



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

May 19, 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;
PREHEARING CONFERENCE MEMORANDUM OF INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC, NRG ENERGY, INC, VISTRA ENERGY CORP., ENGIE RESOURCES LLC., WGL ENERGY SERVICES, INC., AND DIRECT ENERGY SERVICES, LLC

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission is the Prehearing Conference Memorandum of Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc, Vistra Energy Corp., ENGIE Resources LLC., WGL Energy Services, Inc., and Direct Energy Services, LLC (“EGS Parties”) in the above-captioned proceeding. The undersigned certifies that this filing contains no averments or denials of fact subject to verification and penalties under 52 Pa. Code Section 1.36. Copies of this Memorandum 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

Enclosures

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 ONLY

Honorable Mark A. Hoyer
Deputy Chief Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
mhoyer@pa.gov

Michael W. Gang
Anthony D. Kanagy
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
Counsel for Duquesne Light Company

Michael Zimmerman
Tishekia E. Williams
Emily Farah
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15219
mzimmerman@duqlight.com
twilliams@duqlight.com
efarah@duqlight.com
Counsel for Duquesne Light Company

Richard A. Kanaskie, Esquire
Scott B. Granger, Esquire
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265
rkanaskie@pa.gov
sgranger@pa.gov

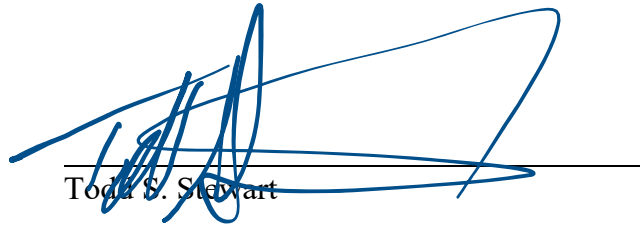
Sharon E. Web, Esquire
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov

Elizabeth R. Marx, Esquire
John Sweet, Esquire
Ria Pereira, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

John F. Lushis, Jr., Esquire
Norris McLaughlin, P.A.
515 W. Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-law.com
Counsel for Calpine Retail Holdings, LLC

David T. Evrard, Esquire
Kristine E. Robinson, Esquire
Aron J. Beatty, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
devrard@paoca.org
krobinson@paoca.org
abeatty@paoca.org

DATED: May 19, 2020



Todd S. Stewart

**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 :

**PREHEARING CONFERENCE MEMORANDUM
OF INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC,
NRG ENERGY, INC., VISTRA ENERGY CORP., ENGIE RESOURCES LLC.,
WGL ENERGY SERVICES, INC., AND DIRECT ENERGY SERVICES, LLC**

TO THE HONORABLE MARK A. HOYER

Pursuant to the Prehearing Order dated April 30, 2020 in the above-captioned matter and the Commission’s regulations at 52 Pa. Code §5.221, *et seq.*, Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc., Vistra Energy Corp., ENGIE Resources LLC., WGL Energy Services, Inc., and Direct Energy Services, LLC (“EGS Parties”) by and through their counsel, Hawke McKeon & Sniscak LLP, hereby submit their Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

1. On or about April 20, 2020, Duquesne Light Company (“Duquesne Light”) filed the above-captioned petition with the Pennsylvania Public Utility Commission (“Commission”).

2. On May 1, 2020, the EGS Parties filed a Petition to Intervene in the above-captioned proceeding.

II. EXPECTED ISSUES

3. The EGS Parties presently intend to address the following deficiencies in Duquesne Light’s Default service filing:

- a. Duquesne Light's proposed modifications to its heretofore successful Standard Offer Program ("SOP");
- b. Duquesne Light's proposal for shopping by customers on Customer Assistance ("CAP");
- c. Duquesne Light's plan to enter into power purchase agreement(s) with a utility scale solar project(s) as a means of compliance with the renewable energy credit ("REC") requirements; and,
- d. The EGS Parties will address ongoing responsibility for Network Integration Transmission Service ("NITS") charges.

III. PROPOSED WITNESSES

4. The EGS Parties have tentatively identified the following witness for this matter:

Chris Kallaher
Senior Director, Corporate Affairs
Direct Energy Services
162 Cypress Street
Brookline, MA 02445

If, for any reason this designation was to change, the EGS Parties will provide notice to Your Honor and the other parties at the earliest possible time. The EGS Parties reserve the right to offer additional witnesses as necessitated by the issues.

IV. LITIGATION SCHEDULE

5. The EGS Parties are committed to working with the other parties and Your Honor to develop a schedule that meets all the parties' needs.

V. DISCOVERY

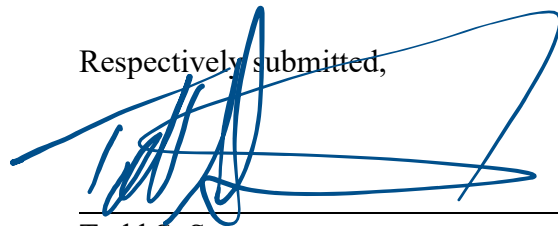
6. The EGS Parties have not submitted discovery as of the date of this prehearing memorandum but will endeavor to do so as soon as possible. The EGS Parties will work cooperatively with Duquesne Light and all the other parties in order to minimize discovery issues that might require the attention of the Presiding Administrative Law Judge. Moreover, the EGS Parties would not object to the typical discovery modifications proposed by the Office of Consumer Advocate in cases such as this.

VI. SETTLEMENT

7. The EGS Parties are willing to engage in settlement discussion with any and all parties at any time during this proceeding and welcome the opportunity to do so at the earliest possible date.

WHEREFORE, the EGS Parties respectfully submit this Prehearing Conference Memorandum in anticipation of the Prehearing Conference currently scheduled to be held telephonically on Friday, June 12, 2020 at 10:00 am.

Respectively submitted,



Todd S. Stewart
PA Attorney I.D. # 75556
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
Email: tsstewart@hmslegal.com
Telephone: 717.236.1300
Facsimile: 717.236.4841

Counsel for EGS Parties

DATED: May 19, 2020