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Senior Counsel, Regulatory

July 21, 2014

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JUL 21 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA OVERNIGHT MAIL

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

RE: Interim Guidelines for Eligible Customer Lists
Docket No. M-2010-2183412

Dear Secretary Chiavetta:

On June 19, 2014, the Pennsylvania Public Utility Commission ("Commission") issued a Tentative Order in the above referenced docket seeking comments on the Office of Competitive Market Oversight's (OCMO) proposal to require triennial solicitations of residential and small commercial customers by Electric Distribution Companies (EDCs) in order to update the electric Eligible Customer List. Enclosed for the Commission's consideration are the comments of Duquesne Light Company.

Please do not hesitate to contact me with questions, comments or concerns.

Respectfully submitted,

Tishekia Williams
Senior Counsel, Regulatory

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Re: Interim Guidelines for Eligible Customer
Lists**

: Docket No. M-2010-2183412

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**COMMENTS OF
DUQUESNE LIGHT COMPANY**

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

On June 19, 2014, the Pennsylvania Public Utility Commission (“Commission”) issued a Tentative Order in the above captioned docket seeking comments on the Office of Competitive Market Oversight’s (OCMO) proposal to require triennial solicitations of residential and small commercial customers by Electric Distribution Companies (EDCs) in order to update the electric Eligible Customer List (“ECL”). Duquesne Light Company (“Duquesne Light” or the “Company”) generally supports the Commission’s attempt to ensure a robust retail market in Pennsylvania while maintaining essential safeguards and protections of sensitive customer information. The ECL is an important and valuable tool to Pennsylvania’s electric retail market. Duquesne Light thanks the Commission for the opportunity to provide comment on this matter.

I. Triennial Solicitation

In the Tentative Order, the PUC is proposing a consistent methodology for company-wide ECL refreshes every three years, to begin by end of the first quarter of 2015 which is three years after the previous solicitation. The triennial ECL refresh process would continue on from that time, during the first quarter of 2018, the first quarter of 2021, and so on.

Duquesne Light does not oppose required triennial ECL solicitations for residential and small commercial customers. Duquesne Light fully supports customers’ right to choose to have their customer information released to or restricted from EGSs or other third parties. Although

the Company does not currently solicit regularly scheduled updates of customers ECL status, customers have the option of changing or reaffirming their ECL status at any time on Duquesne Light's website.

While the Company is generally supportive of the triennial solicitation requirement, Duquesne Light is concerned that customers may feel inundated with solicitations and other mailings related to retail competition due to Pennsylvania's active retail market for electricity. Accordingly, the Company seeks to mitigate potential customer confusion and requirements for those customers who have already chosen to opt in, or out of including their information on the ECL. Therefore, Duquesne Light suggests the three year company-wide solicitation be in the form of two separate letters, each letter based on the customer's current status on the ECL.¹ For example, for customers who have chosen to withhold their account information from the ECL, the letter would reaffirm the customer's existing choice and advise the customer that no action is required unless they would like to change their ECL status. Additionally, customers would be informed of the various methods by which they can change their status on the ECL, including via website, telephone or returned mail.

II. Content of Company-wide Solicitations

In its Tentative Order, the Commission proposes that the EDCs include eight specific information elements in their triennial solicitations to customers. Those elements include:

1. A description of what the ECL is
2. What information is to be included on the ECL
3. What the more detailed information represents

¹ It is Duquesne Light's assumption that the Commission will maintain the customer's choice prior to each new Company-wide solicitation, such that no response from the customer to the new solicitation will keep the customer's existing status.

4. How this information is to be used by the suppliers
5. How the information is to be safeguarded by the suppliers
6. How widely the information will be disseminated
7. The potential benefits to the customers of having their information included in the ECL
8. The inclusion of language outlining the methodologies through which a customer can respond with his/her preference regarding information included on the ECL.

The Commission also proposes that the EDCs work in consultation with the Commission's *Office of Communications* in developing the Company-wide solicitations.

Duquesne Light respectfully suggests that the EDC solicitations regarding the ECL should not include information regarding how customer information will, or should be used by the suppliers, or how the information will be safeguarded by the suppliers. Rather, Duquesne Light believes that this particular information is more appropriately communicated by suppliers or the Commission directly. The Company is concerned that customers may misinterpret this information as a guarantee. EDCs do not control suppliers use or protection of confidential customer information.

Similarly, Duquesne Light proposes that the Commission provide EDCs with standard language regarding the potential benefits to the customers of having their information included on the ECL. To the extent that the Commission determines that EDCs should provide information about the use and protection of customer information by suppliers, Duquesne Light suggests the Commission should also provide the EDCs with standardized statements for these three areas which EDCs would include in the solicitation along with a statement that this information was created by, and is being provided as a requirement of, the Commission.

III. Triennial Solicitation Response Methodologies

The PUC proposes that EDCs allow customers to reply to the triennial solicitation via direct mail, website processes, electronic mail, or telephone contacts with customer service representatives. Duquesne Light has already implemented technology and processes that allows for handling customer responses through US Mail, its website, electronic mail and toll-free telephone calls.

IV. Cost of Performing Triennial Solicitations

The PUC has specifically requested comments from the EDCs regarding the costs of performing triennial company-wide solicitations and how EDCs should recover the costs associated with the triennial solicitations.

Duquesne estimates the costs of preparing the customer solicitation at \$657,000. This includes all costs related to the preparation of the documents, such as the paper stock, printing and folding fees, postage fees and return postage fees. Duquesne Light currently permits customers to include or exclude their information from the ECL on the Company's website, email or toll-free customer contact number. As such, Duquesne would not incur implementation costs in these areas.

EDCs should be permitted to recovery costs for complying with this requirement through their retail market enhancement surcharges, or similar customer education surcharges that may be in effect. Duquesne Light has proposed a Retail Markets Initiatives Surcharge in its Light's POLR/Default Service Plan VII, which is currently before the Commission.

V. Conclusion

Duquesne Light has, and continues, to support a robust competitive retail market for electricity in Pennsylvania. Duquesne Light currently provides licensed EGSs with an ECL, updated monthly, to utilize in their business processes. Duquesne Light understands that the information contained on the ECL is conducive and helpful for EGS marketing purposes.

Duquesne Light appreciates the opportunity to comment on this Tentative Order, and supports the Commission's efforts to balance the EGSs desire for access to data with the customer's right or desire to choose whether they want their information disseminated to third parties.

Respectfully submitted,



Vern Edwards

Manager, Regulatory Affairs

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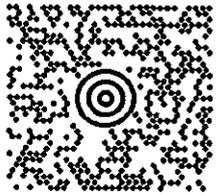
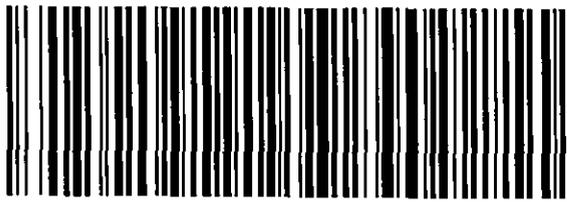
Date: July 21, 2014

UPS CampusShip: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed sheet containing the label at the line so that the entire shipping label is visible.** Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**
 UPS locations include the UPS Store[®], UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.
 Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.
 Hand the package to any UPS driver in your area.
 Take your package to any location of The UPS Store[®], UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot[®] or Staples[®]) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Customers with a Daily Pickup
 Your driver will pickup your shipment(s) as usual.

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TISHEKIA WILLIAMS 4129931541 DUQUESNE LIGHT 411 SEVENTH AVENUE, MAIL DROP PITTSBURGH PA 15219		0.0 LBS LTR	1 OF 1
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