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E-FILE

February 24, 2022

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

**Re: Petition of ChargeVC-PA to Initiate a Proceeding to Consider Issuance
of a Policy Statement on Electric Utility Rate Design for Electric Vehicle
Charging
Docket No. P-2022-3030743**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is a Petition to Intervene in the above-referenced proceeding.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on February 24, 2022, which is the date it was filed electronically using the Commission's E-filing system.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael J. Shafer", is written over a light blue, semi-transparent rectangular background.

Michael J. Shafer

Enclosure

cc: Certificate of Service

**THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of ChargeVC-PA to Initiate a :
Proceeding to Consider Issuance of a Policy : Docket No. P-2022-3030743
Statement on Electric Utility Rate Design :
for Electric Vehicle Charging :

**PETITION TO INTERVENE OF
PPL ELECTRIC UTILITIES CORPORATION**

TO PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by and through its attorneys, hereby file this Petition to Intervene in the above-captioned proceeding initiated by ChargeVC-PA (“ChargeVC-PA”) to Initiate a Proceeding to Consider Issuance of a Policy Statement on Electric Utility Rate Design for Electric Vehicle Charging (“Petition”). ChargeVC-PA’s Petition requests that the Pennsylvania Public Utility Commission (“Commission”) initiate a proceeding that will result in the issuance of a Policy Statement on electric utility rate design for electric vehicle charging in Pennsylvania which, if granted, would substantially affect PPL Electric’s interests, operations, and customers.

In support thereof, PPL Electric avers as follows:

I. BACKGROUND

1. The name and business address for PPL Electric are:

PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101

2. The names and addresses of PPL Electric’s attorneys are:

Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)

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PPL Electric's attorneys are authorized to accept service on behalf of PPL Electric in this proceeding.

3. PPL Electric is a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

4. On February 4, 2022, ChargeVC-PA filed its Petition in the above-captioned proceeding, requesting that the Commission initiate a proceeding to consider the issuance of a policy statement on electric utility rate design for electric vehicle charging.

II. STANDARDS FOR INTERVENTION

5. The Commission's regulations at 52 Pa. Code §§ 5.71-5.76 establish the standards and requirements for a party to intervene in an action before the Commission. Section 5.72 sets forth the eligibility requirements for a party to intervene and provides, in pertinent part, as follows:

(a) Persons. A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

(1) A right conferred by statute of the United States or of the Commonwealth.

(2) 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.

(3) Another interest of such nature that participation of the petitioner may be in the public interest.

52 Pa. Code § 5.72. The eligibility requirements for an interested party to intervene in an action before the Commission is less strict and easier to satisfy than the common law standard for intervention. *See Application of Metropolitan Edison Co. for Approval to Construct an Electric Generating Unit Fueled by Natural Gas*, Docket No. A-110300, 1994 Pa. PUC LEXIS 52 (Order Entered Feb. 25, 1994) (citing *William Penn Parking Garage, Inc. v. City of Pittsburgh*, 464 Pa. 168, 346 A.2d 269 (1975)).

III. GROUNDS FOR INTERVENTION

6. PPL Electric has a substantial and direct interest in participating in the above-captioned proceeding.

7. ChargEVC-PA has requested that the Commission initiate a proceeding that will result in the issuance of a Policy Statement on electric utility rate design for electric vehicle charging in Pennsylvania. (*See* Petition pg. 17). If the Commission grants ChargEVC-PA's Petition, PPL Electric anticipates that it will participate in the proposed Policy Statement proceeding regarding EV charging rate design as the outcome of that proceeding would necessarily impact how PPL Electric designs EV rates for its service territory.

8. PPL Electric reserves the right to address the substance and factual assertions made by ChargEVC-PA's in its Petition during any Policy Statement proceeding that may follow if the Commission grants ChargEVC-PA's requested relief.

9. PPL Electric submits that no other party can or will adequately protect its interest in this proceeding.

10. PPL Electric further submits that no party will be prejudiced by the Company's participation in this proceeding.

11. For these reasons, PPL Electric's interests may be directly and immediately affected by the Commission's disposition of ChargeVC-PA's Petition. Accordingly, pursuant to Section 5.72 of the Commission's regulations, 52 Pa. Code § 5.72, PPL Electric should be permitted to intervene in this proceeding.

IV. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and allow PPL Electric Utilities Corporation to participate in the above-captioned matter.

Respectfully submitted,



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Date: February 24, 2022

Attorneys for PPL Electric Utilities Corporation

CERTIFICATE OF SERVICE

(Docket No. P-2022-3030743)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

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