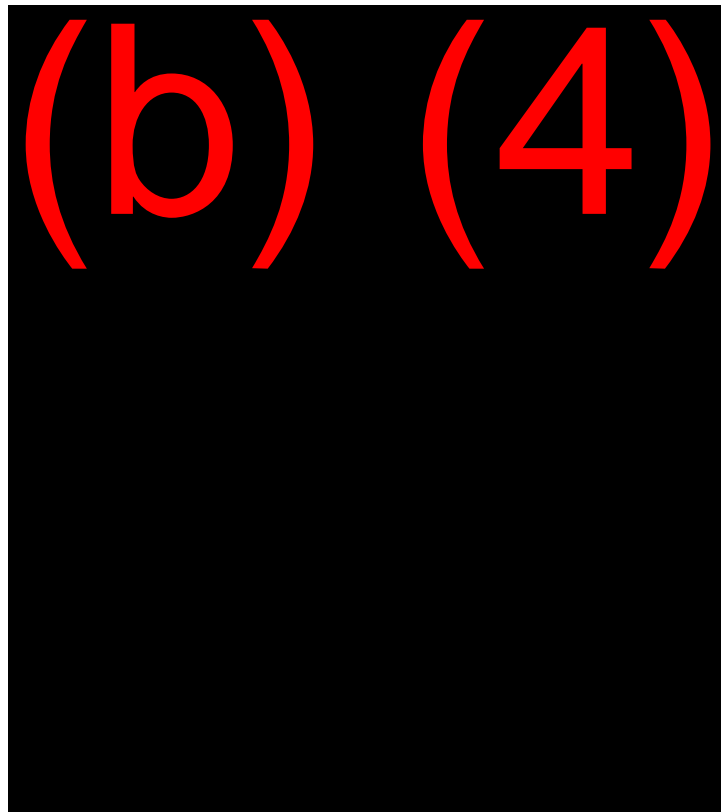


**Community Benefits Plan: Job Quality and Equity****Bipartisan Infrastructure Law (BIL) Grid Resilience and Innovation Partnerships (GRIP)  
Funding Opportunity Announcement (FOA) Number: DE-FOA-0002740  
Assistance Listing Number: 81.254**

**Confidentiality Statement:** Pages 1, 2, 5, 6, 7, 8, 9, and 10 of this document may contain trade secrets, confidential, proprietary, or privileged information that is exempt from public disclosure. Such information shall be used or disclosed only for evaluation purposes or in accordance with a financial assistance or loan agreement between the submitter and the government. The government may use or disclose any information that is not appropriately marked or otherwise restricted, regardless of source.

Duquesne Light Company (DLC) is pleased to submit the following Community Benefits Plan (CBP). For more than 100 years, DLC has delivered safe, reliable service free from undue preference or discrimination. Said another way, equity is foundational to the services that we provide to more than 600,000 customers, and we remain steadfast in our commitment to a clean energy future for all. Our approach to community benefits for the Grid Visibility Program (GVP) builds upon our documented commitment to diversity, equity, and inclusion<sup>1</sup>. [



---

<sup>1</sup> <https://duquesnelight.com/company/about/diversity>

The GVP supports DLC's mission to harness the power of innovation, collaboration, and new technology to provide safe, reliable, and affordable electric service to the Pittsburgh region.

DLC assessed its service territory and identified communities that would benefit most from improved system visibility. The communities selected have higher concentrations of distributed energy resources (DERs) or voltage constraints that impact service reliability. Fifteen (15) communities were selected within Allegheny County, 9 of which happen to be disadvantaged communities (DACs) as defined by the Climate and Economic Justice screening tool (CEJST)<sup>2</sup>. [REDACTED] (b) (4) ] DLC has already implemented collaborative projects with some of these communities and achieved positive results<sup>3</sup>.

## **1. Community & Labor Engagement**

### **Background: Previous Examples of Community Engagement**

DLC has demonstrated a strong commitment to improving the Pittsburgh region by investing in local communities, bolstering workforce development programs, and leading sustainability efforts that focus on reducing energy burdens and greenhouse gas (GHG) emissions. Through these efforts, DLC has established successful, award-winning partnerships with the City of Pittsburgh, top tier research universities and local community colleges, non-profit organizations, and small businesses that deliver meaningful results.

DLC has a strong track-record of supporting the communities it serves and investing in causes that align with the company's goals and values. For example, in 2021, DLC invested more than \$2 million, in the form of Community Impact Grants, to grassroots organizations that focus on three areas: social and economic equity (\$551,500); workforce development (\$623,200); and sustainable communities (\$1,029,600).

Additionally, a recent example of DLC's innovative approach to inclusive, multi-stakeholder collaboration is its partnership with Rewiring America, a leading electrification non-profit. DLC collaborated alongside six other nationally recognized business leaders to develop a consumer outreach campaign to educate the public about Inflation Reduction Act (IRA) rebates and tax incentives to electrify their homes.<sup>4</sup>

### **GVP Community and Workforce Engagement Plan**

DLC has engaged its labor union, local government officials, universities, and community-based organizations (CBOs) to discuss the Project and form project partnerships. DLC will continue to engage these stakeholders during the program design phase, and regularly throughout the project, to achieve tangible, desired benefits to selected GVP communities.

---

<sup>2</sup> <https://screeningtool.geoplatform.gov/en/#3/33.47/-97.5>

<sup>3</sup> Duquesne Light LED Municipal Cobrahead Street Lighting Conversion Pilot Program

<sup>4</sup> <https://www.rewiringamerica.org/education-coalition>

(b) (4)

With the support of the partners shown in Table 1, DLC is committed to expanding its outreach to additional CBOs, representing the GVP communities. Specifically, DLC will engage community representatives in Table 2.

(b) (4)

DLC will form a Community and Workforce Coalition (CWC) comprised of CBOs, representing the communities in Figure 1 and workforce development representation from Pittsburgh Gateways Corporation (PGC), International Brotherhood of Electrical Workers (IBEW), and Community College of Allegheny County (CCAC). During the project, the CWC will be engaged to incorporate community needs and feedback.

## **2. Investing in the American Workforce**

There are three types of jobs this Project is expected to create: 1) traditional skilled labor, which includes the installation of dynamic line ratings (DLR) and smart grid chips (SGC), 2) professional careers in data science, software, and AI, which is the future of grid operations and 3) indirect employment opportunities in the clean energy industry, resulting from having a system that can accommodate more renewable energy.

### **Existing Workforce Initiatives**

DLC has established partnerships with the CCAC, Pennsylvania's Department of Labor & Industry, and the Department of Veterans Affairs to attract and train those interested in skilled labor positions with electric utilities. For example, DLC, in partnership with the CCAC, offers a one-year certificate program, Electrical Distribution Technology Program (EDTP), that provides training for basic skills, knowledge, and abilities applicants will need to apply for positions in the overhead, underground, and substation-maintenance. To attract students who have been chronically underrepresented in the industry, DLC removed the financial barrier to enrollment in the EDTP by offering the 2022-2023 class full tuition scholarships. Since 2017, 86 students have completed the EDTP with 12% representation of students of color, 6% women, and 12% veterans. In addition, DLC participates and provides cost sharing for a Pennsylvania Department of Labor & Industry Clean Energy Jobs Program; this program creates a pipeline for individuals from underserved communities to access training and the quality jobs available in the clean energy sector.

## **GVP Workforce Investment**

### *Skilled Labor*

As of 2023, half of DLC's workforce are union employees, represented by IBEW 29. The installation of GVP equipment will be completed by union-represented resources. Utilidata and LineVision will provide ongoing technical training and support to this workforce.

DLC and IBEW 29 have an existing collective bargaining agreement (CBA) that provides workers with guaranteed wages and benefits. The CBA protects workers from discrimination based on race, color, religion, sex, age, national origin, handicap, or being a disabled veteran. DLC has established a joint Company and Union Safety Committee and sets standards for a safe and fair workplace. DLC and Local 29 will negotiate a new CBA in 2023.

IBEW union representatives were briefed on the GVP and provided DLC with their support and willingness to continue collaboration on workforce readiness and development initiatives.

### *Professional Careers*

DLC has an existing research agreement with the University of Pittsburgh (Pitt). As part of the GVP, DLC will expand this agreement to develop new coursework and student-industry collaboration projects. During initial outreach for the GVP, DLC met staff from the Swanson School of Engineering at Pitt, who indicated a current gap between academia and industry in AI, machine learning, and cybersecurity, particularly as they relate to grid modernization.

NVIDIA has ongoing work with the AI Technology Center at the University of Florida to support the development of energy industry and AI-specific courses, along with a cybersecurity curriculum. With United States Department of Energy (DOE) funding, DLC will work with NVIDIA to extend this curriculum training to Pitt's Swanson School of Engineering. Furthermore, DLC will collaborate with the university to develop a student-industry project that leverages data collected in this project, by SGCs, to produce valuable analytics and studies. This collaboration is expected to produce insight for the industry, while creating a pipeline of knowledgeable students in the Pittsburgh region to fill jobs in power systems, cybersecurity, and AI. DLC and Pitt will design recruitment and project efforts to reach students who have historically lacked access to these types of opportunities. Developing a workforce with experience in these topic areas is crucial to a clean energy future.

## **2.1 Plan to Attract, Train, and Retain a Skilled and Well Qualified Workforce**

In terms of attracting and retaining a skilled and well-qualified workforce, DLC provides employees with a competitive wage, a thorough benefits package including health benefits, paid time off, a paid family leave policy, disability benefits, 401(K) retirement plan, life insurance options, employee assistance programs and flexible spending accounts. Employee assistance programs include assistance with continued education opportunities, which helps to retain employees and strengthen our workforce. Employee recognition is also a key aspect of DLC's strategy to attract and retain a skilled workforce; DLC offers a mix of formal recognition programs, like annual Employee Excellence Awards, as well as informal practices.

## **2.2 Prior Violations and Union Rules**

There were no violations found against DLC within the past two years under the National Labor Relations Act, Fair Labor Standards Act, Service Contract Act, Davis-Bacon Act, or Title VII of the Civil Rights Act. Approximately half of DLC's workforce is union-represented with the ability to organize, bargain collectively, and participate through the IBEW labor organization.

(b) (4) [REDACTED]

[REDACTED] Safety is DLC's highest priority; it is an integral part of our operations and a key measurement of success. DLC will leverage the Company and Union Safety Committee to support the ongoing health and safety of its workforce and avoid future citations to the best extent possible.

## **2.3 Future Jobs Potential**

(b) (4) [REDACTED]

Southwestern Pennsylvania has a history in the coal industry that shaped the region in the late 19<sup>th</sup> and 20<sup>th</sup> centuries. In support of a just clean energy transition to ensure no workers are left behind, and in recognition of the clean energy workforce needs in southwest Pennsylvania, DLC will develop strategies to hire displaced workers from the coal industry as part of the development of new recruitment and training strategies with partner, PGC.

## **3. Diversity, Equity, Inclusion, and Accessibility (DEIA)**

Historically, the utility industry has experienced significant underrepresentation of women and communities of color. DLC is continuing to find ways to attract diverse talent to careers in these industries and is committed to initiatives that advance the company's culture, policies, and resources and support the growth of diversity. DEIA will play a critical role in every part of the GVP planning, implementation, and evaluation process to ensure that this project's benefits are distributed in an inclusive and equitable manner.

DLC is dedicated to building a culture of collaboration and is continuously expanding partnerships with diverse suppliers. In 2015, DLC introduced DEIA workforce commitments. In 2018, DLC

---

<sup>5</sup> IMPLAN; Allegheny Conference on Community Development, March 2023

launched its first unconscious bias training for leadership and employees. To expand DLC's commitment to DEIA, the first Chief Diversity Officer (CDO) was hired in 2019. Soon after, DLC introduced a Five Pillar DEIA Strategy that includes: (1) talent, (2) culture (3) community (4) customer, and (5) supplier diversity. The intent of each pillar is to attract a high-performing workforce, define and grow a culture of inclusion, enhance our customer experience, act as a responsible community steward, and engage with diverse and innovative suppliers. Recent accomplishments include:

- Hosted first Supplier Diversity Summit featuring a Supplier Diversity Roundtable.
- Formed an Executive DEIA Council, which invites executives and guest speakers to engage in candid and open conversations about race, equity, and inclusion.
- Partnered with the New Pittsburgh Courier (NPC), a historic Black newspaper, to facilitate an open discussion during a virtual town hall between the corporate community, grassroots CBOs, and local Black businesses to drive change.
- Invested in local Black-owned businesses to support long-term community growth.
- Launched Employee Resource Groups, which are voluntary, employee organizations that drive DEIA efforts through engagement, networking, leadership, and community service.

### **3.1 Partnering to Address DEIA**

The proposed project team for the GVP is also committed to DEIA. For example, one of the proposed subcontractors, Bridgewater Consulting Group, is a certified Minority Business Enterprise (MBE). Another project partner, Utilidata, has a workforce comprised of 60% women and minorities (and 50% of the executive team). Another proposed project partner, LineVision, sponsors eleven co-ops/internships from educational institutions that serve underrepresented communities and provide training and mentorship. Furthermore, many of the organizations that DLC is partnering with for the GVP CBP serve communities that represent Pittsburgh's vast racial, cultural, religious, and socioeconomic diversity.

### **3.2. Examples of How the Project will Incorporate DEIA Elements**

This project incorporates elements of DEIA throughout its scope. DLC will partner with CBOs from [REDACTED] DACs participating in the GVP. These partnerships will serve as invaluable resources that will provide direct insight and feedback from the GVP communities. This collaboration will continue throughout the project to allow community stakeholders to be engaged, help shape the project, perform outreach, and perform a regular evaluation.

DLC will team with its workforce development partner, PGC, to deliver workforce development and training programs to recruit candidates from DACs. In collaboration with the University of Pittsburgh, the project team will leverage student organizations such as the National Society of Black Engineers, Society of Hispanic Professional Engineers, and Society of Women Engineers to attract talent and encourage participation in the educational programs developed from the GVP.

#### **4. Justice40 Initiative**

We expect the project will deliver multiple benefits to the GVP communities. Detailed below is an assessment of benefits based on current project scope. DLC is committed to tracking the flow of benefits to DACs with an emphasis on reducing energy burdens, increasing access to high-quality jobs, access to clean energy adoption and improving energy resilience.

##### **4.1 Disadvantaged Communities that will benefit from the Project**

Based on the CEJST screening results, 9 of the 15 selected communities include census tracts that are classified as a DAC. This comprises approximately 61% of the participating population.

(b) (4)

##### **4.2. Project Benefits**

###### **A Decrease in Energy Burden**

As part of the GVP, DLC expects to deploy approximately 52% of SGCs in DACs, where energy costs are a considerable portion of a household's income. The SGC provides a premise-level AI prediction model that can be used to forecast customer program impacts, evaluate specific upgrade options like electrification of heating, and real-time program measurement and verification. DLC can use this capability to inform program enrollment and design, with the aspiration of reducing energy burdens and enhancing services to low-income customers. An example of this will be to better understand customer baseload usage patterns and build predictive models that will help DLC quickly identify customers that would benefit from income-eligible energy assistance programs. DLC plans to use the qualitative data collected through the Community Engagement Plan to supplement the quantitative data provided by the SGC. This information will equip DLC with operational insight into how it can better target and market its energy assistance programs.

###### **An Increase in High-Quality Job Creation, the Clean Energy Job Pipeline, and Job Training**

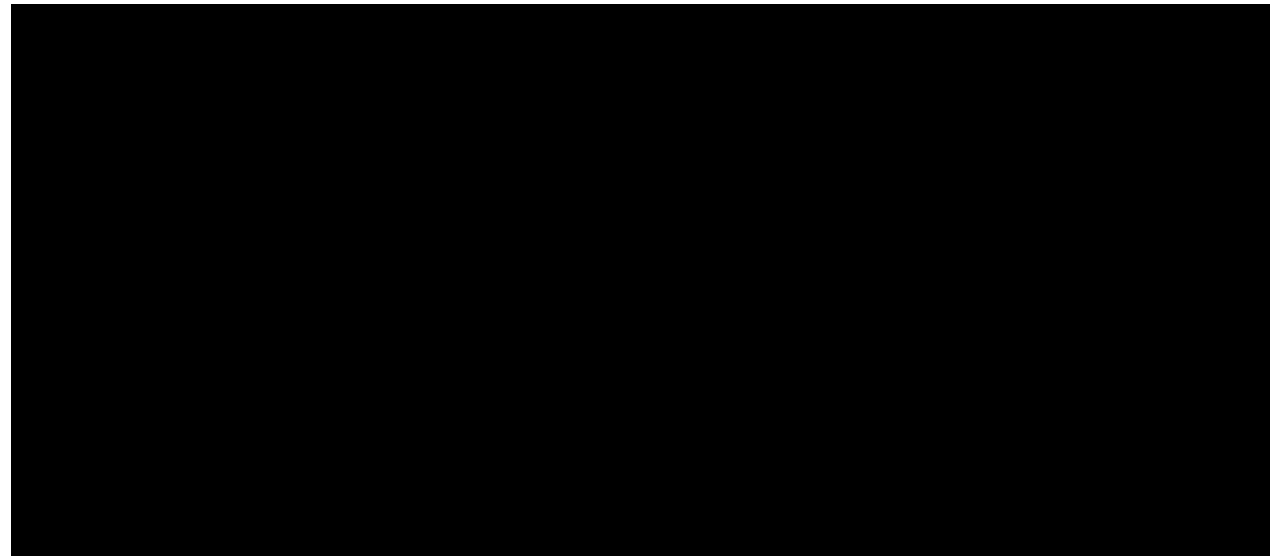

An important characteristic of the GVP is the opportunity for new skills training, both for the physical installation of innovative, grid-enhancing hardware, and for the interpretation and analysis of data resulting from both technological advancements. DLC is committed to working

with IBEW 29 to provide new training content to its existing union workforce. In terms of data analytics, DLC is committed to partnering with the University of Pittsburgh and NVIDIA to build new coursework centered on AI in energy.

DLC will partner with the PGC, a non-profit focused on workforce development in DACs, to collaborate on GVP recruitment and retention strategies. DLC will implement a recruitment strategy aimed at reaching individuals who are historically underrepresented or from DACs for placement in DLC's GVP-supported employment and education opportunities.

### **Increased Parity in Clean Energy Technology Access and Adoption**

DLC's interconnection requests for DERs have grown exponentially over the past decade. For example, DLC receives an average of 175 new interconnection applications monthly, which represents a 62% increase from 2021. (b) (4)



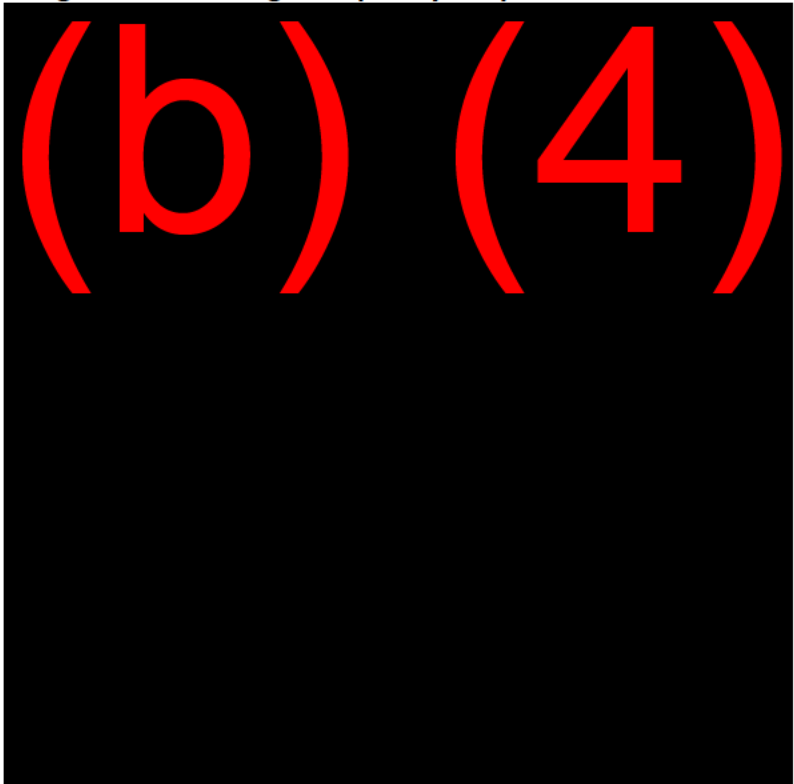
Currently, DLC can successfully process their interconnection applications within 25-30 days depending on the system size. However, DLC is projecting that interconnection requests will exceed current trends, which will require better visibility at the feeder level, increased hosting capacity and automated processing. DLC feels GVP is a viable solution to this challenge as it will create the first step towards system-wide visibility and will help with expediting the interconnection process by reducing the need for a manual engineering studies. The SGC will also enable control signals to DERs that can be used to address DER grid impacts during periods of system constraints, as opposed to slower and more costly grid upgrades as the method for dealing with grid constraints.

One of the largest barriers to an equitable transition to clean energy is that DER benefits remain an unknown for many customers and therefore deemed expensive. The GVP, particularly the deployment of SGCs, is designed to quantify both grid and customer benefits of DERs and provide insight into the monetary value of DERs and the resulting impact to total cost of ownership. These

insights can be leveraged to inform alternative approaches to deploy DERs without upfront capital. Identifying system benefits of DER enablement, increasing interconnection application processing efficiency and reducing the need for system upgrades due to better visibility and control of DERs will overall make DER interconnections less costly upfront. SGC insights and analytics can inform and create affordable DERs which will make them more accessible to more communities, who can then benefit from the cost savings and resiliency benefits of these clean energy assets. DLC is committed to tracking interconnection rates to inform and create strategies to address parity in access and adoption in DACs.

#### **An Increase in Energy Resilience Including Reduced Outage Frequency and/or duration.**

Enabling real-time distribution grid visibility is the first step towards operating an electric grid that uses local energy resources to provide power to consumers when other parts of the transmission or distribution grid are unavailable. GVP will immediately allow DLC to identify power quality inconsistencies more equitably. For example, GVP will provide DLC with the capability identify optimal DER locations that can offer individual and community resiliency during extreme weather events. This will improve safety, security, and economic outcomes. As DLC collects additional real-time data, they will further improve reliability and resiliency in communities via trained



predictions to identify and alert operations of pre-outage conditions or pending equipment failure. [(b) (4)] the GVP communities experience varying frequencies of voltages exceeding DLC planning standards (“voltage violations”), which among many factors, was the reasoning for including each neighborhood into the GVP. DLC is committed to reducing the quantity of voltage violations in GVP communities.

#### **Decrease in Environmental Exposure and Burdens**

Real-time monitoring and control of the power grid made possible by this Project will enable more efficient utilization of clean energy power sources, such as wind and solar, which will reduce the environmental impact of fossil fuel power generation. During periods of system constraint, high-emission peaking generation is often used to balance loads and reduce congestion. Not only does this disable clean generation from reaching the grid, but these high-emission peaking plants are often located in DACs. The only peaking plant (natural gas and diesel) located within DLC territory is on Brunot Island, a DAC as classified by CEJST. DLR enables reduced transmission

congestion, increasing renewable energy curtailments. This congestion relief results in reduced peaker plant emissions and better air quality, directly impacting the surrounding community.

### **Increase in Low-Cost Capital**

The system improvements, from the installation of the SGCs and DLRs, provide granular usage data. This will provide DLC the capability to geo-locate areas to target and prioritize outreach for equitable access to incentive programs. In addition, the enhanced data will allow DLC to more confidently model and measure program outcomes, further supporting the introduction of low-cost capital.

### **Increases in Clean Energy Enterprise Creation and Contracting (e.g., minority-owned or disadvantaged business enterprises)**

The GVP will accelerate the deployment of DERs onto the grid, which will enable industries supporting clean energy adoption to flourish. Given DLC's commitment to DEIA, DLC will continue to partner with CBOs that have been underrepresented in clean energy (e.g., minority-owned businesses), to ensure the equitable distribution of information relating to contracting opportunities.

### **Increases in Energy Democracy, Including Community Ownership**

DLC is committed to increasing energy democracy by continuing to forge partnerships in communities across its service territory to both educate customers on DLC-led projects and initiatives, as well as better understand the needs and dynamics of a particular community so that DLC's future grid investments are aligned, and both minimize disruption and improve quality of life. DLC has an active CBA with the IBEW Local 29 and is actively renegotiating the agreement. The CBA increases the voice of the workforce and is essential to effective implementation of GVP.

## **4.3. Anticipated Negative and Cumulative Environmental Impacts**

Since the Project involves only upgrading the electronics and data processing capabilities of the grid, we do not anticipate negative environmental impacts.

## **5. Community Benefits Plan SMART Goals**

DLC's CBP includes SMART Goals for each section. The staff time and budget required to achieve the CBP is accounted for in the Budget Justification Workbook. The proposed SMART Goal timeline is shown in Figure 5:

SMART Goal	Project Year 1				Project Year 2				Project Year 3				Project Year 4				Project Year 5			
1: GVP Community Engagement																				
2: Investing in the American Workforce and DEIA																				
3: Increased Parity in Clean Energy Technology Access and Adoption (Justice 40)																				
4: Increase in Energy Resilience - Reduced Outage Frequency and/or Duration (Justice 40)																				

*Figure 5: SMART Goal Timeline*

### **5.1 SMART Goal 1: GVP Community Engagement**

DLC will form a CWC with representation from all GVP communities and workforce development representation from PGC, IBEW, and CCAC. DLC will conduct up to 3 listening tours by 2025 and will incorporate feedback into the CBP. DLC will provide a final report to the CWC including achieved SMART goals by 2028.

**Budget Period (BP) 1 Milestone:** Finalization of the participants in the CWC and conduct first listening tours.

**BP2 - 5 Milestone:** Conduct one CWC listening session per budget period to report out on SMART goals and continue to collect feedback to inform necessary CBP revisions.

### **5.2 SMART Goal 2: Investing in the American Workforce and DEIA**

By the end of 2025, DLC, in conjunction with NVIDIA and the University of Pittsburgh's Swanson School of Engineering will have developed AI, machine learning and/or cyber security coursework in support of grid modernization activities. By 2026, DLC will develop and implement new strategies to attract talent from DACs and historically underrepresented groups for workforce development/employment opportunities resulting from this project.

**BP2 Milestone:** In collaboration with Pitt, develop new course modules to support the GVP.

**BP3 Milestone:** Develop and implement new strategies to attract talent from DACs and underrepresented groups for GVP workforce development/employment opportunities.

### **5.3 SMART Goal 3: Increased Parity in Clean Energy Technology Access and Adoption**

By 2028, for GVP communities, DLC will decrease their solar interconnection times by 25% and increase its hosting capacity, thereby lowering total costs of DER ownership.

**BP3 Milestone:** Demonstrate hosting capacity can be calculated on-demand using data driven models of DER actions and responses to control signals.

**BP4 Milestone:** Demonstrate that DLC's interconnection study process timelines can be reduced in GVP communities with SGCs using real-time hosting capacity matrices.

**BP5 Milestone:** Reduce DLC's internal interconnection processing time by 25%.

### **5.4 SMART Goal 4: Increase in Energy Resilience - Reduced Outage Frequency and/or Duration**

Reduce voltage violations by approximately 5% in GVP communities by Budget Period 5.

**BP3 Milestone:** With SGC data, determine highest priority voltage violations to mediate in GVP communities.

**BP5 Milestone:** Reduce voltage violations by at least 5% through system repair or optimization of local resources (such as DERs, controllers, and/or loads).