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May 1, 2020

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
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;
PETITION TO INTERVENE OF INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC, NRG ENERGY, INC, VISTRA ENERGY CORP., ENGIE RESOURCES LLC, WGL ENERGY, AND DIRECT ENERGY SERVICES, LLC

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc, Vistra Energy Corp., Engie Resources LLC, and Direct Energy Services, LLC ("EGS Parties") in the above-captioned proceeding. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,


Todd S. Stewart
Counsel for EGS Parties

TSS/jld

Enclosure

cc: Administrative Law Judge Mark A. Hoyer
Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL

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Todd S. Stewart

DATED: May 1, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PETITION TO INTERVENE OF
INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC,
NRG ENERGY, INC, VISTRA ENERGY CORP., ENGIE RESOURCES LLC,
WGL ENERGY, AND DIRECT ENERGY SERVICES, LLC**

NOW COMES, Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc, Vistra Energy Corp., Engie Resources LLC, WGL Energy, and Direct Energy Services, LLC (“EGS Parties”) by and through their counsel, Hawke McKeon & Sniscak, LLP, and respectfully petition to intervene in the above-captioned proceedings. In support thereof, EGS Parties states and avers as follows:

1. The EGS Parties are: Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy¹, Inc, Vistra Energy Corp., ENGIE Resources LLC., and Direct Energy Services, LLC. All are either licensed electric generation suppliers (“EGS”) or are the parent of wholly owned EGS subsidiaries that are licensed to provide service in the Duquesne Light Company service territory. The EGS Parties continue to review the Duquesne Light default service plan and reserve the right to address any other issues as appropriate.

¹ NRG’s wholly owned subsidiaries include: Energy Plus Holdings LLC (A-2009-2139745), Independence Energy Group LLC d/b/a Cirro Energy (A-2011-226337), Reliant Energy Northeast LLC d/b/a NRG Home & NRG Business (A-2010-2192350), Green Mountain Energy Company (A-2011-2229060), XOOM Energy Pennsylvania, LLC (A-2012-2283821), Stream Energy Pennsylvania, LLC (A-2010-2181867)

2. As electric generation suppliers serving retail customers on the Duquesne Light Company system, the EGS Parties have serious concerns regarding several of the proposals in Duquesne's Petition including, but not limited to: 1) Duquesne's plan to allow customers in customer assistance programs ("CAP Customers") to shop; 2) Duquesne's plan to modify its Standard Offer Program ("SOP"), and 3) Duquesne's plan to enter into power purchase agreements with renewables projects as a means of compliance with the renewable energy credits ("REC"). In addition, the EGS Parties will propose changes to responsibility for Network Integration Transmission Service ("NITS"). The EGS Parties continue to review the Duquesne Light Petition and reserve the right to raise additional issues as appropriate.

3. As active retail suppliers, the EGS Parties have a substantial and unique interest in this proceeding that cannot adequately be represented by any other party, and EGS Parties will be bound by any decision rendered by the Pennsylvania Public Utility Commission in this matter. Accordingly, EGS Parties' participation in this proceeding meets the standard for intervention set forth in the Commission's Regulations at 52 Pa. Code §§ 5.71, et seq.

4. Representing the EGS Parties in this proceeding is the following counsel:

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WHEREFORE, EGS Parties respectfully request that their Petition to Intervene be granted and that they collectively be afforded full party status in this matter.

Respectively submitted,



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DATED: May 1, 2020

Counsel for EGS Parties