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File #: 175520

February 19, 2019

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: Petition of PPL Electric Utilities Corporation to Extend its Current Universal Service and Energy Conservation Plan for 2017-2019, Amend Related Filing Dates, and Grant a Limited Waiver of 52 Pa. Code § 54.74(a)
Docket No. P-2019-3007285**

Dear Secretary Chiavetta:

Enclosed for filing is the Answer of PPL Electric Utilities Corporation to the PP&L Industrial Customer Alliance's Petition to Intervene in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl
Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation to Extend Its Current :
Universal Service and Energy : Docket No. P-2019-3007285
Conservation Plan for 2017-2019, Amend :
Related Filing Dates, and Grant a Limited :
Waiver of 52 Pa. Code § 54.74(a) :

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO
THE PP&L INDUSTRIAL CUSTOMER ALLIANCE’S PETITION TO INTERVENE**

TO PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code §§ 5.61 and 5.66, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), hereby respectfully submits its Answer to the Petition to Intervene (“Petition to Intervene” or “Petition”) filed by the PP&L Industrial Customer Alliance (“PPLICA”) on February 5, 2019. As explained herein, PPL Electric has no objection to PPLICA intervening in this proceeding for the purpose of monitoring the docket. Further, counsel for PPL Electric and counsel for PPLICA spoke about PPLICA’s Petition to Intervene. Based on that conversation, PPL Electric can represent that, subject to no other parties intervening in the proceeding: (1) PPLICA does not oppose the Company’s January 18, 2019 Petition to Extend its Universal Service and Energy Conservation Plan (“USECP”); and (2) PPLICA does not want the case referred to the Pennsylvania Public Utility Commission’s (“Commission”) Office of Administrative Law Judge (“OALJ”) for hearings.

In support thereof, PPL Electric states as follows:

I. BACKGROUND

1. On January 18, 2019, PPL Electric filed a Petition for the Commission to issue an Order on an expedited basis by its public meeting on March 14, 2019,¹ which: (1) extends the Company's current 2017-2019 USECP through 2020; (2) amends the USECP filing schedule set forth in the Secretarial Letter dated June 27, 2014, to reflect that the six-year independent evaluation of the Company's USECP is due by March 1, 2020, and that the Company's next USECP is due by September 1, 2020; (3) grants a limited waiver of Section 54.74(a) of the Commission's regulations so that PPL Electric can file its next USECP by September 1, 2020, and extend its current USECP for 2017-2019 through 2020; and (4) grants any other approvals or waivers that are needed to implement these requests ("Petition to Extend the USECP").

2. PPL Electric filed the Petition to Extend the USECP at its current USECP docket (*i.e.*, Docket No. M-2016-2554787) and served it on the Office of Consumer Advocate ("OCA") and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA"), who were the only parties in that proceeding, as well as the Commission's Bureau of Investigation and Enforcement ("I&E") and the Office of Small Business Advocate ("OSBA").

3. Attached to PPL Electric's Petition to Extend the USECP as Appendix A were emails from the OCA and CAUSE-PA stating that they do not oppose extending the deadlines for PPL Electric's next six-year independent evaluation and the next USECP.

¹ As explained in PPL Electric's January 18, 2019 Petition to Extend the USECP, PPL Electric would need to begin updating and designing that USECP in March 2019 unless the Company's proposal is approved because the current filing date for PPL Electric's next USECP is August 1, 2019. Therefore, Commission approval by this date is necessary to avoid the incurrence of unnecessary time and expenses.

4. Subsequently, the Commission assigned Docket No. P-2019-3007285 to the Company's Petition to Extend the USECP.

5. On February 5, 2019, PPLICA filed its Petition to Intervene at Docket No. P-2019-3007285 for the purpose of monitoring the docket in case any proposals were made that would affect Large Commercial and Industrial ("Large C&I") customers.

II. ANSWER TO PPLICA'S PETITION TO INTERVENE

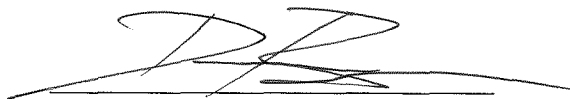
6. PPL Electric has no objection to PPLICA intervening in this proceeding for the purpose of monitoring the docket.

7. On February 8, 2019, counsel for PPL Electric and counsel for PPLICA spoke about PPLICA's Petition to Intervene.

8. Based on that conversation, PPL Electric is authorized to represent that, subject to no other parties intervening in the proceeding: (1) PPLICA does not oppose the Company's Petition to Extend the USECP; and (2) PPLICA does not want the case referred to OALJ for hearings.

9. For these reasons, and as stated in PPL Electric's Petition to Extend the USECP, the Company respectfully requests that the Commission not refer the case to OALJ for hearings and that the Commission issue an Order on an expedited basis by its public meeting on March 14, 2019, approving the Petition to Extend the USECP.

Respectfully submitted,



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Devin T. Ryan (ID # 316602)

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Date: February 19, 2019

Attorneys for PPL Electric Utilities Corporation

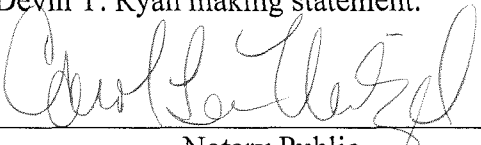
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF DAUPHIN) SS:

DEVIN T. RYAN, being duly sworn according to law, deposes and states that he is Counsel to PPL Electric Utilities Corporation and that in this capacity, he is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Answer are true and correct to the best of his knowledge, information and belief.

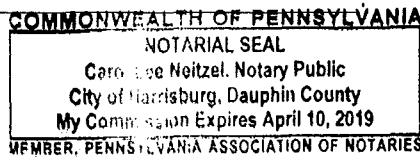

Devin T. Ryan, Esquire

Signed and sworn to before me on
February 19, 2019, by
Devin T. Ryan making statement.


Notary Public

My commission expires

(SEAL)



CERTIFICATE OF SERVICE

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 E-MAIL & FIRST CLASS MAIL

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Date: February 19, 2019



Devin T. Ryan