

Michael Zimmerman Senior Counsel, Regulatory 411 Seventh Avenue Mail drop 15-7 Pittsburgh, PA 15219 Tel: 412-393-6268 mzimmerman@duqlight.com

September 30, 2020

Via Electronic Filing

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

Re: Petition of Duquesne Light Company For Approval of Default Service Plan For The Period June 1, 2021 through May 31, 2025 Docket No. P-2020-3019522

Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned proceeding, please find the *Joint Stipulation of Duquesne Light Company, Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, and the Office of Consumer Advocate*, addressing issues related to the Company's Customer Assistance Program and Standard Offer Program proposals.

Should you have any questions, please feel free to contact me.

Respectfully Submitted,

Michael Zimmerman Senior Counsel, Regulatory

Enclosures

Cc: Certificate of Service Hon. Deputy Chief ALJ Mark A. Hoyer

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

ELECTRONIC MAIL

Bureau of Investigation & Enforcement Scott B. Granger Commonwealth Keystone Building 400 North Street, 2nd Floor West PO Box 3265 Harrisburg, PA 17105-3265 sgranger@pa.gov

Office of Consumer Advocate David T. Evrard Aron J. Beatty 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923 <u>DEvrard@paoca.org</u> <u>ABeatty@paoca.org</u>

Norris McLaughlin, P.A. John F. Lushis, Jr. James Laskey 515 W. Hamilton Street Suite 502 Allentown, PA 18101 jlushis@norris-law.com jlaskey@norris-law.com On behalf of Calpine Retail Holdings, LLC

Excel Consulting Brian Kalcic 225 S. Meramac Avenue Suite 720-T St. Louis, MO 63105 Excel.consulting@sbcglobal.net On behalf of OSBA Office of Small Business Advocate Sharon E. Webb Steven C. Gray 555 Walnut Street, 1st Floor Harrisburg, PA 17101 <u>swebb@pa.gov</u> sgray@pa.gov

Pennsylvania Utility Law Project Elizabeth R. Marx John Sweet Ria Pereira 118 Locust Street Harrisburg, PA 17101 pulp@palegalaid.net On behalf of CAUSE-PA

Hawke McKeon & Sniscak, LLP Todd S. Stewart 100 North Tenth Street Harrisburg, PA 17101 <u>tsstewart@hmslegal.com</u> On behalf of EGS Parties

Post & Schell, P.C. Michael W. Gang Anthony D. Kanagy 17 North Second Street 12th Floor Harrisburg, PA 17101 <u>mgang@postschell.com</u> <u>akanagy@postschell.com</u> *On behalf of Duquesne Light Company* Barbara Alexander Consulting, LLC Barbara R. Alexander 83 Wedgewood Drive Winthrop, ME 04364 <u>barbalexand@gmail.com</u> <u>barbalex@ctel.net</u> On behalf of OCA

Phillips Lytle, LLP Thomas F. Puchner 30 South Pearl Street Albany, NY 12207 tpuchner@phillipslytle.com On behalf of StateWise

Keyes & Fox LLP James M. Van Nostrand 275 Orchard Drive Pittsburgh, PA 15228 jvannostrand@keyesfox.com On behalf of ChargePoint

Thomas, Niesen & Thomas, LLC Charles E. Thomas, Jr. 212 Locust Street, Ste 302 Harrisburg, PA 17101 <u>cthomasjr@tntlawfirm.com</u> On behalf of MAREC Action Phillips Lytle, LLP Gregory L. Peterson 201 West Third Street Suite 205 Jamestown, NY 14701-4907 gpeterson@phillipslytle.com On behalf of StateWise

Phillips Lytle, LLP Kevin C. Blake 125 Main Street Buffalo, NY 14203 Kblake@phillipslytle.com On behalf of StateWise

MAREC Action Bruce Burcat P.O. Box 385 Camden, DE 19934 Marec.org@gmail.com

Natural Resources Defense Council Mark C. Szybist Kathy Harris 1152 15th Street, Suite 300 Washington, DC 20005 mszybist@nrdc.org KHarris@nrdc.org Fair Shake Environmental Legal Services Emily Collins Andrew J. Karas 647 E. Market Street Akron, OH 44304 ecollins@fairshake-els.org akaras@fairshake-els.org On behalf of NRDC

Applied Economics Clinic Elizabeth Stanton Joshua Castigliego 1012 Massachusetts Avenue Arlington, MA 02476 <u>liz.stanton@aeclinic.org</u> joshua.castigliego@aeclinic.org On behalf of MAREC Action

Hon. Mark A. Hoyer Deputy Chief Administrative Law Judge Piatt Place Downtown 301 Fifth Avenue #220 Pittsburgh, PA 15222 <u>mhoyer@pa.gov</u>

Date: September 30, 2020

Michal In

Michael Zimmerman Duquesne Light Company 411 Seventh Avenue, 15-7 Pittsburgh, PA 15219 Phone: 412-393-6268 Email: mzimmerman@duqlight.com

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

:

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

: Docket No. P-2020-3019522

JOINT STIPULATION OF

DUQUESNE LIGHT COMPANY, THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA, AND THE OFFICE OF CONSUMER ADVOCATE,

Duquesne Light Company ("Duquesne Light" or the "Company"), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), and the Office of Consumer Advocate ("OCA") (together, Stipulating Parties) by their respective counsel, hereby enter into a Joint Stipulation with regard to the captioned proceeding as follows:

The Stipulating Parties agree to the implementation of the Company's Standard Offer Program as proposed by the Company at Paragraphs 60-66 of the *Petition of Duquesne Light Company for Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025* ("Petition"), with the following modifications:

Per its initial proposal, DLC will outsource administration of the SOP to a third party, a. initially Allconnect. The costs associated with the third party administrator will be recovered, as proposed by DLC, from participating EGSs. As part of its transition to Allconnect, DLC agrees to develop customer education scripts that are consistent with the practices of Pennsylvania's EDCs that currently utilize third party SOP administrators. DLC will provide these scripts the parties for to review/comment. Upon implementation of such scripting, DLC agrees to monitor Allconnect's adherence to the scripts at regular intervals to ensure compliance and provide a report of its efforts at the midpoint of DSP IX, including a random sampling of call recordings of monitored solicitations, as part of such report. Additionally, DLC

will provide a report in its next Default Service filing that will document the third party administrator's compliance with the Company's SOP directives.

- b. DLC will continue its current practice of referring eligible customers to SOP, rather than automatically placing them into SOP.
- c. DLC will continue its current practice of allowing SOP participants to remain with their EGS following the initial 12-month SOP period, absent affirmative action by the customer.
- d. DLC will add a section to the "Customer Choice" page of its website that specifically addresses SOP and participating customers' options upon expiration of their initial 12-month SOP contract.
- e. DLC will conduct an analysis of SOP participants' effective supply rates following their initial 12-month SOP period, and will present results annually beginning in 2022.

Additionally, the Stipulating Parties agree to the withdrawal of the Company's proposal regarding Customer Assistance Program ("CAP") Shopping, as proposed by the Company at Paragraphs 68-72 of the Petition. The Stipulating Parties further agree that within 6 months of a final, unappealable order implementing CAP Shopping in PPL Electric service territory, Duquesne Light will make a filing with the Commission regarding CAP shopping that is consistent with Duquesne Light's CAP design, and which is informed by all available information and data.

WHEREFORE, the Stipulating Parties, by their respective counsel, respectfully submit that this Joint Stipulation is in the public interest, and request that it be approved without modification.

Respectfully Submitted,

Counsel for Duquesne Light Company

Wield on

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

Counsel for Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania

Elizabeth Marx John Sweet Ria Pereira Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 pulp@palegalaid.net Counsel for Office of Consumer Advocate

David Evrard Assistant Consumer Advocate Aron Beatty Senior Assistant Consumer Advocate Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place <u>devrard@paoca.org</u> <u>abeatty@paoca.org</u> Respectfully Submitted,

Counsel for Duquesne Light Company

Counsel for Office of Consumer Advocate

David Evrard

Aron Beatty

555 Walnut Street

devrard@paoca.org

abeatty@paoca.org

5th Floor, Forum Place

Assistant Consumer Advocate

Office of Consumer Advocate

Senior Assistant Consumer Advocate

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

Counsel for Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania

Elizabeth Marx John Sweet Ria Pereira Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 pulp@palegalaid.net

Respectfully Submitted,

Counsel for Duquesne Light Company

Counsel for Office of Consumer Advocate

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

Counsel for Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania

Doborn K. Man

Elizabeth Marx John Sweet Ria Pereira Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 pulp@palegalaid.net David Evrard Assistant Consumer Advocate Aron Beatty Senior Assistant Consumer Advocate Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place <u>devrard@paoca.org</u> abeatty@paoca.org