

ELIZABETH J. SHER

Attorney at Law

One Jefferson Road

Parsippany, NJ 07054-2891

T: (973) 966-8214 F: (973) 210-8535

esher@daypitney.com

Via Electronic Filing

May 31, 2024

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

Re: Docket No. P-2024-3048592: Petition of Duquesne Light Company for Approval of a Default Service Plan

Dear Secretary Chiavetta:

Enclosed please find Constellation NewEnergy, Inc. and Constellation Energy Generation, LLC's Petition to Intervene in the above captioned proceeding.

The parties shown on the attached Certificate of Service are being duly served by email or regular mail with a copy of the enclosed Petition to Intervene.

Please do not hesitate to contact me if you have any questions or require additional information. Thank you.

Very truly yours,



Elizabeth J. Sher
Attorney No. 207853

Enclosure

cc: Administrative Law Judge Mary D. Long (via email malong@pa.gov)
Administrative Law Judge John Coogan (via email jcoogan@pa.gov)
Service List

CERTIFICATE OF SERVICE

I hereby certify that I am serving via email or regular mail 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).

A handwritten signature in black ink that reads "Elizabeth J. Sher". The signature is written in a cursive, flowing style.

Elizabeth J. Sher
Attorney No. 207853
Counsel to Constellation NewEnergy, Inc.
and Constellation Energy Generation, LLC

Dated this 31st day of May 2024

**P-2024-3048592 PETITION OF DUQUESNE LIGHT COMPANY FOR APPROVAL OF
DEFAULT SERVICE PLAN**

LISA GRIMMENSTEIN
DUQUESNE LIGHT COMPANY
411 SEVENTH AVENUE 15TH FLOOR
PITTSBURGH PA 15219
412.393.1499
lgrimenstein@duqlight.com
Accepts eService

ANTHONY D. KANAGY, ESQUIRE
NICHOLAS STOBBE ESQUIRE
POST & SCHELL PC
17 NORTH SECOND STREET, 12TH
FLOOR HARRISBURG PA 17101
717.612.6034
akanagy@postschell.com
nstobbe@postschell.com
Accepts eService
(*Counsel for DLC*)

ALLISON KASTER ESQUIRE
BUREAU OF INVESTIGATION &
ENFORCEMENT
COMMONWEALTH KEYSTONE
BUILDING
400 NORTH STREET, 2ND FLOOR
WEST
PO BOX 3265
HARRISBURG, PA 17120
717.425.7593
akaster@pa.gov
Accepts eService

CHRISTY APPLEBY ESQUIRE
EMILY FARREN ESQUIRE
OFFICE OF CONSUMER ADVOCATE
555 WALNUT STREET
FORUM PLACE, 5TH FLOOR
HARRISBURG, PA 17101
717.783.5048
cappleby@paoca.org
efarren@paoca.org
Accepts eService

NAZARAARAH SABREE ESQUIRE
OFFICE OF SMALL BUSINESS
ADVOCATE
555 WALNUT STREET, 1ST FLOOR
HARRISBURG, PA 17101
717.783.2525
RA-SBA@PA.GOV
Served via email

ELIZABETH MARX, ESQUIRE
JOHN SWEET, ESQUIRE
RIA PEREIRA, ESQUIRE
CAUSE-PA
118 LOCUST STREET
HARRISBURG, PA 17101
717.236.9486
emarx@pautilitylawproject.org
jsweet@pautilitylawproject.org
rpereira@pautilitylawproject.org
lberman@pautilitylawproject.org
Accepts eService
(*Intervenor*)

JOHN F. LUSHIS, JR., ESQUIRE
NORRIS MCLAUGHLIN P.A.
515 WEST HAMILTON ST., STE. 502
ALLENTOWN PA 18101
484.765.2211
jlushis@norris-law.com
Served via email and first-class mail
(*Counsel for Calpine Retail Holdings, LLC*)

PJM INTERCONNECTION
CHRISTOPHER O'HARA
2750 MONROE BOULEVARD
AUDUBON, PA 19403-2497
christopher.ohara@pjm.com
(*Served via email*)

JAMES H. LASKEY, ESQUIRE
NORRIS MCLAUGHLIN P.A.
400 CROSSING BLVD., 8TH FL.
BRIDGEWATER TOWNSHIP NJ 08807
908.252.4221

jlasky@norris-law.com

*Served via email and first-class mail
(Counsel for Calpine Retail Holdings,
LLC)*

TODD S. STEWART, ESQUIRE
HAWKE MCKEON & SNISCAK LLP
100 NORTH TENTH STREET
HARRISBURG, PA 17101
717.236.1300

tsstewart@hmslegal.com

*Served via email and first-class mail
(Representing EGS Parties)*

GREGORY L. PETERSON, ESQUIRE
PHILLIPS LYTLE LLP
201 WEST THIRD STREET, SUITE 205
JAMESTOWN, NY 14701-4907
716.664.3906

gpeterson@phillipslytle.com

*Served via email and first-class mail
(Counsel for Statewise)*

KEVIN C. BLAKE, ESQUIRE
PHILLIPS LYTLE LLP
125 MAIN STREET
BUFFALO, NY 14203
716.847.7082

kblake@phillipslytle.com

*Served via email and first-class mail
(Counsel for Statewise)*

THOMAS F. PUCHNER, ESQUIRE
PHILLIPS LYTLE LLP
OMNI PLAZA
30 SOUTH PEARL STREET
ALBANY, NY 12207-1537
518.618.1214

tpuchner@phillipslytle.com

*Served via email and first-class mail
(Counsel for Statewise)*

JAMES M. VAN NOSTRAND, ESQUIRE
KEYES & FOX LLP
275 ORCHARD DRIVE
PITTSBURGH, PA 15228
304.777.6050

jvannostrand@keyesfox.com

*Served via email and first-class mail
(Counsel for Charge Point Inc)*

CHARLES E. THOMAS JR., ESQUIRE
THOMAS, NIESEN & THOMAS, LLC
212 LOCUST STREET, SUITE 302
HARRISBURG, PA 17101
717.255.7615

cthomasjr@tntlawfirm.com

*Served via email and first-class mail
(Counsel for MAREC)*

BRUCE BURCAT, ESQUIRE
P.O. BOX 385
CAMDEN, DE 19934
302.331.4639

marec.org@gmail.com

*Served via email and first-class mail
(Counsel for MAREC)*

MARK C. SZYBIST, ESQUIRE
1152 15TH STREET, SUITE 300
WASHINGTON, DC 20005
570.447.4019

mszybist@nrdc.org

*Served via email and first-class mail
(Counsel for Natural Resources Defense
Council)*

ANDREW J. KARAS, ESQUIRE
EMILY A. COLLINS, ESQUIRE
FAIR SHAKE ENVIRONMENTAL
LEGAL SERVICES
647 E. MARKET STREET
AKRON, OH 44304
234.334.0997

akaras@fairshake-els.org

ecollins@fairshake-els.org

*Served via email and first-class mail
(Counsel for Natural Resources Defense
Council)*

PARTIES SERVED VIA EMAIL AND FIRST- CLASS MAIL

ANNE SCHENK
AEP ENERGY INC
225 W WACKER DR STE 600
CHICAGO, IL 60606
utilityservices@apenergy.com

MAY RUAN
AGERA ENERGY LLC
555 PLEASANTVILLE RD
BRIARCLIFF, NY 10510
utilitycontact@ageraenergy.com

ADAM SMALL ESQUIRE
ALPHA GAS AND ELECTRIC, LLC
12 COLLEGE ROAD
MONSEY, NY 10952
adam.small@alphagne.com

DUANE RICE, FINANCE MANAGER
AMERICAN POWER & GAS OF PA LLC
10601 BELCHER RD S
SEMINOLE, FL 33777
duaner@goapg.com

APN STARFIRST, LP
45 COMMENCE DR
WYOMISSING, PA 19610
jordand@americanpowernet.com

NICHOLAS CAPOZZO
ATLANTIC ENERGY MD, LLC
1 SHORE AVENUE, UNIT 1
OYSTER BAY, NY 11771
nick@atlanticenergyco.com

JESSICA CROMEK
CLEANCHOICE ENERGY, INC.
1055 THOMAS JEFFERSON STREET,
NW WASHINGTON, DC 20007
utilityops@cleanchoiceenergy.com

DEB KISER
AGWAY ENERGY SERVICES, LLC.
5793 WIDEWATERS PARKWAY
SYRACUSE, NY 13214
dkiser@surburbanpropane.com

VICTOR QUINTANA
AMBIT ENERGY
1801 N. LAMAR STREET, SUITE 200
DALLAS, TX 75202
vquintana@ambitenergy.com

JOHN MURRAY, SENIOR ENERGY
MANAGER
AMERICAN POWERNET
MANAGEMENT, LP
45 COMMERCE DR
WYOMISSING, PA 19610
jmurray@americanpowernet.com

TIFFANY MANESS
AP GAS & ELECTRIC (PA), LLC DBA
APG&E
6161 SAVOY DR STE 500
HOUSTON, TX 77036
tmaness@apge.com

CHARLES PALMINTERI
ASTRAL ENERGY LLC
580 SYLVAN AVENUE SUITE 2
ENGLEWOOD CLIFFS, NJ 07632
ops@astralenergylc.com

PA ENROLLMENTS - GENERAL
MAILBOX
CHAMPION ENERGY SERVICES, LLC
1500 RANKIN RD, STE 200
HOUSTON, TX 77073
pa.enrollments@champion.energy

FRANK MCGOVERN, PRESIDENT
CLEARVIEW ELECTRIC, INC
PO BOX 130659
DALLAS, TX 75313-0659
execs@clearviewelectric.net

CONSTELLATION NEW ENERGY, INC
1221 LAMAR ST., STE, 750
HOUSTON, TX 77010
CNEUtilityNotices@constellation.com

JAY CARLIS, VP
COMMUNITY ENERGY, INC 100
MATSONFORD ROAD, SUITE 300
RADNOR, PA 19087
jay.carlis@communityenergyinc.com

CONSTELLATION NEW ENERGY, INC.
1001 LOUISIANA STREET, SUITE 2300
HOUSTON, TX 77002
MMOPSMid-Continent@exeloncorp.com

MATTHEW MCCALL
DIRECT ENERGY BUSINESS, LLC
1001 LIBERTY AVENUE, SUITE 12
PITTSBURGH, PA 15222
DEBUtilityOperations@directenergy.com

KRISTINE REDANAUER
DIRECT ENERGY SERVICES, LLC
PO BOX 180
TULSA, OK 74101
USNUtilityContact@directenergy.com

JOEL GLASSMAN, COO
DISCOUNT POWER, INC.
6 ARMSTRONG ROAD
SHELTON, CT 06484
jglassman@discountpowerinc.com

JOHN SCHATZ, MARKET RELATIONS
MANAGER
DYNEGY ENERGY SERVICES EAST,
LLC 312 WALNUT STREET, SUITE
1500
CINCINNATI, OH 45202
john.schatz@vistraenergy.com

KATIE KIFER
DYNEGY ENERGY SERVICES EAST,
LLC
DBA DYNEGY
6555 SIERRA DRIVE
IRVING, TX 75039
katie.kiefer@vistraenergy.com

DEEP ADLJA
EAST COAST POWER & GAS
340 JACKSON AVENUE
BRONX, NY 10454
dadalja@ecppg.com

EDF ENERGY SERVICES, LLC
TRANSACTION MANAGEMENT
601 TRAVIS ST
HOUSTON, TX 77002
TM@edfenergyservices.com

ELIGO ENERGY PA, LLC
UTILITY RELATIONS
201 W LAKE STREET, SUITE 151
CHICAGO, IL 60606
utilityrelations@eligoenergy.com

DUNJA AUGUSTIN
ENERGY HARBOR, LLC
341 WHITE POND DRIVE, AWAC B2
AKRON, OH 44320
dunja.augustin@firstenergycorp.com

LEAH GIBBONS
ENERGY PLUS HOLDINGS, LLC
3711 MARKET ST., SUITE 1000
PHILADELPHIA, PA 19104
leah.gibbons@nrg.com

ENERGY REWARDS
535 CONNECTICUT AVENUE FLOOR
6
NORWALK, CT 06854
csemler@criusenergy.com

DAN JACKSON ENERGY TRANSFER
RETAIL POWER,
LLC
7400 W. 129TH STREET, SUITE 250
OVERLAND PARK, KS 66213
dan.jackson@energytransfer.com

LISA BEJARAN
ENGIE RETAIL, LLC
PO BOX 25225
LEHIGH VALLEY, PA 18002
lisa.bejaran@engie.com

KENZIE PAPE
ENTRUST ENERGY EAST, INC.
1301 MCKINNEY ST #2950
HOUSTON, TX 77010
kenzie.pape@entrustenergy.com

ANDREW FITZGERALD
FIRST POINT POWER LLC
200 CHAPEL VIEW BLVD, SUITE 450
CRANSTON, RI 02920
andrew@firstpointpower.com

MARY NENZA
FREEPOINT ENERGY SOLUTIONS
LLC
3050 POST OAK BLVD., SUITE 1330
HOUSTON, TX 77056
operations@freepointsolutions.com

SCOTT BIRMINGHAM
FRONTIER UTILITIES NE, LLC
5444 WESTHEIMER, SUITE 1100
HOUSTON, TX 77056
scott.birmingham@frontierutilities.com

JEFFREY LEVINE
GDF SUEZ ENERGY RESOURCES NA
2005 DELANCEY PLACE
PHILADELPHIA, PA 19103
jeffrey.levine@gdfsuezna.com

JESS EVANS
GREAT AMERICAN POWER
2633 MCKINNY AVE, STE 130 #517
DALLAS, TX 75204
jevans@greatamericanpower.com

JOE HOLTMAN
GREEN MOUNTAIN ENERGY
3711 MARKET STREET, SUITE 1000
PHILADELPHIA, PA 19104
joe.holtman@nrgenergy.com

MICHAEL HARTOFILIS
GREENLIGHT ENERGY, INC.
10818 QUEEND BOULEVARD. FLOOR
4 FOREST HILLS, NY 11375
michael@gogreenlightenergy.com

DAVID WANOUNOU
HIKO ENERGY, LLC
12 COLLEGE ROAD
MONSEY, NY 10952
davidw@hikoenergy.com

SIARA LEVINE
HUDSON ENERGY SERVICES
5251 WESTHEIMER ROAD, SUITE
1000 HOUSTON, TX 77056
siara.levine@hudsonenergy.net

TRACIE RILEY
IDT ENERGY, INC.
CUSTOMER SERVICE MANAGER
20 WEST THIRD STREET, SUITE 10
PO BOX 400
JAMESTOWN, NY 14702
triley@genieretail.com

ADAM WEANER
IGS ENERGY
6100 EMERALD PARKWAY
DUBLIN, OH 43017
igs_ops_electric@igsenergy.com

LEAH GIBBONS
INDEPENDENCE ENERGY GROUP,
LLC DBA CIRRO ENERGY
3711 MARKET ST., SUITE 1000
PHILADELPHIA, PA 19104
leah.gibbons@nrg.com

MICHAEL D'ANGELO
INDRA ENERGY
1515 MARKET ST., SUITE 1200
PHILADELPHIA, PA 19102
compliance@indraenergy.com

INSPIRE ENERGY HOLDINGS, LLC
OPERATIONS
3250 OCEAN PARK BLVD.
SANTA MONICA, CA 90405
operations@helloinspire.com

MATT GORDON
JOSCO ENERGY USA LLC
200 ROUTE 17 SOUTH
MAHWAH, NJ 07430
chani@joscoenergy.com

KRISTINA MONTGOMERY
JUST ENERGY PENNSYLVANIA
CORP.
5251 WESTHEIMER RD #1000
HOUSTON, TX 77056
kmontgomery@justenergy.com

JEREMY ENNEN
LIBERTY POWER HOLDINGS LLC
2100 WEST CYPRESS CREEK RD,
STE 130 FT. LAUDERDALE, FL 33309
jennen@libertypowercorp.com

LINDE ENERGY SERVICES, INC.
1 GREENWICH STREET, SUITE 200
STEWARTSVILLE, NJ 08886
Sean.powers@linde.com

JIM NICHOLS
MARATHON POWER LLC
100 ELWOOD DAVIS ROAD
NORTH SYRACUSE, NY 13212
jnichols@mecny.com

HENRY BENNETT
MEDIAN ENERGY PA LLC
1 LETHBRIDGE PLAZA, SUITE 2
MAHWAH, NJ 07430
hbennett@medianenergy.com

MIDAMERICAN ENERGY SERVICE,
LLC
PO BOX 4350
DAVENPORT, IA 52808
EDI@midamericanenergyservices.com

CHERYL SCHIPILLITI
MINT ENERGY LLC
1 ROUNDER WAY, SUITE 220
BURLINGTON, MA 01803
cschipilliti@mintenergy.net

MICHELLE SANCHEZ
MP2 ENERGY NE, LLC
21 WATERWAY AVE., SUITE 450
THE WOODLANDS, TX 77380
michelle.sanchez@mp2energy.com

Yael DUBROVSKY
MPOWER ENERGY NJ LLC
24 HILLEL PLACE
BROOKLYN, NY 11210
yaeld@mpowerenergy.com

SHAWN TA BYRD
NATIONAL GAS & ELECTRIC, LLC.
12140 WICKCHESTER LN STE 100
HOUSTON, TX 77079
sbyrd@ngande.com

ROBERT DESHAZO
NEXTERA ENERGY SERVICES PA
LLC
20455 SH 249, SUITE 200
HOUSTON, TX 77070
robert.deshazo@gexaenergy.com

NOBLE AMERICAS ENERGY
SOLUTIONS
401 W A STREET, SUITE 500
SAN DIEGO, CA 92101
hnanace@noblesolutions.com

DAVID CHESNICK
SPRING ENERGY RRH, LLC
D/B/A SPRING POWER & GAS
200 PARK AVENUE SOUTH, SUITE
1301
NEW YORK, NY 10003
pricing@rrhenergy.us

VICTORIA CRITES
STAR ENERGY PARTNERS, LLC
3340 W MARKET STREET
FAIRLAWN, OH 44333
suppliersupport@starenergypartners.com

PETER MUZSO
STARION ENERGY PA INC.
751 STRAITS TURNPIKE, SUITE 2000
MIDDLEBURY, CT 06762
pmuzsi@starionenergy.com

SAMIR KAREEM
STATEWISE ENERGY PA, LLC
PO BOX 399
BUFFALO, NY 14240
skareem@sfeenergy.com

LETICIA CASTELLANOS
STREAM ENERGY
14675 DALLAS PARKWAY, SUITE 150
DALLAS, TX 75254
leticia.castellanos@mystream.com

TALEN ENERGY MARKETING, LLC
GENPL7S
835 HAMILTON STREET, SUITE 150
ALLENTOWN, PA 18101
retailelectricoperations@talenenergy.com

TENASKA POWER MANAGEMENT,
LLC
170 E LAMAR BOULEVARD
ARLINGTON, TX 76006
tpscheckout@tnsk.com

CHRIS HENDRIX
TEXAS RETAIL ENERGY, LLC
2001 SE 10TH ST
BENTONVILLE AR, 72716 72712
chris.hendrix@texasretailenergy.com

YARA ABDUR RAHMAN
TITAN GAS, LLC
3355 W. ALABAMA, SUITE 500
HOUSTON, TX 77098
retail-ops@titangasandpower.com

KIMBERLY BAILEY
TOMORROW ENERGY CORP
3010 BRIARPARK DR., SUITE 200
HOUSTON, TX 77042
kbailey@tomorrowenergy.com

STUART NAFTEL
TOWN SQUARE ENERGY EAST, LLC
208 W CHANDLER HEIGHTS ROAD
SUITE 102
CHANDLER, AZ 85248
snaftel@genieretail.com

WILLIAM HUNSICKER
TRIEAGLE ENERGY, LP
PO BOX 131615
THE WOODLANDS, TX 77393
ediinformation@criusenergy.com

GILBERT CRYSTLE
UGI ENERGY SERVICES, INC.
1 MERIDIAN BOULEVARD, SUITE
2C01 WYOMISSING, PA 19610
gcrystle@ugies.com
MICHELLE PROSEK
VIRIDIAN ENERGY PA, LLC
535 CONNECTICUT AVE., 6TH FLOOR
NORWALK, CT 06854
mprosek@criusenergy.com

MEREDITH MOELLER
VISTA ENERGY MARKETING, L.P.
4306 YOAKUM, SUITE 600
HOUSTON, TX 77006
mmoeller@vistaenergymarketing.com

JEFF BOREK
WGL ENERGY SERVICES, INC.
8614 WESTWOOD CENTER DR.,
SUITE 1200 VIENNA, VA 22182
jeff.borek@wglenergy.com

CHRISTINA BINMORE
XOOM ENERGY PA, INC.
11208 STATESVILLE RD., SUITE 200
HUNTERSVILLE, NC 28708
cbinmoe@xoomenergy.com

CHRISTIAN BEDORTHA
ENERPENN USA LLC
7660 WOODWAY DRIVE, STE. 471A
HOUSTON, TX 77063
cb@yepenergy.com

KIRA JORDAN
VERDE ENERGY USA, INC.
12140 WICKCHESTER LN., STE. 100
HOUSTON, TX 77079
kjordan@sparkenergy.com

MURIEL LECLERC
HIKO ENERGY, LLC
12140 WICKCHESTER LANE SUITE
100
HOUSTON, TX 77079
mleclerc@sparkenergy.com

CARRIE ALLEN
EXELON CORPORATION
101 CONSTITUTION AVENUE N.W.,
SUITE 400
EAST WASHINGTON, DC 20001
Carrie.allen@exeloncorp.com

KERSTIN WILLIAMS
CLEARVIEW ENERGY
901 MAIN STREET
SUITE 4700
DALLAS, TX 75202
Regulatory@ClearviewEnergy.com

**PARTIES SERVED VIA FIRST CLASS
MAIL**

APPROVED ENERGY II LLC
6717 4TH AVENUE
BROOKLYN, NY 11220

ASPIRITY ENERGY LLC
701 XENIA AVE S STE 475
MINNEAPOLIS, MN 55416
BLUE PILOT ENERGY
250 PILOT RD STE 300
LAS VEGAS, NV 89119

BLUEROCK ENERGY, INC.
125 E JEFFERSON ST STE 800
SYRACUSE, NY 13202

BOUNCE ENERGY
2802 ALBANY ST
HOUSTON, TX 77006

BP ENERGY RETAIL COMPANY LLC
201 HELIOS WAY
HOUSTON, TX 77079

BRIGHTEN ENERGY, LLC
6555 SIERRA DR
IRVING, TX 75039

CAPITAL ENERGY PA LLC DBA
SUNRISE POWER & GAS
1770 ST. JAMES PLACE SUITE # 606
HOUSTON, TX 77056

CATALYST POWER & GAS LLC
600 FRANKLIN AVE., #268
GARDEN CITY, NY 11530

CHOICE ENERGY, LLC D/B/A 4
CHOICE ENERGY, LLC
601 SW 9TH ST
DES MOINES, IA 50309

CITY POWER AND GAS, LLC
5 COMMERCE ROAD
NEWTOWN, CT 06470

CLEANSKY ENERGY
3355 W ALABAMA ST STE 500
HOUSTON, TX 77098

COMMUNITY ENERGY, INC.
100 MATSONFORD RD STE 300
RADNOR, PA 19087

CONOCO PHILLIPS COMPANY
600 NORTH DAIRY ASHFORD (CH
1032)
HOUSTON, TX 77079

CONSOLIDATED EDISON SOLUTIONS,
100 SUMMIT LAKE DR STE 410
VALHALLA, NY 10595

CONSTELLATION ENERGY SERVICES,
INC.
1716 LAWRENCE DR
DE PERE, WI 54115

CONSTELLATION NEWENERGY, INC.
100 CONSTELLATION WAY
BALTIMORE, MD 21202

CPY RETAIL ENERGY LP
2245 TEXAS DR
SUGAR LAND, TX 77479

DOMINION ENERGY SOLUTIONS
120 TREDEGAR ST STE 500
RICHMOND, VA 23219

DOMINION MARKETING SERVICES
DPL ENERGY RESOURCES, INC.
1065 WOODMAN DR
DAYTON, OH 45432

DTE ENERGY SUPPLY, INC.
414 S MAIN ST STE 200
ANN ARBOR, MI 48104

DUQUESNE LIGHT ENERGY LLC
424 S 27TH ST STE 220
PITTSBURGH, PA 15203

ENERGETIX, INC
50 METHODIST HILL DR STE 1500
ROCHESTER, NY 14623

ENERGO POWER & GAS LLC D/B/A
MARATHON ENERGY D/B/A ENERGO
100 ELWOOD DAVIS ROAD, 2G
SYRACUSE, NY 13212

ENERPENN USA LLC
1275 GLENLIVET DR STE 100
ALLENTOWN, PA 18106

GLACIAL ENERGY OF PA, INC.
555 PLEASANTVILLE RD
BRIARCLIFF, NY 10510

GRAND ENERGY, LLC
15215 N. KIERLAND BLVD
SCOTTSDALE, AZ 85254

GREAT AMERICAN POWER
539 W COMMERCE ST
DALLAS, TX 75208

GREEN MOUNTAIN ENERGY
COMPANY
PO BOX 7476
PHILADELPHIA, PA 19101

GRID POWER DIRECT, LLC
1 METROTECH CENTER NORTH
BROOKLYN, NY, 11201

GUTTMAN ENERGY INC.
3117 WASHINGTON PIKE STE 550
BRIDGEVILLE, PA 15017

HESS CORPORATION
1 HESS PLACE
WOODBIDGE, NJ 07095

IDT ENERGY, INC.
550 BROAD ST
NEWARK, NJ 07102

IRON ENERGY
1114 LOST CREEK BLVD STE 410
AUSTIN, TX 78746

LIFE ENERGY, LLC
2000 WEST LOOP S STE 2010
HOUSTON, TX 77027

MIDAMERICAN ENERGY
4299 NW URBANDALE DR
URBANDALE, IA 50322

NATIONAL CHOICE ENERGY, LLC
17113 MIRAMAR PKWY STE 200
MIRAMAR, FL 33027

NEW WAVE ENERGY CORP
410 MAIN ST.
BUFFALO, NY 14202

NEXTERA ENERGY SERVICES PA LLC
PO BOX 25225
LEHIGH VALLEY, PA 18002

NEXTERA ENERGY SERVICES
PENNSYLVANIA, LLC
601 TRAVIS STREET STE 1400
HOUSTON, TX 77002

NORDIC ENERGY SERVICES, LLC
1 TOWER LANE
OAKBROOK TERRACE, IL 60181

NORTH AMERICAN POWER AND GAS
1500 RANKIN RD STE 200
HOUSTON, TX 77073

NRG RETAIL SOLUTIONS
804 CARNEGIE CENTER
PRINCETON, NJ 08540

OASIS ENERGY
11152 WESTHEIMER, SUITE 901
HOUSTON, TX 77042

OCTOPUS ENERGY LLC
114 MAIN STREET, SUITE 500
HOUSTON, TX 77002

OXFORD ENERGY SERVICES, LLC
90B JOHN MUIR DR STE 100
AMHERST, NY 14228

PARK POWER
2098 W CHESTER PIKE STE 200
BROOMALL, PA 19008

PENNSYLVANIA GAS & ELECTRIC
4075 LINGLESTOWN RD # 113
HARRISBURG, PA 17112

PEPCO ENERGY SERVICES, INC
1300 17TH ST N STE 1600
ARLINGTON, VA 22209

PILOT POWER GROUP, LLC
8910 UNIVERSITY CENTER LN STE 520
SAN DIEGO, CA 92122

PINNACLE POWER, LLC
5847 SAN FELIPE ST STE 3700
HOUSTON, TX 77057
PLANET ENERGY CORP
1691 MICHIGAN AVE STE 425
MIAMI BEACH, FL 33139

PLYMOUTH ROCK ENERGY CORP.
920 RAILROAD AVE
WOODMERE, NY 11598

POWERVINE ENERGY, LLC
539 W. COMMERCE ST
DALLAS, TX 75208

PUBLIC POWER, LLC
1055 WASHINGTON BLVD FL 7
STAMFORD, CT 06901

RESCOM ENERGY CORP.
20 EAST AVE
BRIDGEPORT, CT 06610

RESIDENTS ENERGY, LLC
20 W 3RD ST
JAMESTOWN, NY 14701

RESPOND POWER DBA MAJOR
ENERGY
12140 WICKCHESTER LN
HOUSTON, TX 77079

RPA ENERGY INC.
14 WALL STREET, 2ND FLOOR
HUNTINGTON, NY 11743

RUSHMORE ENERGY, LLC
54 SUGAR CREEK CENTER BLVD STE
200
SUGAR LAND, TX 77478

SANTANNA NATURAL GAS
CORPORATION
7701 SAN FELIPE BLVD STE 200
AUSTIN, TX 78729

SFE ENERGY
PO BOX 967
BUFFALO, NY 14240

SHIPLEY ENERGY
PO BOX 15052
YORK, PA 17405

SMARTENERGY HOLDINGS, LLC
7450 TILGHMAN ST
ALLENTOWN, PA 18106

SMARTESTENERGY US, LLC
333 W WASHINGTON ST STE 140
SYRACUSE, NY 13202
SOURCE POWER & GAS LLC
2150 TOWN SQUARE PL STE 390
SUGAR LAND, TX 77479

SPARK ENERGY, LLC
12140 WICKCHESTER LN.,
HOUSTON, TX 77079

STREAM ENERGY
PO BOX 7287
PHILADELPHIA, PA 19101

SUMMER ENERGY MIDWEST, LLC
5847 SAN FELIPE ST STE 3700
HOUSTON, TX 77057

SUNWAVE GAS & POWER
PENNSYLVANIA INC.
100 CAMBRIDGE ST.
BOSTON, MA 02114

TERM POWER & GAS LLC D/B/A
ENCOA
8847 W SAM HOUSTON PKWY N
HOUSTON, TX 77040

TEXAS RETAIL ENERGY, LLC
2608 SE J ST.
BENTONVILLE, AR 72716

THE ENERGY COOPERATIVE
ASSOCIATION OF PHILADELPHIA
1515 MARKET STREET
PHILADELPHIA, PA 19102

U.S. ENERGY PARTNERS, LLC
100 COLLEGE PKWY STE 280
WILLIAMSVILLE, NY 14221

VERDE ENERGY USA, INC.
101 MERRITT 7 STE 3
NORWALK, CT 06851

VIRIDIAN ENERGY PA, LLC
1055 WASHINGTON BLVD FL 7
STAMFORD, CT 06901
WGL ENERGY SERVICES, INC
PO BOX 7600
HAMPTON, VA 23666

WGL ENERGY SERVICES, INC.
8614 WESTWOOD CENTER DR
VIENNA, VA 22182

XOOM ENERGY PENNSYLVANIA, INC
11208 STATESVILLE RD STE 2000
HUNTERSVILLE, NC 28078

ALLEGHENY ENERGY SUPPLY CO,
LLC
341 WHITE POND DR
AKRON, OH 44320

AMERICAN POWER PARTNERS, LLC
8205 MAIN ST STE 11
WILLIAMSVILLE, NY 14221

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company
for Approval of a Default Service Plan

Docket No. P-2024-3048592

**PETITION TO INTERVENE OF
CONSTELLATION NEWENERGY, INC.
AND CONSTELLATION ENERGY GENERATION, LLC**

Pursuant to Sections 5.71 through 5.75 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.75, Constellation NewEnergy, Inc. ("CNE") and Constellation Energy Generation, LLC ("CEG") (together, "Constellation") hereby file this Petition to Intervene in the above-captioned proceeding. Constellation hereby states the following in support of its petition to intervene:

1. On April 19, 2024, Duquesne Light Company ("Duquesne" or the "Company") petitioned the Commission for approval of the Company's Default Service Plan ("DSP").
2. In the May 7, 2024 Prehearing Conference Order, the Commission established a deadline of May 31, 2024 for formal protests, petitions to intervene and answers.
3. Constellation submits this petition to intervene. Constellation's participation in the proceeding will benefit the Commission and the public interest, and Constellation has a significant interest in the outcome of the proceeding that cannot be adequately represented by another party.
4. Constellation's attorney in the matter is:
Elizabeth J. Sher
Attorney No. 207853
One Jefferson Road
Parsippany, NJ 07054-2891
(973) 966-8214
esher@daypitney.com

5. CNE is a leading competitive retail supplier in Pennsylvania, with thousands of retail customers in Duquesne's territory. CEG has actively participated in default service auctions for many years and will continue to do so and has served Duquesne default service load.
6. Constellation meets the standards for intervention set forth in 52 Pa. Code § 5.72(a) as Constellation has interests that will be specifically and substantially affected by this proceeding. Constellation has an interest in issues that affect competitive markets in Pennsylvania, including the structure of default service, the procurement and implementation of default service supply, and the product mix under the default service program.
7. The proposed DSP would apply to all retail customers in Duquesne's service territory, including customers of Constellation. This proceeding will establish the terms and conditions under which the Company will acquire electric supply to serve its Default Service load. The outcome of this proceeding will impact the rates against which Constellation must compete to sell electricity to retail customers in the Company's service territory and therefore Constellation's ability to provide electric supply to retail customers in the Company's service territory. Constellation will be bound by the action of the Commission in this proceeding, which will determine the Company's default service rates, terms and conditions beginning June 2025 as well as the terms and conditions for the various retail market enhancement programs proposed by the Company.
8. Constellation's interests in this proceeding are unique from and may not adequately represented by other parties in this proceeding, including individual electric suppliers or other organizations interested in electric competition in Pennsylvania in general and in the Company's service territory in particular. Constellation intends to participate in the proceeding to the extent necessary to protect its interests and those of its customers.

9. Further, as one of the nation's largest retail electric providers, with a significant number of retail customers in the Company's territory, Constellation's intervention is in the public interest. Constellation possesses significant and unique knowledge, experience, and resources that will aid the Commission in this inquiry.
10. Constellation is reviewing the Company's filing and will be identifying issues to be addressed in this proceeding. Due to the early stage of this proceeding, Constellation reserves the right to raise and address issues identified through its continued review and analysis of the Company's filing (and related information), or other issues raised by other parties.
11. For these reasons, Constellation asserts that good cause has been shown, as required under 52 Pa. Code Section 5.74(a), and the Commission should grant this Petition to Intervene.

WHEREFORE, Constellation respectfully requests that the Commission grant its Petition to Intervene, granting it full party status in this proceeding.

Respectfully submitted,



Elizabeth J. Sher
Attorney No. 207853
One Jefferson Road
Parsippany, NJ 07054-2891
(973) 966-8214
esher@daypitney.com

*Attorney for Constellation NewEnergy,
Inc. and Constellation Energy
Generation, LLC*

Dated: May 31, 2024