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June 4, 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**  
**AND HAND DELIVERY**

**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**

Dear Secretary Chiavetta:

Enclosed please find for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the original and three (3) copies of the Petition to Intervene of the Duquesne Industrial Intervenors ("DII") concerning the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and Petition, and kindly return them for our filing purposes. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By   
Pamela C. Polacek

Counsel to the Duquesne Industrial Intervenors

/lmc

c: Administrative Law Judge Katrina L. Dunderdale (via E-mail and First-Class Mail)\  
Certificate of Service

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA E-MAIL AND FIRST CLASS MAIL**

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Counsel to Duquesne Industrial Intervenors

Dated this 4<sup>th</sup> day of June, 2012, at Harrisburg, Pennsylvania.

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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**PETITION TO INTERVENE  
OF DUQUESNE INDUSTRIAL INTERVENORS**

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Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, the Duquesne Industrial Intervenors ("DII") hereby file this Petition to Intervene in response to the above-captioned Petition ("Petition") of Duquesne Light Company ("Duquesne" or "Company").

In its Petition, Duquesne sets forth a proposed default service plan ("DSP"). Beginning for the period of June 1, 2013, this DSP would apply to all retail customers in Duquesne's service territory.

Under Duquesne's plan, Large Commercial and Industrial ("Large C&I") customers will be offered day-ahead Hourly Price Service ("HPS"). Duquesne's HPS includes a large adder and may be contrary to the requirements of the Public Utility Code. As a result, DII respectfully requests that the Commission modify Duquesne's Large C&I plan as set forth herein.

In support of its Petition to Intervene, DII asserts as follows:

**I. PETITION TO INTERVENE**

1. DII is an ad hoc association of energy-intensive commercial, industrial and institutional customers receiving electric service in Duquesne's service territory. DII has been an active participant in many PUC proceedings addressing service terms and conditions in Duquesne's territory, recent Duquesne DSP proceedings and Duquesne's last Distribution Base Rate case.

2. DII members traditionally purchase electric distribution service from Duquesne primarily under Rate Schedules GL, L, and GLH, and associated special contracts or service riders. DII members have the option to purchase electric generation supply service from Duquesne or from an Electric Generation Supplier ("EGS"). For purposes of this proceeding, DII includes the companies listed in Attachment "A" hereto. DII will update Attachment A during the course of this proceeding to reflect changes in its membership.

3. DII members are concerned with issues regarding the terms and conditions of their electricity service, including the rates and options provided by Duquesne for HPS. The Commission's final disposition of Duquesne's Petition will directly affect the rates that Duquesne imposes on DII members for HPS. As Duquesne's largest customers, DII members are in a unique position to comment to the Commission on the customer impact of Duquesne's DSP for Large C&I customers. Moreover, DII is concerned that other parties to the proceeding will raise issues in the proceeding that may be adverse to DII members.

4. DII members have an interest in this proceeding that is not represented by any other party of record; consequently, DII satisfies the standards for intervention under Section 5.72 of the Commission's Regulations, 52 Pa. Code § 5.72.

5. The names and address of DII's attorneys are:

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DII requests that the names and address of its attorneys be added to the Commission's and all parties' service lists. All correspondence in this proceeding from the Commission should be directed to the attention of Pamela C. Polacek at the address listed above.

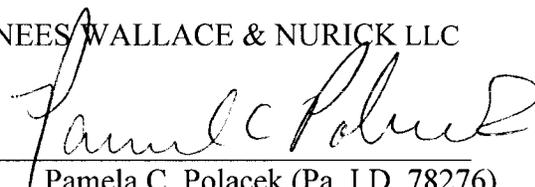
## II. CONCLUSION

**WHEREFORE**, for the reasons stated above, DII respectfully requests that this Honorable Commission grant this Petition to Intervene and provide DII with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By



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Counsel to the Duquesne Industrial Intervenors

Dated: June 4, 2012

**DOCKET NO. P-2012-2301644**

**DUQUESNE INDUSTRIAL INTERVENORS**

Giant Eagle, Inc.

**ATTACHMENT "A"**  
**(June 4, 2012)**

