



June 18, 2018

**VIA E-FILING**

**Matthew F. Smith**

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

**Re: NRG Energy Center Pittsburgh LLC v. Duquesne Light Company  
Docket No. C-2018-3002755**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission, please find a clarification to Paragraph 8 of the Formal Complaint of NRG Energy Center Pittsburgh LLC in the above-referenced proceeding. The only substantive modification is to the third sentence of Paragraph 8, which clarifies that the electricity cost for steam service is contained in the base rate. This filing of the within clarification is intended to replace Paragraph 8 of the Formal Complaint which was previously filed in this matter. A copy of this document has been served in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

By: Matthew F. Smith  
Counsel for *NRG Energy Center Pittsburgh LLC*

MFS:kmg

Enclosure

cc: Honorable Katrina L. Dunderdale  
Clifford Blashford  
Per Certificate of Service

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8. NRGP is a customer of Duquesne Light under Rate GL. The majority of NRGP's electricity costs is passed through to its customers through its Chilled Water Cost Rate. Other electricity costs are incorporated into NRGP's base rates for steam service. NRGP, as a regulated public utility, has a statutory obligation to ensure that its rates are just and reasonable. *See* 66 Pa. C.S. § 1301 ("Rates to be just and reasonable").

9. NRGP opposes Duquesne Light's proposed rate increase on the grounds that it may be unjust, unreasonable and in violation of the law, 66 Pa. C.S. § 1301 *et seq.* NRGP is also concerned that the proposed allocation of the revenue increase and proposed rate design may be unlawfully discriminatory, in violation of the Code, 66 Pa. C.S. §§ 1301 and 1304, and may otherwise be contrary to sound ratemaking principles and public policy.

10. Pursuant to Rider No. 16 – Service to Non-Utility Generating Facilities, Duquesne Light seeks to raise the rate for Back-Up Service for non-utility generating facilities from the current rate of \$2.50 per kW to \$8.00 per kW – an increase of 220%. In addition, Duquesne Light proposes to retain the existing language which provides that customers who exceed their capacity reservation will be charged twice the applicable charge per kilowatt – an increase from \$5.00 per kW to \$16.00 per kW.

11. In addition, pursuant to Rider No. 16, Duquesne Light charges certain fees for interconnecting a non-utility generating facility to Duquesne Light's electric distribution system.

12. As a customer of Duquesne Light, NRGP has a substantial, direct and immediate interest in the rates it pays. Those rates are determined, in part, by reviewing the prudence of all of Duquesne's Light's expenses -- including expenses to provide Back-Up Service. Those rates are also determined by considering Duquesne Light's revenue requirement. Duquesne Light's revenue requirement includes the operating, maintenance, and other costs for Duquesne Light to provide service to all its customers – including service to customers receiving Back-Up Service.

VERIFICATION

I, CLIFF BLASHEED VP/GM of NRG Energy Center Pittsburgh LLC, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: June 18, 2018

CLIFF BLASHEED



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