



515 West Hamilton Street  
Suite 502  
Allentown, PA 18101  
T: 610-391-1800  
F: 610-391-1805

jlushis@norris-law.com

April 30, 2020

**E-FILE**

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

**RE: Petition of Duquesne Light Company for Approval of a Default  
Service Plan for the Period June 1, 2021 through May 31, 2025  
Docket No. P-2020-3019522**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of Calpine Retail Holdings, LLC in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Sincerely,

NORRIS McLAUGHLIN, P.A.

*/s/ John F. Lushis, Jr.*

John F. Lushis, Jr.

c: Deputy Chief Administrative Law Judge Mark A. Hoyer (via e-mail)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Duquesne Light Company :  
for Approval of a :  
Default Service Plan : Docket No. P-2020-3019522  
for the Period :  
June 1, 2021 through May 31, 2025 :**

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**PETITION TO INTERVENE  
OF CALPINE RETAIL HOLDINGS, LLC**

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Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, 52 Pa. Code §§ 5.71 - 5.74, Calpine Retail Holdings, LLC (together with its operating subsidiaries, “Calpine”) hereby files this Petition to Intervene in the above-captioned proceeding.<sup>1</sup>

Duquesne Light Company (“Duquesne Light” or the “Company”) has petitioned the Commission for approval of the Company’s ninth Default Service Program (“DSP IX”). The Company’s Petition for Approval of DSP IX (“Petition”) outlines the Company’s proposed procurement plan, implementation plan, and contingency plan for acquiring default service energy supply for all Company customers who, upon expiration of DSP VIII on May 31, 2021, do not

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<sup>1</sup> As used herein, “Calpine” refers collectively to Calpine Retail Holdings and its retail subsidiaries. Calpine Retail has overall responsibility for the business activities of its retail subsidiaries, which serve residential, commercial, institutional and industrial customers in Pennsylvania’s retail electric and gas markets.

take generation service from an alternative electric generation supplier (“EGS”) or who contract for energy with an EGS, which is not delivered. *Petition of Duquesne Light Company for Approval of Default Service Plan for the Period June 1, 2021 through May 31, 2025*, at 1.

In support of its Petition to Intervene, Calpine asserts the following:

1. The proposed DSP IX would apply to all retail customers in the Company’s service territory, including customers of Calpine.
2. Calpine is an independent, national provider of retail electric service across 20 states. It operates as a licensed Electric Generation Supplier (EGS) in Pennsylvania. Calpine is also a Load Serving Entity (LSE) and member of PJM Interconnection LLC. Calpine is actively serving and soliciting customers throughout Pennsylvania. Calpine currently offers a wide variety of efficiency and energy-related products and services beyond simple energy procurement, including load and risk management and green energy solutions – all designed to meet the individualized needs and demands of Calpine’s customers and capture the benefits of the existing competitive wholesale energy environment to bring those benefits forward into to Pennsylvania’s competitive retail electric market.

3. The name and address of Calpine's attorney is:

John F. Lushis, Jr. (I.D. No. 32400)  
NORRIS McLAUGHLIN, P.A.  
515 W. Hamilton Street,| Suite 502  
Allentown, PA 1810  
Phone: (484) 765-2211  
Fax: (484) 765-2270  
[jlushis@norris-law.com](mailto:jlushis@norris-law.com)

4. Calpine is concerned with issues that affect competitive markets in Pennsylvania, including the structure of the default service, utility affiliate participation, procurement of generation capacity, long term contracting of renewables and programs that could potentially harm or become a disincentive to create customized and innovative competitive retail electric products and services for its current and prospective customers.

5. Calpine intends to participate in this proceeding to the extent necessary to protect its interests and those of its customers. These interests cannot be adequately represented or protected by any other party.

6. As one of the nation's largest retail electric providers, Calpine's intervention is also in the public interest. Calpine possesses significant and unique knowledge, experience and resources with respect to the marketing of retail energy services, which will be helpful in developing a record on the reasonableness of the programs as presented. Moreover, without the opportunity to intervene, Calpine will be unable to participate in this proceeding but will nevertheless be bound by the

actions taken by the Commission. Such actions may have a material impact on Calpine's operations, business and systems as well as its continued involvement in Duquesne Light's service territory as a retail Electric Generation Supplier.

7. Calpine continues to review the Petition and the accompanying direct testimony and exhibits and has not yet definitively established its position on the matters presented therein. Calpine reserves the right to take positions and/or seek relief based on its review of the various filings, discovery responses, or the positions taken by other parties in this proceeding,

8. The Commission's regulations permit intervention by a party that demonstrates an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72 Calpine has a substantial and direct interest in this proceeding and satisfies the standards for intervention under these regulations.

**WHEREFORE**, Calpine Retail Holdings, LLC respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, providing Calpine with full-party status in this proceeding, as well as any other relief as it deems necessary.

Respectfully submitted,  
NORRIS McLAUGHLIN, P.A.

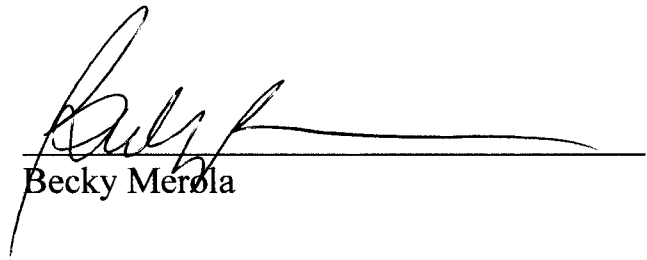
By /s/ John F. Lushis, Jr.  
John F. Lushis, Jr. (I.D. No. 32400)  
NORRIS McLAUGHLIN, P.A.  
515 W. Hamilton Street,| Suite 502  
Allentown, PA 1810  
Phone: (484) 765-2211  
Fax: (484) 765-2270  
jlushis@norris-law.com

Counsel to Calpine Retail Holdings, LLC

Dated: April 30, 2020

VERIFICATION

I, Becky Merola, Director of Government & Regulatory Affairs, hereby state that the facts set forth in the foregoing Petition to Intervene by Calpine Retail Holdings, LLC (Docket # P-2020-3019522) are true and correct to the best of my knowledge, information and belief . I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsifications to authorities.

  
Becky Merola

DATED: April 29, 2020

**CERTIFICATE OF SERVICE**  
**Docket No. P-2020-3019522**

I hereby certify that I have this day served a copy of the foregoing Petition to Intervene via email upon the following participants in accordance with the requirements of 52 Pa. Code Section 1.54, et. seq. (*relating to service by a participant*):

Michael Zimmerman, Esquire  
Tishekia Williams, Esquire  
Emily M Farah, Esquire  
Duquesne Light Company  
411 Seventh Avenue 15th Floor  
Pittsburgh PA 15219  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[efarah@duqlight.com](mailto:efarah@duqlight.com)

Honorable Mark A. Hoyer  
Deputy Chief Administrative Law Judge  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Michael W. Gang, Esquire  
Anthony D. Kanagy, Esquire  
Post & Schell PC  
17 North Second Street, 12th Floor  
Harrisburg PA 17101-1601  
[mgang@postschell.com](mailto:mgang@postschell.com)  
[akanagy@postschell.com](mailto:akanagy@postschell.com)

*/s/ John F. Lushis, Jr.*

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John F. Lushis, Jr.  
Counsel to Calpine Retail Holdings, LLC