



**Phillips Lytle** LLP

**VIA ELECTRONIC FILING**

June 3, 2020

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

**Re: Docket P-2020-3019522, Petition of Duquesne Light Company for Approval of  
a Default Service Plan for the Period June 1, 2021 through May 31, 2025**

Dear Secretary Chiavetta,

Enclosed please find the Petition to Intervene on behalf of StateWise Energy  
Pennsylvania LLC and SFE Energy Pennsylvania, Inc. (collectively, "StateWise") in the  
above-referenced proceeding. Copies have been provided to Administrative Law Judge  
Mark A. Hoyer and those indicated on the Certificate of Service.

Respectfully submitted,

Phillips Lytle LLP

By *Gregory L. Peterson*

Gregory L. Peterson

Enclosure

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

ATTORNEYS AT LAW

GREGORY L. PETERSON, PARTNER DIRECT 716 483 5172 GPETERSON@PHILLIPSLYTL.COM

201 WEST THIRD STREET, SUITE 205 JAMESTOWN, NY 14701-4907 PHONE 716 664 3906 FAX 716 664 4230

NEW YORK: ALBANY, BUFFALO, CHAUTAUQUA, GARDEN CITY, NEW YORK, ROCHESTER | WASHINGTON, DC | CANADA: WATERLOO REGION | PHILLIPSLYTL.COM

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Duquesne Light Company for  
Approval of a Default Service Plan for the Period  
June 1, 2021 through May 31, 2025**

**Docket P-2020-3019522**

**PETITION TO INTERVENE  
OF STATEWISE ENERGY PENNSYLVANIA LLC  
AND SFE ENERGY PENNSYLVANIA, INC.**

Pursuant to Section 5.71 to 5.74 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code §§ 5.71 to 5.74, StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc. (collectively, “StateWise”) respectfully submits this petition to intervene in the above referenced-proceeding (“Petition to Intervene”).

On April 20, 2020, Duquesne Light Company (“Duquesne”) filed a Petition for Approval of its Default Service Plan for the Period June 1, 2021 through May 31, 2025 (“DSP Petition”). The DSP Petition outlines Duquesne’s proposal to acquire and supply default service to customers who do not take service from an alternative electric generation supplier (“EGS”). In support of its Petition to Intervene, StateWise asserts the following:

1. StateWise is a licensed EGS serving residential and commercial customers in Pennsylvania. StateWise offers a range of energy-related value-added products and

services, including renewable energy and environmental attributes to support its customers' decarbonization objectives.

2. The DSP Petition includes proposed products, services, and rates which would apply to all retail customers in Duquesne's service territory, including current and potential future customers of StateWise.

3. The name and address of StateWise's attorney is

Gregory L. Peterson  
PA I.D. No. 23976  
201 West Third Street, Suite 205  
Jamestown, NY 14701-4907  
Phone: (716) 664-3906  
Fax: (716) 664-4230  
gpeterson@phillipslytle.com

4. StateWise's interest in the DSP Petition relates to the integrity of competitive markets in Pennsylvania, including the development, expansion, and maintenance of competitive programs that encourage the provision of innovative value-added retail products and services to Pennsylvania energy customers. In particular, StateWise has concerns about the prudence, appropriateness, and structure of Duquesne's Standard Offer Program and Customer Assistance Program as proposed in the DSP Petition.

5. StateWise intends to participate in the above-referenced proceeding to the extent necessary to protect and advocate for its interests and those of its customers, which cannot be adequately represented by any other party. Without having an

opportunity to intervene, StateWise would be bound by the actions taken by the Commission with respect to the DSP Petition which may have a material impact on StateWise's operations as an EGS serving customers in Duquesne's service territory.

6. StateWise's participation also serves the public interest as StateWise has extensive experience and industry knowledge that may assist in the development of a complete record on the reasonableness and prudence of programs proposed in the DSP Petition.

7. As set forth above, StateWise has a substantial and direct interest in this proceeding and satisfies the standards for intervention. 52 Pa. Code § 5.72 (permitting 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").

**WHEREFORE**, StateWise respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, providing StateWise with full party status in this proceeding.

June 3, 2020

Respectfully submitted,

Phillips Lytle LLP

By *Gregory L. Peterson*

Gregory L. Peterson  
PA I.D. No. 23976  
201 West Third Street, Suite 205  
Jamestown, NY 14701-4907  
Phone: (716) 664-3906  
Fax: (716) 664-4230  
gpeterson@phillipslytle.com

## VERIFICATION

I, Jeff Donnelly, Director of Regulatory Affairs and Compliance for StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc. ("StateWise"), hereby state that the facts set forth in the above-referenced Petition to Intervene in Docket P-2020-3019522 are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. 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.

Dated: June 3, 2020

*Jeff Donnelly*

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Jeff Donnelly  
StateWise Energy Pennsylvania LLC  
SFE Energy Pennsylvania, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA E-MAIL

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

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

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

Excel Consulting  
Brian Kalcic  
225 S. Meramac Avenue  
Suite 720-T  
St. Louis, MO 63105  
excel.consulting@sbcglobal.net

Norris McLaughlin, P.A.  
John F. Lushis, Jr.  
515 W. Hamilton Street  
Suite 502  
Allentown, PA 18101  
jlushis@norris-law.com

Office of Consumer Advocate  
David T. Evrard  
Aron J. Beatty  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
DEvrard@paoca.org  
ABeatty@paoca.org

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

Hawke McKeon & Sniscak, LLP  
Todd S. Stewart  
100 North Tenth Street  
Harrisburg, PA 17101  
tsstewart@hmslegal.com

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

June 3, 2020

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

Phillips Lytle LLP

By *Gregory L. Peterson*

Gregory L. Peterson  
PA I.D. No. 23976  
201 West Third Street, Suite 205  
Jamestown, NY 14701-4907  
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**Docket P-2020-3019522**

**NOTICE TO PLEAD**

You are hereby notified that a responsive pleading to the enclosed Petition to Intervene must be filed within twenty (20) days of the date of service. All responsive pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc. and the Administrative Law Judge assigned to this matter.

**File with:**

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

**With a copy to:**

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Jamestown, NY 14701-4907  
gpeterston@phillipslytle.com

Due to the COVID-19 pandemic, the Pennsylvania Public Utility Commission is encouraging individuals to eFile documents. Information regarding eFiling with the Commission is available at <https://www.puc.pa.gov/efiling/default.aspx>.

Date: June 3, 2020

*Gregory L. Peterson*

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Gregory L. Peterson  
Attorney for *StateWise Energy  
Pennsylvania LLC and SFE Energy  
Pennsylvania, Inc.*