

June 8, 2016

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Duquesne Light Company for Approval of a Default
Service Plan for the Period June 1, 2017 through May 31, 2021;
Docket No. P-2016-2543140

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Noble Americas Energy Solutions LLC is its Prehearing Memorandum in the above-referenced matter. Copies of the Prehearing Memorandum are being served upon the persons and in the manner set forth in the certificate of service attached to it.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 
Charles E. Thomas, III

Enclosure

cc: Certificate of Service (w/encl.)
Becky Merola (w/encl.)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company for :
Approval of a Default Service Plan for the : Docket No. P-2016-2543140
Period June 1, 2017 through May 31, 2021 :

**PREHEARING MEMORANDUM
OF NOBLE AMERICAS ENERGY SOLUTIONS LLC**

AND NOW, comes Noble Americas Energy Solutions LLC (“Noble”), by its attorney, and submits this Prehearing Memorandum in accordance with the Prehearing Conference Order of Administrative Law Judge Conrad A. Johnson, dated May 23, 2016, and in connection with the initial Prehearing Conference scheduled to be held in the above-captioned matter on June 10, 2016.

I. Introduction

On May 2, 2016, Duquesne Light Company (“Duquesne”) filed a petition seeking Commission approval of its eighth Default Service Plan (“DSP VIII”) to establish terms and conditions under which Duquesne will acquire and supply default service for a four-year period, from June 1, 2017 through May 31, 2021. The petition also seeks approval of a Time-of-Use Program, Standard Offer Program, Customer Assistance Program, and other approvals required for the implementation of DSP VIII.

Notice of the filing of the petition was published in the *Pennsylvania Bulletin* on May 21, 2016. 46 Pa.B. 2645. Noble timely filed a Petition to Intervene in this proceeding on June 6, 2016. Noble incorporates by reference the statements and information provided in its Petition to Intervene and respectfully requests that Judge Johnson grant its intervention.

II. Service of Documents

Noble agrees to accept electronic service of all documents for this proceeding, with a hard copy to follow by regular mail. Service should be made on Noble's counsel:

Charles E. Thomas III, Esq.
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cet3@tntlawfirm.com

Noble respectfully requests that a courtesy copy of any electronically served document also be sent to Becky Merola, Government Affairs East for Noble (bmerola@noblesolutions.com).

III. Issues

Noble is in the process of identifying the issues it may pursue in this proceeding. Upon completing its review of Duquesne's filing and direct testimony, Noble may support, oppose, or propose modifications to DSP VIII. Noble reserves the right to present its position in accordance with the litigation schedule which will be finalized at the Prehearing Conference.

IV. Witnesses

Noble is in the process of identifying any potential witnesses it might call and the intended subject matter. Noble agrees to notify Judge Johnson and the parties whether it will be submitting direct testimony in this proceeding and reserves the right to submit rebuttal and surrebuttal testimony as it deems appropriate. Noble will comply with all deadlines established in the proceeding for the service of testimony.

V. Evidence

Because Noble is still identifying the issues it may pursue and the witnesses it may call, it has not determined what evidence, if any, it might present at hearing. Noble anticipates that any

evidence it might submit would consist of prepared direct testimony and accompanying exhibits. Noble also reserves the right to present additional evidence including, but not limited to, rebuttal and surrebuttal testimony and exhibits related thereto.

VII. Discovery

Noble will work with Judge Johnson and the other parties at the Prehearing Conference to develop any reasonable and appropriate modifications to the Commission's discovery rules as are necessary.

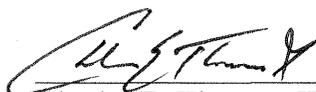
VIII. Proposed Litigation Schedule

Noble will cooperate with Judge Johnson and the other parties to finalize a schedule for the submission of testimony, hearings, and briefs at the Prehearing Conference.

IX. Settlement

Noble will actively participate in settlement discussions as they may occur.

Respectfully submitted,



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Counsel for Noble Americas Energy Solutions LLC

DATED: June 8, 2016

CERTIFICATE OF SERVICE

I hereby certify that I have this 8th day of June, 2016, served a true and correct copy of the foregoing Prehearing Memorandum of Noble Americas Energy Solutions LLC, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

VIA EMAIL AND FIRST CLASS MAIL

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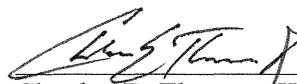
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