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February 17, 2025

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

Re: Clovernote Holdings LLC v. Hudson Energy Services and Duquesne Light Company
Docket No. F-2024-3048157

Dear Secretary Chiavetta:

This correspondence is regarding the Answer and New Matter filed by Duquesne Light Company (“Duquesne”) on January 29, 2025, in the above-captioned Complaint proceeding (“Clovernote Complaint”) by Clovernote Holdings, LLC (“Clovernote”). Specifically, in its New Matter, Duquesne has requested dismissal of the Clovernote Complaint if an attorney has not entered an appearance for Clovernote by a future date certain.

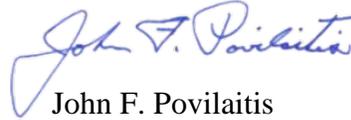
Respondent Hudson Energy Services, LLC (“Hudson”) does not deny any of the averments in Duquesne’s New Matter. However, Hudson wishes to point out that Clovernote did not file a timely Answer to Hudson’s New Matter filed June 12, 2025, which raised the issue of the Pennsylvania Public Utility Commission’s requirement that Clovernote be represented by counsel. In addition, Special Agent Michael J. Mrocza’s subsequent Order dated September 9, 2024, specifically directed that “Clovernote shall cause an attorney to enter their appearance on its behalf.” *Interim Order Joining an Indispensable Party, Granting Request for Continuance, and Requiring Complainant to Cause an Attorney to Enter an Appearance on its Behalf* at 2.

In view of the over five-month period over which Clovernote has not responded to the Special Agent’s directive to have counsel enter an appearance in the Clovernote Complaint, and consistent with Hudson’s January 29, 2025 Motion to Dismiss Clovernote’s Complaint, in Hudson’s view it is not just, reasonable, or legally necessary to provide Clovernote an additional period to demonstrate it is being represented by counsel in this matter.

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This correspondence has been served on all Parties to the Clovernote Complaint as indicated in the attached Certificate of Service.

Very truly yours.



John F. Povilaitis
Counsel for Hudson Energy Services, LLC

JFP/psm
cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Clovernote Holdings, LLC

v.

Hudson Energy Services, LLC and
Duquesne Light Company

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Docket No: F-2024-3048157

CERTIFICATE OF SERVICE

I hereby certify that this day I have filed and served a copy of the foregoing document via electronic means and email upon the persons listed below in accordance with the requirements of 52 Pa. Code § 1.54.

Clovernote Holdings LLC
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Date: February 17, 2025



John F. Povilaitis, Esquire