

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Duquesne Light Company for** :  
**Approval of its Energy Efficiency and** : **Docket No. M-2012-\_\_\_\_\_**  
**Conservation Phase II Plan** :

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**PETITION OF DUQUESNE LIGHT COMPANY**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Pursuant to Act 129 of 2008 (“Act 129”), P.L. 1592, 66 Pa.C.S. §§ 2806.1 and 2806.2, Duquesne Light Company (“Duquesne” or the “Company”) hereby files this Petition seeking approval of its Phase II Energy Efficiency and Conservation Plan (“Phase II EE&C Plan” or “Phase II Plan”). Pursuant to Section 2806.1 of the Public Utility Code, 66 Pa.C.S. § 2806.1, and the Implementation Order issued by the Pennsylvania Public Utility Commission (“Commission”) on August 3, 2012<sup>1</sup>, Duquesne Light hereby petitions the Commission for approval of its Phase II Plan. For the reasons set forth below, Duquesne respectfully requests that the Commission approve its Phase II Plan as described herein and the appended attachments by March 14, 2013.

**I. INTRODUCTION**

1. Duquesne Light is a public utility as the term is defined under Section 102 of the Public Utility Code, 66 Pa.C.S. § 102, certificated by the Commission to provide electric service in the City of Pittsburgh and in Allegheny and Beaver Counties in Pennsylvania. Duquesne Light is also an electric distribution company (“EDC”) and a default service provider as those

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<sup>1</sup> *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411, M-2008-2069887, 2012 Pa. PUC LEXIS 1259 (Implementation Order entered on August 3, 2012) (“*Phase II Order*”)

terms is defined under Section 2803 of the Public Utility Code. 66 Pa.C.S. § 2803. Duquesne Light provides electric distribution service to approximately 579,000 customers.

2. Duquesne Light's attorneys are:

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Duquesne Light's attorneys are authorized to receive all notices and communications regarding this proceeding.

3. Enclosed with this Petition are: (a) Duquesne Light's proposed Phase II EE&C Plan to become effective June 1, 2013; (b) Direct Testimony of David Defide explaining the methodology employed to analyze, develop, and implement the Company's Phase II plan; and (c) Direct Testimony of William V. Pfrommer detailing the Company's proposed cost recovery mechanism. The Company anticipates submitting its proposed Conservation Service Provider ("CSP") contracts in February 2013. However, an approved CSP contract is attached the Phase II Plan.

4. Act 129, which became effective on October 15, 2008, created, *inter alia*, an energy efficiency and conservation ("EE&C") program, codified in the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 2806.1, 2806.2. This program required each EDC with at least 100,000 customers to adopt and implement a Commission-approved EE&C Plan. EE&C Plans are programs designed to achieve the Act 129 conservation and peak load reduction requirements, by specified dates, within the specified cost cap.

5. During the Phase I EE&C Plans, EDCs were required to achieve consumption reductions of at least one percent (1%) by May 31, 2011, and at least three percent (3%) by May 31, 2013. Additionally, EDCs are required to achieve a four and one-half (4.5%) percent peak demand reduction of the one hundred (100) highest hours by May 31, 2013. 66 Pa.C.S. § 2806.1(c) and (d).

6. On June 30, 2009, Duquesne Light filed its Energy Efficiency Conservation and Demand Response Phase I plan (“EE&C Phase I Plan”). Duquesne Light’s EE&C Phase I plan was approved by the Commission on October 27, 2009, with certain modifications. *Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation and Demand Response Plan*, Docket No. M-2009-2093217 (Order Entered October 27, 2009). The EE&C Phase I Plan was further revised by *Petition of Duquesne Light Company for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093217 (Order entered January 28, 2011).

7. Act 129 required the Commission to evaluate the cost and benefits of the EE&C plans by November 30, 2013, and implement additional incremental consumption and peak demand reductions only if the benefits of the EE&C plans exceed the costs. 66 Pa.C.S. §§ 2806.1(c)(3).

8. On March 1, 2012, the Commission issued a Secretarial Letter to begin the process of evaluating EDCs EE&C Phase I programs and the potential transition to Phase II. In addition, on March 16, 2012, the Commission held a stakeholder meeting to gather input on issues addressed in the Secretarial Letter.

9. On May 10, 2012, the Commission issued its Tentative Implementation Order at Dockets Nos. M-2012-2289411 and M-2012-2069887. By Order entered on August 3, 2012, the

Commission adopted its Energy Efficiency and Conservation Phase II Implementation Order (“Phase II Order”). Pursuant to the Commission’s *Phase II Order*, EDCs including Duquesne Light are required to file EE&C Phase II plans by November 1, 2012.<sup>2</sup>

10. Pursuant to the *Phase II Order*, Duquesne Light is required to achieve a 2.0% energy consumption target, or 276,722 MWhs, over a three year period spanning June 1, 2013 through May 31, 2016. *Phase II Order* at 24. Pursuant to Act 129, the cost for achieving the consumption savings may not exceed 2% of the Company’s 2006 annual revenues, including electric generation supplier (“EGS”) revenues, which equates to an average of approximately \$19.545 million per year for three years and approximately \$58.65 million for the Phase II. The three-year Plan will start on June 1, 2013 and conclude on May 31, 2016. The Commission further established June 1, 2009 through May 31, 2010 as the baseline from which to measure savings.

11. Consistent with the requirements set forth in the Act 129 and the Commission’s *Phase II Order*, Duquesne’s Phase II Plan: (a) includes measures to achieve or exceed the required reductions and states the manner in which the consumption reductions will be achieved or exceeded; (b) complies with the designated expenditure cap of 2% of 2006 Annual Revenues for each year of the three-year plan; (c) achieves a total cumulative energy reduction of at least 276,722 MWh by May 31, 2016, with at least 25% of the savings compliance target being achieved in each of the three program years; (d) achieves a minimum of ten percent (10%) of all consumption reduction requirements will come from units of federal, state and local governments, including municipalities, school districts, institutions of higher education and non-profit entities (“GNI”); (e) achieves a minimum of 4.5% of the total required reductions from the

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<sup>2</sup> On October 29, 2012, the Commission granted all EDCs a 15 day extension to file Phase II plans due to severe weather conditions related to Hurricane Sandy.

low-income customer sector by May 31, 2016; (f) includes a proportionate number of energy efficiency measures for low income households as compared to those households' share of the total energy usage in the service territory; (g) offers at least one energy efficiency program for each customer sector and at least one comprehensive measure for residential and small commercial rate classes ; (h) includes an approved contract(s) with one or more conservation service providers ("CSPs"); (i) includes a Phase II reconcilable adjustment clause tariff mechanism in accordance with 66 Pa.C.S. § 1307 cost recovery mechanism; and (j) demonstrates that the Phase II Plan is cost-effective based on the Commission's Total Resource Cost Test (TRC).

## **II. DUQUESNE LIGHT COMPANY'S PROPOSED PHASE II EE&C PLAN**

### **A. OVERVIEW OF THE PHASE II EE&C PLAN**

12. Duquesne's Phase II EE&C Plan is attached hereto and marked as "Exhibit 1". Duquesne's Phase II Plan, as more fully described below, is designed to meet the Company's Phase II consumption reduction target and to comply with the other requirements set forth in the Commission's *Phase II Order*. The Phase II Plan includes a range of energy efficiency programs that include every customer segment in Duquesne's service territory. These programs are the key components of a comprehensive electric energy efficiency initiative designed to achieve the required 276,722 MWh of reduced energy consumption.

13. The proposed Phase II Plan follows the template provided in the September 26, 2012 Secretarial Letter at Docket No. M-2012-2289411.

14. Included in Section 15 to the Phase II EE&C Plan is the proposed pro forma tariff supplement for the Energy Efficiency and Conservation and Demand Response ("EECDR") Surcharge, which is designed to fully recover all applicable EE&C-related costs. The EECDR

Surcharge is fully reconcilable and will be applied on a non-bypassable basis to customers who receive distribution service from the Company.

15. The Company's EE&C Phase II Plan includes programs that reduce consumption for each customer class. The chart below details the Company's proposed programs and expected consumption reductions:

<b>Energy (kWh) and Demand (kW) Savings</b>		<b>May 31, 2016</b>	<b>May 31, 2016</b>
<b>Sector</b>	<b>Program Name</b>	<b>kWh</b>	<b>kW</b>
<b>Residential</b>	Residential Energy Efficiency Program	100,874,929	5,546
	REEP Whole House Audit/Retrofit	997,648	72
	Residential Appliance Recycling	4,774,947	591
	Residential Behavioral Savings	28,036,928	0
	School Energy Pledge Program	4,269,288	139
	Low Income Energy Efficiency	14,942,988	751
<b>Commercial</b>	Commercial Sector Umbrella Program	15,577,880	2,610
	Office Building Energy Efficiency	21,750,658	3,644
	Healthcare Segment Energy Efficiency	12,325,373	2,065
	Retail Segment Energy Efficiency	9,992,864	1,674
	Commercial Upstream Lighting	10,050,411	2,361
	Small Commercial Direct Install	6,126,074	1,029
<b>Industrial</b>	Industrial Sector Umbrella Program	5,531,182	929
	Chemical Products Energy Efficiency	13,689,675	2,300
	Mixed Industrial Energy Efficiency	12,237,740	2,056
	Primary Metals Energy Efficiency	37,681,176	6,331
<b>Governmental</b>	Education Segment Energy Efficiency	11,448,139	1,918
	Multifamily Housing Retrofit	5,173,551	239
	Public Agency Partnership Program	16,584,950	2,779
<b>Total EE&amp;C Plan Savings</b>		<b>332,066,400</b>	<b>37,032</b>
<b>Mandated Reductions</b>		<b>276,722,000</b>	<b>N/A</b>

*Note: Portfolio savings objective is 20% above the mandated reduction to provide for 80% measurement realization.*

These programs are further detailed in Section 3 – Program Descriptions in the Company’s proposed Phase II EE&C Plan.

16. Duquesne Light’s Phase II EE&C Plan includes a total of nineteen programs: six programs targeting the residential sector; nine programs targeting the commercial sector; and four programs targeting the industrial sector. Three of the commercial programs Duquesne Light has developed to target customers in the GNI sector. Of these nineteen programs, four are newly created programs that were added based on the Company’s analysis and experiences in Phase I of the EE&C program.

**B. PROCESS TO DEVELOP PHASE II EE&C PLAN**

17. In developing its Phase EE&C Plan, the Company reviewed the EE&C potential in the Duquesne Light service territory for a cross-section of customer segments comprising the major rate classes. In addition, Duquesne reviewed the participation levels and performance of its Phase I EE&C Plan programs. The Company’s planning process made extensive use of benchmarking data and drew heavily on the Phase I Program Year (PY) 2 and 3 performances. In addition, Duquesne considered input it received from stakeholders during four stakeholders meetings and a separate webinar for trade allies.

18. Duquesne Light’s Phase II EE&C Plan development process employed a “bottoms-up” approach comprised of a sequence of four task areas: (1) measure content and projected mix; (2) measure savings impact, cost and benefit; (3) program definition; and (4) portfolio/program goals and funding. This process is detailed in Section 1.2 of the Company’s Phase II EE&C Plan but in summary entailed the following activities:

- Measure content and projected mix: The Company built its Phase II Plan upon the Phase I PY 2-3 record of program performance. Therefore, the initial measure mix was established based on the previous two years of measure activity and reconciled with the content of the Commission’s proposed 2013 Technical Reference Manual

(TRM)<sup>3</sup> and information provided in the SWE saturation studies and potential forecast.

- Measure savings impact, cost and benefit: The Company used measure deemed savings consistent with the proposed 2013 TRM and measure costs were documented, referenced to California Public Utilities Commission Database of Energy Efficient Resources (DEER), invoice data and specific measure cost research. Avoided cost assumptions were updated consistent with the Commission's Total Resource Cost Test (TRC) Order.
- Program definition: The Company's PY2-3 program performance as well as customer participant feedback supported retention of the portfolio of programs, based on the Phase I market segmentation and where programs underperformed, program design was revised. In addition, consistent with the Commission's *Phase II Order*, a residential whole house audit/retrofit program and a small commercial multifamily building retrofit program were added to the Phase II EE&C Plan.
- Portfolio/Program Goals and Funding: Program goal allocation and associated program budgets were adjusted to accommodate the Commission's *Phase II Order*, which required segment carve-outs for the low income and governmental/nonprofit segments and identified program comprehensiveness requirements. Goal allocation for the remaining customer segments was based on segment energy use, previous delivery channel strengths and weaknesses, as well as requirements to achieve mandated reductions at authorized budgets

19. Further, the Company applied the lessons learned about what worked effectively during the Company's Phase I EE&C Plan. The Company then made decisions to include or exclude particular EE&C programs/measures within its Phase II EE&C Plan to cost effectively achieve its Phase II required consumption reductions.

### **C. DESCRIPTION OF PHASE II EE&C PLAN**

20. Duquesne designed its Phase II Plan to deliver cost effective programs that will meet customers' needs, and fulfill the Company's Phase II Plan objectives, as defined in Section 8 of the Phase II EE&C Plan, and achieve the results required by Act 129 and the Commission's *Phase II Order*.

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<sup>3</sup> *Implementation of the Alternative Energy Portfolio Standards Act of 2004: Standards for the Participation of Demand Side Management Resources – Technical Reference Manual 2013 Update*, Docket Nos. M-2012-2313373, M-00051865, 2012 Pa. PUC LEXIS 1511 (September 13, 2012).



21. The proposed Phase II Plan, as noted above, consists of the 19 programs. Below, consistent with the Commission's *Phase II Order* and in consideration of input received from Duquesne developed the following Phase II programs for each of its sectors. Below is a summary of the proposed Phase II programs and a brief description of the implementation of these programs over the three year Phase II plan period:

- Residential Sector: Duquesne Light has developed six programs targeting the residential sector: a low income program; a residential rebate program including upstream components; a schools educational program; a whole house retrofit program; a home energy reporting program; and, a residential appliance recycling program. Several of the programs were approved and implemented in Phase I and have an existing CSP that will continue to be utilized in Phase II.
- Commercial Sector: The Company has developed plans to launch nine programs targeting the commercial sector: a commercial umbrella program; an office building program; a retail program; a direct install program; an upstream lighting; and a health care program. Again, several of these programs were approved and implemented in Phase I and have an existing CSP that will continue to be utilized in Phase II. As reflected in the Gantt Chart for Commercial and Industrial Programs in Section 12 of the Phase II Plan, Duquesne Light will complete contract negotiations with additional CSPs following the Request for Proposal (RFP) process for each of the new programs included in Phase II.
- Industrial Sector: Duquesne Light has developed plans to launch four programs targeting the industrial sector: an industrial umbrella; a chemicals program; a mixed industrial program; and, a primary metals program. Several of the programs were approved and implemented in Phase I and have an existing Conservation Service Provider ("CSP") that will continue to be utilized in Phase II. Retention of CSPs currently implementing Phase I approved programs will enable Duquesne Light continuance of those programs concurrent with the Commission's approval of this plan, no later than March 14, 2013.
- Governmental/Non-Profit/Education Sector Programs: The Company has developed plans to launch three commercial programs targeting this sector: an education segment energy efficiency program; a multifamily housing retrofit program; and, a public agency partnership program. Duquesne Light began working directly with regional local governments shortly after the Act 129 Stakeholder meetings in an effort to tailor EE&C programs to meet segment specific needs. Occurring in Phase I that will continue in Phase II, Duquesne Light executed memoranda of understanding with several key local public agencies and identified project areas for EE&C services. Project work continues or begins concurrent with the Commission's approval of the plan. Programs will be launched no later than June 1, 2013, as shown in the Gantt chart for Governmental/non-profit Sector Programs in Section 12, Chart 4.

All of the Company's programs are voluntary and, subject to the budget limitations for each program, customers can elect to participate in any program for which they are eligible.

22. A full description of each of the 19 programs is set forth in Section 3 of the Phase II EE&C Plan. In compliance with the Secretarial Letter dated September 26, 2012 at Docket No. M-2012-2289411, Duquesne has differentiated its programs according to the customer classes defined in the EE&C Plan template. Phase II EE&C Plan Section 3.2. Duquesne Light has defined its customer sectors consistent with its existing tariff. However, where programs offer customer benefits across multiple classes, and where similar implementation, marketing, and administrative strategies may be utilized to capture functional efficiencies, those programs will be offered to all appropriate customer classes. Regardless, Duquesne will document, track and report on its program results and progress by the customer classes identified in its Phase II Plan.

23. In its *Phase II Order*, the Commission required that Phase II EE&C Plans include specific energy efficiency measures for households at or below 150% of the federal poverty income guidelines. *Phase II Order* at 53. In addition, the Commission directed that each EDC obtain a minimum of 4.5% of their total required consumption reduction from low-income customers by May 31, 2016. *Phase II Order* at 54. These savings may be achieved directly from low-income sector programs as well as low-income customer participation in general residential programs.

24. Duquesne calculates that approximately 7.88% of its total load comes from low-income customers. The Company Phase II EE&C Plan offers nine programs to the low-income sector, thereby providing this sector with a proportion of measures in excess of their share of the Company's total load. Phase II EE&C Plan Section 9.1.3. Further, to achieve the required 4.5%

low income consumption carve out target, the Company proposes to implement low income energy efficiency measures to achieve 14,942,988 kWhs, for a Phase EE&C Plan low income savings target of 5.3%.

25. Likewise, the Company's EE&C Phase II Plan is designed to achieve the 10% GNI carve out consumption reduction target through the Multifamily Housing Retrofit, Public Agency Partnership Program and Education Segment Energy Efficiency programs. Collectively, Duquesne Light anticipates achieving 33,206.640 kWhs of consumption reduction from these programs to meet its 10% reduction target. *Phase II Order* at 45.

26. Although Duquesne Light is not required to achieve a set demand reduction target, to avoid customer confusion and mitigate future ramp up cost, the Company proposes to pay customer incentives to maintain devices installed under the Company's Phase I residential direct load control program. Phase II EE&C Plan, Table 5.

27. Duquesne Light's EE&C Phase II Plan is cost effective as defined by the Total Resource Cost ("TRC") test. The TRC Test was initially adopted by the Commission at Docket No M-2009-2108601 on June 23, 2009. The TRC test was modified at the same docket on August 2, 2011. Most recently, the TRC test was further modified by the Commission at the same docket on August 30, 2012. The modification contained in the most recent Order is applicable beginning June 1, 2013. Duquesne Light's EE&C Phase II Plan is cost effective as defined by the most August 30, 2012 TRC test. The cost effectiveness of each program measure is discussed in Section 8 of the Phase II EE&C Plan.

#### **D. COST RECOVERY AND FUNDING**

28. Section 2806.1(g) of Act 129 requires that the total cost of any EE&C Plan can not exceed two percent (2%) of the EDC's total annual revenues as of December 31, 2006. The three year cost of the Company's EE&C Phase II Plan is projected to be \$58,637,392 which is

consistent with the spending cap established by Act 129, inclusive of EGS revenue. Phase II EE&C Plan Section 7.1. The projected costs include incentives, program administration and portfolio administration costs, exclusive of the Company's share of costs for the Statewide Evaluator.

29. The Company's total cost to implement its Phase II Plan will include the costs incurred to develop its EE&C Plan. Phase II EE&C Plan Sections 1.7, 7.2. In the *Phase II Order*, the Commission found that EDCs should be permitted to recover the incremental cost incurred to design, create, and obtain Commission approval of a plan. *Phase II Order* at 103. In addition, consistent with the Commission's directive, Duquesne, for accounting purposes, will defer its Phase II EE&C Plan development costs incurred during Phase I as a regulatory asset until Phase II cost recovery rates become effective. *Phase II Order* at 114. The Company proposes to amortize and recover those deferred costs ratably over the 36-month life of its Phase II Plan (*i.e.*, June 1, 2013 through May 31, 2016). The amortization of those costs is included within the \$58.5 million spending cap.

30. The Company is proposing to continue the same cost recovery mechanism used in Phase I in its Phase II EE&C Plan. However, consistent with the Commission's *Phase II Order*, the surcharge will separately account for and reconcile Phase I and Phase II expenses. The Residential surcharge is designed to recover costs on a cents per kilowatt-hour basis with an annual reconciliation; the charges would be included in the overall distribution kWh rate. The Small and Medium Commercial and Industrial surcharges are also designed to recover costs on a cents per kilowatt-hour basis with an annual reconciliation. The large Commercial and Industrial surcharges are designed to recover costs through a combination of a fixed monthly surcharge and a demand-based surcharge with an annual reconciliation. All of the commercial and industrial

customers will have a separate line item delineation of these charges on the bill. Phase II EE&C Plan Sections 1.8, 7.4.

31. The Company will implement five surcharges to recover costs as close as reasonably possible to the customer class receiving the benefit. The costs are first defined for the three specific customer classes – residential, commercial and industrial. Commercial and industrial (“C&I”) customers were separated into small and medium C&I and large C&I customer segments because of the diversity in the size of C&I customers in the Company’s service territory to allow for more reasonable cost recovery. Small and medium C&I customers are those customers with monthly metered billing demand 300 kW and less. Large C&I customers are those customers with monthly billing metered demand greater than 300 kW. This segmentation of customers is appropriate because it aligns programs and program costs with the current tariff and with the tariff charges for distribution, transmission and default service supply. C&I program costs were then assigned for recovery first based on program description (e.g. Office Buildings – Large). Duquesne Light will implement a rate design using a fixed customer charge to recover the administrative costs and a demand charge, using Peak Load Contribution, to recover the incentive costs for Large Commercial and Large Industrial customers. The fixed customer charge component of the surcharge and the demand charge component of the surcharge are set forth as two separate line item charges on the customer bill. Phase II EE&C Plan Section 7.5.

32. The Commission’s *Phase II Order* directed that each EDC to develop a Phase II reconcilable adjustment clause tariff mechanism in accordance with 66 Pa.C.S. § 1307 and include this mechanism in its Phase II Plan. *Phase II Order* at 118. The Phase II recovery mechanism is to be a separate cost recovery mechanism from that used in Phase I and will be

accounted for and reconciled separately from Phase I funds. *Id.* Duquesne's Phase II cost recovery mechanism is set forth in pro-forma tariff supplement to Tariff-Electric Pa. PUC No. 24 is included in Section 15 to the Phase II Plan.

33. All costs attributable to the Company's Phase I EE&C Plan will be accounted for by May 31, 2013 with minor exceptions. Costs associated with projects completed but not paid for will be accrued in Phase I and will be paid based upon surcharge funding from Phase I. Costs incurred for Phase I after May 31, 2013 will be reconciled and identified separately in the next reconciliation filing. From June 1, 2013, all costs associated with Phase II program plan will be identified and tracked in Program Management Reporting System. As in prior Phase I program years, Duquesne Light will reconcile on an annual basis, filed with the Commission on July 1 for revised surcharge to be effective on September 1. Phase II EE&C Plan Section 7.6.

#### **E. PLAN MODIFICATIONS**

34. The Company will continue to file quarterly reports detailing incremental consumption reductions and expenditures and monitor the Plan to identify the most effective programs. As the success of the Company's EE&C Phase II Plan depends in part on circumstances beyond the Company's control, Duquesne anticipates that it may make minor modification to its plan in order to achieve the targets established by the Commission as needed. Major modifications to the Plan will be filed with the Commission as required.

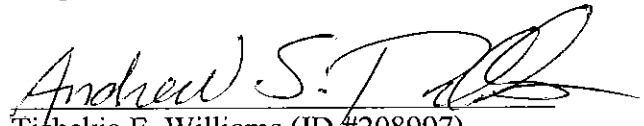
### **III. THE PROPOSED PHASE II EE&C PLAN IS IN THE PUBLIC INTEREST**

35. Duquesne Light believes that its proposed Phase II EE&C Plan is in the public interest and in compliance with the requirements of Act 129 and all of the Commission's applicable Act 129 Orders. The Phase II EE&C Plan includes a broad range of cost effective energy efficiency programs that are targeted to all of the Company's customer segments. The Company has developed these programs in order to achieve energy consumption reductions

required by Act 129 and the Commission's *Phase II Order* and within the cost cap established by Act 129. Duquesne Light's Phase II EE&C Plan provides a structure by which the Company's residential, low-income, commercial and industrial, and government and non-profit sector customers have the opportunity to achieve energy efficiency savings. In addition, the Company's Phase II Plan details its strategy to marketing and education its customers about the various programs available as well as details how customer care and quality assurance, program tracking, evaluation, monitoring, and verification will be achieved.

**WHEREFORE**, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission approve the Phase II Energy Efficiency and Conservation Plan, without modification, as set forth in this petition and the attachment hereto. Duquesne Light also requests that the Commission enters its final order approving the Phase II Energy Efficiency and Conservation Plan on March 14, 2013.

Respectfully submitted,



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Date: November 15, 2012

Attorneys for Duquesne Light Company

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

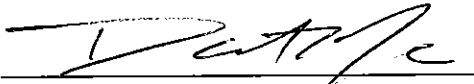
Energy Efficiency and Conservation : Docket No. M-2012-\_\_\_\_\_  
Program Phase II Plan :

**VERIFICATION**

I, Dave Defide, being a Manager of Customer Programs of Duquesne Light Company (“Duquesne Light”) hereby state that the testimony set forth in Duquesne Light Statement No. 1 is true and correct to the best of my knowledge, information and belief, and that if asked orally at a hearing in this matter, my answers would be as set forth therein. I further state that the information set forth in the Duquesne Light Energy Efficiency and Conservation Program Phase II Plan is true and correct to the best of my knowledge, information and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: November 14, 2012

  
\_\_\_\_\_  
Dave Defide