

May 24, 2021

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

VIA ELECTRONIC FILING

**Re: Pennsylvania Public Utility Commission v. Duquesne Light Company;
Docket No. R-2021-3024750**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Prehearing Conference Memorandum of United States Steel Corporation ("U.S. Steel"), in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 

Derrick Price Williamson
Barry A. Naum

BAN/sds
Enclosures

c: Deputy Chief Administrative Law Judge Joel H. Cheskis (via E-mail)
Administrative Law Judge John M. Coogan (via E-Mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2021-3024750
	:	
Duquesne Light Company	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

VIA E-MAIL

cott B. Granger, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265
sgranger@pa.gov

Christy M. Appleby, Esquire
Phillip D. Demanchick, Esquire
David T. Evrard, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
cappleby@paoca.org
pdemanchick@paoca.org
devrard@paoca.org
abeatty@paoca.org

Sharon E. Webb, Esquire
Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101
swebb@pa.gov

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com

Tishekia E. Williams, Esquire
Michael Zimmerman, Esquire
Emily Farah, Esquire
Duquesne Light Company
411 Seventh Avenue, 16th Floor
Pittsburgh, PA 15219
twilliams@duqlight.com
mzimmerman@duqlight.com
efarah@duqlight.com


Certificate of Service
Docket No. R-2021-3024750
Page 2

Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Lauren N. Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

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

Mark C. Szybist, Esquire
Natural Resources Defense Council
1152 15th Street NW, Suite 300
Washington, DC 20005
mszybist@nrdc.org

Andrew J. Karas, Esquire
Sophia Al Rasheed, Esquire
Fair Shake Environmental Legal Services
600 Superior Avenue East
Cleveland, OH 44114
akaras@fairshake-els.org
salrasheed@fairshake-els.org



Barry A. Naum

Dated: May 24, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2021-3024750
	:	
Duquesne Light Company	:	

**PREHEARING CONFERENCE MEMORANDUM OF
UNITED STATES STEEL CORPORATION**

Pursuant to the Prehearing Conference Order issued on May 20, 2021, by Deputy Chief Administrative Law Judge ("DCALJ") Joel H. Cheskis and Administrative Law Judge ("ALJ") John M. Coogan, United States Steel Corporation ("U.S. Steel"), hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On April 16, 2021, Duquesne Light Company ("Duquesne" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") Supplement No. 25 to the Company's Tariff Electric – Pa. P.U.C. No. 25 ("Filing"), representing a request for a general increase in the Company's electric distribution rates of approximately \$115 million to be effective June 15, 2021. The Company is also requesting a return on equity ("ROE") of 10.95 percent. On May 24, 2021, U.S. Steel filed a Petition to Intervene to participate in this proceeding. A description of U.S. Steel is set forth in its Petition to Intervene.

II. REPRESENTATION AND SERVICE CONTACT

U.S. Steel is represented by counsel with contact information as follows:

Derrick Price Williamson
Barry A. Naum
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2742
Fax: (717) 795-2743
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

III. ANTICIPATED ISSUES

U.S. Steel is still evaluating Duquesne's Filing and anticipates being informed by the record created in this case. At this preliminary stage, however, U.S. Steel plans to pay careful attention to the proposed overall revenue increase, the allocation of costs among the various rate schedules, and Duquesne's proposed overall Return on Equity of 10.95%. U.S. Steel anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all matters raised by other parties.

IV. PROPOSED WITNESSES AND EVIDENCE

U.S. Steel is still in the process of evaluating whether it will sponsor testimony in this proceeding. In the event U.S. Steel decides to sponsor testimony, U.S. Steel will inform the parties, the DCALJ, and ALJ if this changes. Regardless, U.S. Steel reserves the right to participate in this proceeding and adduce evidence through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

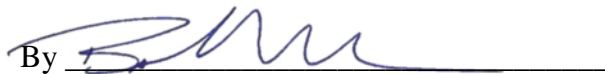
U.S. Steel will cooperate with the DC ALJ, ALJ, and the parties to formulate a reasonable procedural schedule and discovery rules in accordance with the Commission's regulations and DCALJ and ALJ directives.

VI. SETTLEMENT

U.S. Steel is willing to participate in settlement discussions so as to narrow or resolve issues in dispute among the parties.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 
Derrick Price Williamson (Pa. I.D. No. 69274)
Barry A. Naum (Pa. I.D. No. 204869)
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2742
Fax: (717) 795-2743
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

Counsel to United States Steel Corporation

Dated: May 24, 2021