

May 29, 2014

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Petition of Duquesne Light Company for Approval of Default Service Plan for the Period June 1, 2015 through May 31, 2017; Docket No. P-2014-2418242

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 on the certificate of service attached to it.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By   
Charles E. Thomas, III

Encl.

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Petition of Duquesne Light Company for :  
Approval of Default Service Plan for the : Docket No. P-2014-2418242  
Period June 1, 2015 through May 31, 2017 :

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

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AND NOW, comes Noble Americas Energy Solutions LLC (“Noble”), by its attorneys, and submits this Prehearing Conference Memorandum in accordance with the Prehearing Conference Order of Administrative Law Judge Katrina L. Dunderdale, dated May 7, 2014, and in connection with the Prehearing Conference scheduled to be held in the above-captioned matter on June 2, 2014.

**I. Introduction**

On or about April 24, 2014, Duquesne Light Company (“Duquesne”) filed a petition seeking Commission approval of its seventh Default Service Plan (“Plan”) to establish terms and conditions under which Duquesne will acquire and supply default service for the period from June 1, 2015 through May 31, 2017. The petition also seeks approval of a Time-of-Use Program and other approvals required for the implementation of the Plan.

Notice of the filing of the petition was published in the *Pennsylvania Bulletin* on May 10, 2014. *See* 44 Pa.B. 2831. As presented in the published notice, petitions to intervene in the proceeding were to be filed with the Commission on or before May 27, 2014.

On May 23, 2014, Noble filed a Petition to Intervene (“Petition”) in this proceeding. Noble incorporates by reference the statements and information provided in its Petition and respectfully requests that Judge Dunderdale grant its intervention.

**II. Counsel for Noble**

The name, business addresses, telephone and fax numbers, and email address of Noble's counsel are:

Charles E. Thomas III, Esq.  
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**III. Noble's Participation**

Noble will participate in this proceeding as an active party. It requests that copies of all discovery responses, including any discovery responses that may have already been distributed, be provided to counsel for Noble. As necessary and appropriate, Noble will conduct its own discovery, present testimony, cross examine witnesses, and submit briefs for Commission consideration.

**IV. 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 Duquesne's proposed Plan. Noble reserves the right to present its position in accordance with the litigation schedule which will be finalized at the Prehearing Conference.

**V. Witnesses**

Noble is in the process of identifying any potential witnesses it may call and their intended subject matter. Noble agrees to notify Judge Dunderdale 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.

**VI. Schedule for Submission of Testimony, Hearings, and Briefs**

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

**VII. Proposed Plan and Schedule of Discovery**

Noble will cooperate with Judge Dunderdale and all other parties at the Prehearing Conference to develop a proposed plan and schedule of discovery, as well as any reasonable and appropriate modifications to the Commission's Rules of Practice and Procedure for the conduct of discovery as are necessary.

**VIII. Settlement**

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

**IX. Email Distribution List**

In addition to the undersigned counsel, Noble requests that Becky Merola, Government Affairs East for Noble ([bmerola@noblesolutions.com](mailto:bmerola@noblesolutions.com)), be included on the email distribution list established for this proceeding.

Respectfully submitted,



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*Counsel for Noble Americas Energy Solutions LLC*

DATED: May 29, 2014

Petition of Duquesne Light Company for :  
Approval of Default Service Plan for the : Docket No. P-2014-2418242  
Period June 1, 2015 through May 31, 2017 :

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 29<sup>th</sup> day of May, 2014, served a true and correct copy of the foregoing Prehearing Conference Memorandum of Noble Americas Energy Solutions LLC, upon the persons and in the manner set forth below:

#### Electronic Mail and First Class Mail, Postage Prepaid

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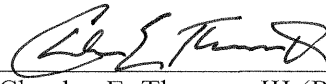
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