



June 5, 2020

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

Re: Petition of Duquesne Light Company for Approval of Default Service Plan for the
Period of June 1, 2021 through May 31, 2025

Docket No. P-2020-3019522

Dear Secretary Chiavetta:

Attached for electronic filing please find Solar United Neighbors of Pennsylvania's
Petition to Intervene in the above-referenced proceeding.

Respectfully submitted,

Henry McKay
Program Director
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412-440-8934

**PETITION TO INTERVENE OF SOLAR UNITED NEIGHBORS OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for Approval of Default Service Plan for the Period
of June 1, 2021 through May 31, 2025

Docket No. P-2020-3019522

Pursuant to 52 Pa. Code §§ 5.71 et seq., Solar United Neighbors of Pennsylvania
(SUN-PA) hereby gives Petition to Intervene in the above-captioned proceeding. In
support of its Petition, SUN-PA states:

1. With more than 4000 members and supporters in Pennsylvania (and nearly
70,000 nationwide), SUN-PA is a nonprofit organization that advocates for the interests
of residential and small commercial solar customer-generators across the
Commonwealth of Pennsylvania. SUN-PA is particularly interested in ensuring that net
metering regulations provide fair compensation to solar customer-generators that reflect
the benefits that distributed solar generation provides to the entire energy system.

2. On April 20, 2020, Duquesne Light Company (DLC) filed its Petition for
Approval of Default Service Plan for the Period June 1, 2021 through May 31, 2025
(DSP IX or the Plan) pursuant to 66 Pa. C.S. § 2807(e) of the Pennsylvania Public
Utility Code, the Commission's Default Service Regulations and the Commission's
Policy on Default Service.

3. As part of its filing, DLC proposes to recover net metering year-end payouts
associated with default service customers through bypassable default service supply
and transmission rates. Beginning with DSP IX, the Company proposes to recover

these payments for generation as an expense in the respective default service class over/under collection calculation within the Company's Rider No. 8 – DSS [default service supply] and Appendix A – Transmission Service Charge 1307(e) reconciliations (both are bypassable riders).

4. DLC's proposed recovery of net metering payments directly affects the interests of SUN-PA members who are currently solar customer-generators or are planning to install net metered solar photovoltaic systems on their property in the future. In particular, a fair and accurate accounting of the costs and savings associated with net metered solar is necessary to protect the economic interests of customer-generators.

5. While SUN-PA reserves the right to raise and address issues that are not specifically identified in this Petition to Intervene, as well as additional issues raised by other parties, SUN-PA would like to highlight the following issues at this time:

6. How does DLC estimate this end-of-year compensation to customer-generators to grow in future years, and why is DLC only now deciding to formally allocate these expenditures?

7. Under DLC's proposal, would default service customers see a specific line item on their bills for this net metering recovery? What is the expected price impact on default service customer bills?

8. Why does DLC not consider these year-end payments to be *already* recovered, as all excess energy from customer-generators is promptly delivered to other nearby customers, who are subsequently billed for that energy at the full retail rate by DLC?

9. If DLC considers excess energy from customer generators to *reduce* DLC's costs paid to wholesale suppliers (as explained in paragraph 76 of their "Petition of Duquesne Light Company For Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025"), why is there a need to recover costs from ratepayers?

10. SUN-PA's interests in this proceeding are unique from and not adequately represented by other parties.

11. A copy of all correspondence and notices, documents, orders or other communications with respect to this matter should be addressed to the following: Henry McKay, Solar United Neighbors of Pennsylvania, 327 Whipple St, Pittsburgh, PA 15218; henry@solarunitedneighbors.org; 412-440-8934. Pursuant to 52 Pa. Code § 1.54(b)(3), SUN-PA consents to the electronic service of all documents to the e-mail address stated above.

WHEREFORE, SUN-PA respectfully requests that the Commission grant this Petition to Intervene.

Respectfully Submitted,



Henry McKay
Program Director
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Date: June 5th, 2020