

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Kevin J. Moody
Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

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April 9, 2007

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
2nd Fl., 400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Duquesne Light Company for Approval of
Default Service Plan for the Period January 1, 2008
through December 31, 2010, Docket No. P-00072247

Dear Secretary McNulty:

On behalf of The Retail Energy Supply Association, enclosed for filing please find an original and three copies of its Objections to Interrogatories and Requests for Production of Documents of Duquesne Light Company, Set I with regard to the above-referenced matter. A copy has been served in accordance with the Certificate of service.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/lww
Enclosures

cc: Cert of Service w/enc.
Hon. Larry Gesoff w/enc.

HAR:72499.1/MID051-242246



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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APR 09 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Petition of Duquesne Light Company :
For Approval of Default Service Plan :
For The Period January 1, 2008 :
Through December 31, 2010 :

Docket No. P-00072247

**OBJECTIONS
OF THE RETAIL ENERGY SUPPLY ASSOCIATION TO INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
OF DUQUESNE LIGHT COMPANY, SET I**

Pursuant to 52 Pa. Code § 5.342(c) and Administrative Law Judge ("ALJ") Gesoff's Prehearing Order issued February 28, 2007, incorporating the modifications to the Commission's discovery rules adopted in the Duquesne Light Company ("Duquesne")/Macquarie Consortium merger proceeding (Docket Nos. A-11050F0035, A-311233F002), the Retail Energy Supply Association ("RESA") hereby files these objections to Duquesne's Interrogatories and Request for Production of Documents to Direct Energy and RESA, Set I. In support of its objections, RESA avers as follows:

I. BACKGROUND

1. In accordance with the modified discovery rules, counsel for RESA contacted Duquesne's counsel on Thursday, April 5, 2007 to discuss RESA's objections. On Friday, April 6, 2007, Duquesne's counsel proposed a resolution of RESA's objections in an e-mail to RESA's counsel. Counsel for RESA and Duquesne discussed the proposed resolution and other approaches on Monday, April 9, 2007. However, in the abbreviated time available, counsel were not able to resolve RESA's objections or limit the scope of the RESA's responses in a manner acceptable to RESA, so RESA files these

written objections within five (5) days of service of the discovery requests, as the fifth day occurred on Saturday, April 7, 2007.

II. OBJECTIONS

2. General objection.

RESA objects generally to the requests for information about, or from, individual RESA members that are not parties to this proceeding, on the basis such information: (i) is not relevant to this proceeding; (ii) is not likely to lead to admissible evidence; (iii) relates to matter which is privileged and confidential; (iv) would cause RESA's individual members who are not parties unreasonable annoyance, burden and expense to respond; and (v) would require RESA's individual members who are not parties to make unreasonable investigations or special studies.

RESA is a trade association whose submittals generally – and in this case in particular – identify its membership and state clearly that its submittals represent the position of RESA as an organization but not necessarily the views of all individual RESA members. The Commission has clearly conferred standing to participate in Commission proceedings in a representative capacity on advocacy organizations such as RESA so that their membership's consensus views can be heard even though individual members do not or cannot commit the resources to participate individually.¹ Although RESA's standing is not an issue, as RESA has been granted party status, RESA's party status does not confer standing on each member. Only those members whose interventions have been granted are parties that should be subject to discovery. The positions of individual, non-party RESA members are simply not relevant because RESA's positions represent the

¹ *Pa. P.U.C. et al. v. Columbia Gas of Pennsylvania, Inc.*, Docket Nos. R-00049783, R-00049783C0001-0007, Order entered November 4, 2005 at 23-24.

consensus views of its members as an organization.² Permitting Duquesne to obtain company specific information about RESA members who are not parties, or to essentially "poll" non-party RESA members on their individual positions on all or particular issues, would effectively nullify the reason for RESA's participation as a party and destroy the economies of scale recognized by the Commission as a reason to permit organizations such as RESA to participate as parties.

3. DLC Set 1 - 1 to Direct Energy and RESA states as follows:

Referring to p. 1, provide a list of the electric utility service areas where Direct Energy currently serves residential electric customers in the United States. For each service area, provide the month and year in which Direct Energy began such service.

a. Provide the same information for each member of RESA identified in footnote 1 on page 2.

RESA objects to No. 1.a. on the basis of its "general objection" as set forth above in ¶ 2, which is incorporated herein by reference. Without waiving its objections, RESA intends to provide Duquesne with information consistent with its objections (except for Reliant Energy Retail Services, LLC, who is not participating in this proceeding as part of RESA as its parent company, Reliant Energy, Inc., has entered into a settlement agreement with Duquesne in this proceeding). Also the information requested may not be available in RESA members' records in the manner requested, RESA members, if required to provide any information responsive to the request, should be limited to the information readily available in members' records and should be permitted to be provided in the aggregate.

4. DLC Set 1 - 2 to Direct Energy and RESA states as follows:

Referring to p. 2 provide a list of the electric utility service areas where Direct Energy currently serves small C&I customers with peak demands

² In accordance with 52 Pa. Code § 5.73(b), RESA's petition to intervene listed its members.

<300 kW in the United States. For each service area, provide the month and year in which Direct Energy began such service.

- a. Provide the same information for each member of RESA identified in footnote 1 on page 2.

RESA objects to No. 2.a. on the same basis it set forth above in ¶ 3, which is incorporated herein by reference. Without waiving its objections, RESA intends to provide Duquesne with information consistent with its objections, as described above in ¶ 3.

5. DLC Set I - 5 to Direct Energy and RESA states as follows:

Referring to p. 4, lines 10-14:

- b. Please provide a list of all members of RESA who support the ANOFR and Policy Statement without any modifications.
- d. Provide a list of RESA members that believe that if the Commission were to approve the ANOFR and Policy Statement in its current form, this would provide a "competitive retail market" (as referred to on p. 5) for residential and small C&I customers.

RESA objects to No. 5.b. and d. on the same basis as set forth above in ¶ 3, which is incorporated herein by reference. Nonetheless, RESA is providing a response consistent with its objection, as stated above in ¶ 3.

6. DLC Set I - 14 to Direct Energy and RESA states as follows:

Referring to p. 8, lines 10-15 ["A downward market pricing trend could result from a fundamental shift in the underlying fuel commodities markets. Electricity prices could decrease by 50% over the course of three years, yet suppliers are still not likely to enter the market despite all of the potential savings, or "headroom", because of the risk of being non-competitive for long periods of time after the next POLR price is set.":

- b. List all RESA members who believe that retail suppliers are not likely to enter a market in which the default service rate is 100% higher than prevailing market prices for the same service.

RESA objects to No. 14.b. on the same basis as set forth above in ¶ 3.

7. DLC Set I - 25 to Direct Energy and RESA states as follows:

Referring to p. 3 of Exhibit FPL-3, does the witness, Direct Energy, or any member of RESA know of any residential or small C&I customers anywhere in Pennsylvania who procures its electric supply and associated services "directly from the wholesale market?"

RESA objects to No. 25 on the same basis as set forth above in ¶ 3, which is incorporated herein by reference. Nonetheless, RESA is providing a response consistent with its objection as stated above in ¶ 3.

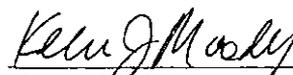
8. DLC Set I - 28 to Direct Energy and RESA states as follows:

Referring to p. 4, lines 20-22, identify all RESA members and which members support Mr. Lacey's testimony in this proceeding.

RESA objects to No. 28 on the same basis as set forth above in ¶ 3, which is incorporated herein by reference.

WHEREFORE, RESA respectfully requests that Your Honor and the Pennsylvania Public Utility Commission grant these objections to Duquesne's Set I to Direct Energy and RESA.

Respectfully submitted,



Kevin J. Moody, Esquire
Daniel Clearfield, Esquire
Wolf Block Schorr and Solis-Cohen LLP
213 Market Street, 9th Floor
Harrisburg, PA 17101

Date: April 9, 2007

Attorneys for the Retail Energy Supply
Association

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Objections Of The Retail Energy Supply Association To Interrogatories And Requests For Production Of Documents Of Duquesne Light Company, Set I in P-00072247 upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

VIA E-MAIL & FIRST CLASS MAIL

David B. MacGregor, Esquire
Post and Schell, PC
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103-2921

Steven S. Goldenberg, Esquire
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Drive, Bldg. 3
Lawrenceville, NJ 08648-2311

Anthony Kanagy, Esquire
Post and Schell, PC
17 North Second Street ,12th Floor
Harrisburg, PA 17101-1601

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
Harrisburg, PA 17101

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1923

Theodore H. Jobes, Esquire
Fox Rothschild, LLP
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291

Johnnie Simms, Esquire
Charles Shields, Esquire
Robert V. Eckenrod, Esquire
Office of Trial Staff
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Gary A. Jeffries, Esquire
Senior Counsel
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburgh, PA 15221-5817

Sharon Webb, Assistant Small Business
Advocate
Office of Small Business Advocate
Commerce Building Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, NW
Suite 800
Washington, DC 20036-3816

Pamela C. Polacek, Esquire
Adam L. Benshoff, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

RECEIVED

APR 09 2007

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Fl.
Harrisburg, PA 17101-1503

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219

Adrian D. Newall
Assistant General Counsel
Exelon Generation Company, LLC
2301 Market Street, S23-1
Philadelphia, PA 19101

John Hanger, Esquire
PennFuture
610 North Third Street
Harrisburg, PA 17101

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Date: April 9, 2007

Harry S. Geller
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

David I. Fein
Senior Regulatory Counsel
Constellation Energy
111 Market Place
Suite 500
Baltimore, MD 21202

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy J. Kolich, Esquire
FirstEnergy Services
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217



Kevin J. Moody

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

DOCUMENT FOLDER

Kevin J. Moody
Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

April 9, 2007

Via E-mail and First Class Mail

Anthony Kanagy, Esquire
Post & Schell
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Re: Petition of Duquesne Light Company for Approval of
Default Service Plan for the Period January 1, 2008
through December 31, 2010, Docket No. P-00072247

Dear Mr. Kanagy:

Enclosed please find Strategic Energy, LLC's Responses to Duquesne Light Company's Interrogatories and Requests for Production of Documents to Strategic Energy and RESA, Set I, Nos. 1-8 and 10, in the above-referenced matter. The response to No. 9 will be provided as soon as possible, but no later than Wednesday, April 11, 2007.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/lww
Enclosure

HAR:72483.1/MID051-242246

SECRETARY'S OFFICE
2007 APR 10 AM 10:22

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Interrogatory responses to Duquesne Light Company in P-00072247 upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

VIA E-MAIL & FIRST CLASS MAIL

David B. MacGregor, Esquire
Post and Schell, PC
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103-2921

Anthony Kanagy, Esquire
Post and Schell, PC
17 North Second Street ,12th Floor
Harrisburg, PA 17101-1601

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1923

Johnnie Simms, Esquire
Charles Shields, Esquire
Robert V. Eckenrod, Esquire
Office of Trial Staff
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Sharon Webb, Assistant Small Business
Advocate
Office of Small Business Advocate
Commerce Building Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

Steven S. Goldenberg, Esquire
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Drive, Bldg. 3
Lawrenceville, NJ 08648-2311

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
Harrisburg, PA 17101

Theodore H. Jobses, Esquire
Fox Rothschild, LLP
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291

Gary A. Jeffries, Esquire
Senior Counsel
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburgh, PA 15221-5817

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, NW
Suite 800
Washington, DC 20036-3816

Pamela C. Polacek, Esquire
Adam L. Benshoff, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 18108-1166

SECRETARY OF TREASURY
2007 APR 10 PM 10:22

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Fl.
Harrisburg, PA 17101-1503

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219

Adrian D. Newall
Assistant General Counsel
Exelon Generation Company, LLC
2301 Market Street, S23-1
Philadelphia, PA 19101

John Hanger, Esquire
PennFuture
610 North Third Street
Harrisburg, PA 17101

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Harry S. Geller
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

David I. Fein
Senior Regulatory Counsel
Constellation Energy
111 Market Place
Suite 500
Baltimore, MD 21202

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy J. Kolich, Esquire
FirstEnergy Services
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217

Date: April 9, 2007



Kevin J. Moody

**Reger
Rizzo
Kavulich
& Darnall** LLP
ATTORNEYS AT LAW

**DOCUMENT
FOLDER**

SUITE 300
20 NORTH MARKET SQUARE
HARRISBURG, PA 17101
TEL: 717.233.1855
FAX: 717.233.1884
www.rrkdllaw.com

DAVID P. ZAMBITO
E-MAIL: dzambito@rrkdllaw.com

April 9, 2007

Anthony D. Kanagy, Esquire
Post & Schell PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

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PA
SECRETARY'S BUREAU

Re: Petition of Duquesne Light Company for Approval of Default Service Plan for the Period January 1, 2008 through December 31, 2010; Docket No. P-00072247;
CONSTELLATION NEWENERGY, INC.'S RESPONSES TO DUQUESNE LIGHT COMPANY'S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS - SET I

Dear Mr. Kanagy:

Enclosed are an original and two (2) copies of Constellation NewEnergy, Inc.'s Responses to Duquesne Light Company's Interrogatories and Requests for Production of Documents - Set I in the above-referenced proceeding.

Per the Certificate of Service, copies have been served upon all parties to this proceeding. Note however that, due to the voluminous nature, hard copies of **Appendix A** have been served only on Duquesne Light Company. Hard copies of **Appendix A** will be provided to other parties upon request.

Very truly yours,

REGER RIZZO KAVULICH & DARNALL LLP



David P. Zambito
Counsel for Constellation NewEnergy, Inc.

DPZ/kmg

cc: James J. McNulty, Secretary (letter and Certificate of Service only)
Per Certificate of Service

BTL

**CERTIFICATE OF SERVICE
(Docket No. P-00072247)**

I hereby certify that I have this day served Constellation NewEnergy, Inc.'s Responses to Duquesne Light Company's Interrogatories and Requests for Documents – Set I upon the parties listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL

Pamela C. Polacek, Esquire
Adam L. Benshoff, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
ppolacek@mwn.com
abenshoff@mwn.com

Tanya McCloskey, Esquire
David Evrard, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
tmccloskey@paoca.org
devrard@paoca.org

Steven C. Gray, Esquire
Sharon Webb, Esquire
Office of Small Business Advocate
Commerce Bldg. Suite 1102
300 N. Second Street
Harrisburg, PA 17101
sgray@state.pa.us
swebb@state.pa.us

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Daniel Clearfield, Esquire
Kevin J. Moody, Esquire
Wolf, Block, Schorr and Solis-Cohen LLP
213 Market Street, 9th Floor
Harrisburg, PA 17108-0865
dclearfield@wolfblock.com
kmoody@wolfblock.com
(Strategic Energy, LLC)
(Retail Energy Supply Association)

John E. McCaffrey, Esquire
Stinson Morrison Heckerd LLP
1150 18th Street, N.W., Suite 800
Washington, DC 20036-3816
jmccaffrey@stinsonmoheck.com
(Citizens Power, Inc.)

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SECRETARY'S BUREAU

Charles D. Shields, Esquire
Michael Gruber, Esquire
Robert V. Eckenrod, Esquire
Pennsylvania Public Utility Commission
Office of Trial Staff
Commonwealth Keystone Building
400 North Street, 2 West
PO Box 3265
Harrisburg, PA 17105-3265
chshields@state.pa.us
mgruber@state.pa.us
roeckenrod@state.pa.us

Todd S. Stewart, Esquire
Hawke McKeon Sniscak & Kennard LLP
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17105-1778
tsstewart@hmsk-law.com
(Dominion Retail, Inc.)

Erin Creahan
Strategic Energy, LLC
Two Gateway Center, 9th Floor
Pittsburgh, PA 15222-1458
ecreahan@sel.com

Kathy J. Kolich, Esquire
First Energy
76 South Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Post & Schell, PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
(Duquesne Light Company; Duquesne Light Holdings; DQE Communication Network Services LLC; and DQE Holding LLC)

Brian J. Knipe, Esquire
Ramona C. Cataldi, Esquire
Buchanan Ingersoll & Rooney, P.C.
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121
bjknipe@klettrooney.com
(Reliant Energy, Inc.)

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue, 8th Floor
Pittsburgh, PA 15219
gjack@duqlight.com

David I. Fein, Esquire
Constellation NewEnergy, Inc.
550 W. Washington Blvd., Suite 300
Chicago, IL 60661
david.fein@constellation.com

Divesh Gupta, Esquire
Constellation Energy Commodities
Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202
divesh.gupta@constellation.com

Gary A. Jeffries, Esquire
Dominion Resources Services, Inc.
1201 Pitt Street
Pittsburgh, PA 15221
gjeffries@dom.com

Steven S. Goldenberg, Esquire
Fox Rothschild LLP
Princeton Pike Corporate Center
997 Lenox Drive, Building 3
Lawrenceville, NJ 08648-2311
SGoldenberg@foxrothschild.com
(Pennsylvania Large Energy Users Coalition)

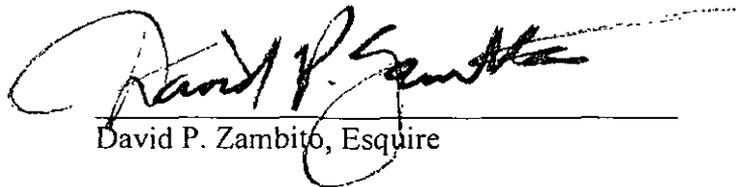
Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004
pforshay@sablaw.com

Adrian D. Newall, Esquire
Assistant General Counsel
Kent D. Murphy, Esquire
Acting Associate General Counsel
Exelon Business Service Company
2301 Market Street, S-23-1
P.O. Box 8699
Philadelphia, PA 19103-8699
adrian.newall@exeloncorp.com
kent.murphy@exelcorp.com

George Jugovic, Jr., Esquire
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219
jugovic@pennfuture.org

Nicholas A. Pasciullo, Esquire
Pasciullo Law Firm, P.C.
5435 Pocusset Street
Pittsburgh, PA 15217
Pasciullo@pasciullolawfirm.com

Dated this 9th day of April, 2007



David P. Zambito, Esquire

CERTIFICATE OF SERVICE

DOCUMENT
FOLDER

Petition of Duquesne Light Company :
for Approval of Default Service Plan : Docket No. P-00072247
for the Period January 1, 2008 through :
December 31, 2010 :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate Responses to Duquesne Light Company Set I, numbers 1 through 11, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 9th day of April 2007.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Charles Daniel Shields, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265
Counsel For: *Office of Trial Staff*

RECEIVED

APR - 9 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SERVICE BY E-MAIL and FIRST CLASS MAIL

Anthony Kanagy, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Counsel for: *Duquesne Light Company*

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue, 8th Floor
Pittsburgh, PA 15219
Counsel for: *Duquesne Light Company*

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
Counsel for: *Duquesne Light Company*

David I. Fein, Sr., Esquire
Constellation new Energy, Inc.
111 Market Place, Suite 700
Baltimore, MD 21202
Counsel for: *Constellation NewEnergy, Inc. and
Constellation Energy Commodities Group, Inc.*

Sharon E. Webb
Assistant Small Business Advocate
Office of Small Business Advocate
1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101
Counsel for: *Office of Small Business Advocate*

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121
Counsel for: *Reliant Energy, Inc.*

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Avenue
Suite 2770
Pittsburgh, PA 15219
Counsel for: *Citizens for Pennsylvania Future*

John E. McCaffrey, Esquire
Stinson Morrison Hecker, LLP
1150 18th Street NW, Suite 800
Washington, DC 20036-3816
Counsel for: *Citizen Power*

Kevin J. Moody, Esquire
Daniel Clearfield, Esquire
Wolf Block Schorr & Solis-Cohen, LLP
213 Market Street, 9th Floor
Harrisburg, PA 17108-0865
Counsel for: *Retail Energy Supply Association
and Direct Energy Service, LLC*

Pamela C. Polacek, Esquire
Adam Benschhoff, Esquire
McNees Wallace & Nurick, LLC
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17101-1166
Counsel for: *Duquesne Industrial Intervenors*

Gary A. Jeffries, Esquire
Dominion Resources Services, Inc.
1201 Pitt Street
Pittsburgh, PA 15221
Counsel for: *Dominion Retail, Inc.*

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
Counsel for: *Dominion Retail, Inc.*

Kent D. Murphy, Esquire
Adrian D. Newall, Esquire
Exelon Business Services Company
2301 Market Street, S23-1
Philadelphia, PA 19101
Counsel for: *Exelon Corporation and Exelon
Generation Company, LLC*

Paul F. Forshay, Esquire
Sutherland, Asbill & Brennan, LLP
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004
Counsel for: *Pennsylvania Large Energy Users
Coalition*

Steven S. Goldenberg, Esquire
FOX ROTHSCHILD LLP
Princeton Pike Corporate Center
997 Lenox Drive, Building 3
Lawrenceville, NJ 08648-2311
Counsel for: *Pennsylvania Large Energy Users
Coalition*

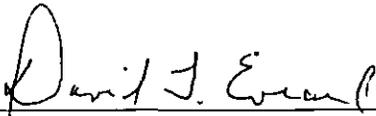
Nicholas A. Pasciullo, Esquire
Pasciullo Law Firm, P.C.
5435 Pocusset Street
Pittsburgh, PA 15217-1910
Counsel for: *Conservation Consultants, Inc.*

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Street, Suite 500
Baltimore, MD 21202
Counsel for: *Constellation NewEnergy, Inc. and
Constellation Energy Commodities Group, Inc.*

Erin H. Creahan
Strategic Energy, L.L.C.
Corporate Headquarters
Two Gateway Center
Ninth Floor
Pittsburgh, PA 15222
Counsel for: *Strategic Energy, L.L.C.*

Kathy J. Kolich, Senior Attorney
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
Counsel for: *FirstEnergy Service Company*

David P. Zambito
Reger, Rizzo, Kavulich & Darnell, LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101
Counsel for: *Constellation NewEnergy, Inc. and
Constellation Energy Commodities Group, Inc.*



Tanya J. McCloskey
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50044
E-Mail: TMcCloskey@paoca.org
David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870
E-Mail: DEvrard@paoca.org

Counsel for
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Kevin J. Moody
Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

DOCUMENT FOLDER

April 11, 2007

VIA E-MAIL & FIRST CLASS MAIL

Pamela Polacek
McNees Wallace & Nurick
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-0865

Re: Petition of Duquesne Light Company for Approval of
Default Service Plan for the Period January 1, 2008
through December 31, 2010, Docket No. P-00072247

Dear Pam:

Enclosed please find Strategic Energy's response to Duquesne Industrial Intervenors Interrogatories, Set I, Nos. 1 and 2.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/lww
Enclosure

BTL

REC'D
2007 APR 12 AM 10:19
SECRETARY'S OFFICE

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing response of Strategic Energy to Interrogatories and Requests for Production of Documents of Duquesne Industrial Intervenors, Set I, Nos. 1 and 2, in P-00072247, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

VIA E-MAIL & FIRST CLASS MAIL

David B. MacGregor, Esquire
Post and Schell, PC
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103-2921

Steven S. Goldenberg, Esquire
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Drive, Bldg. 3
Lawrenceville, NJ 08648-2311

Anthony Kanagy, Esquire
Post and Schell, PC
17 North Second Street ,12th Floor
Harrisburg, PA 17101-1601

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
Harrisburg, PA 17101

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1923

Theodore H. Jobes, Esquire
Fox Rothschild, LLP
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291

Johnnie Simms, Esquire
Charles Shields, Esquire
Robert V. Eckenrod, Esquire
Office of Trial Staff
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Gary A. Jeffries, Esquire
Senior Counsel
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburgh, PA 15221-5817

Sharon Webb, Assistant Small Business
Advocate
Office of Small Business Advocate
Commerce Building Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, NW
Suite 800
Washington, DC 20036-3816

SECRETARY'S OFFICE

2007 APR 12 AM 10:20

Pamela C. Polacek, Esquire
Adam L. Benshoff, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 18108-1166

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Fl.
Harrisburg, PA 17101-1503

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219

Adrian D. Newall
Assistant General Counsel
Exelon Generation Company, LLC
2301 Market Street, S23-1
Philadelphia, PA 19101

John Hanger, Esquire
PennFuture
610 North Third Street
Harrisburg, PA 17101

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Date: April 11, 2007

Harry S. Geller
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

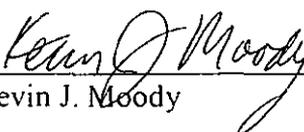
David I. Fein
Senior Regulatory Counsel
Constellation Energy
111 Market Place
Suite 500
Baltimore, MD 21202

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy J. Kolich, Esquire
FirstEnergy Services
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217



Kevin J. Moody

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Kevin J. Moody
Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

DOCUMENT
FOLDER

April 11, 2007

Via E-mail and First Class Mail

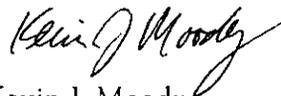
Anthony Kanagy, Esquire
Post & Schell
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Re: Petition of Duquesne Light Company for Approval of
Default Service Plan for the Period January 1, 2008
through December 31, 2010, Docket No. P-00072247

Dear Mr. Kanagy:

Enclosed please find the Retail Energy Supply Association's (RESA) REVISED Response to Duquesne Light Company's Interrogatories and Requests for Production of Documents to Direct Energy and RESA, Set 1, No. 2, in the above-referenced matter.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/jls
Enclosures

cc: ~~James McNulty (Cert. of Service only)~~

BTL

HAR:72535.1/DIR023-242252

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing REVISED Response of RESA to Interrogatories and Requests for Production of Documents of Duquesne Light Company to Direct Energy and RESA, Set I, No. 2, in P-00072247, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

VIA E-MAIL & FIRST CLASS MAIL

David B. MacGregor, Esquire
Post and Schell, PC
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103-2921

Anthony Kanagy, Esquire
Post and Schell, PC
17 North Second Street ,12th Floor
Harrisburg, PA 17101-1601

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1923

Johnnie Simms, Esquire
Charles Shields, Esquire
Robert V. Eckenrod, Esquire
Office of Trial Staff
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Sharon Webb, Assistant Small Business
Advocate
Office of Small Business Advocate
Commerce Building Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

Steven S. Goldenberg, Esquire
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Drive, Bldg. 3
Lawrenceville, NJ 08648-2311

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
Harrisburg, PA 17101

Theodore H. Jobes, Esquire
Fox Rothschild, LLP
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291

Gary A. Jeffries, Esquire
Senior Counsel
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburgh, PA 15221-5817

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, NW
Suite 800
Washington, DC 20036-3816

SECRETARY'S BUREAU

APR 12 AM 10:20

RECORDED

Pamela C. Polacek, Esquire
Adam L. Benshoff, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 18108-1166

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Fl.
Harrisburg, PA 17101-1503

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219

Adrian D. Newall
Assistant General Counsel
Exelon Generation Company, LLC
2301 Market Street, S23-1
Philadelphia, PA 19101

John Hanger, Esquire
PennFuture
610 North Third Street
Harrisburg, PA 17101

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Harry S. Geller
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

David I. Fein
Senior Regulatory Counsel
Constellation Energy
111 Market Place
Suite 500
Baltimore, MD 21202

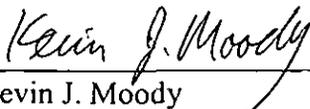
Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy J. Kolich, Esquire
FirstEnergy Services
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217

Date: April 11, 2007


Kevin J. Moody



STINSON
MORRISON
HECKER LLP



John E. McCaffrey
(202) 728-3013
jmccaffrey@stinsonmoheck.com
www.stinsonmoheck.com

1150 18th Street N.W., Suite 800
Washington, D.C. 20036-3816

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RECEIVED

APR 12 2007

Tel (202) 785-9100
Fax (202) 785-9163

April 12, 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA ELECTRONIC AND FIRST-CLASS MAIL

David B. MacGregor, Esq.
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808

Michael W. Gang, Esq.
Anthony D. Kanagy, Esq.
Post & Schell, P.C.
17 North Second Street
Twelfth Floor
Harrisburg, PA 17101-1601

Re: *Petition of Duquesne Light Company for Approval of Default Service Plan for the Period January 1, 2008 through December 31, 2010, Docket No. P-00072247*

Dear Messrs. MacGregor, Gang and Kanagy:

Enclosed are the Initial Interrogatories of Citizen Power, Inc. to Duquesne Light Company in the referenced proceeding. Also enclosed is an appropriate certificate of service.

Should you have any questions or concerns regarding this matter, please do not hesitate to contact me.

Respectfully yours,

STINSON MORRISON HECKER LLP

John E. McCaffrey

An attorney for Citizen Power, Inc.

Enclosures

cc: James J. McNulty, Secretary (letter and certificate of service only for filing) ✓
(via overnight delivery)
Certificate of Service (via electronic mail and first-class mail)

KANSAS CITY
OVERLAND PARK
WICHITA
WASHINGTON, D.C.
PHOENIX
ST. LOUIS
OMAHA
JEFFERSON CITY

BTL

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company :
For Approval of Default Service Plan : Docket No. P-00072247
For The Period January 1, 2008 :
Through December 31, 2010 :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Initial Interrogatories of Citizen Power, Inc. to Duquesne Light Company upon the participants listed below, in accordance with the requirements of § 1.54 (relating to service by a participant).

Via U.S. Mail and Electronic Mail

Anthony Kanagy, Esquire
Post & Schell, P. C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Duquesne Light Company

RECEIVED

APR 12 2007

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808

Duquesne Light Company

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue, 8th Floor
Pittsburgh, PA 15219

Duquesne Light Company

Charles Daniel Shields, Esquire
Office of Trial Staff
P. O. Box 3265
Harrisburg, PA 17105-3265

Office of Trial Staff

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Office of Consumer Advocate

Sharon Webb, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Office of Small Business Advocate

Kent D. Murphy, Esquire
Adrian Newall, Esquire
Exelon Business Services Company
2301 Market Street, S23-1
Philadelphia, PA 19103

Exelon Corporation and Exelon Generation
Company, LLC

David I. Fein, Esquire
Constellation NewEnergy, Inc.
550 W. Washington Blvd., Suite 300
Chicago, IL 60661

Constellation NewEnergy, Inc.
Constellation Energy Commodities Group, Inc.

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Constellation NewEnergy, Inc.
Constellation Energy Commodities Group, Inc.

Todd S. Stewart, Esquire
Hawke McKeon Sniscak & Kennard LLP
P.O. Box 1778
100 North Tenth Street
Harrisburg, PA 17105

Dominion Retail, Inc.

Gary A. Jeffries, Senior Counsel
Dominion Resources Services, Inc.
1201 Pitt Street
Pittsburgh, PA 15221

Dominion Retail, Inc.

George Jugovic, Jr., Esquire
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219

Citizens for Pennsylvania's Future

Brian J. Knipe, Esquire
Buchanan Ingersoll & Rooney, P.C.
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121

Reliant Energy, Inc.

Daniel Clearfield, Esquire
Kevin J. Moody, Esquire
Wolf, Block, Schorr and Solis-Cohen LLP
213 Market St., 9th Floor
P.O. Box 865
Harrisburg, PA 17108-0865

Retail Energy Supply Association
Direct Energy Services, LLC

Erin H. Creahan, Esquire
Strategic Energy, L.L.C.
Two Gateway Center, 9th Floor
Pittsburgh, PA 15222

Strategic Energy, L.L.C.

Pamela C. Polacek, Esquire
Adam L. Benshoff, Esquire
McNees Wallace & Nurick LLC
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166

Duquesne Industrial Intervenors

Steven S. Goldenberg, Esquire
Fox Rothschild LLP
Princeton Pike Corporate Center
997 Lenox Drive, Building 3
Lawrenceville, NJ 08648-2311

Pennsylvania Large Energy Users Coalition

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004

Pennsylvania Large Energy Users Coalition

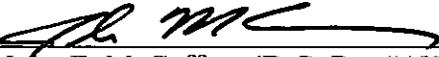
Kathy J. Kolich, Esquire
FirstEnergy Service Department
Legal Department
76 South Main Street
Akron, OH 44308

FirstEnergy Solutions Corp.

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217

Conservation Consultants, Inc.

Dated at Washington, D.C., this 12th day April, 2007.

By: 
John E. McCaffrey (D.C. Bar #457829)
STINSON MORRISON HECKER LLP
1150 18th Street, N.W.,
Suite 800
Washington, DC 20036
(202) 785-9100 (phone)
(202) 785-9163 (fax)

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Kevin J. Moody
Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

April 12, 2007

VIA E-MAIL & FIRST CLASS MAIL

Pamela Polacek
McNees Wallace & Nurick
100 Pine Street
P. O. Box 1166
Harrisburg, PA 17108-0865

**DOCUMENT
FOLDER**

RECEIVED
2007 APR 13 AM 10:56
PA.P.U.C.
SECRETARY'S BUREAU

Re: Petition of Duquesne Light Company for Approval of
Default Service Plan for the Period January 1, 2008
through December 31, 2010, Docket No. P-00072247

Dear Pam:

Enclosed are Direct Energy's responses to Duquesne Industrial Intervenors
Interrogatories, Set I, Nos. 1 and 2.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM
Enclosures

BTL

HAR:72556.1/DIR023-242252

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing response of Direct Energy to Interrogatories and Requests for Production of Documents of Duquesne Industrial Intervenors, Set I, Nos. 1 and 2, in P-00072247, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

VIA E-MAIL & FIRST CLASS MAIL

David B. MacGregor, Esquire
Post and Schell, PC
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103-2921

Steven S. Goldenberg, Esquire
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Drive, Bldg. 3
Lawrenceville, NJ 08648-2311

Anthony Kanagy, Esquire
Post and Schell, PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
Harrisburg, PA 17101

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1923

Theodore H. Jobes, Esquire
Fox Rothschild, LLP
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291

Johnnie Simms, Esquire
Charles Shields, Esquire
Robert V. Eckenrod, Esquire
Office of Trial Staff
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Gary A. Jeffries, Esquire
Senior Counsel
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburgh, PA 15221-5817

Sharon Webb, Assistant Small Business
Advocate
Office of Small Business Advocate
Commerce Building Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, NW
Suite 800
Washington, DC 20036-3816

Pamela C. Polacek, Esquire
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McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 18108-1166

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Fl.
Harrisburg, PA 17101-1503

George Jugovic, Jr.
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PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219

Adrian D. Newall
Assistant General Counsel
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2301 Market Street, S23-1
Philadelphia, PA 19101

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PennFuture
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Harrisburg, PA 17101

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Harry S. Geller
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Senior Regulatory Counsel
Constellation Energy
111 Market Place
Suite 500
Baltimore, MD 21202

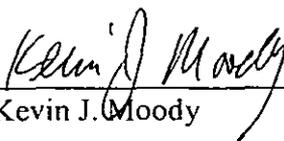
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Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy J. Kolich, Esquire
FirstEnergy Services
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217

Date: April 12, 2007



Kevin J. Moody

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Kevin J. Moody
Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

April 13, 2007

VIA EMAIL & FEDERAL EXPRESS

Judge Larry Gesoff
Administrative Law Judge
Pennsylvania Public Utility Commission
1103 Pittsburgh State Office Bldg.
300 Liberty Ave.
Pittsburgh, PA 15222

DOCUMENT
FOLDER

Re: Petition of Duquesne Light Company for Approval of
Default Service Plan for the Period January 1, 2008
through December 31, 2010; Docket No. P-00072247

Dear Judge Gesoff:

Enclosed are two copies of the Rebuttal Testimony of Frank Lacey on behalf of Direct Energy Services LLC and the Retail Energy Supply Association in the above-referenced matter. As indicated on the attached Certificate of Service, the parties of record have been served in the manner indicated.

If you have any questions, please contact us at your convenience.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/jls
Enclosure

cc: Certificate of Service (w/enc)
James McNulty w/cert. of service only

HAR:72568.1/MID051-242246

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Rebuttal Testimony of Frank Lacey in P-00072247, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

VIA E-MAIL & FIRST CLASS MAIL

David B. MacGregor, Esquire
Post and Schell, PC
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103-2921

Anthony Kanagy, Esquire
Post and Schell, PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

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555 Walnut Street
Harrisburg, PA 17101-1923

Johnnie Simms, Esquire
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Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Sharon Webb, Assistant Small Business
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Office of Small Business Advocate
Commerce Building Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

Steven S. Goldenberg, Esquire
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Drive, Bldg. 3
Lawrenceville, NJ 08648-2311

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
Harrisburg, PA 17101

Theodore H. Jobes, Esquire
Fox Rothschild, LLP
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291

Gary A. Jeffries, Esquire
Senior Counsel
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburgh, PA 15221-5817

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, NW
Suite 800
Washington, DC 20036-3816

Pamela C. Polacek, Esquire
Adam L. Benschhoff, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Fl.
Harrisburg, PA 17101-1503

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219

Adrian D. Newall
Assistant General Counsel
Exelon Generation Company, LLC
2301 Market Street, S23-1
Philadelphia, PA 19101

John Hanger, Esquire
PennFuture
610 North Third Street
Harrisburg, PA 17101

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Harry S. Geller
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

David I. Fein
Senior Regulatory Counsel
Constellation Energy
111 Market Place
Suite 500
Baltimore, MD 21202

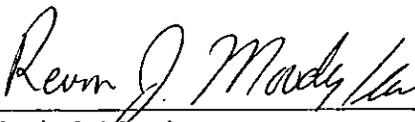
Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy J. Kolich, Esquire
FirstEnergy Services
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217

Date: April 13, 2007



Kevin J. Moody

**Reger
Rizzo
Kavulich
& Darnall** LLP
ATTORNEYS AT LAW

SUITE 300
20 NORTH MARKET SQUARE
HARRISBURG, PA 17101
TEL: 717.233.1855
FAX: 717.233.1884
www.rrkdllaw.com

April 13, 2007

Via Email and Overnight Delivery:

The Honorable Larry Gesoff
Pennsylvania Public Utility Commission
1103 State Office Building
300 Liberty Avenue
Pittsburgh, PA 15222-1210

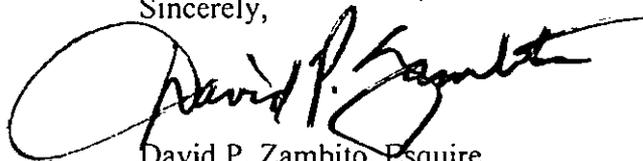
DOCUMENT
FOLDER

Re: Petition of Duquesne Light Company for Approval of Default Service Plan for the Period January 1, 2008 through December 31, 2010; Docket No. P-00072247;
Rebuttal Testimony of Steven W. Ruback (Constellation NewEnergy, Inc. Statement No. 1-R)

Dear Judge Gesoff:

Enclosed please find two copies of the Rebuttal Testimony of Steven W. Ruback, Constellation NewEnergy Statement No. 1-R, in the above-referenced proceeding. Copies have been served on the parties of record per the attached Certificate of Service. Thank you for your attention to this matter.

Sincerely,



David P. Zambito, Esquire
Counsel for Constellation NewEnergy, Inc.

DPZ/kmg
Enclosures

cc: Per Certificate of Service
James J. McNulty (letter and Certificate of Service only)

BTL

PA PUC
SECRETARY'S BUREAU

2007 APR 13 PM 4:24

RECEIVED

**CERTIFICATE OF SERVICE
(Docket No. P-00072247)**

I hereby certify that I have this day served the foregoing Constellation NewEnergy, Inc. Statement No. 1-R upon the parties listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND OVERNIGHT DELIVERY

The Honorable Larry Gesoff
Pennsylvania Public Utility Commission
1103 State Office Building
300 Liberty Avenue
Pittsburgh, PA 15222-1210
lgesoff@state.pa.us

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VIA E-MAIL AND FIRST CLASS MAIL

Pamela C. Polacek, Esquire
Adam L. Benschhoff, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
ppolacek@mwn.com
abenschhoff@mwn.com
(Duquesne Industrial Intervenors)

Tanya McCloskey, Esquire
David Evrard, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
tmccloskey@paoca.org
devrard@paoca.org

Steven C. Gray, Esquire
Sharon Webb, Esquire
Office of Small Business Advocate
Commerce Bldg. Suite 1102
300 N. Second Street
Harrisburg, PA 17101
sgray@state.pa.us
swebb@state.pa.us

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Daniel Clearfield, Esquire
Kevin J. Moody, Esquire
Wolf, Block, Schorr and Solis-Cohen LLP
213 Market Street, 9th Floor
Harrisburg, PA 17108-0865
dclearfield@wolfblock.com
kmoody@wolfblock.com
(Strategic Energy, LLC)
(Retail Energy Supply Association)

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, N.W., Suite 800
Washington, DC 20036-3816
jmccaffrey@stinsonmoheck.com
(Citizens Power, Inc.)

Charles D. Shields, Esquire
Michael Gruber, Esquire
Robert V. Eckenrod, Esquire
Pennsylvania Public Utility Commission
Office of Trial Staff
Commonwealth Keystone Building
400 North Street, 2 West
PO Box 3265
Harrisburg, PA 17105-3265
chshields@state.pa.us
mgruber@state.pa.us
roeckenrod@state.pa.us

Todd S. Stewart, Esquire
Hawke McKeon Sniscak & Kennard LLP
100 North Tenth Street
PO Box 1778
Harrisburg, PA 17105-1778
tsstewart@hmsk-law.com
(*Dominion Retail, Inc.*)

Erin Creahan
Strategic Energy, LLC
Two Gateway Center, 9th Floor
Pittsburgh, PA 15222-1458
ecreahan@sel.com

Kathy J. Kolich, Esquire
First Energy
76 South Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Post & Schell, PC
17 North Second Street
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
(*Duquesne Light Company; Duquesne Light Holdings; DQE Communication Network Services LLC; and DQE Holding LLC*)

Brian J. Knipe, Esquire
Ramona C. Cataldi, Esquire
Buchanan Ingersoll & Rooney, P.C.
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121
bjknipe@klettrooney.com
(*Reliant Energy, Inc.*)

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue, 8th Floor
Pittsburgh, PA 15219
gjack@duqlight.com

David I. Fein, Esquire
Constellation NewEnergy, Inc.
550 W. Washington Blvd., Suite 300
Chicago, IL 60661
david.fein@constellation.com

Divesh Gupta, Esquire
Constellation Energy Commodities
Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202
divesh.gupta@constellation.com

Gary A. Jeffries, Esquire
Dominion Resources Services, Inc.
1201 Pitt Street
Pittsburgh, PA 15221
gjeffries@dom.com

Steven S. Goldenberg, Esquire
Fox Rothschild LLP
Princeton Pike Corporate Center
997 Lenox Drive, Building 3
Lawrenceville, NJ 08648-2311
SGoldenberg@foxrothschild.com
(*Pennsylvania Large Energy Users Coalition*)

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004
pforshay@sablaw.com

Adrian D. Newall, Esquire
Assistant General Counsel
Kent D. Murphy, Esquire
Acting Associate General Counsel
Exelon Business Service Company
2301 Market Street, S-23-1
Philadelphia, PA 19103
adrian.newall@exeloncorp.com
kent.murphy@exelcorp.com

George Jugovic, Jr., Esquire
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219
jugovic@pennfuture.org

Nicholas A. Pasciullo, Esquire
Pasciullo Law Firm, P.C.
5435 Pocusset Street
Pittsburgh, PA 15217
Pasciullo@pasciullolawfirm.com

Dated this 13th day of April, 2007


David P. Zambito, Esquire



McNees Wallace & Nurick LLC
attorneys at law

PAMELA C. POLACEK
DIRECT DIAL: (717) 237-5368
E-MAIL ADDRESS: PPOFACEK@MWN.COM

April 16, 2007

Via E-Mail Transmission
and First Class Mail

Michael W. Gang, Esq.
Anthony D. Kanagy, Esq.
Post & Schell, PC
17 North Second Street
Harrisburg, PA 17101-1601

**DOCUMENT
FOLDER**

**Re: Petition of Duquesne Light Company for Approval of Default Service
Plan for the Period January 1, 2008 Through December 31, 2010;
Docket No. P-00072247**

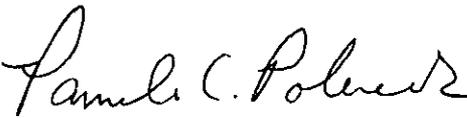
Dear Messrs. Gang and Kanagy:

Enclosed please find two (2) copies of the Duquesne Industrial Intervenors' ("DII") Interrogatories – Set II to Duquesne Light Company ("Duquesne") in the above referenced proceeding.

As indicated on the Certificate of Service, all parties to these proceedings are being duly served. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek

Counsel to the Duquesne Industrial
Intervenors

RECEIVED
2007 APR 16 PM 3:52
MWN LLC
SECRETARY'S BUREAU

PCP/bes
Enclosures

c: James J. McNulty, Secretary (via first class mail – letter and COS only) ✓
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant):

VIA E-MAIL AND FIRST CLASS MAIL

Tanya McCloskey
David Evrard
Office of Consumer Advocate
555 Walnut Street
Forum Place - 5th Floor
Harrisburg, PA 17101-1923
tmccloskey@paoca.org
devrard@paoca.org

Steven Gray
Sharon Webb
Office of Small Business Advocate
Commerce Building – Suite 1102
300 North Second Street
Harrisburg, PA 17101
sgray@state.pa.us
swebb@state.pa.us

David B. MacGregor
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Daniel Clearfield
Kevin J. Moody
Wolf, Block, Schorr and Solis-Cohen LLP
213 Market Street, 9th Floor
Harrisburg, PA 17108-0865
dclearfield@wolfblock.com
kmoody@wolfblock.com
(Strategic Energy, LLC)
(Retail Energy Supply Association)

John E. McCaffrey
Stinson Morrison Hecker LLP
1150 18th Street, N. W., Suite 800
Washington, DC 20036-3816
jmccaffrey@stinsonmoheck.com
(Citizens Power, Inc.)

Charles D. Shields
Robert V. Eckenrod
Office of Trial Staff
Commonwealth Keystone Building
400 North Street, 2nd Floor West
P. O. Box 3265
Harrisburg, PA 17105-3265
chshields@state.pa.us
mgruber@state.pa.us
roeckenrod@state.pa.us

Todd S. Stewart
Hawke McKeon Sniscak & Kennard LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmsk-law.com
(Dominion Retail, Inc.)

Erin Creahan
Strategic Energy, LLC
Two Gateway Center, 9th Floor
Pittsburgh, PA 15222-1458
ecreahan@sel.com

Kathy J. Kolich
First Energy
76 South Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com

Certificate of Service
Docket No. P-00072247

Page 2

Brian J. Knipe
Ramona C. Cataldi
Buchanan Ingersoll & Rooney, P.C.
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121
bjknipe@klettrooney.com
(*Reliant Energy, Inc.*)

Gary A. Jack
Duquesne Light Company
411 Seventh Avenue, 8th Floor
Pittsburgh, PA 15219
gjack@duqlight.com

David I. Fein
Constellation NewEnergy, Inc.
550 W. Washington Blvd., Suite 300
Chicago, IL 60661
David.fein@constellation.com

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202
divesh.gupta@constellation.com

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
Suite 300, 20 North Market Square
Harrisburg, PA 17101
dzambito@rrkdllaw.com
(*Constellation NewEnergy, Inc./*
Constellation Energy Commodities Group,
Inc.)

Gary A. Jeffries
Dominion Resources Services, Inc.
1201 Pitt Street
Pittsburgh, PA 15221
gjeffries@dom.com

Steven S. Goldenberg
Fox Rothschild LLP
Princeton Pike Corporate Center
997 Lenox Drive, Building 3
Lawrenceville, NJ 08648-2311
SGoldenberg@foxrothschild.com
(*Pennsylvania Large Energy Users*
Coalition)

Paul F. Forshay
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004
pforshay@sablaw.com
(*Pennsylvania Large Energy Users*
Coalition)

Adrian D. Newall
Assistant General Counsel
Kent D. Murphy
Acting Associate General Counsel
Exelon Business Service Company
2301 Market Street, S-23-1
Philadelphia, PA 19103
adrain.newel@exeloncorp.com
kent.Murphy@exeloncorp.com

Certificate of Service
Docket No. P-00072247
Page 3

George Jugovic, Jr.
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219
Jugovic@pennfuture.org

Nicholas A. Pasciullo
Pasciullo Law Firm P.C.
5435 Pocusset Street
Pittsburgh, PA 15217
Pasciullo@pasciullolawfirm.com


Pamela C. Polacek
Pamela C. Polacek

Dated this 16th day of April 2007, at Harrisburg, Pennsylvania.

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Kevin J. Moody
Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

ORIGINAL

SECRETARY'S BUREAU

2007 APR 19 PM 3:41

REC'D

April 19, 2007

VIA HAND DELIVERY

James McNulty, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
2nd Fl., 400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

DOCUMENT FOLDER

Re: Petition of Duquesne Light Company for Approval of Default Service Plan for the Period January 1, 2008 through December 31, 2010; Docket No. P-00072247 ("POLR IV Plan")

Dear Secretary McNulty:

Enclosed for filing are the original and three copies of our Entry of Appearance on behalf of Strategic Energy, LLC, in the above-referenced matter. As evidenced by the attached Certificate of Service, the parties of record have been served in the manner indicated.

If you have any questions regarding this filing, please contact me.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/jls

cc: Certificate of Service

BTL

HAR:72706.1/STR163-210988

Boston, MA ■ Cherry Hill, NJ ■ Harrisburg, PA ■ New York, NY ■ Norristown, PA ■ Philadelphia, PA ■ Roseland, NJ ■ Wilmington, DE

WolfBlock Government Relations - Harrisburg, PA ■ WolfBlock Public Strategies - Boston, MA and Washington, DC

Wolf, Block, Schorr and Solis-Cohen LLP, a Pennsylvania Limited Liability Partnership

60

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2007 APR 19 PM 3:41
SECRETARY'S BUREAU

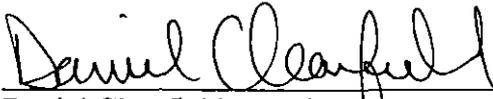
Petition of Duquesne Light Company :
For Approval of Default Service Plan : Docket No. P-00072247
For The Period January 1, 2008 :
Through December 31, 2010 :

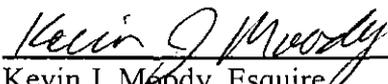
PRAECIPE FOR ENTRY OF APPEARANCE

TO: James McNulty, Secretary

Please enter our appearances on behalf of Strategic Energy, LLC, in the above-captioned action. On the basis of this notice, we request a copy of each document hereafter issued by the Commission in this matter.

Respectfully submitted,


Daniel Clearfield, Esquire


Kevin J. Moody, Esquire
WOLF, BLOCK, SCHORR and SOLIS-
COHEN, LLP
213 Market Street, 9th Floor
Harrisburg, PA 17101
(717) 237-7160

Attorneys for Strategic Energy, LLC

DOCUMENT
FOLDER

DOCKETED
APR 20 2007

Dated: April 19, 2007

ORIGINAL

CERTIFICATE OF SERVICE

ORIGINAL

I hereby certify that this day I served a copy of the foregoing Entry of Appearance, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa.

Code Section 1.54.

VIA FIRST CLASS MAIL

David B. MacGregor, Esquire
Post and Schell, PC
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103-2921

Steven S. Goldenberg, Esquire
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Drive, Bldg. 3
Lawrenceville, NJ 08648-2311

Anthony Kanagy, Esquire
Post and Schell, PC
17 North Second Street ,12th Floor
Harrisburg, PA 17101-1601

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
Harrisburg, PA 17101

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1923

Theodore H. Jobes, Esquire
Fox Rothschild, LLP
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291

Johnnie Simms, Esquire
Charles Shields, Esquire
Robert V. Eckenrod, Esquire
Office of Trial Staff
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Gary A. Jeffries, Esquire
Senior Counsel
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburgh, PA 15221-5817

Sharon Webb, Assistant Small Business
Advocate
Office of Small Business Advocate
Commerce Building Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, NW
Suite 800
Washington, DC 20036-3816

Pamela C. Polacek, Esquire
Adam L. Benshoff, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 18108-1166

SECRETARY'S BUREAU
2007 APR 19 PM 3:41

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Fl.
Harrisburg, PA 17101-1503

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219

Adrian D. Newall
Assistant General Counsel
Exelon Generation Company, LLC
2301 Market Street, S23-1
Philadelphia, PA 19101

John Hanger, Esquire
PennFuture
610 North Third Street
Harrisburg, PA 17101

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Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Harry S. Geller
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

David I. Fein
Senior Regulatory Counsel
Constellation Energy
111 Market Place
Suite 500
Baltimore, MD 21202

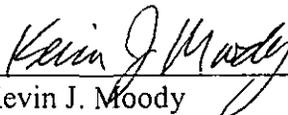
Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy J. Kolich, Esquire
FirstEnergy Services
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217

Date: April 19, 2007



Kevin J. Moody



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Fax
www.postschell.com

**DOCUMENT
FOLDER**

Anthony D. Kanagy

akanagy@postschell.com
717-612-6034 Direct
File #: 2267-126934

April 20, 2007

VIA E-MAIL AND FEDERAL EXPRESS

Honorable Larry Gesoff
Administrative Law Judge
Pennsylvania Public Utility Commission
1103 State Office Building
300 Liberty Avenue
Pittsburgh, PA 15222

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2007 APR 20 PM 3:42
PA PUC
SECRETARY'S BUREAU

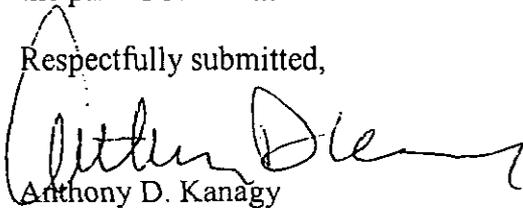
**RE: Petition of Duquesne Light Company for Approval of Default Service
Plan for the Period January 1, 2008 through December 21, 2010
Docket No. P-00072247**

Dear Judge Gesoff:

Enclosed are two copies of the Surrebuttal Testimony of William V. Pfrommer on behalf of Duquesne Light Company in the above-referenced proceeding.

As indicated on the enclosed certificate of service, copies of the testimony have been served on the parties in the manner indicated.

Respectfully submitted,


Anthony D. Kanagy

ADK/jl

Enclosures

cc: James J. McNulty, Secretary (letter and certificate of service only)
Certificate of Service

BTL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Surrebuttal Testimony has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

Charles Daniel Shields
Michael Gruber
Office of Trial Staff
PO Box 3265
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265

Tanya J. McCloskey
David T. Evrard
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Daniel J. Clearfield
Kevin J. Moody
Wolf Block Schorr & Solis-Cohen LLP
213 Market Street, 9th Floor
Harrisburg, PA 17108-0865

Gary Jack
Duquesne Light Company
411 Seventh Avenue, Mail Drop 8-2
Pittsburgh, PA 15219

David I. Fein
Constellation Energy Group, Inc.
550 West Washington Blvd., Ste 300
Chicago, IL 60661

Divesh Gupta
Constellation Energy Group, Inc.
111 Market Place, 5th Floor
Baltimore, MD 21202

Sharon Webb
Office of Small Business Advocate
Commerce Building
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Pamela C. Polacek
Adam L. Benshoff
McNees Wallace & Nurick
PO Box 1166
100 Pine Street
Harrisburg, PA 17108-1166

Erin Creahan
Strategic Energy
Two Gateway Center
Pittsburgh, PA 15222-1458

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219

John E. McCaffrey
Stinson Morrison Heckler LLP
1150 Eighteenth Street, N.W.
Suite 800
Washington, DC 20036-3816

Brian Knipe
Buchanan Ingersol & Rooney, PC
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard LLP
100 N. 10th Street
PO Box 1778
Harrisburg, PA 17101

Kathy J. Kolich
FirstEnergy Service Company
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo
5435 Pocusset Street
Pittsburgh, PA 15217

Paul F. Forshay
Sutherland, Asbill & Brennan, LLP
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004

Kent D. Murphy
Adrian D. Newall
Legal Department
Exelon Business Services Company
PO Box 8699
2301 Market Street, S23-1
Philadelphia, PA 19101-8699

Ronald J. Shaffer
Fox Rothschild LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291

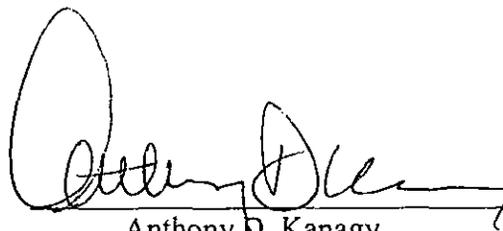
Steven S. Goldenberg
Fox Rothschild LLP
Princeton Pike Corporate Center
997 Lenox Drive Bldg. 3
Lawrenceville, NJ 08648-2311

Gary Jeffries
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburg, PA 15212-5817

David P. Zambito
Reger Rizzo Kavulich & Damall LLLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720-T
St. Louis, MO 63105

Date: April 20, 2007



Anthony D. Kanagy



McNees Wallace & Nurick LLC
attorneys at law

DOCUMENT
FOLDER

ADAM L. BENSHOFF
DIRECT DIAL: (717) 237-5298
E-MAIL ADDRESS: ABENSHOFF@MWN.COM

April 20, 2007

VIA E-MAIL AND FIRST CLASS MAIL

The Honorable Larry Gesoff
Administrative Law Judge
Pennsylvania Public Utility Commission
1103 Pittsburgh State Office Building
300 Liberty Avenue
Pittsburgh, PA 15222

**Re: Petition of Duquesne Light Company for Approval of Default Service Plan
for the Period January 1, 2008 Through December 31, 2010;
Docket No. P-00072247**

Dear Judge Gesoff:

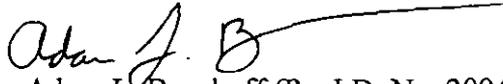
Please be advised that the Duquesne Industrial Intervenors ("DII") will not be submitting Surrebuttal Testimony in the above-referenced proceeding. DII reserves the right, however, to participate in hearings, perform cross-examination, and file briefs and exceptions, as necessary.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with copies of this document.

Thank you.

Very truly yours,

MCNEES WALLACE & NURICK LLC

By 
Adam L. Benshoff (Pa. I.D. No. 200498)

Counsel to the Duquesne Industrial Intervenors

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ALB/lhi

c: James J. McNulty, Secretary (via hand delivery) ✓
Certificate of Service

BTL

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant):

VIA E-MAIL AND FIRST CLASS MAIL

Tanya McCloskey
David Evrard
Office of Consumer Advocate
555 Walnut Street
Forum Place - 5th Floor
Harrisburg, PA 17101-1923
tmccloskey@paoca.org
devrard@paoca.org

Steven Gray
Sharon Webb
Office of Small Business Advocate
Commerce Building -- Suite 1102
300 North Second Street
Harrisburg, PA 17101
sgray@state.pa.us
swebb@state.pa.us

David B. MacGregor
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

Daniel Clearfield
Kevin J. Moody
Wolf, Block, Schorr and Solis-Cohen LLP
213 Market Street, 9th Floor
Harrisburg, PA 17108-0865
dclearfield@wolfblock.com
kmoody@wolfblock.com
(Strategic Energy, LLC)
(Retail Energy Supply Association)

John E. McCaffrey
Stinson Morrison Hecker LLP
1150 18th Street, N. W., Suite 800
Washington, DC 20036-3816
jmccaffrey@stinsonmoheck.com
(Citizens Power, Inc.)

Charles Daniel Shields
Robert V. Eckenrod
Office of Trial Staff
Commonwealth Keystone Building
400 North Street, 2nd Floor West
P. O. Box 3265
Harrisburg, PA 17105-3265
chshields@state.pa.us
mgruber@state.pa.us
roeckenrod@state.pa.us

Todd S. Stewart
Hawke McKeon Sniscak & Kennard LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmsk-law.com
(Dominion Retail, Inc.)

Erin Creahan
Strategic Energy, LLC
Two Gateway Center, 9th Floor
Pittsburgh, PA 15222-1458
ecreahan@sel.com

Kathy J. Kolich
First Energy
76 South Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com

Michael W. Gang
Anthony D. Kanagy
Post & Schell, PC
17 North Second Street
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
(Duquesne Light Company; Duquesne Light Holdings; DQE Communication Network Services LLC; and DQE Holding LLC)

Brian J. Knipe
Ramona C. Cataldi
Buchanan Ingersoll & Rooney, P.C.
One South Market Square
213 Market Street, 3rd Floor
Harrisburg, PA 17101-2121
bjknipe@klettrooney.com
(Reliant Energy, Inc.)

Gary A. Jack
Duquesne Light Company
411 Seventh Avenue, 8th Floor
Pittsburgh, PA 15219
gjack@duqlight.com

David I. Fein
Constellation NewEnergy, Inc.
550 W. Washington Blvd., Suite 300
Chicago, IL 60661
David.fein@constellation.com

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202
divesh.gupta@constellation.com

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
Suite 300, 20 North Market Square
Harrisburg, PA 17101
dzambito@rrkdllaw.com
(Constellation NewEnergy, Inc./
Constellation Energy Commodities Group, Inc.)

Gary A. Jeffries
Dominion Resources Services, Inc.
1201 Pitt Street
Pittsburgh, PA 15221
gjeffries@dom.com

Steven S. Goldenberg
Fox Rothschild LLP
Princeton Pike Corporate Center
997 Lenox Drive, Building 3
Lawrenceville, NJ 08648-2311
SGoldenberg@foxrothschild.com
(Pennsylvania Large Energy Users
Coalition)

Paul F. Forshay
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, DC 20004
pforshay@sablaw.com
(Pennsylvania Large Energy Users
Coalition)

Adrian D. Newall
Assistant General Counsel
Kent D. Murphy
Acting Associate General Counsel
Exelon Business Service Company
2301 Market Street, S-23-1
Philadelphia, PA 19103
adrain.newel@exeloncorp.com
kent.Murphy@exeloncorp.com

• Certificate of Service
Docket No. P-00072247
Page 3

George Jugovic, Jr.
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219
Jugovic@pennfuture.org

Nicholas A. Pasciullo
Pasciullo Law Firm P.C.
5435 Pocusset Street
Pittsburgh, PA 15217
Pasciullo@pasciullolawfirm.com


Adam L. Bershoff

Dated this 20th day of April 2007, at Harrisburg, Pennsylvania.

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Kevin J. Moody
Direct Dial: (717) 237-7187
Direct Fax: (717) 237-2767
E-mail: kmoody@wolfblock.com

**DOCUMENT
FOLDER**

April 20, 2007

VIA EMAIL & FEDERAL EXPRESS

Judge Larry Gesoff
Administrative Law Judge
Pennsylvania Public Utility Commission
1103 Pittsburgh State Office Bldg.
300 Liberty Ave.
Pittsburgh, PA 15222

Re: Petition of Duquesne Light Company for Approval of
Default Service Plan for the Period January 1, 2008
through December 31, 2010; Docket No. P-00072247

Dear Judge Gesoff:

Enclosed are two copies of the Surrebuttal Testimony of Frank Lacey and Guy Sharfman on behalf of Direct Energy Services, LLC and the Retail Energy Supply Association, and the Surrebuttal Testimony of Richard J. Hudson, Jr. on behalf of Strategic Energy, LLC and the Retail Energy Supply Association, in the above-referenced matter. As indicated on the attached Certificate of Service, the parties of record have been served in the manner indicated.

If you have any questions, please contact us at your convenience.

Sincerely,



Kevin J. Moody

For WOLF, BLOCK, SCHORR and SOLIS-COHEN LLP

KJM/jls
Enclosure

cc: Certificate of Service (w/enc)
James McNulty w/cert. of service only

HAR:72719.1/MID051-242246

BTL

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Surrebuttal Testimony,
upon the persons listed below in the manner indicated in accordance with the requirements of 52
Pa. Code Section 1.54.

VIA FIRST CLASS MAIL

David B. MacGregor, Esquire
Post and Schell, PC
Four Penn Center
1600 JFK Blvd.
Philadelphia, PA 19103-2921

Anthony Kanagy, Esquire
Post and Schell, PC
17 North Second Street ,12th Floor
Harrisburg, PA 17101-1601

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
5th Floor, Forum Place Bldg.
555 Walnut Street
Harrisburg, PA 17101-1923

Johnnie Simms, Esquire
Charles Shields, Esquire
Robert V. Eckenrod, Esquire
Office of Trial Staff
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Sharon Webb, Assistant Small Business
Advocate
Office of Small Business Advocate
Commerce Building Suite 1102
300 North 2nd Street
Harrisburg, PA 17101

Steven S. Goldenberg, Esquire
Fox Rothschild, LLP
Princeton Pike Corporate Center
997 Lenox Drive, Bldg. 3
Lawrenceville, NJ 08648-2311

Todd S. Stewart, Esquire
Hawke, McKeon, Sniscak & Kennard, LLP
100 North Tenth Street
Harrisburg, PA 17101

Theodore H. Jobes, Esquire
Fox Rothschild, LLP
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-3291

Gary A. Jeffries, Esquire
Senior Counsel
Dominion Retail, Inc.
Suite 400, 501 Martindale Street
Pittsburgh, PA 15221-5817

John E. McCaffrey, Esquire
Stinson Morrison Hecker LLP
1150 18th Street, NW
Suite 800
Washington, DC 20036-3816

Pamela C. Polacek, Esquire
Adam L. Benschhoff, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Gary A. Jack, Esquire
Duquesne Light Company
411 Seventh Avenue
8th Floor
Pittsburgh, PA 15219

Brian J. Knipe
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Fl.
Harrisburg, PA 17101-1503

George Jugovic, Jr.
Senior Attorney
PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219

Adrian D. Newall
Assistant General Counsel
Exelon Generation Company, LLC
2301 Market Street, S23-1
Philadelphia, PA 19101

John Hanger, Esquire
PennFuture
610 North Third Street
Harrisburg, PA 17101

David P. Zambito, Esquire
Louise A. Knight, Esquire
Reger Rizzo Kavulich & Darnall LLP
20 North Market Square, Suite 300
Harrisburg, PA 17101

Date: April 20, 2007

Harry S. Geller
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

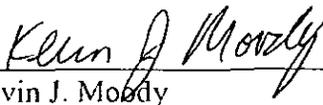
David I. Fein
Senior Regulatory Counsel
Constellation Energy
111 Market Place
Suite 500
Baltimore, MD 21202

Divesh Gupta, Esquire
Constellation Energy Group, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202

Paul F. Forshay, Esquire
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, NW
Washington, DC 20004

Kathy J. Kolich, Esquire
FirstEnergy Services
Legal Department
76 South Main Street
Akron, OH 44308

Nicholas A. Pasciullo, Esquire
5435 Pocusset Street
Pittsburgh, PA 15217



Kevin J. Moody