

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos. R-2010-2179522
Office of Small Business Advocate	:	C-2010-2193322
Office of Consumer Advocate	:	C-2010-2194660
Linda L. Sullivan	:	C-2010-2153066
Janet Vento	:	C-2010-2196479
Mary M. Chestnut	:	C-2010-2196790
Donald W. Killmeyer	:	C-2010-2199926
Sarah Divilly	:	C-2010-2199945
Delores D. White	:	C-2010-2200548
Vicki Courie	:	C-2010-2201179
Rebecca Nesvet	:	C-2010-2202732
Marie Rubottom	:	C-2010-2202837
Duquesne Industrial Intervenors	:	C-2010-2203197
Carolina Ursitti	:	C-2010-2203912
Donald J. Gilbert	:	C-2010-2204100
NRG Energy Center Pittsburgh, LLC	:	C-2010-2206586
Jay Folkens	:	C-2010-2213076
John and Sherry Urban	:	C-2010-2214197
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	:	
Complainants,	:	
	:	
	:	
v.	:	
	:	
	:	
Duquesne Light Company,	:	
	:	
	:	
Respondent	:	

**STATEMENT OF NRG ENERGY CENTER PITTSBURGH, LLC  
IN SUPPORT OF THE JOINT PETITION FOR SETTLEMENT**

NRG Energy Center Pittsburgh, LLC (“NRGEC”), by and through  
its undersigned counsel, hereby submits this statement in support of the Joint

Petition for Settlement (“Settlement”) executed by the parties (“Joint Petitioners”) to this proceeding.

In support of this Settlement, NRGECF states as follows:

1. NRGECF is a certificated Pennsylvania public utility providing steam, hot water, and chilled water service in the 21st and 22nd wards in the City of Pittsburgh. NRGECF operates under certificates of public convenience issued by this Commission and is an indirect, wholly-owned subsidiary of NRG Thermal LLC, an NRG Energy Inc. company. Its principal place of business is 111 South Commons, Pittsburgh, PA 15212.

2. NRGECF provides service to more than 25 customer buildings. More specifically, NRGECF provides both district heating and cooling services to a total of 6.3 million square feet of building space. NRGECF’s customers include: Allegheny General Hospital, Carnegie Science Center, Andy Warhol Museum, Community College of Allegheny County, Children’s Museum of Pittsburgh, Allegheny Center residential and commercial complex, and PNC Park, home of the Pittsburgh Pirates.

3. NRGECF also is a customer of Duquesne Light Company (“Duquesne Light”) under Rate Class General Service Large (“GL”).

4. NRGCEP had concerns about the overall level of the rate increase initially requested by Duquesne Light (approximately 23.4 percent or \$87.3 million per year). NRGCEP also had concerns about the allocation of this rate increase among the various rate schedules. In NRGCEP's view, Duquesne Light's proposal failed to eliminate cross-subsidies that harm commercial and industrial ratepayers, including customers receiving service under Rate Schedule GL. All of these issues, however, were the subject of extensive negotiations among the Joint Petitioners. NRGCEP believes that the parties negotiated in good faith to reach a mutually-acceptable compromise.

5. Under the Settlement, the overall rate increase was reduced to approximately 11.7 percent. Additionally, the cross-subsidies established under Duquesne Light's existing tariff were reduced to some extent. Accordingly, on a percentage basis, the rate increase for customers served under the Rate Schedule GL will be less than the average percentage increase.

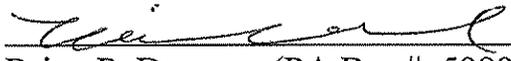
6. NRGCEP supports this Settlement because it is fair, just and reasonable and therefore is in the public interest. While Duquesne Light still will earn varying rates of return on its service to different customer groups, the Settlement moves in a positive direction and reduces the disparities that now exist.

WHEREFORE, for all of the foregoing reasons, NRGCEP supports the Settlement and respectfully requests that the ALJs and the Commission expeditiously review and approve the Settlement.

Respectfully submitted,

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*Attorneys for NRG Energy Center Pittsburgh, LLC*

Dated: January 7, 2011