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September 23, 2016

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
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;
LETTER OF OPPOSITION TO NON-UNANIMOUS SETTLEMENT

Dear Secretary Chiavetta:

Noble Americas Energy Solutions LLC ("Noble"), a party to the above-captioned proceeding, has reviewed the Joint Petition for Approval of Non-Unanimous Settlement ("Settlement") being filed on even date herewith by Duquesne Light Company ("Duquesne"). Noble has not joined the Non-Unanimous Settlement and is submitting this letter to confirm its opposition thereto. Specifically, Noble opposes Paragraph 22 of the Non-Unanimous Settlement which, if approved, would eliminate the uncollectible expense component of Duquesne's Purchase of Receivables ("POR") discount for open market, competitive electric generation suppliers ("EGS") that elect to participate in the POR program and allow Duquesne to recover those costs until its next base rate proceeding through its Rider No. 1 Retail Market Enhancement Surcharge which is recoverable from all customers regardless of their chosen EGS and irrespective of the billing mechanism employed by that EGS.

In accordance with Commission regulations at 52 Pa. Code, Noble will file its objections and a statement in opposition to the Non-Unanimous Settlement, which shall more fully address Noble's reasons for opposing the settlement, on September 29, 2016, in accordance with the revised procedural schedule approved by Administrative Law Judge Conrad A. Johnson on September 20, 2016.

Thank you for your consideration.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

cc: Honorable Conrad A. Johnson
Certificate of Service
Becky Merola

CERTIFICATE OF SERVICE

I hereby certify that I have this 23rd day of September, 2016, served a true and correct copy of the foregoing letter upon the parties, listed below, via email and first class mail 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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