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June 8, 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 Prehearing Conference Memorandum on behalf 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 :

**PREHEARING CONFERENCE MEMORANDUM
OF CALPINE RETAIL HOLDINGS, LLC**

TO THE HONORABLE MARK A. HOYER, DEPUTY CHIEF

ADMINISTRATIVE LAW

Pursuant to the Prehearing Conference Order dated April 30, 2020, in the above-captioned proceeding and Sections 5.221 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, 52 Pa. Code § 5.221, Calpine Retail Holdings, LLC (together with its operating subsidiaries, “Calpine”) hereby files this Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

1. On April 20, 2020, Duquesne Light Company (“Duquesne Light” or the “Company”) 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 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.*

2. On April 30, 2020, Calpine petitioned to intervene in this proceeding.

3. Calpine is a provider of competitive electric services and as such is directly affected by the default service programs maintained by the Company and other electric utilities.

II. COUNSEL

4. The name and address of Calpine’s attorney is:

John F. Lushis, Jr. (I.D. No. 32400)
Norris McLaughlin, P.A.
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5. Calpine has also sought the admission pro hac vice of the following attorney:

James Laskey (NJ Id. No 016311978)
Norris McLaughlin, P.A.
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All parties are requested to hereafter serve said counsel electronically with all documents served in this proceeding.

III. EXPECTED ISSUES

6. Calpine is concerned with issues that affect competitive markets in Pennsylvania, including the structure of the default service, utility affiliate participation, 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.

IV. PROPOSED WITNESSES

7. Calpine is not currently planning to file direct testimony. Depending on the issues raised in direct testimony by other parties, Calpine reserves the right to call Becky Merola, a Calpine Director of Government & Regulatory Affairs, as a rebuttal witness. Calpine reserves the right to offer additional witnesses as necessitated by the issues.

V. LITIGATION SCHEDULE

8. Calpine is willing to agree to any reasonable schedule that will permit the proceeding to be completed within nine (9) months.

VI. DISCOVERY

9. Calpine has not submitted discovery as of the date of this Prehearing Conference Memorandum. Should it conclude that such discovery is necessary, it will submit its requests consistent with the schedule established for the proceedings. Calpine proposes that exchange of documents be conducted electronically to the greatest extent feasible.

VII. SETTLEMENT

10. Calpine is willing to engage in settlement discussions with any and all parties at any time during this proceeding.

WHEREFORE, Calpine Retail Holdings, LLC respectfully submits 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.

Respectfully submitted,
NORRIS McLAUGHLIN, P.A.

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

Dated: June 8, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Prehearing Conference Memorandum on behalf of Calpine Retail Holdings, LLC upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail as follows:

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Dated: June 8, 2020

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