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September 17, 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 Statement of Calpine Retail Holdings, LLC in support of the Partial Settlement 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 : Docket No. P-2020-3019356
Service Program and Procurement Plan :
for the Period June 1, 2021 through May :
31, 2025 :

**STATEMENT OF CALPINE RETAIL HOLDINGS, LLC IN SUPPORT OF JOINT
PARTIAL SETTLEMENT**

TO THE HONORABLE ELIZABETH H. BARNES:

Pursuant to the regulations of the Pennsylvania Public Utility Commission (“PUC” or “Commission”) at 52 Pa. Code §§ 5.231-5.232, Calpine Retail Holdings, LLC (together with its operating subsidiaries, “Calpine Retail”) hereby files this Statement in Support of the Joint Partial Settlement.

I. PROCEDURAL HISTORY

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

2. On April 21, 2020, Calpine Retail petitioned to intervene in this proceeding. This petition was granted in the Procedural Order of May 15, 2020.

3. Calpine Retail subsequently filed Rebuttal Testimony of Becky Merola. This testimony was admitted into the record without opposition on August 13, 2020.

II. STATEMENT OF SUPPORT

4. Calpine Retail 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. Calpine Retail 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.

5. Calpine Retail's witness Becky Merola opposed the proposal of the so-called EGS Parties to create a non-bypassable charge to recover PJM Interconnection, L.L.C. ("PJM") charges for Network Integration Transmission Service ("NITS") costs. She supported maintaining the current system of NITS cost recovery from all Load Serving Entities, including Calpine Retail and the EGS Parties. According to Ms. Merola, the current system creates opportunities for all Load Serving Entities to compete by managing their loads more efficiently.

6. Section III(B) of the Partial Settlement (paragraph 20) confirms that this proposal of the EGS Parties is withdrawn for purposes of this proceeding only. The withdrawal of this proposal resolves Calpine Retail's interest in this proceeding, and preserves the current system of recovery of NITS costs, which Calpine Retail supports.

WHEREFORE, Calpine Retail Holdings, LLC respectfully supports approval of the Joint Partial Settlement.

Respectfully submitted,
NORRIS McLAUGHLIN, P.A.

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

Dated: September 17, 2020

CERTIFICATE OF SERVICE
Docket No. P-2020-3019356

I hereby certify that I am this day serving a true copy of the foregoing Statement in Support of Partial Settlement by Calpine Retail Holdings 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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Honorable Elizabeth Barnes
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/s/ John F. Lushis, Jr.

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

Dated this 17th day of September, 2020, in Allentown, Pennsylvania