Duquesne Light
Our Energy...Your Power

411 Seventh Avenue
16th Floor
Pittsburgh, PA 15219

Tel 412-393-1541
Fax 412-393-1418
gjack@duqlight.com

**Gary A. Jack**
Assistant General Counsel

April 21, 2011

**VIA ELECTRONIC FILING**

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

**Re: Energy Efficiency and Conservation Program**
***Docket No. M-2008-2069887***

Dear Secretary Chiavetta:

Duquesne Light Company ("Duquesne") files this letter in support of the Commission's Tentative Order entered April 1, 2011 in the above-referenced docket regarding adopting a process to administratively handle on a faster basis certain energy efficiency Plan modifications. The second of the three bullets listing minor EE&C Plan changes (page 5 of the Tentative Order) states that staff shall have delegated authority to approve "The transfer of funds from one measure to another measure within the same customer class." Duquesne structured its EE&C Plan with different programs for each customer class, but many programs do not have "measures" under the program umbrella. In fact, only the residential program has any "measures" under it at all. All the other programs have no measures. So Duquesne would not be transferring funds from a measure within one program to a measure in another program. It would be transferring from one program to another program within the same customer class. For example, if Duquesne determines that its Public Agency program is needing more funds and that its Healthcare program does not need its full budget, it would like to be able to move funds from its Healthcare program to the Public Agency program (both are in the commercial customer class) through the process proposed in the Tentative Order. Duquesne requests the language be clarified or expanded to allow Staff review of such program funding transfers. Accordingly, Duquesne proposes the following word additions: "The transfer of funds from one measure <u>or program</u> to another measure <u>or program</u> within the same customer class." Duquesne Light also supports the comments filed by the Energy Association on this matter.

Sincerely yours,

Gary A. Jack

cc: Kriss Brown (via E-mail)