



Lindsay Baxter
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July 22, 2022

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, PA 17120

**Re: Distribution System Improvement Charge Implementation Order to Address All Issues Pertaining to the DSIC Calculations Required in The Pa. Supreme Court's Decision in McCloskey v. Pa. PUC, 255 A. 3d 416 (Pa. 2021)
M-2012-2293611**

Dear Secretary Chiavetta:

Duquesne Light Company (Company) is filing this letter in lieu of comments in the above-captioned proceeding.

In its Secretarial Letter issued April 22, 2022, the Commission invited comments from interested stakeholders. Duquesne Light Company is a member of the Energy Association of Pennsylvania (EAP), which is filing comments on behalf of its member utilities at this docket. The Company wishes to express its support for EAP's comments.

In particular, Duquesne Light echoes EAP's observation that refunds/recoupments of prior distribution system improvement charge (DSIC) recoveries should be excluded from working group discussions. Among other legal infirmities, such refunds/recoupments would likely constitute impermissible retroactive ratemaking, and would rely heavily on speculation. This issue is therefore not appropriate to include in the working group.

The Company appreciates the opportunity to participate in this proceeding and looks forward to engaging in future conversations via the working group that is to be created.

Sincerely,

A handwritten signature in blue ink, appearing to read 'LBA', with a long horizontal flourish extending to the right.

Lindsay A. Baxter
Manager, Regulatory and Clean Energy Strategy

Enclosure

cc: Erin Laudenslager, elaudensla@pa.gov
David Huff, dhuff@pa.gov