



SouthSide Works  
424 South 27<sup>th</sup> Street  
Suite 220  
Pittsburgh, PA 15203

RECEIVED

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

APR 30 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

April 30, 2015

Re: Duquesne Light Energy, LLC  
Load Serving Entity – Annual Filing

A-110142

Dear Secretary Chiavetta:

This letter is in response to the Secretarial Letter issued on March 18, 2010 at Docket No. M-2012-2157431, requiring Electric Generation Suppliers, on an annual basis, to provide proof of registration as a PJM Load Serving Entity or proof of contractual agreement with a registered PJM LSE that facilitates the retail electricity services of the EGS.

This response is for Duquesne Light Energy, LLC who is a registered and operating EGS in the state of Pennsylvania. Enclosed is a copy of PJM Interconnection's current "Schedule 17" of their "Reliability Assurance Agreement Among Load Serving Entities in the PJM Region", as part of their Rate Schedule FERC No. 44, documenting Duquesne Light Energy, LLC's present active membership status as shown on Page 144.

If you have any questions regarding the information provided, please contact me at 412-393-6099 or [rgarrity@duqlight.com](mailto:rgarrity@duqlight.com).

Sincerely,

Clifford E. Blashford  
President  
Duquesne Light Energy, LLC  
(412) 393-1133

Enclosures

cc: Bureau of Technical Utility Services (via email)

Duquesne Light Energy is an unregulated subsidiary of Duquesne Light Holdings, Inc., and is not the same company as Duquesne Light Company, its affiliated electric distribution company. The prices of Duquesne Light Energy are not regulated by the Pennsylvania Public Utility Commission. You are not required to buy electricity or other products from Duquesne Light Energy to receive the same quality service from Duquesne Light Company.

## LOAD SERVING ENTITY COMPLIANCE REQUIREMENT FORM

On an annual basis, EGSs providing retail electric supply service (i.e. take title to electricity) must file with the Commission this Load Serving Entity (LSE) Compliance Requirement Form. EGSs are directed to attach to this form documentation which provides the following:

- Proof of registration as a PJM LSE, or
- Proof of a contractual arrangement with a registered PJM LSE that facilitates the retail electricity services of the EGS.

Examples of sufficient documentation to satisfy this compliance requirement include, but may not be limited to:

- A screen print showing that the EGS is listed as a Party to an effective version of the PJM Reliability Assurance Agreement (RAA), located at Schedule 17 of the RAA.
- Correspondence, such as an e-mail screen print or regular mail scan, from PJM verifying membership as an LSE.
- Documentation of an effective contract between the EGS and another party that serves as the LSE on behalf of the EGS. In such a case, the documentation must also include proof that the party fulfilling the LSE role is indeed registered with the PJM as an LSE

EGSs may mark all or portions of their filing confidential.

EGSs which do not provide retail electric supply service, such as brokers, must file an LSE Compliance Requirement Form with the appropriate box checked below. No attached documentation is necessary for EGSs whom operate in such a capacity.

### SELECT ONLY ONE OF THE FOLLOWING

- EGS provides retail electric supply service and has attached compliance with the LSE requirement hereto.

*Description of attachment (provide a brief description of the attachment below):*

Copy of PJM Interconnection's current "Schedule 17" of their "Reliability Assurance Agreement Among Load Serving Entities in the PJM Region".

- EGS does not provide retail electric supply service and therefore, is not presently obligated to provide such documentation.

PJM Interconnection, L.L.C.  
Rate Schedule FERC No. 44

---

**RELIABILITY ASSURANCE AGREEMENT**

**Among**

**LOAD SERVING ENTITIES**

**in the**

**PJM REGION**

---

Effective Date: 02/20/2015

## **PJM RELIABILITY ASSURANCE AGREEMENT**

---

### **TABLE OF CONTENTS**

ARTICLE 1 -- DEFINITIONS

ARTICLE 2 -- PURPOSE

ARTICLE 3 -- TERM AND TERMINATION OF THE AGREEMENT

- 3.1 Term
- 3.2 Transition Provisions
- 3.3 Termination

ARTICLE 4 -- ADDITION OF NEW PARTIES

ARTICLE 5 -- WITHDRAWAL OR REMOVAL OF A PARTY

- 5.1 *Withdrawal of a Party*
- 5.2 Breach by a Party

ARTICLE 6 -- MANAGEMENT ADMINISTRATION

ARTICLE 7 -- RESERVE REQUIREMENTS AND OBLIGATIONS

- 7.1 *Forecast Pool Requirement and Unforced Capacity Obligations*
- 7.2 Responsibility to Pay Locational Reliability Charge
- 7.3 LSE Option to Provide Capacity Resources
- 7.4 Fixed Resource Requirement Alternative
- 7.5 Capacity Plans and Deliverability
- 7.6 Nature of Resources
- 7.7 Compliance Audit of Parties

ARTICLE 8 -- DEFICIENCY, DATA SUBMISSION, AND EMERGENCY CHARGES

- 8.1 Nature of Charges
- 8.2 Determination of Charge Amounts
- 8.3 Distribution of Charge Receipts

ARTICLE 9 -- COORDINATED PLANNING AND OPERATION

- 9.1 Overall Coordination
- 9.2 Generator Planned Outage Scheduling
- 9.3 Data Submissions
- 9.4 Charges for Failures to Comply
- 9.5 Metering

ARTICLE 10 -- SHARED COSTS

- 10.1 Recording and Audit of Costs
- 10.2 Cost Responsibility

ARTICLE 11 -- BILLING AND PAYMENT

- 11.1 Periodic Billing
- 11.2 Payment
- 11.3 Failure to Pay

ARTICLE 12 -- INDEMNIFICATION AND LIMITATION OF LIABILITIES

- 12.1 Indemnification
- 12.2 Limitations on Liability
- 12.3 Insurance

ARTICLE 13 -- SUCCESSORS AND ASSIGNS

- 13.1 Binding Rights and Obligations
- 13.2 Consequences of Assignment

ARTICLE 14 -- NOTICE

ARTICLE 15 -- REPRESENTATIONS AND WARRANTIES

- 15.1 Initial Representations and Warranties
- 15.2 Continuing Representations and Warranties

ARTICLE 16 -- OTHER MATTERS

- 16.1 Relationship of the Parties
- 16.2 Governing Law
- 16.3 Severability
- 16.4 Amendment
- 16.5 Headings
- 16.6 Confidentiality
- 16.7 Counterparts
- 16.8 No Implied Waivers
- 16.9 No Third Party Beneficiaries
- 16.10 Dispute Resolution

SCHEDULE 1 PROCEDURES TO BECOME A PARTY

SCHEDULE 2 STANDARDS FOR INTEGRATING AN ENTITY INTO THE PJM REGION

SCHEDULE 3 OTHER AGREEMENTS TO BE EXECUTED BY THE PARTIES

SCHEDULE 4 GUIDELINES FOR DETERMINING THE FORECAST POOL REQUIREMENT

SCHEDULE 4.1 DETERMINATION OF FORECAST POOL REQUIREMENT

SCHEDULE 5 FORCED OUTAGE RATE CALCULATIONS

SCHEDULE 6	PROCEDURES FOR DEMAND RESOURCES AND ENERGY EFFICIENCY
SCHEDULE 7	PLANS TO MEET OBLIGATIONS
SCHEDULE 8	DETERMINATION OF UNFORCED CAPACITY OBLIGATIONS
SCHEDULE 8.1	FIXED RESOURCE REQUIREMENT ALTERNATIVE
SCHEDULE 9	PROCEDURES FOR ESTABLISHING THE CAPABILITY OF CAPACITY RESOURCES
SCHEDULE 10	PROCEDURES FOR ESTABLISHING DELIVERABILITY OF GENERATION CAPACITY RESOURCES
SCHEDULE 10.1	LOCATIONAL DELIVERABILITY AREAS AND REQUIREMENTS
SCHEDULE 11	DATA SUBMITTALS
SCHEDULE 12	DATA SUBMISSION CHARGES
SCHEDULE 13	EMERGENCY PROCEDURE CHARGES
SCHEDULE 14	DELEGATION TO THE OFFICE OF THE INTERCONNECTION
SCHEDULE 15	ZONES WITHIN THE PJM REGION
SCHEDULE 16	NON-RETAIL BEHIND THE METER GENERATION MAXIMUM GENERATION EMERGENCY OBLIGATIONS
SCHEDULE 17	PARTIES TO THE RELIABILITY ASSURANCE AGREEMENT

## **RELIABILITY ASSURANCE AGREEMENT**

RELIABILITY ASSURANCE AGREEMENT, dated as of this 1st day of June, 2007 by and among the entities set forth in Schedule 17 hereto, hereinafter referred to collectively as the "Parties" and individually as a "Party."

### **WITNESSETH:**

**WHEREAS**, each Party to this Agreement is a Load Serving Entity within the PJM Region;

**WHEREAS**, each Party is committing to share its Capacity Resources with the other Parties to reduce the overall reserve requirements for the Parties while maintaining reliable service; and

**WHEREAS**, each Party is committing to provide mutual assistance to the other Parties during Emergencies;

**WHEREAS**, each Party is committing to coordinate its planning of Capacity Resources to satisfy the Reliability Principles and Standards; and

**NOW THEREFORE**, for and in consideration of the covenants and mutual agreements set forth herein and intending to be legally bound hereby, the Parties agree as follows:

## SCHEDULE 17

### PARTIES TO THE RELIABILITY ASSURANCE AGREEMENT

*This Schedule sets forth the Parties to the Agreement:*

AEP Energy, Inc.  
AEP Retail Energy Partners LLC  
Abest Power & Gas, LLC  
Agway Energy Services, LLC  
Algonquin Energy Services Inc.  
Allegheny Electric Cooperative, Inc.  
Allegheny Energy Supply Company, L.L.C.  
Alpha Gas and Electric LLC  
Ambit Northeast, LLC  
American Electric Power Service Corporation on behalf of its affiliates:  
    Appalachian Power Company  
    Indiana Michigan Power Company  
    Kentucky Power Company  
    Kingsport Power Company  
    Ohio Power Company  
    Wheeling Power Company.  
American Illuminating Company, LLC  
American Municipal Power, Inc.  
American Power & Gas of Pennsylvania, LLC  
American Power & Gas of NJ, LLC  
American Power Partners LLC  
American PowerNet Management, L.P.  
American Transmission Systems, Inc.  
AP Gas and Electric (PA), LLC  
APN Starfirst, LP  
ArcelorMittal USA LLC  
Atlantic City Electric Company  
Baltimore Gas and Electric Company  
Barclays Bank PLC  
Barclays Capital Services, Inc  
Bargain Energy, LLC  
Batavia, IL (City of)  
BBPC LLC d/b/a Great Eastern Energy  
Blackstone Wind Farm, LLC  
Blue Ridge Power Agency, Inc.  
BlueRock Energy, Inc.  
Border Energy Electric Services, Inc.  
Borough of Butler, Butler Electric Division  
Borough of Chambersburg  
Borough of Columbia, PA

Borough of Lavallette, New Jersey  
Borough of Milltown  
Borough of Mont Alto, PA  
*Borough of Park Ridge, New Jersey*  
Borough of Pemberton  
Borough of Pitcairn, Pennsylvania  
Borough of Seaside Heights, New Jersey  
Borough of South River, New Jersey  
Boston Energy Trading and Marketing LLC  
BP Energy Company  
*Brighten Energy LLC*  
BTG Pactual Commodities (US) LLC  
Capital Energy, LLC  
Cargill Power Markets LLC  
Castlebridge Energy Group, LLC  
Central Virginia Electric Cooperative  
Centre Lane Trading Limited  
Champion Energy Marketing LLC  
Champion Energy, LLC  
Choice Energy, LLC dba 4 Choice Energy, LLC  
Cincinnati Bell Energy, LLC  
Citigroup Energy Inc.  
Citizens' Electric Company of Lewisburg, PA  
City of Cleveland, Department of Public Utilities, Division of Cleveland Public Power  
City of Dover, Delaware  
City of New Martinsville - WV  
City of Philippi - West VA  
City of Rochelle  
Clearview Electric, Inc.  
Cleveland Electric Illuminating Company (The)  
Collegiate Clean Energy, LLC  
Commerce Energy, Inc.  
Commonwealth Edison Company  
Conectiv Energy Supply, Inc.  
*ConocoPhillips Company*  
Consolidated Edison Energy, Inc.  
Consolidated Edison Solutions, Inc.  
Constellation Energy Power Choice, Inc.  
Constellation NewEnergy, Inc.  
Constellation Power Source Generation, Inc.  
Corporate Services Support Corp  
Credit Suisse (USA), Inc.  
Dayton Power & Light Company (The)  
DC Energy LLC  
Delaware Municipal Electric Corporation  
Delmarva Power & Light Company

Denver Energy, LLC  
Devonshire Energy LLC  
Direct Energy Business, LLC  
Direct Energy Business Marketing, LLC  
Direct Energy Services, LLC  
Discount Energy Group, LLC  
Discount Power, Inc.  
Dominion Retail, Inc.  
Downes Associates, Inc.  
DPL Energy Resources, Inc.  
DTE Energy Supply, Inc.  
DTE Energy Trading, Inc.  
Duke Energy Commercial Asset Management, LLC  
Duke Energy Kentucky, Inc.  
Duke Energy Ohio, Inc.  
Duke Energy Retail Sales, LLC  
Duquesne Light Company  
→ Duquesne Light Energy, LLC  
Dynegy Energy Services, Inc.  
Dynegy Energy Services, LLC  
Dynegy Kendall Energy, LLC  
Eagle Energy, LLC  
East Kentucky Power Cooperative, Inc.  
Easton Utilities Commission  
EDF Industrial Power Services (IL), LLC  
EDF Trading North America, LLC  
Eligio Energy, LLC  
Energetix, Inc.  
Energy America, LLC  
Energy Cooperative Association of Pennsylvania (The)  
Energy Cooperative of America, Inc.  
Energy Plus Holdings LLC  
Energy Services Providers, Inc.  
Energy Technology Savings, LLC  
Energy Transfer Retail Power, LLC  
Energy.me Midwest llc d/b/a energy.me  
EnerPenn USA, LLC  
Evergreen Gas & Electric, LLC  
Evraz Claymont Steel  
Exelon Generation Co., LLC  
First Point Power, LLC  
FirstEnergy Solutions Corp.  
Front Royal (Town of)  
Galt Power Inc.  
Gateway Energy Services Corporation  
GDF Suez Retail Energy Solutions, LLC

GenOn Power Midwest, LP  
Gerdau Ameristeel Energy, Inc.  
Glacial Energy of New Jersey, Inc.  
Great American Power, LLC  
Greenlight Energy Inc.  
Green Mountain Energy Company  
Guttman Energy, Inc.  
Hagerstown Light Department  
Harborside Energy, LLC  
Harrison REA, Inc. - Clarksburg, WV  
Hawk Energy Corp  
Hess Corporation  
HIKO Energy, LLC  
Hoosier Energy REC, Inc.  
HOP Energy, LLC  
HSBC Technology & Services (USA), Inc.  
Hudson Energy Services, LLC  
IDT Energy, Inc.  
Illinois Municipal Electric Agency  
Illinois Power Marketing Company  
Ingenco Holdings, LLC  
Inspire Energy Holdings, LLC  
Iron Energy LLC  
J. Aron & Company  
J.P. Morgan Ventures Energy Corporation  
Jack Rich, Inc. d/b/a Anthracite Power & Light Company  
Jersey Central Power & Light Company  
Keil and Sons, Inc. dba Systrum Energy  
Kuehne Chemical Company, Inc.  
L & P Electric Inc., d/b/a Leggett & Platt Electric Inc.  
Land O'Lakes, Inc.  
Liberty Power Corp., L.L.C.  
Liberty Power Delaware LLC  
Liberty Power Holdings LLC  
Linde Energy Services, Inc.  
Lower Electric, LLC  
Lykins Oil Company d/b/a Lykins Energy Solutions  
Macquarie Cook Energy LLC  
Major Energy Electric Services LLC  
MC Squared Energy Services, LLC  
Meadow Lake Wind Farm II LLC  
Meadow Lake Wind Farm III LLC  
Meadow Lake Wind Farm IV LLC  
Meadow Lake Wind Farm LLC  
MeadWestvaco Corporation  
Metropolitan Edison Company

MidAmerican Energy Company  
Mint Energy, LLC  
Morgan Stanley Capital Group, Inc.  
MP2 Energy IL, LLC  
MP2 Energy NE, LLC  
MP2 Energy NJ, LLC  
MPower NJ LLC  
NATGASCO d/b/a/ Supreme Energy, Inc.  
Nextera Energy Services New Jersey, LLC  
Nextera Energy Services, Illinois, LLC  
Noble Americas Energy Solutions LLC  
Noble Americas Gas & Power Corp.  
Nordic Energy Services LLC  
North American Power and Gas LLC.  
North Carolina Electric Membership Corporation  
North Carolina Municipal Power Agency Number 1  
North Eastern States, Inc.  
Northeastern REMC  
Northern Virginia Electric Cooperative – NOVEC  
NRG Power Marketing, L.L.C.  
NYSEG Solutions, Inc.  
Oasis Power, LLC dba Oasis Energy  
Occidental Power Services, Inc.  
Ohio Edison Company  
Old Dominion Electric Cooperative  
Oxford Energy Services, LLC  
Palmco Power DC, LLC  
Palmco Power IL, LLC  
Palmco Power MD, LLC  
Palmco Power NJ, LLC  
Palmco Power OH, LLC  
Palmco Power PA, LLC  
Panda Power Corporation  
Park Power LLC  
Parma Energy, LLC  
PBF Power Marketing LLC  
PECO Energy Company  
Pennsylvania Electric Company  
Pennsylvania Power Company  
PEPCO Energy Services, Inc.  
Planet Energy (Maryland) Corp.  
Planet Energy (Pennsylvania) Corp.  
Planet Energy (USA) Corp.  
Plymouth Rock Energy, LLC  
Potomac Electric Power Company  
PPL Electric Utilities Corporation d/b/a PPL Utilities

PPL Energy Plus, LLC  
Prairieland Energy, Inc.  
Provider Power, LLC  
PSEG Energy Resources and Trade LLC  
Public Service Electric & Gas Company  
Pure Energy USA LLC  
Realgy, LLC  
Red Oak Power, LLC  
ResCom Energy, LLC  
Residents Energy, L.L.C.  
Respond Power LLC  
Riverside Generating, LLC  
Rolling Hills Generating, LLC  
RPA Energy, Inc.  
RRI Energy Services, LLC  
RRI Energy Solutions East, LLC  
Rushmore Energy, LLC (new)  
S.J. Energy Partners, Inc.  
Santanna Energy Services  
SFE Energy, Inc.  
SFE Energy NJ, Inc.  
Shiple Choice LLC  
Solios Power Mid-Atlantic Trading LLC  
Source Power & Gas LLC  
South Jersey Energy Company  
Southeastern Power Administration  
Southern Indiana Gas & Electric  
Southern Maryland Electric Cooperative, Inc.  
Spark Energy, L.P.  
Sperian Energy Corp  
Star Energy Partners LLC  
Starion Energy PA Inc.  
Stream Energy Columbia, LLC  
Stream Energy Maryland, LLC  
Stream Energy New Jersey, LLC  
Stream Energy Pennsylvania, LLC  
Sunwave USA Holdings LLC  
Superior Plus Energy Services Inc.  
Switch Energy, LLC  
Tenaska Power Services Co.  
TERM Power & Gas, LLC  
Texas Retail Energy, LLC  
Thurmont Municipal Light Company  
Titan Gas and Power  
Toledo Edison Company (The)  
Town of Berlin, Maryland

Town of Williamsport  
TransAlta Energy Marketing (U.S.) Inc.  
TransCanada Power Marketing Ltd.  
Tri-County Rural Electric Cooperative, Inc.  
TriEagle Energy, LP  
Trustees of the University of Pennsylvania, a Pennsylvania Non-Profit Corporation d/b/a  
    University of Pennsylvania, The  
Twin Eagle Resource Management, LLC  
UGI Energy Services, LLC  
UGI Utilities, Inc. - Electric Division  
Utility Bid USA, LLC  
VCharge, Inc.  
Verde Energy USA DC, LLC  
Verde Energy USA Illinois, LLC  
Verde Energy USA Maryland, LLC  
Verde Energy USA Ohio, LLC  
Verde Energy USA, Inc.  
Vineland Municipal Electric Utility (City of Vineland)  
Virginia Electric & Power Company  
Viridian Energy PA LLC  
Wabash Valley Power Association, Inc.  
Washington Gas Energy Services, Inc.  
Wellsboro Electric Company  
West Penn Power Company d/b/a Allegheny Power  
Xoom Energy Maryland, LLC  
Xoom Energy New Jersey, LLC  
XOOM Energy Ohio, LLC  
Xoom Energy, LLC  
York Generation Company, LLC