

April 29, 2021

# DATE OF DEPOSIT

APR 2 9 2021

Ms. Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 2<sup>nd</sup> Floor, Room N201 400 North Street Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

A-110142

#### Re: Duquesne Light Energy, LLC Load Serving Entity Compliance Form – Annual Filing

Dear Secretary Chiavetta:

This letter is in response to the Secretarial Letter issued on March 18, 2010 at Docket No. M-2010-2157431, requiring Electric Generation Suppliers, on an annual basis, to provide proof of registration as a PJM Load Serving Entity or proof of contractual agreement with a registered PJM LSE that facilitates the retail electric services of the EGS.

This response is for Duquesne Light Energy, LLC, a registered EGS in the Commonwealth of Pennsylvania. Enclosed is a copy of PJM Interconnection's current Schedule 17 of the Reliability Assurance Agreement Among Load Serving Entities in the PJM Region, as part of its Rate Schedule FERC No. 44, documenting Duquesne Light Energy, LLC's present active member status as shown on Page 3.

If you have any questions regarding the information contained in this filing, please contact Lindsay Baxter at (412) 393-6224 or lbaxter@duqlight.com.

Sincerely,

Digitally signed by Matthew Ankrum / Date: 2021.04.08 09:35:16 -04'00

Matthew S. Ankrum Vice President of Finance

Enclosure

cc (w/enc.): Bureau of Technical Utility Services (kgermick@pa.gov, elaudensla@pa.gov)

Duquesne Light Energy is an unregulated subsidiary of Duquesne Light Holdings, Inc., and is not the same company as Duquesne Light Company, its affiliated electric distribution company. The prices of Duquesne Light Energy are not regulated by the Pennsylvania Public Utility Commission. You are not required to buy electricity or other products from Duquesne Light Energy to receive the same quality service from Duquesne Light Company.

#### LOAD SERVING ENTITY COMPLIANCE REQUIREMENT FORM

On an annuals basis, EGSs providing retail electric supply service (i.e. take title to electricity) must file with the Commission this Load Serving Entity (LSE) Compliance Requirement Form. EGSs are directed to attach to this form documentation which provides the following:

- Proof of registration as a PJM LSE, or
- Proof of a contractual arrangement with a registered PJM LSE that facilitates the retail electricity services of the EGS.

Examples of sufficient documentation to satisfy this compliance requirement include, but may not be limited to:

- A screen print showing that the EGS is listed as a Party to an effective version of the PJM Reliability Assurance Agreement (RAA), located at Schedule 17 of the RAA.
- Correspondence, such as an e-mail screen print or regular mail scan, from PJM verifying membership as an LSE.
- Documentation of an effective contract between the EGS and another party that serves as the LSE on behalf of the EGS. In such a case, the documentation must also include proof that the party fulfilling the LSE role is indeed registered with the PJM as an LSE

EGSs may mark all or portions of their filing confidential.

EGSs which do not provide retail electric supply service, such as brokers, are not required to file an LSE Compliance Requirement Form.

The EGS provides retail electric supply service and has attached compliance with the LSE requirement hereto.

Description of attachment (provide a brief description of the attachment below):

Copy of PJM Interconnection's current "Schedule 17" of their "Reliability Assurance Agreement Among Load Serving Entities in the PJM Region."

# DATE OF DEPOSIT

APR 2 9 2021

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

# PJM Interconnection, L.L.C. Rate Schedule FERC No. 44

# **RELIABILITY ASSURANCE AGREEMENT**

## Among

# LOAD SERVING ENTITIES

in the

# **PJM REGION**

# DATE OF DEPOSIT

### APR 2 9 2021

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

.

Effective Date: 9/17/2010 - Docket #: ER10-2710-008 - Page 1

#### PJM RELIABILITY ASSURANCE AGREEMENT

#### **TABLE OF CONTENTS**

#### ARTICLE 1 -- DEFINITIONS

#### ARTICLE 2 – PURPOSE

#### ARTICLE 3 - TERM AND TERMINATION OF THE AGREEMENT

- 3.1 Term
- 3.2 Transition Provisions
- 3.3 Termination

#### ARTICLE 4 – ADDITION OF NEW PARTIES

#### ARTICLE 5 -- WITHDRAWAL OR REMOVAL OF A PARTY

- 5.1 Withdrawal of a Party
- 5.2 Breach by a Party

#### ARTICLE 6 -- MANAGEMENT ADMINISTRATION

#### **ARTICLE 7 – RESERVE REQUIREMENTS AND OBLIGATIONS**

- 7.1 Forecast Pool Requirement and Unforced Capacity Obligations
- 7.2 Responsibility to Pay Locational Reliability Charge
- 7.3 LSE Option to Provide Capacity Resources
- 7.4 Fixed Resource Requirement Alternative
- 7.5 Capacity Plans and Deliverability
- 7.6 Nature of Resources
- 7.7 Compliance Audit of Parties

#### ARTICLE 8 -- DEFICIENCY, DATA SUBMISSION, AND EMERGENCY CHARGES

- 8.1 Nature of Charges
- 8.2 Determination of Charge Amounts
- 8.3 Distribution of Charge Receipts

#### **ARTICLE 9 -- COORDINATED PLANNING AND OPERATION**

- 9.1 Overall Coordination
- 9.2 Generator Planned Outage Scheduling
- 9.3 Data Submissions
- 9.4 Charges for Failures to Comply
- 9.5 Metering

#### ARTICLE 10 - SHARED COSTS

- 10.1 Recording and Audit of Costs
- 10.2 Cost Responsibility

#### ARTICLE 11 -- BILLING AND PAYMENT

- 11.1 Periodic Billing
- 11.2 Payment
- 11.3 Failure to Pay

#### **ARTICLE 12 -- INDEMNIFICATION AND LIMITATION OF LIABILITIES**

- 12.1 Indemnification
- 12.2 Limitations on Liability
- 12.3 Insurance

#### ARTICLE 13 -- SUCCESSORS AND ASSIGNS

- 13.1 Binding Rights and Obligations
- 13.2 Consequences of Assignment
- **ARTICLE 14 NOTICE**

#### **ARTICLE 15 -- REPRESENTATIONS AND WARRANTIES**

- 15.1 Initial Representations and Warranties
- 15.2 Continuing Representations and Warranties

#### **ARTICLE 16 -- OTHER MATTERS**

- 16.1 Relationship of the Parties
- 16.2 Governing Law
- 16.3 Severability
- 16.4 Amendment
- 16.5 Headings
- 16.6 Confidentiality
- 16.7 Counterparts
- 16.8 No Implied Waivers
- 16.9 No Third Party Beneficiaries
- 16.10 Dispute Resolution

#### SCHEDULE 1 PROCEDURES TO BECOME A PARTY

- SCHEDULE 2 STANDARDS FOR INTEGRATING AN ENTITY INTO THE PJM REGION
- SCHEDULE 3 OTHER AGREEMENTS TO BE EXECUTED BY THE PARTIES
- SCHEDULE 4 GUIDELINES FOR DETERMINING THE FORECAST POOL REQUIREMENT
- SCHEDULE 4.1 DETERMINATION OF FORECAST POOL REQUIREMENT
- SCHEDULE 5 FORCED OUTAGE RATE CALCULATIONS

- SCHEDULE 6 PROCEDURES FOR DEMAND RESOURCES AND ENERGY EFFICIENCY
- SCHEDULE 7 PLANS TO MEET OBLIGATIONS
- SCHEDULE 8 DETERMINATION OF UNFORCED CAPACITY OBLIGATIONS
- SCHEDULE 8.1 FIXED RESOURCE REQUIREMENT ALTERNATIVE
- SCHEDULE 9 PROCEDURES FOR ESTABLISHING THE CAPABILITY OF CAPACITY RESOURCES
- SCHEDULE 10 PROCEDURES FOR ESTABLISHING DELIVERABILITY OF GENERATION CAPACITY RESOURCES
- SCHEDULE 10.1 LOCATIONAL DELIVERABILITY AREAS AND REQUIREMENTS
- SCHEDULE 11 DATA SUBMITTALS
- SCHEDULE 12 DATA SUBMISSION CHARGES
- SCHEDULE 13 EMERGENCY PROCEDURE CHARGES
- SCHEDULE 14 DELEGATION TO THE OFFICE OF THE INTERCONNECTION
- SCHEDULE 15 ZONES WITHIN THE PJM REGION
- SCHEDULE 16 NON-RETAIL BEHIND THE METER GENERATION MAXIMUM GENERATION EMERGENCY OBLIGATIONS
- SCHEDULE 17 PARTIES TO THE RELIABILITY ASSURANCE AGREEMENT

Effective Date: 5/28/2013 - Docket #: ER13-1166-000 - Page 3

#### **RELIABILITY ASSURANCE AGREEMENT**

RELIABILITY ASSURANCE AGREEMENT, dated as of this 1st day of June, 2007 by and among the entities set forth in Schedule 17 hereto, hereinafter referred to collectively as the "Parties" and individually as a "Party."

#### WITNESSETH:

WHEREAS, each Party to this Agreement is a Load Serving Entity within the PJM Region;

WHEREAS, each Party is committing to share its Capacity Resources with the other Parties to reduce the overall reserve requirements for the Parties while maintaining reliable service; and

WHEREAS, each Party is committing to provide mutual assistance to the other Parties during Emergencies;

WHEREAS, each Party is committing to coordinate its planning of Capacity Resources to satisfy the Reliability Principles and Standards; and

**NOW THEREFORE**, for and in consideration of the covenants and mutual agreements set forth herein and intending to be legally bound hereby, the Parties agree as follows:

Intra-PJM Tarlffs --> RELIABILITY ASSURANCE AGREEMENT --> RAA SCHEDULE 17 - PARTIES TO THE RELIABILITY ASSURANCE AGREE

#### SCHEDULE 17

#### PARTIES TO THE RELIABILITY ASSURANCE AGREEMENT

This Schedule sets forth the Parties to the Agreement:

AEP Energy, Inc. AEP Retail Energy Partners LLC **AES Ohio Generation, LLC AES Solutions Management, LLC** Aggressive Energy LLC Agway Energy Services, LLC Algonquin Energy Services Inc. All American Power and Gas, LLC Allegheny Electric Cooperative, Inc. Allegheny Energy Supply Company, L.L.C. Alpaca Energy LLC Alpha Gas and Electric LLC Ambit Northeast, LLC American Electric Power Service Corporation on behalf of its affiliates: Appalachian Power Company Indiana Michigan Power Company Kentucky Power Company Kingsport Power Company **Ohio Power Company** Wheeling Power Company. American Municipal Power, Inc. American Power & Gas of IL, LLC American Power & Gas of MD, LLC American Power & Gas of NJ, LLC American Power & Gas of Ohio, LLC American Power & Gas of Pennsylvania, LLC American PowerNet Management, L.P. American Transmission Systems, Inc. AP Gas and Electric (PA), LLC **APN Starfirst, LP** Approved Energy II LLC Archer Energy, LLC ArcelorMittal USA LLC Arrow Energy RRH, LLC Astral Energy LLC Atlantic City Electric Company Atlantic Energy MD, LLC Avangrid Renewables, LLC Axpo U.S. LLC Baltimore Gas and Electric Company

0

Baltimore Power Company LLC **Barclays Capital Services, Inc** Bativa, IL (City of) BBPC LLC d/b/a Great Eastern Energy Blackstone Wind Farm, LLC Blue Ridge Power Agency, Inc. Borough of Butler, Butler Electric Division Borough of Chambersburg Borough of Columbia, PA Borough of Lavallette, New Jersey **Borough of Milltown** Borough of Mont Alto, PA Borough of Park Ridge, New Jersey **Borough of Pemberton** Borough of Pitcairn, Pennsylvania Borough of Seaside Heights, New Jersey Borough of South River, New Jersey Boston Energy Trading and Marketing LLC **BP Energy Company** Brookfield Renewable Energy Marketing US LLC **BTG Pactual Commodities (US) LLC** Calpine Energy Service, L.P. Calpine Energy Solutions, LLC Capital Energy d/b/a Sunrise Power and Gas Central Virginia Electric Cooperative Centre Lane Trading Limited Champion Energy Marketing LLC Champion Energy, LLC Choice Energy, LLC dba 4 Choice Energy, LLC Cincinnati Bell Energy, LLC Citigroup Energy Inc. Citizens' Electric Company of Lewisburg, PA City of Cleveland, Department of Public Utilities, Division of Cleveland Public Power City of Dover, Delaware City of New Martinsville - WV City of Rochelle Cleveland Electric Illuminating Company Click Energy, LLC CMS Resource Management Company Collegiate Clean Energy, LLC Commonwealth Edison Company ConocoPhillips Company Consolidated Edison Energy, Inc. Consolidated Edison Solutions, Inc. Constellation Energy Power Choice, LLC Constellation Energy Services, Inc.

Constellation NewEnergy, Inc. Constellation Power Source Generation, LLC Convanta Energy Group, LLC Convanta Energy Marketing LLC Credit Suisse (USA), Inc. Current Energy and Renewables Inc. David Energy Supply, LLC Dayton Power & Light Company (The) DC Energy LLC **Delaware Municipal Electric Corporation** Delmarva Power & Light Company Denver Energy, LLC **Devonshire Energy LLC** Direct Energy Business, LLC Direct Energy Business Marketing, LLC Direct Energy Services, LLC Discount Power, Inc. DPL Energy Resources, Inc. DTE Atlantic, LLC DTE Energy Trading. Inc. Duke Energy Kentucky, Inc. Duke Energy Ohio, Inc. Duquesne Light Company Duquesne Light Energy, LLC DXT Commodities North America LLC Dynegy Energy Services, LLC Dynegy Kendall Energy, LLC Dynegy Marketing and Trade, LLC East Kentucky Power Cooperative, Inc. Easton Utilities Commission EDF Energy Services, LLC EDF Trading North America, LLC Eligio Energy, LLC Enel Trading North America, LLC Energetix, Inc. Energy Cooperative Association of Pennsylvania (The) Energy Cooperative of America, Inc. Energy Harbor LLC EnergyMark, LLC Energy Plus Holdings LLC Energy Services Providers, Inc. Energy Technology Savings, Inc. Energy Transfer Retail Power, LLC EnerPenn USA, LLC Engie Energy Marketing NA, Inc. ENGIE Retail, LLC

Intra-PJM Tariffs -> RELIABILITY ASSURANCE AGREEMENT -> RAA SCHEDULE 17 - PARTIES TO THE RELIABILITY ASSURANCE AGREE

EnPowered USA Inc. Entrust Energy East, Inc. Evergreen Gas & Electric, LLC Everyday Energy, LLC Exelon Generation Co., LLC First Point Power, LLC Freepoint Energy Solutions LLC Frontier Utilities Northeast, LLC Front Royal (Town of) Galt Power Inc. GenOn Power Midwest, LP Gerdau Ameristeel Energy, Inc. Grand Energy, LLC Great American Gas & Electric, LLC Great American Power, LLC Greenlight Energy Inc. Green Mountain Energy Company Grid Power Direct, LLC Hagerstown Light Department Harborside Energy, LLC Harrison REA, Inc. - Clarksburg, WV Hartee Parnters, LP HIKO Energy, LLC Holcim (US) Inc. Hoosier Energy REC, Inc. Horizon Power and Light LLC Hudson Energy Services, LLC IDT Energy, Inc. Illinois Municipal Electric Agency Illinois Power Marketing Company Inspire Energy Holdings, LLC Interstate Gas Supply, Inc. J.P. Morgan Ventures Energy Corporation Jack Rich, Inc. d/b/a Anthracite Power & Light Company J. Aron & Company LLC Jersey Central Power & Light Company Josco Energy USA, LLC Just Energy Solutions Inc. Kentucky Municipal Energy Agency Kiwi Energy NY LLC Kuehne Chemical Company, Inc. L & P Electric Inc., d/b/a Leggett & Platt Electric Inc. Land O'Lakes, Inc. Liberty Power Corp., L.L.C. Liberty Power Delaware LLC Liberty Power Holdings LLC

Intra-PJM Teriffs -> RELIABILITY ASSURANCE AGREEMENT -> RAA SCHEDULE 17 - PARTIES TO THE RELIABILITY ASSURANCE AGREE

LifeEnergy, LLC Lower Electric, LLC LSC Communications US, LLC Lykins Oil Company d/b/a Lykins Energy Solutions Macquarie Cook Energy LLC Major Energy Electric Services LLC MC Squared Energy Services, LLC Meadow Lake Wind Farm LLC Meadow Lake Wind Farm II LLC Meadow Lake Wind Farm III LLC Meadow Lake Wind Farm IV LLC MeadWestvaco Corporation Median Energy Corp. Median Energy PA LLC Mega Energy Holdings, LLC Mercuria Energy America, Inc. Messer Energy Services, Inc. MeterGenius Inc. Metropolitan Edison Company MidAmerican Energy Company MidAmerican Energy Services, LLC Morgan Stanley Capital Group, Inc. Morgan Stanley Services Group Inc. MP2 Energy NE, LLC MPower NJ LLC National Gas & Electric, LLC NextEra Energy Marketing, LLC Nextera Energy Services New Jersey, LLC Nextera Energy Services, Illinois, LLC Nittany Energy, LLC Nordic Energy Services LLC North American Power and Gas LLC. North Carolina Electric Membership Corporation North Carolina Municipal Power Agency Number 1 Northeastern REMC Northern States Power Company Northern Virginia Electric Cooperative - NOVEC NRG Power Marketing, L.L.C. nTherm, LLC Oasis Power, LLC dba Oasis Energy Ohio Edison Company **Ohio Valley Electric Corporation** Old Dominion Electric Cooperative Palmco Power DC, LLC PALMco Power DE, LLC Palmco Power IL, LLC Palmco Power MD, LLC

Intre-PJM Tariffs --> RELIABILITY ASSURANCE AGREEMENT --> RAA SCHEDULE 17 - PARTIES TO THE RELIABILITY ASSURANCE AGREE

Palmco Power NJ, LLC Palmco Power OH, LLC Palmco Power PA, LLC PALMco Power VA, LLC Park Power LLC Pay Less Energy, LLC **PBF** Power Marketing LLC PECO Energy Company Pennsylvania Electric Company Pennsylvania Grain Processing LLC Pennsylvania Power Company PEPCO Energy Services, Inc. Pilot Power Group, LLC Pinnacle Power LLC Plymouth Rock Energy, LLC Potomac Electric Power Company Power UP Energy, LLC Powervine Energy, LLC PPL Electric Utilities Corporation d/b/a PPL Utilities Prairieland Energy, Inc. Presto Energy, LLC Provision Power and Gas, LLC **PSEG Energy Resources & Trade LLC PSEG Energy Solutions LLC** Public Service Electric & Gas Company Pure Energy USA IL, LLC Pure Energy USA, LLC Realgy, LLC Red Oak Power, LLC Renaissance Power & Gas, Inc. ResCom Energy, LLC Residents Energy, L.L.C. **Respond Power LLC Riverside Generating Company, LLC** Rolling Hills Generating, LLC **RPA Energy**, Inc. Rushmore Energy, LLC (new) S.J. Energy Partners, Inc.

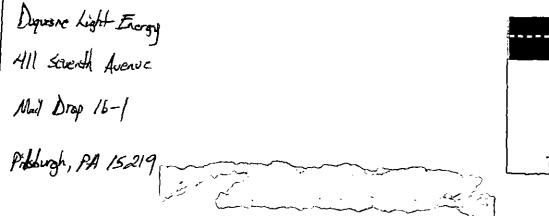
Santanna Energy Services Seward Generation, LLC SFE Energy, Inc. Shipley Choice LLC Smartest Energy US LLC Solios Power Mid-Atlantic Trading LLC South Bay Energy Corp. Intra-PJM Tariffs -> RELIABILITY ASSURANCE AGREEMENT -> RAA SCHEDULE 17 - PARTIES TO THE RELIABILITY ASSURANCE AGREE

South Jersey Energy Company Southeastern Power Administration Southern Indiana Gas & Electric Southern Maryland Electric Cooperative, Inc. Spark Energy, LLC Spring Energy RRH, LLC dba Spring Power & Gas Standard Gas & Electric, LLC Star Energy Partners LLC Starion Energy PA Inc. Stream Energy Columbia, LLC Stream Energy Delaware, LLC Stream Energy Illinois, LLC Stream Energy Maryland, LLC Stream Energy New Jersey, LLC Stream Energy Pennsylvania, LLC Stream Ohio Gas & Electric, LLC Summer Energy Midwest, LLC SunSea Energy LLC Sunwave USA Holdings Inc. Switch Energy, LLC Talen Energy Marketing, LLC Tenaska Power Services Co. Texas Retail Energy, LLC Thurmont Municipal Light Company Tidal Energy Marketing Inc. Titan Gas and Power Toledo Edison Company (The) Tomorrow Energy Corp Town of Berlin, Maryland Town of Williamsport Town Square Energy East, LLC TransAlta Energy Marketing (U.S.) Inc. TransCanada Power Marketing Ltd. Tri-County Rural Electric Cooperative, Inc. TriEagle Energy, LP Trustees of the University of Pennsylvania Twin Eagle Resource Management, LLC UGI Energy Services, LLC UGI Utilities, Inc. - Electric Division Verde Energy USA DC, LLC Verde Energy USA Illinois, LLC Verde Energy USA Maryland, LLC Verde Energy USA Ohio, LLC Verde Energy USA, Inc. Vineland Municipal Electric Utility (City of Vineland) Virginia Electric & Power Company

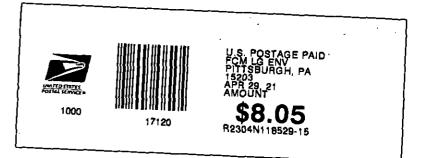
Intra-PJM Tariffs --> RELIABILITY ASSURANCE AGREEMENT --> RAA SCHEDULE 17 - PARTIES TO THE RELIABILITY ASSURANCE AGREE

Viridian Energy PA LLC Vista Energy Marketing, L.P. Volunteer Energy Services, Inc. Wabash Valley Power Association, Inc. Wellsboro Electric Company West Penn Power Company d/b/a Allegheny Power WGL Energy Services, Inc. Wolverine Holdings, L.P. Wolverine Holdings, L.P. Wolverine Power Supply Cooperative, Inc. Xoom Energy Maryland, LLC Xoom Energy New Jersey, LLC XOOM Energy Ohio, LLC Xoom Energy, LLC York Generation Company, LLC

Effective Date: 12/31/2020 - Docket #: ER21-1048-000 - Page 8







# RECEIVED

MAY - 6 2021

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Reserving Chiaveda, Secretary Pensylana Public Utility Commission

Commonworth Kayston & Billing

2nd Floor, Loon N201

100 North Street

Harrisburg ; PA 17120