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May 9, 2012

**VIA ELECTRONIC FILING AND HAND DELIVERY**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

RE: Petition of Duquesne Light Company for Approval Of Default Service Plan for the Period June 1, 2013 Through May 31, 2015, Docket No. P-2012-2301664; **PETITION TO INTERVENE OF DOMINION RETAIL, INC. AND INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission are the original and three (3) copies of the Petition to Intervene of Dominion Retail, Inc. d/b/a Dominion Energy Solutions and Interstate Gas Supply, Inc. in the above-captioned docket. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please contact the undersigned.

Very truly yours,

Todd S. Stewart  
*Counsel for Dominion Retail, Inc. and  
Interstate Gas Supply, Inc.*

TSS/alh  
Enclosures

**MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in the manner indicated below, and in accordance with the requirements of 52 P.A. Code §1.54 (relating to service by a party).

**VIA EMAIL AND FIRST CLASS MAIL**

Irwin A. Popowsky, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor Forum Place  
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David T. Fisfis, Esquire  
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400 North Street  
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Daniel Clearfield, Esquire  
Eckert Seamans  
213 Market Street  
8th Floor  
Harrisburg, PA 17101



Todd S. Stewart

Dated this 9<sup>th</sup> day of May 2012

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Petition of Duquesne Light Company for Approval :  
Of Default Service Plan for the Period : Docket No. P-2012-2301664  
June 1, 2013 Through May 31, 2015 :

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**JOINT PETITION TO INTERVENE OF  
DOMINION RETAIL, INC. and INTERSTATE GAS SUPPLY, INC.**

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AND NOW, come Dominion Retail, Inc., d/b/a Dominion Energy Solutions (“DES”), and Interstate Gas Supply, Inc., d/b/a IGS Energy (“IGS”)(collectively, “EGS Parties”), by and through their counsel, Hawke McKeon & Sniscak, LLP, and hereby Jointly Petition to Intervene in the above-captioned matter pursuant to 52 Pa. Code § 5.71, *et seq.* The EGS Parties are both licensed Electric Generation Suppliers (“EGS”) serving customers in the Duquesne Light Company (“Duquesne”) service territory. Both have actively participated in the Pennsylvania Public Utility Commission’s (“Commission”) ongoing proceedings to promote increased competition in the electricity markets in Pennsylvania and therefore both have a direct and substantial interest in the outcome of this proceeding. In support of their Joint Petition to Intervene, the EGS Parties state and avers as follows:

1. The EGS Parties are electric generation suppliers licensed by the Pennsylvania Public Utility Commission and both serve customers in Duquesne’s service territory.
2. The EGS Parties are represented in this matter by the following counsel. Please serve this counsel with all documents hereafter filed in this proceeding by electronic and paper form.

Todd S. Stewart  
Attorney I.D. No. 75556  
Hawke McKeon & Sniscak LLP  
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Please also include the following counsel on the electronic service list or any expanded service list for this matter:

Vince Parisi, Esquire  
General Counsel  
Interstate Gas Supply, Inc. d/b/a IGS  
Energy  
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3. On or about April 27, 2012 Duquesne filed a Default Service Plan with the Commission seeking approval of its Default Service Plan for the period June 1, 2013 through May 31, 2015. In addition to providing a substantially revamped procurement regimen for that period, Duquesne has proposed a retail opt-in aggregation program, a standard offer customer referral program and a new and moving customer referral program in response to the Commission's March 2, 2012 Order, *Investigation of Pennsylvania's Retail Electricity Markets*, Docket No. I-2011-2237952, (Final Order entered March 2, 2012).

4. The structure of Duquesne's proposed procurement and the details of the market enhancements are of particular interest to the EGS parties and will be the primary focus of their efforts in this matter.

5. Because both DES and IGS serve customers in the Duquesne service territory and because of the nature of the default service plan and the enhancements included therein, both

DES and IGS have a direct and substantial interest in the outcome of this proceeding, and will be bound by any Commission decision. Moreover, the interest is heightened because the competitive enhancements are intended to spur further competition in the Duquesne service territory which will directly impact the businesses of the EGS Parties. Finally, the interest of the EGS Parties is unique and cannot be reasonably represented by any other party to this proceeding. The interests of DES and IGS comply with the applicable criteria of 52 Pa. Code § 5.72(a)(2) and accordingly should be granted.

WHEREFORE, DES and IGS respectfully request that the Pennsylvania Public Utility Commission grant their Joint Petition to Intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.72(a)(2) and that they be allowed full party status in this matter.

Respectfully submitted,



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*Counsel for Dominion Retail, Inc., and Interstate Gas Supply, Inc.*

Dated: May 9, 2012