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File #: 161574

August 3, 2015

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation**  
**Docket No. R-2015-2469275**

Dear Secretary Chiavetta:

Enclosed for filing is the Motion in Limine of PPL Electric Utilities Corporation to Exclude Certain Portions of Testimony and to Limit the Scope of the Evidentiary Hearing and this Proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Wright".

Christopher T. Wright

CTW/jl  
Enclosures

cc: Honorable Susan D. Colwell  
Certificate of Service

**CERTIFICATE OF SERVICE**

**Docket Nos. R-2015-2469275, C-2015-2475448, C-2015-2478277,  
C-2015-2480265, C-2015-2485827, C-2015-2484588,  
C-2015-2485860 & P-2015-2472714**

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).

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Date: August 3, 2015

  
\_\_\_\_\_  
Christopher T. Wright

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2015-2469275
	:	
PPL Electric Utilities Corporation	:	
	:	
Office of Consumer Advocate	:	C-2015-2475448
Office of Small Business Advocate	:	C-2015-2478277
PP&L Industrial Customer Alliance	:	C-2015-2480265
C. Wintermeyer	:	C-2015-2485827
Cathleen A. Woomert	:	C-2015-2484588
Michael B. Young	:	C-2015-2485860
Joseph E. McAndrew	:	C-2015-2489524
	:	
v.	:	
	:	
PPL Electric Utilities Corporation	:	
	:	
Petition for a Waiver of the Distribution System	:	P-2015-2474714
Improvement Charge Cap of 5% of Billed Revenues	:	

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**MOTION IN LIMINE OF PPL ELECTRIC UTILITIES CORPORATION  
TO EXCLUDE CERTAIN PORTIONS OF  
TESTIMONY AND TO LIMIT THE SCOPE OF THE  
EVIDENTIARY HEARING AND THIS PROCEEDING**

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TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion in Limine, pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code § 5.103, to: (1) request that the scope and evidence received during the evidentiary hearing in the above-captioned matter be limited to exclude certain issues and proposals presented by The Alliance for Solar Choice (“TASC”) regarding interconnection criteria and standards for distributed generation; and (2) strike certain portions of the direct testimony concerning those issues submitted on behalf of TASC. In support thereof, PPL Electric states as follows:

## **I. BACKGROUND**

1. This proceeding was initiated on March 31, 2015, when PPL Electric filed Supplement No. 179 to PPL Electric's Tariff – Electric Pa. P.U.C. No. 201 (“Supplement No. 179”) with the Commission. Supplement 179, issued to be effective for service rendered on or after June 1, 2015, proposes changes to PPL Electric's base retail distribution rates designed to produce an increase in revenues of approximately \$167.5 million, based upon data for a fully projected future test year ending December 31, 2016 (“2015 Base Rate Case”). The filing was made in compliance with the Commission's regulations and contains all supporting data and testimony required to be submitted in conjunction with a tariff change seeking a general rate increase.

2. Formal complaints against this proposed tariff have been filed by: the Office of Consumer Advocate, the Office of Small Business Advocate, PP&L Industrial Customer Alliance, D. Wintermeyer, Cathleen A. Woomert, and Thomas B. Young. Petitions to intervene were filed by and granted for CEO, CAUSE-PA, the Clean Air Council, Sustainable Energy Fund, TASC, Natural Resources Defense Council, Keystone Energy Efficiency Alliance Energy Education Fund, Environmental Defense Fund, and Eric Joseph Epstein. The Commission's Bureau of Investigation and Enforcement filed a Notice of Appearance.

3. A prehearing conference was held as scheduled on May 7, 2015. A litigation schedule and modified discovery rules were agreed to by the parties and adopted in the Scheduling Order issued by the Honorable Administrative Law Judge Susan D. Colwell (“ALJ”) on May 7, 2014.

4. Pursuant to the litigation schedule adopted in the Scheduling Order, the parties other than the Company submitted direct testimony on June 23, 2015. Pertinent to this Motion, TASC submitted TASC Statement No. 1, the direct testimony of Steven Gabel. Therein, TASC

made several proposals regarding interconnection criteria and standards for distributed generation.

5. On August 31, 2015, the parties reached a settlement in principle that resolved all issues except TASC's distributed interconnection proposals.

6. Pursuant to the litigation schedule adopted in the Scheduling Order, TASC submitted TASC Statement No. 2, the surrebuttal testimony of Steven Gabel. Therein, TASC again raised issues related to interconnection criteria and standards for distributed generation.

7. As of the date of this Motion, all parties waived cross on all issues except the interconnection issues raised by TASC.

8. PPL Electric hereby submits this Motion in Limine to: (1) request that the scope and evidence received during the evidentiary hearing in the above-captioned matter be limited to exclude TASC's proposals regarding interconnection criteria and standards for distributed generation; and (2) strike certain portions of TASC Statement Nos. 1 and 2.

## **II. DISCUSSION**

### **A. THE ALJ HAS AUTHORITY TO LIMIT THE ADMISSION OF TESTIMONY THAT IS BEYOND THE SCOPE OF THIS PROCEEDING**

9. Pursuant to 52 Pa. Code § 5.403, the ALJs are tasked with the responsibility and authority to control the scope of the evidence admitted to the record. Section 5.403 provides as follows:

(a) The presiding officer shall have all the necessary authority to control the receipt of evidence, including the following:

(1) *Ruling on the admissibility of evidence.*

(2) *Confining the evidence to the issues in the proceeding and impose, were appropriate:*

(i) Limitations on the number of witnesses to be heard.

(ii) *Limitations of time and scope for direct and cross examinations.*

(iii) Limitations on the production of further evidence.

(iv) *Other necessary limitations.*

(b) The presiding officer will *actively employ these powers to direct and focus the proceedings consistent with due process.*

52 Pa. Code § 5.403 (emphasis added).

10. ALJs have employed the authority granted in Section 5.403 to exclude evidence that is beyond the proper scope of Commission proceedings to focus the evidence on the matters properly at issue. *See, e.g., Pa. PUC v. PPL Electric Utilities Corporation*, Docket Nos. R-2015-2469275, *et al.* (ALJ Colwell Sixth Prehearing Order issued July 14, 2015) (granting a motion in limine to exclude evidence on issues that were not properly within the scope of a distribution base rate case); *Pa. PUC v. Pennsylvania-American Water Co.*, Docket No. R-00932670 *et al.*, 1994 Pa. PUC LEXIS 120 at \*158 (Final Order entered July 26, 1994) (adopting the ALJ's conclusion that the issues raised by OCA were outside the scope of rate case and would be better addressed in a statewide rulemaking proceeding); *Re Gas Cost Rate No. 5*, 57 Pa. P.U.C. 158 (1983) ("The testimony stricken by the ALJ addresses, in part, matters broader than the scope of the instant proceeding."); *Joint Application of PECO Energy Company and Public Service Electric and Gas Company For Approval of the Merger of Public Service Enterprise Group, Inc. with and into Exelon Corp.*, Docket No. A-110550F0160, pp. 8-9 (Initial Decision entered April 25, 2005) (denying a Petition to Intervene where, among other things, the issues sought to be raised by petitioner were outside the scope of that proceeding); *Re Structural Separation Of Bell Atlantic-Pennsylvania, Inc. Retail And Wholesale Operations*, Docket No. M-00001353, 2000 Pa. PUC LEXIS 59 at \*7-9 (Final Order entered September 28, 2000) (affirming the decision of

the Administrative Law Judge in that case to exclude certain evidence as “beyond the scope of the proceeding”).

11. For the reasons explained below, PPL Electric respectfully requests that the ALJ: (a) limit the scope of the exhibits and evidence introduced at the hearing and offered into the evidentiary record to exclude evidence pertaining to TASC’s proposals regarding interconnection criteria and standards for distributed generation that should properly be addressed in an appropriate statewide proceeding; and (b) strike the testimony appearing on TASC Statement No. 1, page 19, line 28 to page 27, line 28, TASC Statement No. 2, page 1, line 31 to page 10, line 10, and TASC Exhibit SG-2.

**B. TASC’S PROPOSALS REGARDING INTERCONNECTION CRITERIA AND STANDARDS FOR DISTRIBUTED GENERATION ARE BEYOND THE SCOPE OF THIS DISTRIBUTION BASE RATE PROCEEDING**

12. Mr. Gabel submitted written direct and surrebuttal testimony on behalf of TASC. In his testimony, Mr. Gabel raises several issues and proposals regarding interconnection criteria and standards for distributed generation. Specifically, Mr. Gabel makes the following proposals:

- (1) PPL Electric should provide a Permission to Operate (“PTO”) in the form of an email within 10 business days from the applicant’s notification that the Company has successfully commission-tested the generator;
- (2) Reporting requirements for interconnection processing timelines should be submitted to the Commission quarterly instead of annually, and PPL Electric should have adequate resources in place to meet all timelines;
- (3) If PPL Electric misses an interconnection review deadline, PTO or other deadline, the Company should provide a response to the applicant within two business days of all interconnection status update requests;
- (4) PPL Electric should not differentiate between solar-only and solar and battery installations;
- (5) When the solar and the battery share inverter(s), only the collective nameplate of the shared inverter(s) and the type of distribution network should be used for determining the requirement of a Level 1 – Level 4 interconnection study;

(6) No additional metering or monitoring equipment should be required than would be required for a solar without storage application;

(7) PPL Electric, interested stakeholders, and the Commission should review the Company's criteria used to determine if upgrades to the distribution system are required when interconnecting solar distributed generation including consideration of National Renewable Energy Laboratory studies;

(8) PPL Electric should provide color-coded service territory maps of circuits that include certain information pertaining to available capacity, which should be updated at least every three months; and

(9) Rate relief should be conditioned on PPL Electric's implementation of improvements to distribution services related to distributed generation interconnection and storage development, as detailed in Exhibit SG-2.

*See* TASC St. No. 1, pp. 19-27; TASC St. No. 2, p. 2-10. TASC's recommendations are wholly outside the scope of this distribution base rate proceeding.

13. These issues implicate the Alternative Energy Portfolio Standards Act of 2004, 73 P.S. §§ 1648.1, *et seq.* ("AEPS Act"), and net metering. TASC's proposals are not items related to rates, revenue requirement, revenue allocation, and rate design. Instead, they are broad-sweeping modifications to PPL Electric's and the Commission's interconnection criteria and standards for distributed generation.

14. The Commission's regulations govern the interconnection standards for customer-generators with alternative energy systems that want to participate in EDCs' net metering programs. *See* 52 Pa. Code §§ 75.21, *et seq.* TASC, however, proposes requirements that essentially amend the Commission's regulations.

15. TASC first proposes that EDCs should provide a PTO in the form of an email within 10 business days from the applicant's notification that the Company has successfully commission-tested the generator. TASC also proposes that if an EDC misses an interconnection review deadline, PTO or other deadline, the EDC should provide a response to the applicant within two business days of all interconnection status update requests. TASC overlooks,

however, that review procedures for interconnection requests, including the timing for review, are currently established by Commission regulations at 52 Pa. Code §§ 75.34, 75.37-75.51. TASC should not be permitted to implement what are, in essence, revisions to the Commission's existing interconnection review regulations outside the Commission's formal rulemaking process.

16. Further, it should be noted that the "PTO" requested by TASC is not a concept that is used in the Commonwealth of Pennsylvania. It is entirely unknown what is meant by a PTO and whether it is consistent with the Commission's regulations, which do not use the term PTO but, rather, rely on a "certificate of completion." *See, e.g.*, 52 Pa. Code §§ 75.37(c)(3), 75.38(c)(5), 75.39(g); 75.40(g). Essentially, TASC seeks to add a new term and requirement that is not currently provided by the Commission's existing regulations. Whether use of a PTO is appropriate and should be adopted in the Commonwealth should be thoroughly evaluated in a statewide proceeding that allows all interested stakeholders notice and the opportunity to be heard.

17. TASC next seeks to amend the Commission's reporting requirements for interconnection requests. Specifically, TASC proposes that EDCs should submit interconnection processing timelines on a quarterly basis. The Commission's regulations, however, expressly provide that EDCs shall provide a report to the Commission within 30 calendar days of the close of each annualized period. 52 Pa. Code § 75.36(4). It is clear that TASC's proposal is inconsistent with the reporting requirements of the Commission's regulations. TASC should not be permitted to implement an amendment to the Commission's existing interconnection reporting regulation outside the Commission's formal rulemaking process.

18. TASC also seeks to adopt new interconnection criteria for solar-plus-battery facilities. In essence, TASC seeks to have solar-only and solar-plus-battery facilities treated exactly the same for purposes of interconnection and net metering. It is entirely unclear whether solar-plus-battery facilities qualify as “alternative energy sources” as defined in Section 1648.2 of the AEPS Act, 73 P.S. § 1648.2, and Section 75.1 of the Commission’s regulations, 52 Pa. Code § 75.1. Indeed, battery and other storage facilities are not included in the list of eligible “alternative energy sources” set forth in the AEPS Act or the Commission’s regulations. Thus, it is unclear whether solar-plus-battery facilities would be lawful absent an amendment by the General Assembly and/or the Commission.

19. Even assuming, *arguendo*, that solar-plus-battery facilities were lawful under the AEPS Act and the Commission’s regulations, technical requirements and billing standards would still need to be developed. For example, it is unknown what the proper name plate capacity should be for purposes of solar-plus-battery facilities (e.g., solar facility capacity alone or combined capacity of solar and battery). It is unknown what type of monitoring equipment should be employed for solar-plus-battery facilities. It is unknown whether the excess generation stored in the battery can be later sold back or should only be used to offset future usage at the solar site. It is unknown whether excess generation that is sold from battery should be priced at the time the excess generation was produced or at the time the excess generation is sold. There are many other issues and considerations that need to be fully addressed before solar-plus-battery facilities should be implemented. These issues clearly will have an impact on other customers, which ultimately pay for the excess generation produced and sold back to the EDC. Therefore, these issues should be properly addressed in an appropriate statewide proceeding that provides all interested stateholders notice and the opportunity to participate.

20. TASC also proposes changes to EDCs' criteria used to determine if upgrades to the distribution systems are required when interconnecting solar distributed generation. The Commission's regulations already proscribe the technical standards for evaluating interconnection requests. *See* 52 Pa. Code § 75.35. Essentially, TASC seeks to add new technical standards for interconnection requests that are not currently provided by the Commission's existing regulations. TASC should not be permitted to implement what are, in essence, revisions to the Commission's existing interconnection review regulations outside the Commission's formal rulemaking process.

21. To the extent that TASC seeks to have the Commission alter the interconnection standards prescribed in its regulations, it should request a statewide rulemaking to address the Commission's regulations. The Company notes that the Commission already has undertaken a review of its regulations pertaining to the AEPS Act and received an extremely large number of comments in response to its proposed revisions to those regulations. *See Advance Notice of Final Rulemaking Order*, Docket No. L-2014-2404361 (Order Entered Apr. 23, 2015). Some of the proposed revisions pertain to the interconnection provisions in the Commission's regulations, including review procedures and adjusting the required electric nameplate capacity of eligible small generation facilities. *See id.* at pp. 28-30. To the extent that TASC wants wide-sweeping reforms to the Commission's interconnection standards, it could and should have participated in the Commission's rulemaking proceeding.

22. Moreover, these issues are a matter of statewide importance that should not be addressed on a case-by-case basis in each EDC's distribution base rate proceeding. If adopted, TASC's proposals would have a precedential effect on all EDCs and customers in the Commonwealth, not just PPL Electric and its ratepayers. It would be inappropriate, prejudicial,

and a denial of due process for the Commission to make such a statewide and novel determination without providing all potentially affected parties notice and the opportunity to fully participate in or comment on these proposals.

23. Additionally, given the time constraints of a base rate proceeding, it would be impractical and inappropriate for these complex issues to be addressed in this proceeding. A statewide proceeding, however, would provide sufficient time and would enable all interested entities to participate. Therefore, a statewide proceeding is the appropriate forum for a review of the Commission's interconnection criteria and standards for distributed generation. As a result, TASC's issues concerning interconnection criteria and standards for distributed generation are outside the scope of this base rate proceeding.

24. There is simply not enough time to fully address these concepts within the time limits of a distribution base rate case. These details will need to be thoroughly evaluated and considered on a statewide basis before they can be implemented. PPL Electric submits that there simply is not sufficient time to fully evaluate, develop, and implement Mr. Gabel's proposals in this base rate proceeding.

25. TASC's proposals regarding interconnection criteria and standards for distributed generation are entirely irrelevant and unrelated to this distribution base rate proceeding. Indeed, PPL Electric submits that these proposals have no impact on revenue requirement, revenue allocation, rate design, or any other distribution base rate tariff rule or service. Thus, these issues are entirely beyond the scope of this distribution base rate proceeding. A distribution base rate proceeding should be limited to address distribution base rates, especially given the statutory time limits for a distribution base rate case.

26. Finally, it must be noted that even if this Motion is granted and TASC's interconnection criteria and distributed generation issues are excluded from this distribution base rate proceeding, TASC still has a readily available remedy to address its concerns. Indeed, TASC can at any time petition the Commission to open an investigation, formal rulemaking, or other appropriate proceeding to consider and address TASC's concerns and proposals regarding interconnection criteria and distributed generation.

27. Based on the foregoing, PPL Electric respectfully requests that the ALJ:

(a) Limit the scope of the exhibits and evidence introduced at the hearing and offered into the evidentiary record to exclude evidence pertaining to interconnection criteria and distributed generation issues and proposals that should properly be addressed in an appropriate statewide proceeding; and

(b) Strike the testimony appearing on TASC Statement No. 1, page 19, line 28 to page 27, line 28, TASC Statement No. 2, page 1, line 31 to page 10, line 10, and TASC Exhibit SG-2.

### III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Susan D. Colwell:

(1) Grant this Motion in Limine;

(2) Limit the scope of the exhibits and evidence introduced at the hearing and offered into the evidentiary record to exclude evidence pertaining to interconnection criteria and distributed generation issues and proposals that should properly be addressed in an appropriate statewide proceeding;

(3) Strike the testimony appearing on TASC Statement No. 1, page 19, line 28 to page 27, line 28, TASC Statement No. 2, page 1, line 31 to page 10, line 10, and TASC Exhibit SG-2.

Respectfully submitted,



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Post & Schell, P.C.

Date: August 3, 2015

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