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April 4, 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 PPL Electric Utilities Corporation for Approval of Its Default Service Program for the Period from June 1, 2025 through May 31, 2029 Docket No. P-2024-3047290

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.

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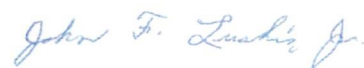
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John F. Lushis, Jr.

Date: April 4, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Its Default Service Program : Docket No. P-2024-3047290
for the Period From June 1, 2025 Through :
May 31, 2029 :

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

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.¹

PPL Electric Utilities Corporation (“PPL” or the Company”) has petitioned the Commission for approval of the Company’s sixth Default Service Program (“DSP VI”). PPL’s Petition for Approval of DSP VI (the “Petition”) outlines, *inter alia*, the Company’s proposed procurement plan, implementation plan and contingency plan for acquiring default service energy supply for all PPL customers who, upon expiration of DSP V 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 PPL Energy Co. for Approval of its Default Serv. Program for the Period from June 1, 2025 through May 31, 2029*, Docket No. P-2024-3047290, at 1.

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

¹ 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.

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

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 of the default service, the procurement and implementation of default service supply, utility affiliate participation, the product mix relating to default service supply 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 PPL'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.

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Dated: April 4, 2024