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May 12, 2020

E-FILE

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

**RE: Petition of PPL Electric Utilities Corporation for Approval of a
Default Service Program and Procurement Plan for the Period June
1, 2021 through May 31, 2025
Docket No. P-2020-3019356**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum on behalf 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 electronically with a copy of this document.

Thank you.

Sincerely,

NORRIS McLAUGHLIN, P.A.

/s/ John F. Lushis, Jr.

John F. Lushis, Jr.

c: Administrative Law Judge Elizabeth H. Barnes (via e-mail)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of a :
Default Service Program and : **Docket No. P-2020-3019356**
Procurement Plan for the Period :
June 1, 2021 through May 31, 2025 :

**PREHEARING CONFERENCE MEMORANDUM
OF CALPINE RETAIL HOLDINGS, LLC**

TO THE HONORABLE ELIZABETH H. BARNES

Pursuant to the Prehearing Conference Order dated April 8, 2020, in the above-captioned proceeding and Sections 5.221 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, 52 Pa. Code § 5.221, Calpine Retail Holdings, LLC (together with its operating subsidiaries, “Calpine”) hereby files this Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

1. On March 25, 2020, PPL Electric Utilities Corporation (“PPL” or the “Company”) petitioned the Commission for approval of the Company’s fifth Default Service Program (“DSP V”).

2. On April 21, 2020, Calpine petitioned to intervene in this proceeding.

3. Calpine is a provider of competitive electric services and as such is directly affected by the default service programs maintained by PPL and other electric utilities.

II. COUNSEL

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

John F. Lushis, Jr. (I.D. No. 32400)
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515 W. Hamilton Street, Suite 502

Allentown, PA 1810
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5. Calpine has also sought the admission pro hac vice of the following attorney:

James Laskey (NJ Id. No 016311978)
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400 Crossing Blvd, 8th Dloor
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All parties are requested to hereafter serve said counsel electronically with all documents served in this proceeding.

III. EXPECTED ISSUES

6. Calpine is concerned with issues that affect competitive markets in Pennsylvania, including the structure of the default service, utility affiliate participation, 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.

IV. PROPOSED WITNESSES

7. Calpine is not currently planning to file direct testimony. Depending on the issues raised in direct testimony by other parties, Calpine reserves the right to call Becky Merola, a Calpine Director of Government & Regulatory Affairs, as a rebuttal witness. Calpine reserves the right to offer additional witnesses as necessitated by the issues.

V. LITIGATION SCHEDULE

8. Calpine is willing to agree to any reasonable schedule that will permit the proceeding to be completed within nine (9) months.

VI. DISCOVERY

9. Calpine has not submitted discovery as of the date of this Prehearing Conference Memorandum. Should it conclude that such discovery is necessary, it will submit its requests consistent with the schedule established for the proceedings. Calpine proposes that exchange of documents be conducted electronically to the greatest extent feasible.

VII. SETTLEMENT

10. Calpine is willing to engage in settlement discussions with any and all parties at any time during this proceeding.

WHEREFORE, Calpine Retail Holdings, LLC respectfully submits this Prehearing Conference Memorandum in anticipation of the Prehearing Conference currently scheduled to be held telephonically on Friday, May 15, 2020 at 10:00 am.

Respectfully submitted,
NORRIS McLAUGHLIN, P.A.

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

Dated: May 12, 2020

CERTIFICATE OF SERVICE
Docket No. P-2020-3019356

I hereby certify that I am this day serving 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).

VIA E-MAIL

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Dated this 12th day of May, 2020, in Allentown, Pennsylvania

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/s/ John F. Lushis, Jr.

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

Dated this 12th day of May, 2020, in Allentown, Pennsylvania