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April 18, 2017

**E-FILED**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2<sup>nd</sup> Floor, Room-N201  
400 North Street  
Harrisburg, PA 17120

**Re: Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with  
the Amended Provisions of 66 Pa. C.S. Chapter 14  
Docket No. L-2015-2508421**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's Comments in the above-referenced proceeding.

Upon receipt, if you have any questions regarding the information contained in this filing, please contact the undersigned or Audrey Waldock at 412-393-6334 or [awaldock@duqlight.com](mailto:awaldock@duqlight.com).

Sincerely,

Shelby A. Linton-Keddie  
Manager, State Regulatory Affairs  
And Senior Legal Counsel

Enclosure

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Amend the Provisions of 52 :  
Pa. Code, Chapter 56 to Comply with the :           Docket No. L-2015-2508421  
Amended Provisions of 66 Pa. C.S. :  
Chapter 14 :

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**COMMENTS OF  
DUQUESNE LIGHT COMPANY**

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**I. INTRODUCTION**

On October 22, 2014, Governor Corbett signed into law HB 939, or Act 155 of 2014. This law, which reauthorized and amended Chapter 14 of the Public Utility Code (66 Pa. C.S. §§ 1401-1419), became effective on December 22, 2014. Due to the amendments in the law, certain regulations in Chapter 56 of the Pennsylvania Code that relate to the standards and billing practices for residential utility service must be revised. The Pennsylvania Public Utility Commission (“PUC” or “Commission”) has been charged with revising the current regulations in Chapter 56 to implement the amended statute.

As an initial step of the implementation process, on December 10, 2014, the Commission issued two Secretarial Letters, one summarizing pertinent parts of Chapter 56 that had been superseded and the other reminding steam heat, wastewater and natural gas distribution utilities that Chapter 14 now applies to these entities.<sup>1</sup> In addition, on January 15, 2015, the PUC issued a Tentative Order at Docket No. M-2014-2448824, in an effort to address “more urgent implementation matters” such as defining the type of “form” the Commission would take for

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<sup>1</sup> Secretarial Letters dated December 10, 2014 advising affected utilities of the more significant changes to Chapter 56 and advising steam heat, wastewater and natural gas distribution utilities of Act 155 provisions making Chapter 14 applicable to such utilities.

medical certificates (Section 1403) as well as outlining the contents requested for utility reporting requirements concerning accounts with arrearages in excess of \$10,000 and annual reporting of medical certificate usage (Sections 1410.1(3), (4)). The proposals in this Order were finalized on July 9, 2015.<sup>2</sup>

Most recently, on July 21, 2016, the PUC issued a *Notice of Proposed Rulemaking Order* (“NOPR”) to amend Chapter 56 of the Commission’s regulations in Title 52 of the Pennsylvania Code to comply with the amended provisions of 66 Pa. C.S. Chapter 14. This NOPR seeks additional input on the guidance issued in July 2015, and suggests further regulatory revisions. Moreover, the Commission seeks, through the NOPR, to make revisions with other recent regulatory changes such as those in Chapter 57 (relating to electric service) intended to accelerate the switching of electric generation service (52 Pa. Code §§ 57.1 – 57.259) and proposes minor revisions to 52 Pa. Code § 56.100(i) regarding the February winter survey update and the collections reporting data dictionary found in Chapter 56 Appendix C.

The NOPR was published in the *Pennsylvania Bulletin* on February 18, 2017. *See* 47 Pa.B. 965. Pursuant to the NOPR, interested parties had sixty (60) days from the date of publication in the *Pennsylvania Bulletin* to file comments, i.e., on or before April 19, 2017. Consistent with this direction, Duquesne Light Company (“Duquesne Light” or “Company”) hereby respectfully submits comments for the Commission’s consideration.<sup>3</sup>

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<sup>2</sup> *See Final Order, Chapter 14 Implementation* at Docket No. M-2014-2448824 (hereinafter, “Ch. 14 Final Order”).

<sup>3</sup> Duquesne Light is a member of the Energy Association of Pennsylvania, who is also submitting comments at this docket. In addition to the positions stated herein, Duquesne Light generally supports the positions articulated in EAP’s comments to the extent they are consistent with the comments submitted by the Company.

## II. COMMENTS

As indicated above, on October 22, 2014, Act 155 of 2014 was signed into law and became effective December 22, 2014. The Act reauthorized and amended Chapter 14 of the Public Utility Code (66 Pa. C.S. §§ 1401-1419, entitled Responsible Utility Customer Protection). As a result, Chapter 56 of the Pennsylvania Code at 52 Pa. Code §§ 56.1-56.461 must be revised because the amended Chapter 14 supersedes a number of Chapter 56 regulations, and the Commission is directed to revise Chapter 56 and promulgate regulations to administer and enforce Chapter 14.

The Commission began its efforts to administer and enforce Chapter 14 as revised by Act 155 of 2014 through a series of Secretarial Letters and Tentative Orders.<sup>4</sup> In the instant proceeding, the Commission seeks to address the remaining amended Chapter 14 provisions and propose numerous revisions to Chapter 56 to incorporate the amended statutory provisions to ensure consistency in PUC regulations.

Duquesne Light is a public utility as the term is defined under Section 102 of the Public Utility Code, 66 Pa.C.S. § 102, and is certificated by the Commission to provide electric distribution service in portions of Allegheny County and Beaver County in Pennsylvania. Duquesne Light is also an electric distribution company (“EDC”) as that term is defined under Section 2803 of the Public Utility Code. *See* 66 Pa.C.S. § 2803. As a result, both Chapter 14 of the Public Utility Code and Chapter 56 of the Commission’s regulations pertain to the Company.

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<sup>4</sup> Secretarial Letters dated December 10, 2014 advising affected utilities of the more significant changes to Chapter 56 and advising steam heat, wastewater and natural gas distribution utilities of Act 155 provisions making Chapter 14 applicable to such utilities. On January 15, 2015 the Commission issued a *Tentative Order, Chapter 14 Implementation* and on July 9, 2015 the Commission entered a *Final Order, Chapter 14 Implementation* at Docket No. M-2014-2448824 (“Ch. 14 Final Order”).

Throughout the *Notice of Proposed Rulemaking Order*, the Commission specifically seeks comment on subchapters L-V regarding protection from abuse and privacy guidelines related to electronic communications. In addition, the Commission is seeking additional comments on medical certificates and reporting requirements related to residential accounts in excess of \$10,000 that were the subject of the earlier January 15, 2015, and July 9, 2015, *Implementation Orders*.

Duquesne Light appreciates the Commission's specificity with regard to its request for comments as noted above. The Company views these comments as an opportunity to inform the Commission on proposals that could have greater impact on utilities than perceived and to offer clarifications where Duquesne Light deems necessary.

*A. Reporting Requirements for Medical Certificates and Accounts in Excess of \$10,000 Contained in Ch. 14 Final Order*

In 2015, after issuing a Tentative Order and reviewing comments from numerous parties, the PUC issued guidance as to the form and content of a medical certificate that would conform with the newly revised Chapter 14, and directed that this guidance would remain in effect until the Commission more fully addressed these issues in the context of a Chapter 56 rulemaking.<sup>5</sup> The Commission has asked for comments on the provisions regarding the reporting requirements contained in its July 9, 2015 Ch. 14 Final Order. Specifically, the guidance for medical certificates includes:

- If a utility has a medical certificate form, it should be required to place it on the utility's website;

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<sup>5</sup> See NOPR at 6.

- That information regarding the “nature” of the affliction (52 Pa. Code § 56.113(3)) and the specific reason for which service is required (52 Pa. Code § 56.113(4)) are no longer needed, but the length of the affliction must be given;
- The possibility of including medical professionals’ license numbers on the medical certificate;
- Clarification on reporting of medical certificate information – to require: (1) the number of medical certificates and renewals that have been submitted; and (2) the number of medical certificates and renewals that have been accepted;
- The timing of when these reports should be due; and
- Any other information parties deem necessary.<sup>6</sup>

Similarly, in reviewing its earlier conclusions on the scope of reporting for residential accounts which have accumulated \$10,000 or more in arrearages, the PUC proposed the following:

- Reports for the previous calendar year will be due April 1 each year;
- Customer identifying information will not be included. Instead, utilities will use unique identifiers that will remain consistent per account during subsequent reporting periods;
- Customers with a PFA or other court order which provides clear evidence of domestic violence will not be included; and
- Keeping the seven points articulated in the previous Implementation Order (account identifier; account balance at the time of the “snapshot”, date the account was established, average monthly bill for previous 12 months, number of PUC formal/informal complaints,

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<sup>6</sup> See NOPR pp. 7-9

number of company payment arrangements and number of times service was terminated due to non-payment).

In response to these inquires, Duquesne Light offers the following:

1. **Time Period for Filing.**

The April 1st date for the filing of the medical certificates report and the report for residential accounts in excess of \$10,000 is consistent with the Implementation Order of 2015, Docket No. M-2014-2448824, which required the first of these reports on April 1, 2016. In addition, these reports coincide with other reporting deadlines to BCS, such as those reporting requirements found in 52 Pa. Code §§ 54.75 and 56.231. This timeline makes sense and has been working to date. As such, Duquesne Light recommends adoption of the April 1 deadline for both reports.

2. **Accounts in Excess of \$10,000 Report.**

As the utilities subject to Chapter 14 and Chapter 56 have had an opportunity to both previously comment on the appropriate scope of reporting requirements on accounts in excess of \$10,000, as well as file a report in April of 2016, Duquesne Light requests that the Commission provide further guidance on the accounts that should be excluded or included in the report. The concept of a “snapshot” in time, specifically the end of the calendar year, and the April 1 due date for the report are consistent with the requirements in §53.231 as proposed and the Company has no issue with either proposal. However, at that particular moment, an account that is in arrears and active (*i.e.*, not final billed) can have both a balance in excess of \$10,000 and be subject to other conditions that affect the collectability of the account.

During preparation of its first annual report in 2016, Duquesne Light had several accounts that did not fall neatly into the definition of “active” above. For example, a question arose whether



an account with a disputed amount that, if included, would reach the \$10,000 threshold should be reported. Another instance involved an account in which a portion of the balance had been referred to an outside collection agency. Upon direction from Commission staff, Duquesne Light included disputed amounts in identifying reportable accounts, but did not include accounts where a portion had been referred to outside collection. While the Company is not requesting that an additional regulatory requirement be added or that Section 56.231 as proposed be revised, Duquesne Light is seeking further clarification from the Commission that only amounts for which the Company can actively collect on should be reported, which excludes other amounts such as those associated with disputues, bankruptcy, or where final bills have been submitted.

*B. Medical Certificates Form and Content*

Duquesne Light agrees with the Commission's characterization of revised Section 1403 that the use of the word "form" does not mean that a specific document must be used but instead a Commission approved manner.<sup>7</sup> Accordingly, Duquesne Light does not believe there is any need for a statewide mandated form for use by all utilities. In addition, Duquesne Light makes its form generally available for use by medical professionals on its website or upon request. As a result, the Company believes the efforts required to develop and maintain a statewide form and requiring that the form be placed on the Company's website are not needed.

In this proceeding, the Commission is making further recommendations for the elements of the medical certificate form such as including the health professional's license number.<sup>8</sup> Duquesne Light is in favor of including the activeprofessional license number for the signing

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<sup>7</sup> NOPR at 7.

<sup>8</sup> NOPR 8-9



physician, physician's assistant or nurse practitioner. It provides the public utility with a quick and easy method to investigate the validity of any questionable certificates should there be any suspicious circumstances attached to the submittal of the medical certificate, is consistent with other requirements for professionals (such as attorneys providing their license numbers on filings) and is not unduly burdensome or time consuming. Accordingly, license numbers should be included on medical certificate forms going forward.

*C. Court Order Providing Evidence of Domestic Violence*

Act 155 of 2014 revised §1417 to read “This chapter shall not apply to victims under a protection from abuse order as provided 23 Pa.C.S. Ch. 61 (relating to protection from abuse) or **a court order issued by a court of competent jurisdiction in this Commonwealth, which provides clear evidence of domestic violence against the applicant or customer.**” (Emphasis added). Duquesne Light supports efforts to reduce adverse effects domestic violence and the havoc it wreaks on families and children in our community. Duquesne Light takes seriously its obligations as a utility to protect its customers who have been victims of such violence and has procedures to afford such protections as required.

The Courts within Duquesne Light's service territory have developed consistent forms and procedures for Protection from Abuse (“PFA”) proceedings. The commonality of format afforded by the Courts' actions has enabled Duquesne Light to develop, implement and adhere to consistent handling of matters involving PFAs. The additional language in Section 1417 that requires utilities to accept a “court order ... provides clear evidence of domestic violence,”<sup>9</sup> without more detail, places utilities in the untenable position of interpreting and then determining whether “clear

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<sup>9</sup> Emphasis added

evidence” of domestic violence exists. Duquesne Light understands that this exclusion is delineated in Act 155, but has concerns regarding its application in that the Company will be placed in the position of making a determination on an issue of fact. While Duquesne Light is aware of suggestions to seek determination from in-house legal counsel or expertise from domestic violence agencies when faced with such dilemmas, the Company does not feel this is an adequate resolution of the issue. Thus, the Company is seeking guidance from the Commission on the treatment of such court orders or at least some explanation as to what types of orders (other than a PFA) fit this criteria.

In addition to seeking guidance as to what types of court orders, other than PFAs, show “clear evidence of domestic violence,” the Company is concerned about the lack of time limitation associated with such orders. The Pennsylvania Protection From Abuse Act, as codified in 23 Pa.C.S. §6108(d), specifically provides that the protection order “shall be for a fixed period of time not to exceed three years.” Upon petition to the court, a PFA can be extended and a new PFA can be obtained should it be necessary, extending protection for another three years. By contrast, an unnamed and unspecified “court order” may be silent on the period of time it covers, which potentially translates into a permanent exemption from Chapter 14. Duquesne Light respectfully asks that the Commission consider the issues attendant with unspecified court orders and facilitate conversation around application of these orders through a working group or other process in order to remove these current ambiguities.

#### *D. The Use of Electronic Communications*

Duquesne Light appreciates the General Assembly’s and the Commission’s efforts to enter the 21<sup>st</sup> century by recognizing the changing communication needs and preferences of today’s utility customers. In the Fall of 2016, Duquesne Light conducted customer focus groups and

inquired about customers' preferred means of communicating. Customers viewed emails pertaining to account information very favorably. In addition, customers were extremely receptive to receiving text messages regarding outages and other matters that impact service. However, it should be noted that customers did not view favorably electronic information regarding non-account related information. The findings from Duquesne Light's customer focus research are consistent with consumers of other goods and services; they want information that is relevant, not marketing materials or other perceived unimportant information cluttering up the inbox.

Until recently, Allegheny County, as well as Duquesne Light's service territory generally, was one of the oldest demographic areas in Pennsylvania. However, in the last five years, Pittsburgh, Allegheny County and even other areas of Duquesne Light's territory have seen growth in younger demographics. As companies such as Uber, Google and other tech companies open offices in Pittsburgh, with younger employees, Duquesne Light must be cognizant of the communication methods and preferences of the millennial generation. Duquesne Light welcomes the opportunity to provide notifications to customers electronically and believes that, in addition to increasing customer satisfaction, this type of notification over other forms of traditional communication could yield savings on the Company's mailing and personnel costs.

Duquesne Light believes that there are any number of opportunities during customer contact to obtain consent for, and educate customers about, electronic messaging. Beginning with a customer's initial contact on the application for service and during customer contact for any reason, Duquesne Light could seek authorization, and explain the implications of, electronic communication. Duquesne Light, like other utilities, seeks to engage customers via various platforms, which provides an opportunity to inform customers of electronic notifications.

The Company shares the Commission's concerns that EDCs must work to ensure that customers' privacy and security are not sacrificed if receiving electronic communications. Currently, Duquesne Light provides notices to its customers related to privacy protections of customer data and online account access. Duquesne Light has implemented industry standard protection related to customer data and continues to monitor and implement up-to-date cybersecurity.

Duquesne Light looks forward to working with the Commission and other stakeholders to develop privacy guidelines for electronic communications with customers, as necessary, especially related to personal account and service information.

*E. Other Suggested Revisions to Specific Sections*

Sections 56.2/56.252. The definition of "Applicant" and "Customer" as set forth in §56.2 should be aligned in §56.252 for consistency of application of the regulations and to ensure that the definitions in §56.252 adhere to the revised Chapter 14. When comparing these two Sections, Section 56.2 is more specific and in line with Act 155, whereas Section 56.252 needs some additions in order to be consistent with the definitions contained in Section 56.2.

Sections 56.31/56.281. Duquesne Light suggests that the Commission take this opportunity to update the Policy Statements contained in these Sections to include a broader scope of protections that have been afforded citizens of the Commonwealth in other areas. Specifically, the Company recommends that the Commission incorporate the language as set forth in Governor Wolf's Executive Orders, signed on April 7, 2016, which provide protections for employment and contracting within the Commonwealth. The Executive Orders provide that people should be given opportunities for employment and contracting "without regard to race, color, religious creed, ancestry, union membership, age, gender, sexual orientation, gender expression or identity,

national origin, AIDS or HIV status, or disability.”<sup>10</sup> While the current Policy Statements in Chapter 56 do mention “race, sex, age over 18 years of age, national origin or marital status,” they are notably silent as to gender, sexual orientation, gender expression or identity, AIDS or HIV status or disability. Accordingly, Duquesne Light requests that these additional statuses be added in order to better afford these categories of individuals’ freedom from discrimination when applying for or receiving utility service in the Commonwealth.

Section 56.32. Duquesne Light seeks clarification of the new provision in Section 56.32, subsection (d). As proposed, §56.32 subsection (a) provides for a cash deposit to be payable “during a 90-day period” while subsection (d) provides that a utility is not required to provide service if the full amount of the cash deposit is not paid during the 90-day period. The Company asks for clarification as to the obligations of the utility should the deposit not be paid. Specifically, if deposits are required to be paid 50% initially, with 25% due after 30 days and the remaining 25% due after 60 days, service has already started. It is conceivable that while an applicant may pay the first 50%, they could miss one of the other two required payment deadlines. The question then arises when may a utility begin its collection process – at the time of the first missed payment or after the full 90 days has passed. To solve this ambiguity, Duquesne Light supports the suggested clarification for subsection (d) that provides:

“(d) *Failure to pay full amount of cash deposit.* A public utility will not be required to continue to provide service if the applicant fails to pay the cash deposit or any portion thereof billed within the time period under subsection (a).”

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<sup>10</sup> [https://www.governor.pa.gov/executive\\_orders/executive-order-2016-05-contract-compliance](https://www.governor.pa.gov/executive_orders/executive-order-2016-05-contract-compliance) and [https://www.governor.pa.gov/executive\\_orders/executive-order-2016-04-equal-employment-opportunity](https://www.governor.pa.gov/executive_orders/executive-order-2016-04-equal-employment-opportunity)

In addition, the Company suggests the following modifications (in bold) to the current proposed language in subsection (e):

(e) *Cash deposit prohibition.* Notwithstanding subsection (a), a public utility may not require **an applicant**~~customer~~ **that is the utility has** confirmed to be eligible for a customer assistance program to provide a cash deposit.

This suggested change would clarify that responsibility for confirming a customer's eligibility for a customer service program resides with the utility, which would include third parties (like CBOs) that work on behalf of a utility. The change is designed to ensure against scenarios where, for example, an outside third party confirms the customer's eligibility but fails to timely communicate such information to the utility or its designee. This change would not, however, prevent the utility from accepting a third party's determination as confirmation of the customer's eligibility, provided that the third party demonstrates the validity of its determination in a manner acceptable to the utility.

Section 56.38. Similar to the timing contained in Section 56.32(a), Section 56.38 Subsection (a) provides that an applicant has up to 90 days to pay a deposit but is silent as to whether that payment can be installments, similar to §56.32(a). Specifically, Section 56.38(a) is unclear as to whether an applicant has a full ninety days to pay the entire deposit or whether the applicant can be required to pay some portion initially followed by the remainder in the 90 days. Subsection (b) provides that an applicant paying a deposit for reconnection must pay 50% of the deposit for service and the remaining amount of the deposit is spread over the remaining 60 days. Duquesne Light suggests that any provision for payment of a deposit in a 90 day period contain similar language setting out the payment terms, *i.e.*, what is the maximum that can be demanded upfront, followed by direction on the remainder. The Company suggests that 50% be required upfront, with 25% due after 30 days and the

remaining 25% due after 60 days. This clarification and consistency of treatment for applicants and customers, would make it easier for utilities to apply provisions (including explanations) regarding deposits, no matter the situation.

Section 56.53/56.302(4). Similar to the deletion in Section 56.53, Duquesne Light suggests that the language in §56.302(4) be revised to remove the 24 month maximum deposit hold to be consistent with changes made in the remaining provisions of Chapter 56, which requires that deposits be held until a timely payment history is established.<sup>11</sup>

Section 56.93. As noted *supra*, Duquesne Light is supportive of the changes to this section with regard to the addition of using electronic communications to satisfy the attempted contact standard with its customers. Having the option of utilizing a more efficient technology to deliver such notices in lieu of in person visits or telephone calls should benefit all ratepayers with reduced costs and is more in line with customers' changing needs and preferences.

Consistent with this proposed section, Duquesne Light believes that utilities should be given flexibility to implement procedures consistent with their billing software to allow customers to affirmatively consent to receive electronic notice of issues relating to their account, up to and including termination, and to identify the preferred means for communication of any electronic format such as text, email or a secured login. This consent could be obtained during the application process or during any customer contact – it does not (nor should not) need to be on a standalone basis.

In addition, Duquesne Light proposes that, similar to proposed Sections 56.93(1) and (2), guidance be given in regulation to enumerate what frequency satisfies “an attempt” for electronic

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<sup>11</sup> As indicated in § 56.53(b), “a timely payment history is established when a customer has paid in full and on time for 12 consecutive months.”



messaging format. For example, in Section 56.93(1), “Phone contact shall be deemed complete upon attempted calls on 2 separate days to the residence ....” Similarly, Section 56.93(2) states that “If contact is attempted in person by a home visit, only one attempt is required.” As proposed, however, Section 56.93(3) only explains the ability of electronic messaging format and the requirements to obtain consent – it is silent on what is considered an “attempt.”

As a proposed remedy, Duquesne Light suggests that the language in §56.93(3) be revised as follows (see bold):

**(3) Electronic contact shall be deemed complete if, after attempted transmittal, no message is received indicating that the transmittal was undeliverable or otherwise not received. In the event the utility receives notification that the transmittal was undeliverable or otherwise not received, the utility shall attempt to contact the customer either in person or by telephone, consistent with the requirements of this section. Contact by email, text message or other electronic messaging format consistent with the Commission’s privacy guidelines and approved by Commission order. The electronic notification option is voluntary and shall only be used if the customer has given prior consent approving the use of a specific electronic message format for the purpose of notification of a pending termination.**

Section 56.173(f). The Company suggests further revising the last sentence of this section to make it clear that the party who originally filed the informal complaint retains the burden of proof regardless of the party that initiates the review and thus the docketing of a formal complaint. Since the remainder of this Section, after 56.173(b) only refers to formal complaints (notably because Administrative Law Judges and Special Agents do not adjudicate informal complaints), the Company suggests that the final sentence in this section be revised to read: “The burden of proof **for the formal complaint** remains with the party who filed the informal complaint.”

Section 56.292. For clarification, the Company suggests adding a sentence at the end of this section consistent with the language in §56.42 that “The customer retains the option to pay the deposit amount in full before the due date.”

Section 56.231. Duquesne Light appreciates the Commission's attempts to clarify elements in the report requirements and definitions therein. Unfortunately, changing definitions does not mean that information that is captured by the Company can be as easily changed. Specifically, Duquesne Light does not separately track the annual collections operating expenses directly attributable to customer assistance programs because it is not practical or cost efficient to create separate business practices to carve out the information that would be required to meet this requirement. With regard to the other definitions related to reporting requirements, Duquesne Light has no comments. In the event the Company is able to transition to email communications related to terminations, it will ensure that the requested information can be captured.

**Other general comments:**

Replace P.O. Box with 400 North Street address. Generally, the Company suggests that all provisions of Chapter 56 that reference the Commission's address be updated to remove the P.O. Box and replaced with the 400 North Street address. Through its participation in a LAW Bureau workgroup (in which Secretary Chiavetta personally participates) that is preliminarily reviewing procedure rules in anticipation of initiating a rulemaking re same, the Company has been advised that the Secretary's Bureau prefers use of the North Street address to receive mail. This is due, in part, to experienced delays and non-delivery with mail sent to the P. O. Box address.

Medical Emergency Notice. As proposed, Appendix A and B,<sup>12</sup> contain language providing for the customer to "make some equitable arrangement to pay the company your current bills for service." The Company seeks more specific language clarifying "equitable payment" to address arrearages on accounts with medical certificates. An equitable arrangement could

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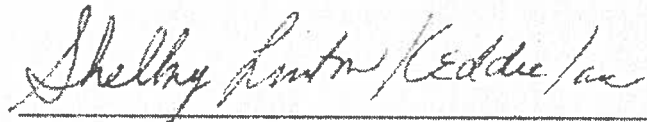
<sup>12</sup> NOPR, pp. 84-85.

arguably mean that the payment includes the current charges and some portion of the past due amounts. However, the language, as proposed, is ambiguous. To resolve this ambiguity, the Company recommends that the Commission consider amending the clause to read: "pay current charges, and if an arrearage exists, additional sums to pay any past due amounts in a period of time consistent with the utility's payment arrangement practices."

### III. CONCLUSION

Duquesne Light appreciates the work undertaken by the Commission to continue the implementation of Act 155 in order to ensure consumer protections and conformity of Commission regulations with the law. The Company respectfully requests that the Commission consider the comments and recommendations included herein as it moves forward with this rulemaking proceeding.

Respectfully submitted,



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Date: April 18, 2017