

COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION COMMONWEALTH KEYSTONE BUILDING 400 NORTH STREET. HARRISBURG. PA 17120

BUREAU OF INVESTIGATION & ENFORCEMENT

September 30, 2020

Via Electronic Filing

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

Re: Petition of Duquesne Light Company for Approval of Default Service Plan for the

Period of June 1, 2021 through May 31, 2025

Docket No. P-2020-3019522 **I&E Not Filing a Main Brief**

Dear Secretary Chiavetta:

Please be advised that the Bureau of Investigation and Enforcement (I&E) will not be filing a Main Brief in the above-referenced proceeding.

Additionally, this letter serves as formal notice of I&E's non-opposition to the Petition of Duquesne Light Company for Approval of Default Service Plan as filed in this proceeding. The I&E review of this case included a full analysis of Duquesne's proposed default service plan. Accordingly, I&E conducted an extensive review of the entire default service and procurement plan pursuant to Section 2807(e) of the Public Utility Code and Sections 54.181 *et seq* of the Commission's regulations. Finally, although I&E will not file a Main Brief, I&E reserves the right to file a Reply Brief.

Copies are being served on the parties of record as evidenced in the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic Service.* Should you have any questions, please do not hesitate to contact me.

Sincerely.

Scott B. Granger

Prosecutor

Bureau of Investigation and Enforcement

PA Attorney ID No. 63641

(717) 425-7593

sgranger@pa.gov

SBG/jfm Enclosures

cc: Hon. Mark A. Hoyer(via email only)

Office of Special Assistants (via email only ra-OSA@pa.gov)

Per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company for

Approval of Default Service Plan for the : Docket No. P-2020-3019522

Period of June 1, 2021 through May 31, 2025

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **I&E Letter** dated September 30, 2020, in the manner and upon the persons listed below:

Served via Electronic Mail Only

Tishekia E. Williams, Esq. David T. Evrard, Esq. Michael Zimmerman, Esq. Aron J. Beatty, Esq.

Emily Farah, Esq. Office of Consumer Advocate

Duquesne Light Company

555 Walnut Street

5th Floor, Forum Place

Pittsburgh, PA 15219

Harrisburg, PA 17101-1923

twilliams@dualight.com

twilliams@duqlight.comdevrard@paoca.orgmzimmerman@duqlight.comabeatty@paoca.orgefarah@duqlight.com

Counsel for Duquesne Light Company

Harrisburg, PA 17101-1601

Sharon E Webb, Esq. Steven C. Gray, Esq.

Office of Small Business Advocate

Michael W. Gang, Esq. 555 Walnut Street
Anthony D. Kanagy, Esq. 1st Floor, Forum Place
Post & Schell, PC Harrisburg, PA 17101

17 North Second Street <u>swebb@pa.gov</u> 12th Floor <u>sgray@pa.gov</u>

mgang@postschell.com
akanagy@postschell.com
Todd S. Stewart, Esq.

Counsel for Duquesne Light Company Hawke McKeon & Sniscak, LLP

100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
Counsel for EGS Parties

Elizabeth R. Marx, Esq.
John Sweet, Esq.
Ria Pereira, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

Charles E. Thomas, Jr., Esq.
Thoms Niesen & Thomas, LLC
212 Locust Street
Suite 302
Harrisburg, PA 17101
cthomasjr@tntlawfirm.com
Counsel for MAREC Action

Bruce H. Burcat, Esq.
MAREC Action
P.O. Box 385
Camden, DE 19934
marec.org@gmail.com
Counsel for MAREC Action

Gregory L. Peterson, Esq.
Phillips Lytle LLP
201 West Third Street
Suite 205
Jamestown, NY 14701-4907
gpeterson@phillipslytle.com
Counsel for StateWise

Thomas F. Puchner, Esq.
Phillips Lytle LLP
Omni Plaza
30 South Pearl Street
Albany, NY 12207-1537
tpuchner@phillipslytle.com
Counsel for StateWise

Kevin C. Blake, Esq.
Phillips Lytle LLP
125 Main Street
Buffalo, NY 14203
kblake@phillipslytle.com
Counsel for StateWise

James M. Van Nostrand, Esq. Keyes & Fox LLP 275 Orchard Drive Pittsburgh, PA 15228 <u>jvannostrand@keyesfox.com</u> Counsel for ChargePoint

John F. Lushis, Esq.
Norris McLaughlin, PA
515 W. Hamilton
Suite 502
Allentown, PA 18101
<u>jlushis@norris-law.com</u>
Counsel for Calpine Retail Holdings
LLC

James Laskey, Esq.
Norris McLaughlin, PA
400 Crossing Blvd, 8th Fl.
Bridgewater, NJ 08807
jlaskey@norris-law.com
Counsel for Calpine Retail Holdings
LLC

Mark Szybist, Esq.
Natural Resources Defense Council
1152 15th Street, NW
Suite 300
Washington, DC 20005
mszybist@nrdc.org
Counsel for NRDC

Emily Collins, Esq.
Andrew J. Karas, Esq.
Fair Shake Environmental Legal
Services
647 E. Market Street
Akron, OH 44304
ecollins@fairshake-els.org
akaras@fairshake-els.org
Counsel for NRDC

Harry S. Geller, Esq. 118 Locust Street Harrisburg, PA 17101 hgellerpulp@palegalaid.net Witness for CAUSE-PA Brian Kalcic
Excel Consulting
225 S. Meramec Avenue
Suite 720T
St. Louis, MO 63105
Excel.consulting@sbcglobal.net
Witness for OSBA

Barbara R. Alexander
Barbara Alexander Consulting, LLC
83 Wedgewood Drive
Winthrop, ME 04364
barbalexand@gmail.com
Witness for OCA

Scott B. Granger

Prosecutor

Bureau of Investigation and Enforcement

PA Attorney ID No. 63641