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May 31, 2024

**VIA ELECTRONIC FILE**

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

**RE: Petition of Duquesne Light Company for Approval of Its Default Service Program for the Period from June 1, 2025 through May 31, 2029 Docket No. 2024-3048592**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission (“Commission”) is the Petition to Intervene of Calpine Retail Holdings, LLC in the above-referenced proceeding.

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

Sincerely,

NORRIS McLAUGHLIN, P.A.

*/s/ John F. Lushis, Jr.*

John F. Lushis, Jr.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF COMPANY FOR APPROVAL OF ITS DEFAULT SERVICE PROGRAM FOR THE PERIOD FROM JUNE 1, 2025 THROUGH MAY 31, 2029** :  
: **Docket No. P-2024-3048592**  
:  
:  
:

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the **Petition of Duquesne Light Company for Approval of Its Default Service Program for the Period from June 1, 2025 through May 31, 2029** on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

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(Counsel for DLC)



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John F. Lushis, Jr.  
Counsel to Calpine Retail Holdings, LLC

Date: May 31, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company : Docket No. P-2024-3048592  
for Approval of Its Default Service Program :  
for the Period From June 1, 2025 Through :  
May 31, 2029 :

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**PETITION TO INTERVENE  
OF CALPINE RETAIL HOLDINGS, LLC**

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Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, 52 Pa. Code §§ 5.71 - 5.74, Calpine Retail Holdings, LLC (together with its operating subsidiaries, “Calpine”) hereby files this Petition to Intervene in the above-captioned proceeding.<sup>1</sup>

Duquesne Light Company (“DLC” or the Company”) has petitioned the Commission for approval of the Company’s tenth Default Service Program (“DSP X”). DLC’s Petition for Approval of DSP X (the “Petition”) outlines the Company’s proposed procurement plan, implementation plan, and contingency plan for acquiring default service energy supply for all DLC customers who, upon expiration of DSP IX on May 31, 2025, do not take generation service from an alternative electric generation supplier (“EGS”) or who contract for energy with an EGS, which is not delivered. *Petition of Duquesne Light Company. for Approval of its Default Serv. Program for the Period from June 1, 2025 through May 31, 2029*, Docket No. P-2024-3048592, at 1.

In support of its Petition to Intervene, Calpine asserts the following:

1. The proposed DSP X would apply to all retail customers in DLC’s service territory, including customers of Calpine.

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<sup>1</sup> As used herein, “Calpine” refers collectively to Calpine Retail Holdings and its retail subsidiaries. Calpine Retail has overall responsibility for the business activities of its retail subsidiaries, which serve residential, commercial, institutional and industrial customers in Pennsylvania’s retail electric and gas markets.

2. Calpine is an independent, national provider of retail electric service across 20 states. It operates as a licensed Electric Generation Supplier (“EGS”) in Pennsylvania. Calpine is also a Load Serving Entity (LSE) and member of PJM Interconnection LLC. Calpine is actively serving and soliciting customers throughout Pennsylvania. Calpine currently offers a wide variety of efficiency and energy-related products and services beyond simple energy procurement, including load and risk management and green energy solutions – all designed to meet the individualized needs and demands of Calpine’s customers and capture the benefits of the existing competitive wholesale energy environment to bring those benefits forward into to Pennsylvania’s competitive retail electric market.

3. The name and address of Calpine’s attorney is:

John F. Lushis, Jr. (I.D. No. 32400)  
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4. Calpine is concerned with issues that affect competitive markets in Pennsylvania, including the structure and implementation of the default service, the procurement of generating capacity, long-term contracting of renewables and programs that could potentially harm or become a disincentive to create customized and innovative competitive retail electric products and services for its current and prospective customers.

5. Calpine intends to participate in this proceeding to the extent necessary to protect its interests and those of its customers. These interests cannot be adequately represented or protected by any other party.

6. As one of the nation's largest retail electric providers, Calpine's intervention is also in the public interest. Calpine possesses significant and unique knowledge, experience and resources with respect to the marketing of retail energy services, which will be helpful in developing a record on the reasonableness of the programs as presented. Moreover, without the opportunity to intervene, Calpine will be unable to participate in this proceeding but will nevertheless be bound by the actions taken by the Commission. Such actions may have a material impact on Calpine's operations, business and systems as well as its continued involvement in DLC's service territory as a retail EGS.

7. Calpine continues to review the Petition and the accompanying direct testimony and exhibits and has not yet definitively established its position on the matters presented therein. Calpine reserves the right to take positions and/or seek relief based on its review of the various filings, discovery responses or the positions taken by other parties in this proceeding,

8. The Commission's regulations permit intervention by a party that demonstrates an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72 Calpine has a substantial and direct interest in this proceeding and satisfies the standards for intervention under these regulations.

**WHEREFORE**, Calpine Retail Holdings, LLC respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, providing Calpine with full-party status in this proceeding, as well as any other relief as it deems necessary.

Respectfully submitted,  
NORRIS McLAUGHLIN, P.A.

By /s/ John F. Lushis, Jr.  
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Counsel to Calpine Retail Holdings, LLC

Dated: May 31, 2024