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June 10, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

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


Dear Secretary Chiavetta:

Attached for filing in accordance with Deputy Chief Administrative Law Judge Hoyer's Prehearing Conference Order is MAREC Action's Prehearing Conference Memorandum in the above matter. A copy is being served on Judge Hoyer and the parties listed on the attached Certificate of Service.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By


Charles E. Thomas, Jr.

Enclosure

cc: Bruce H. Burcat, Esquire

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**PREHEARING CONFERENCE MEMORANDUM
OF
MAREC ACTION**

AND NOW, comes MAREC Action (“MAREC”), by its attorneys, and files this Prehearing Conference Memorandum pursuant to the Prehearing Conference Order issued in this proceeding by Deputy Chief Administrative Law Judge Mark A. Hoyer on April 30, 2020.

I. INTRODUCTION

On April 20, 2020, Duquesne Light Company (“Duquesne”) filed a petition seeking Commission approval of its ninth Default Service Program (“DSP IX” or “Plan”) to establish terms and conditions under which Duquesne will acquire and supply default service for a four-year period, from June 1, 2021 through May 31, 2025.

Notice of the filing of the petition was published in the *Pennsylvania Bulletin* on Saturday, May 9, 2020, 50 Pa.B. 2508. As presented in the published notice, petitions to intervene in the proceeding were to be filed with the Commission on or before June 5, 2020 and on that date, MAREC filed its Petition to Intervene.

II. MAREC

The name, email and business address of MAREC and its company representative for purposes of this proceeding are:

MAREC Action
Post Office Box 385
Camden, DE 19934
Attention: Bruce Burcat, Esquire, Executive Director
marec.org@gmail.com

MAREC is a 501(c)4 non-profit, Pennsylvania Corporation formed to help advance the opportunities for renewable energy development primarily in the region where the Regional Transmission Organization, PJM Interconnection, operates. MAREC's footprint includes Pennsylvania and nine other jurisdictions in the region. MAREC members include utility scale wind and solar developers, wind turbine manufacturers and non-profit organizations dedicated to the growth of renewable energy technologies.

The name, address, and contact information of MAREC's counsel are:

Charles E. Thomas Jr., Esq.
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All pleadings, orders, correspondence, discovery, and other documents filed, served, or issued in this proceeding should be served on the above counsel in both electronic and paper forms. It is anticipated that MAREC's counsel will call into the Initial Prehearing Conference on June 12, 2020.

III. MAREC's POSITION AND ESTABLISHMENT OF PROCEDURAL SCHEDULE

MAREC continues to review Duquesne's filing and has not yet determined its position on the many matters presented therein. It may support, oppose, or propose revisions to the petition and DSP IX, as filed. MAREC will present its position in accordance with the procedural schedule established at the initial prehearing conference.

MAREC will cooperate with the other parties to reach a mutually agreeable litigation and discovery schedule and will work with the other parties to achieve a full or partial settlement of litigation issues. However, as previously stated, MAREC has not yet determined its position on the many matters presented in Duquesne's filing or the witnesses it will call. MAREC may support, oppose or propose revisions to Duquesne's petition and DSP IX, as filed. MAREC will present its position in accordance with the litigation schedule established at the initial prehearing conference and anticipates the need for written testimony, discovery and evidentiary hearings.

This proceeding will establish, among other things, the rates, terms, conditions, and structure of Duquesne's DSP IX. The proceeding will also directly affect MAREC's members – national utility-scale renewable energy developers, highly motivated to develop projects to help meet the requirements of the Commonwealth's Alternative Energy Portfolio Standards. While the long-term contract provisions will enable projects to be developed, MAREC contends that the use of long-term contracts as part of the DSP will also help reduce pricing to customers taking such service and provide a long-term pricing hedge to these customers. Accordingly, MAREC's participation is necessary to help protect the interest of its members and to provide evidence on price stability and the importance of renewable energy procurement as part of Duquesne's DSP.

WHEREFORE, MAREC Action respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,



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DATED: June 10, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have this 10th day of June, 2020, served a true and correct copy of the foregoing Prehearing Conference Memorandum of MAREC Action, upon the persons listed below which MAREC believes are participating in the proceeding:

VIA ELECTRONIC MAIL

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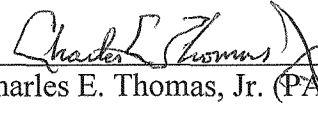
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