH	0.13 X.XX		
Large Commercial	GL, GLH, L		\$216.04 \$XXX.XX	\$0.27 \$X.XX
Large Industrial	GL, GLH, L, HVPS		\$1,053.86 \$X,XXX.XX	\$0.40 \$X.XX
Lighting	AL, SE, SM, SH, PAL	0.00 X.XX		
Unmetered	UMS	0.00 X.XX		

⁽¹⁾Monthly Surcharge applicable to the customer’s Peak Load Contribution.

CALCULATION OF SURCHARGE

The rate, calculated independently for each customer class in this Tariff, shall be applied to all customers served under the Tariff. The rate shall be determined in accordance with the formulas set forth below and shall be applied to all customers served during any part of a billing month:

RESIDENTIAL CUSTOMER CLASS

$$EEC (r) = [((B - e) / S) * 100] * [(1 / (1 - T))]$$

Where: **EEC (r)** = The Energy Efficiency and Conservation Surcharge (residential) in one-hundredth of a cent which shall be added to the distribution rates for billing purposes for all residential customers.

(C) – Indicates Change

ISSUED: ~~XXXXXXXX XX, XXXX~~

EFFECTIVE: ~~XXXXXXXX XX, XXXX~~

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE III-IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE – (Continued)

(C)

(Applicable to all Rates)

CALCULATION OF SURCHARGE – (Continued)

RESIDENTIAL CUSTOMER CLASS – (Continued)

- B =** The projected costs of the EEC (r) Plan applicable to the residential customer class for the planning year June 1 through May 31.
- e =** The over or under recovery for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31. This may include any applicable PJM Forward Capacity Market proceeds and/or penalties.
- S =** Projected distribution sales in kWh for the residential customer class for the planning year.
- T =** The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

(C)

(C)

SMALL AND MEDIUM COMMERCIAL & INDUSTRIAL, LIGHTING AND UNMETERED CUSTOMER CLASSES

$$EEC (s) = [((B - e) / S) * 100] * [(1 / (1 - T))]$$

- Where: **EEC (s)** = The Energy Efficiency and Conservation Surcharge (small commercial & industrial) in one-hundredth of a cent. This Surcharge shall be a separate line item for billing purposes for all small and medium C&I customers.
- B =** The projected costs of the EEC (s) Plan applicable to the small and medium C&I customer class for the planning year June 1 through May 31.
- e =** The over or under recovery for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31. This may include any applicable PJM Forward Capacity Market proceeds and/or penalties.
- S =** Projected distribution sales in kWh for the small and medium C&I customer class for the planning year.
- T =** The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

(C)

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III~~IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued

(C)

(Applicable to all Rates)

CALCULATION OF SURCHARGE – (Continued)

LARGE COMMERCIAL & INDUSTRIAL CUSTOMER CLASSES

$$\text{EEC (I) (Fixed)} = [(B_A - e_A) / C] * [(1 / (1 - T))]$$

$$\text{EEC (I) (Demand)} = [(B_i - e_i) / L] * [(1 / (1 - T))]$$

Where: **EEC (I)** = The Energy Efficiency and Conservation Surcharge (large commercial & industrial) is a two-part Surcharge. EEC (I) (Fixed) is a monthly fixed Surcharge designed to recover projected program administrative costs and EEC (I) (Demand) is a monthly demand Surcharge designed to recover projected program incentive costs. Combined, the two components are designed to recover the total projected program costs. This Surcharge shall be shown separately for billing purposes for all large C&I customers.

B = The projected costs of the EEC (I) Plan applicable to the large C&I customer class for the planning year June 1 through May 31. B_A is the projected administrative costs applicable to each customer class and B_i is the projected incentive costs applicable to each customer class.

e = The over or under recovery for the reconciliation year. e_A is the over or under recovery of program administrative costs for the reconciliation year. e_i is the over or under recovery of program incentive costs for the reconciliation year. The reconciliation year shall be the twelve (12) months ended March 31. This may include any applicable PJM Forward Capacity Market proceeds and/or penalties.

(C)
(C)

C = Projected distribution customers for the planning year.

L = Projected Peak Load Contribution (PLC) in kilowatts (kW) for the large C&I customer class for the planning year.

T = The Pennsylvania Gross Receipts Tax in effect during the billing month, expressed in decimal form.

ANNUAL UPDATE

The Surcharges defined herein will be updated effective June 1 of each year. On or about May 1 of the filing year, the Company will file revised EEC ~~III~~IV rates with the Commission defining rates in effect from June 1 to May 31 of the following year. The reconciliation year shall be the twelve (12) months beginning April 1 of the previous year and ending March 31 of the current year. The rates for EEC (r) and EEC (s) shall be determined based on the projected costs and sales for the planning year and the over or under collection of expenses based on actual EEC (r) and EEC (s) revenue and expense incurred for the reconciliation year.

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III~~ IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued

(C)

(Applicable to all Rates)

ANNUAL UPDATE – (Continued)

The rates for EEC (I) shall be determined based on the projected costs and the projected Peak Load Contribution for the planning year and the over or under collection of expenses based on actual EEC (I) revenue and expense incurred for the reconciliation year. In accordance with 66 Pa. C.S. § 1307(e), a reconciliation statement filing will be made with the Commission by April 30 of each year. A final reconciliation statement will be filed with the Commission within thirty (30) days after the completion of the final over or under collection refund/recovery period.

Upon determination that any EEC ~~III~~ IV, if left unchanged, would result in material over- or under-collection of costs incurred or expected to be incurred during the twelve (12) month period ending March 31, the Company may request that the Commission authorize interim revisions to the EEC ~~III~~ IV to become effective upon no less than ten (10) days' notice from the date of filing upon Commission approval.

(C)

(C)

MISCELLANEOUS

Rider No. 10 – State Tax Adjustment Surcharge (STAS) shall be applicable to the Surcharges defined in this Rider.

The EEC ~~III~~ IV shall be subject to review and audit by the Commission.

(C)

There shall be no interest applicable to over or under collections for the reconciliation period.

Customer class programs are designed to achieve reduction mandates in a cost effective manner using developed delivery channels. The projected program costs for the Residential, Small and Medium C&I and Large C&I customer classes are developed in proportion to their approximate annual energy consumption. Projected program costs are first directly assigned to customer classes based on eligibility and those costs applicable to more than one class are allocated according to their electric loads and history of program participation. Actual program costs will be assigned to customer classes based on customer class program participation. Non-direct program administrative costs are allocated to programs based on projected energy savings for the programs in that customer class. The Company will only recover actual program costs for each customer class based on customer participation in each program.

In compliance with Commission Order at ~~M-2014-2424864~~ M-2020-3015228, the EEC ~~III~~ IV effective June 1, ~~2016~~ 2021, will include a reconciliation component for the Energy Efficiency and Conservation Phase ~~III~~ program costs, ending March 31, ~~2016~~ 2021. The total actual recoverable EEC Phase ~~III~~ Plan expenditures incurred for the ~~ten (10)~~ twelve (12) months ended March 31, ~~2016~~ 2021, will be reconciled with actual EEC Phase ~~III~~ Plan revenues received for the ~~ten (10)~~ twelve (12) months ended March 31, ~~2016~~ 2021. The net over- or under-recovered amount shall be reflected as a separate line item, without interest, as an E-factor adjustment of the EEC Phase ~~III~~ IV rates effective June 1, ~~2016~~ 2021. In addition, as a separate line item, the Phase ~~III~~ IV rates effective June 1, ~~2016~~ 2021, shall include projections of the: expenses to finalize any measures installed and commercially operable on or before May 31, ~~2016~~ 2021; expenses to finalize any contracts; and other Phase ~~III~~ administrative obligations. The reconciliation of actual Phase ~~III~~ expenses with actual EEC Phase ~~III~~ surcharge revenue for April and May ~~2016~~ 2021 shall be reconciled with EEC Phase ~~III~~ IV revenue and expense for the twelve (12) months ending March 31, ~~2017~~ 2022.

(C)

(C)

(C)

(C)

(C)

(C)

(C)

(C)

(C)

(C)

(C) – Indicates Change

ISSUED: XXXXXXXX XX, XXXX

EFFECTIVE: XXXXXXXX XX, XXXX

STANDARD CONTRACT RIDERS - (Continued)

RIDER NO. 15A – PHASE ~~III~~ IV ENERGY EFFICIENCY AND CONSERVATION SURCHARGE — Continued

(C)

(Applicable to all Rates)

MISCELLANEOUS – (Continued)

In order to facilitate the termination of this Rider, the Company may propose a rate adjustment to become effective on no less than ten (10) days' notice to achieve a zero (-0-) balance at calendar year end. This interim filing will adjust the E-factor in effect June 1, ~~2024~~2026, for reconciliation of actual revenue and expense in April and May ~~2024~~2026.

(C)
(C)

This Rider will remain in effect until the final reconciliation statement is approved and all charges are fully recovered or refunded or until otherwise directed by the Commission.

EXHIBIT
DBO-3R

Duquesne Light Company
Rider No. 15A - Phase III Energy Efficiency and Conservation Surcharge
Proposed Surcharge Effective June 1, 20xx

Expense by Month

	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>Total</u>
A. Actual Phase III Expense by Customer Class													
1 Residential (RS, RH, RA)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2 Small & Medium Commercial and Industrial (GS, GM, GMH)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
3 Large Commercial (GL, GLH, L) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
4 Large Commercial (GL, GLH, L) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
5 Large Industrial (GL, GLH, L, HVPS) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
6 Large Industrial (GL, GLH, L, HVPS) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
7 Lighting (AL, SE, SM, SH, PAL)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
8 Unmetered (UMS)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
9 Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>Total</u>
B. Actual Phase IV Expense by Customer Class													
10 Residential (RS, RH, RA)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
11 Small & Medium Commercial and Industrial (GS, GM, GMH)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
12 Large Commercial (GL, GLH, L) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13 Large Commercial (GL, GLH, L) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14 Large Industrial (GL, GLH, L, HVPS) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15 Large Industrial (GL, GLH, L, HVPS) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
16 Lighting (AL, SE, SM, SH, PAL)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
17 Unmetered (UMS)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
18 Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>Total</u>
C. Actual PJM Forward Capacity Market (Proceeds)/Penalties by Customer Class													
19 Residential (RS, RH, RA)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
20 Small & Medium Commercial and Industrial (GS, GM, GMH)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
21 Large Commercial (GL, GLH, L) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
22 Large Commercial (GL, GLH, L) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
23 Large Industrial (GL, GLH, L, HVPS) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
24 Large Industrial (GL, GLH, L, HVPS) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
25 Lighting (AL, SE, SM, SH, PAL)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
26 Unmetered (UMS)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
27 Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>Total</u>
D. Total by Customer Class (Section A + Section B + Section C)													
28 Residential (RS, RH, RA)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
29 Small & Medium Commercial and Industrial (GS, GM, GMH)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
30 Large Commercial (GL, GLH, L) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
31 Large Commercial (GL, GLH, L) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
32 Large Industrial (GL, GLH, L, HVPS) [Fixed]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
33 Large Industrial (GL, GLH, L, HVPS) [Variable]	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
34 Lighting (AL, SE, SM, SH, PAL)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
35 Unmetered (UMS)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
36 Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

**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	:	
	:	

VERIFICATION

I, David Ogden, Manager, Rates and Tariff Services for Duquesne Light Company, verify that the following testimony was prepared by me or under my direct supervision and is true and correct to the best of my knowledge, information and belief.

- a. Duquesne Light Statement No. 2 (Direct Testimony of David Ogden), and accompanying Exhibits DBO-1 through DBO-5.
- b. Duquesne Light Statement No. 2-R (Rebuttal Testimony of David Ogden), and accompanying Exhibits DBO-1R through DBO-5R.

I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

David Ogden

David B. Ogden

Date: February 5, 2021

Interim Order Adopting Joint
Stipulation for Admission of
Evidence and Admitting
Evidence into the Record

Via electronic service only due to Emergency Order at Docket No. M-2020-3019262

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**INTERIM ORDER
ADOPTING JOINT STIPULATION FOR ADMISSION OF EVIDENCE AND
ADMITTING EVIDENCE INTO THE RECORD**

By Notice issued January 19, 2021, an evidentiary hearing in this matter was scheduled for February 8, 2021.

On February 5, 2021, Duquesne Light Company (DLC or Company), the Office of Consumer Advocate (OCA), the Coalition for Affordability Utility Services and Efficiency in Pennsylvania (CAUSE-PA), Peoples Natural Gas Company, LLC, and the Community Action Association of Pennsylvania (CAAP), all parties in the above-captioned proceeding (hereinafter collectively referred to as the Stipulating Parties), filed a “Joint Stipulation for Admission of Testimony and Exhibits into the Evidentiary Record (Joint Stipulation) in the above-captioned proceeding.”¹ The Joint Stipulation is attached to this Order as Attachment A.

Also on February 5, 2021, the Company’s counsel emailed the undersigned advising that all parties agreed to waive cross-examination and had reached a Settlement in this matter.² Counsel also requested that the evidentiary hearing be cancelled.

¹ The Office of Small Business Advocate (OSBA) is also a party in this proceeding. In his February 5, 2021 email to the undersigned, the Company’s counsel advised that, although OSBA is not a party to the Joint Petition, it had no objection to it.

² The Company’s counsel advised that, although OSBA was not joining the Settlement, it had no objection to it.

By Notice dated February 5, 2021, the evidentiary hearing was cancelled.

Each of the Stipulating Parties stipulated to the authenticity of the statements and exhibits listed in the Joint Stipulation and requested that they be admitted into the record of this proceeding on the terms and conditions set forth in the Joint Stipulation.

As this request is reasonable, it will be granted.

THEREFORE,

IT IS ORDERED:

1. That the Joint Stipulation, filed on February 5, 2020, is hereby adopted.
2. That the testimonies and exhibits listed in the Joint Stipulation attached to this Order as Attachment A are admitted into the record of this proceeding on the terms and conditions set forth in the Joint Stipulation as if the same were fully set forth in this ordering paragraph.
3. That, by **4:00 p.m. on February 12, 2021**, the parties shall file the admitted evidence, with appropriate verifications, with the Commission's Secretary's Bureau pursuant to 52 Pa.Code § 5.412a.
4. That the parties shall, when filing their evidence pursuant to Ordering Paragraph 3, include in each filing: (a) a copy of this Order, and (b) a cover letter referencing the caption and Docket Number of this proceeding, the specific evidence included in the filing, and the fact that the evidence included in the filing is "admitted evidence."

5. That the parties shall, by **noon on Tuesday, February 9, 2021**, advise the presiding officers by email of their plan for the filing of their Settlement and Statements in Support.

Date: February 8, 2020

_____/s/_____
Emily I. DeVoe
Mark A. Hoyer
Administrative Law Judges

**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 :
:

**JOINT STIPULATION FOR ADMISSION
OF TESTIMONY AND EXHIBITS INTO THE EVIDENTIARY RECORD**

TO THE HONORABLE MARK HOYER AND HONORABLE EMILY DEVOE,
ADMINISTRATIVE LAW JUDGES:

I. INTRODUCTION

This Joint Stipulation for Admission of Testimony and Exhibits into the Evidentiary Record (“Joint Stipulation”) is entered into by Duquesne Light Company (“Duquesne Light”), the Office of Consumer Advocate (“OCA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), Peoples Natural Gas Company, LLC, and the Community Action Association of Pennsylvania (“CAAP”), parties to the above-captioned proceeding (hereinafter collectively referred to as the “Joint Petitioners”), by their respective counsel. The Joint Petitioners respectfully request that Administrative Law Judges Mark Hoyer and Emily DeVoe admit into the evidentiary record of this proceeding the previously distributed written testimony and exhibits prepared by the witnesses of Duquesne Light, the OCA, CAUSE-PA, and CAAP, as identified below. In support of this request, the Joint Petitioners aver and state as follows:

II. BACKGROUND

1. Duquesne Light is a public utility as the term is defined under Section 102 of the Public Utility Code, 66 Pa.C.S. § 102, certificated by the Commission to provide electric service in the City of Pittsburgh and in Allegheny and Beaver Counties in Pennsylvania. Duquesne Light is also an electric distribution company (“EDC”) and a default service provider as those terms are defined under Section 2803 of the Public Utility Code. 66 Pa.C.S. § 2803.

2. On November 30, 2020, pursuant to Act 129 of 2008 (“Act 129”), 66 Pa. C.S §§2806.1 and 2806.2, and the Implementation Order issued by the Pennsylvania Public Utility Commission (“Commission”) on June 18, 2020, Duquesne Light filed the above-captioned Petition with the Commission. With its Petition, Duquesne Light requested Commission approval of Duquesne Light’s Phase IV EE&C Plan, which covers the period from June 1, 2021 through May 31, 2026. The Phase IV Plan includes a range of energy efficiency and demand response programs designed to achieve the required 348,126 MWh of reduced energy consumption and the required demand reduction of 62 MW. Duquesne Light’s Phase IV EE&C Plan includes a total of twelve programs: five programs targeting the residential sector; four programs targeting the small/medium commercial and industrial sector; and three programs targeting the large commercial/industrial sector.

3. In conjunction with the filing of its Phase IV EE&C Plan, Duquesne Light filed the Direct Testimony of David Defide (Duquesne Light Statement No. 1) explaining the methodology employed to analyze, develop, and implement Duquesne Light’s Phase IV plan; and the Direct Testimony of David Ogden (Duquesne Light Statement No. 2) detailing Duquesne Light’s proposed cost recovery mechanism.

4. Duquesne Light's Plan proposes an Energy Efficiency and Conservation ("EEC") Surcharge, which is designed to fully recover all applicable EE&C-related costs. The EEC Surcharge is fully reconcilable and will be applied on a non-bypassable basis to customers who receive distribution service from the Company. The Plan includes a reconcilable adjustment clause tariff mechanism in accordance with 66 Pa.C.S. § 1307.

5. On December 11, 2020, CAUSE-PA filed its Petition to Intervene and Answer in this proceeding.

6. On December 21, 2020, OSBA filed its Notice of Intervention and Public Statement in this proceeding.

7. Also on December 21, 2020, CAAP filed its Petition to Intervene in this proceeding.

8. On December 30, 2020, a Prehearing Conference Order was issued, which scheduled a Prehearing Conference for January 6, 2021, and directed the parties to file prehearing conference memoranda on or before January 5, 2021.

9. On December 31, 2020, the OCA filed its Notice of Intervention and Public Statement in this proceeding.

10. On January 2, 2021, notice of Duquesne Light's Petition was published in the Pennsylvania Bulletin. The notice established a deadline of January 22, 2021 for the filing of comments on, and responsive pleadings to, the Company's Phase IV EE&C Plan.

11. On January 7, 2021, a Prehearing Order was issued, which established a litigation schedule for the proceeding.

12. On January 8, 2021, CAUSE-PA, CAAP, OCA, OSBA, the Commission on Economic Opportunity, the National Resources Defense Council, the Sustainable Energy Fund

of Central Pennsylvania, and the Tenant Union Representative Network filed a Joint Expedited Motion for Extension of Procedural Schedule (“Joint Expedited Motion”).

13. On January 14, 2021, ALJs Hoyer and DeVoe issued an Order denying the Joint Expedited Motion.

14. On January 14, 2021, OCA served OCA Statement No. 1, the Direct Testimony of Stacy L. Sherwood.

15. On January 14, 2021, CAUSE-PA served CAUSE-PA Statement No. 1, the Direct Testimony of Jim Grevatt.

16. On January 20, 2021, Peoples Natural Gas Company LLC (“Peoples”) filed a Petition to Intervene in the Proceeding.

17. On January 22, 2021, Comments on Duquesne Light’s Phase IV EE&C Plan were filed by the Energy Efficiency for All Pennsylvania Coalition, Daikin U.S. Corporation, Ceres, and Keystone Energy Efficiency Alliance.

18. On January 25, 2021, Duquesne Light served Duquesne Light Statement No. 1-R, the Rebuttal Testimony of David Defide and Duquesne Light Statement No. 2-R, the Rebuttal Testimony of David Ogden.

19. On January 25, 2021, CAAP served CAAP Statement No. 1-R, the Rebuttal Testimony of Susan Moore.

20. On February 5, 2021, the parties informed ALJs Hoyer and DeVoe of the achievement of a settlement, and requested cancellation of the evidentiary hearing.

21. In support of the Settlement, each Joint Petitioner will submit, as an appendix to the Joint Petition, individual Statements in Support of the Settlement.

22. The parties hereby stipulate to the admission into the evidentiary record of the following Testimony and Exhibits, and waive cross examination of the below witnesses:

- a. Duquesne Light Statement No. 1 (Direct Testimony of David Defide).
- b. Duquesne Light Statement No. 2 (Direct Testimony of David Ogden), and accompanying Exhibits DBO-1 through DBO-5.
- c. Duquesne Light Statement No. 1-R (Rebuttal Testimony of David Defide)
- d. Duquesne Light Statement No. 2-R (Rebuttal Testimony of David Ogden), and accompanying Exhibits DBO-1R through DBO-5R.
- e. CAUSE-PA Statement 1 (Direct Testimony of Jim Grevatt) and accompanying Appendices A and B.
- f. OCA Statement No. 1 (Direct Testimony of Stacy L. Sherwood) and accompanying Attachment A and Exhibit SLS-1.
- g. CAAP Statement No. 1-R (Rebuttal Testimony of Susan Moore).

23. Full copies of each of the aforementioned Statements are attached hereto for filing with the Commission, accompanied by signed Verifications.

24. This Joint Stipulation may be executed in any number of counterparts, all of which taken together shall constitute one and the same instrument.

NOW, THEREFORE, desiring to enter into this Joint Stipulation and intending to be bound hereby, the Joint Petitioners agree and stipulate to the following with respect to this proceeding:

That, the testimony and exhibits set forth in paragraph 22 shall be deemed to be made a part of the official evidentiary record of this proceeding and may be used for all proper and

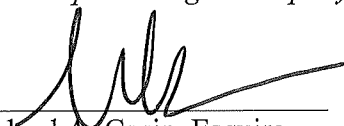
legal purposes in support of the Settlement and Joint Petition as if hearings had been conducted in this matter; and

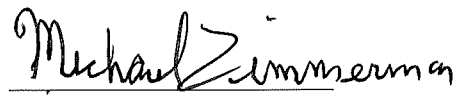
By entering into this Joint Stipulation, no Joint Petitioner makes any precedential concession or admission as to the sufficiency of the law, facts, positions or assumptions upon which the other Joint Petitioners' testimony statements or exhibits in this matter may be based. In addition, the Joint Petitioners agree that this Joint Stipulation may not be cited as precedent in any future proceeding, except to the extent required to implement and enforce the Joint Stipulation.

By their signatures below, the Joint Petitioners agree to the terms of this Joint Stipulation and represent that they are authorized to execute this Joint Stipulation on behalf of their respective clients/offices.

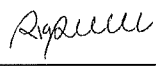
Respectfully submitted,

For: Duquesne Light Company

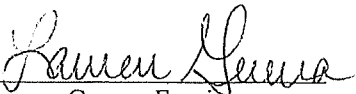

Michael A. Gruin, Esquire
Timothy McHugh, Esquire
Stevens & Lee, P.C.
17 North Second Street, 16th Floor
Harrisburg, PA 17101
Date: 2/5/21


Michael Zimmerman, Esq.
Duquesne Light Company
411 7th Ave.
Pittsburgh, PA 15219

For: CAUSE-PA


Ria M. Pereira, Esquire
Elizabeth Marx, Esquire
John Sweet, Esquire
CAUSE-PA
118 Locust Street
Harrisburg, PA 17101
Date: February 5, 2021

For: Office of Consumer Advocate



Lauren Guerra, Esquire
Aron Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
Date: 2/5/21

*For: Community Action Association of
Pennsylvania*

Joseph L. Vullo, Esq.
Burke, Vullo, Reilly, Roberts
1460 Wyoming Ave.
Forty Fort, PA 18704
Date: _____

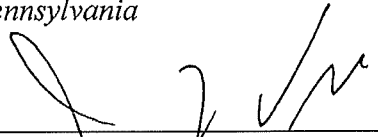
For: Peoples Natural Gas Company, LLC

William H. Roberts II, Esquire
Peoples Natural Gas Company, LLC
375 North Shore Dr.
Pittsburgh, PA 15212
Date: _____

For: Office of Consumer Advocate

Lauren Guerra, Esquire
Aron Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
Date: _____

*For: Community Action Association of
Pennsylvania*



Joseph L. Vallo, Esq.
Burke, Vallo, Reilly, Roberts
1460 Wyoming Ave.
Forty Fort, PA 18704
Date: 2/5/2021

For: Peoples Natural Gas Company, LLC

William H. Roberts II, Esquire
Peoples Natural Gas Company, LLC
375 North Shore Dr.
Pittsburgh, PA 15212
Date: _____

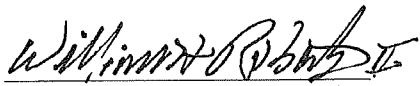
For: Office of Consumer Advocate

Lauren Guerra, Esquire
Aron Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
Date: _____

*For: Community Action Association of
Pennsylvania*

Joseph L. Vullo, Esq.
Burke, Vullo, Reilly, Roberts
1460 Wyoming Ave.
Forty Fort, PA 18704
Date: _____

For: Peoples Natural Gas Company, LLC



William H. Roberts II, Esquire
Peoples Natural Gas Company, LLC
375 North Shore Dr.
Pittsburgh, PA 15212
Date: _____

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the enclosed Joint Stipulation have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

VIA ELECTRONIC MAIL ONLY

Elizabeth Marx, Esq.
Ria Pereira, Esq.
CAUSE-PA
118 Locust Street
Harrisburg, PA 17101
Pulp@palegalaid.net

Sharon E. Webb, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov

Aron Beatty, Esquire
Lauren E. Guerra, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
ABeatty@paoca.org
LGuerra@paoca.org

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Ave.
Forty Fort, PA 18704
jlvullo@bvrrlaw.com

William H. Roberts II, Esquire
Peoples Natural Gas Company, LLC
375 North Shore Dr.
Pittsburgh, PA 15212
WILLIAM.H.ROBERTSII@peoples-gas.com



February 5, 2021

Michael A. Gruin

M-2020-3020818 - PETITION OF DUQUESNE LIGHT COMPANY FOR APPROVAL OF ITS ACT 129 PHASE IV ENERGY EFFICIENCY AND CONSERVATION PLAN

Revised 1/21/21

MICHAEL ZIMMERMAN ESQUIRE
DUQUESNE LIGHT COMPANY
411 7TH AVENUE
15TH FLOOR
PITTSBURGH PA 15219
412-393-6268
Accepts eService

SHARON E WEBB ESQUIRE
OFFICE OF SMALL BUSINESS
ADVOCATE
555 WALNUT STREET 1ST FLOOR
HARRISBURG PA 17101
717-783-2525
swebb@pa.gov

MICHAEL A GRUIN ESQUIRE
TIMOTHY K MCHUGH ESQUIRE
STEVENS & LEE
16th FLOOR
17 NORTH SECOND STREET
HARRISBURG PA 17101
717-255-7365
717-255-7366
Accepts eService
Representing Duquesne Light Company

LAUREN E GUERRA ESQUIRE
ARON J BEATTY ESQUIRE
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET 5TH FLOOR
HARRISBURG PA 17101-1923
717-783-5048
Accepts eService

JOHN SWEET ESQUIRE
ELIZABETH R MARX ESQUIRE
RIA PEREIRA ESQUIRE
PA UTILITY LAW PROJECT
118 LOCUST STREET
HARRISBURG PA 17101
717-701-3837
717-236-9486
717-710-3839
Accepts eService
Representing CAUSE-PA

WILLIAM H ROBERTS II ESQUIRE
MICHAEL TURZAI ESQUIRE
PNG COMPANIES LLC
375 NORTH SHORE DRIVE
PITTSBURGH, PA 15212
412-208-6527
412-258-4473
william.h.robertsii@peoples-gas.com
michael.turzai@peoples-gas.com

JOSEPH L VULLO ESQUIRE
BURKE VULLO REILLY ROBERTS
1460 WYOMING AVENUE
FORTY FORT PA 18704
570-288-6441
Accepts eService
Representing CAAP