

Jay Larry Moyer
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Ms. Rosemary Chiavetta, Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

March 12, 2014

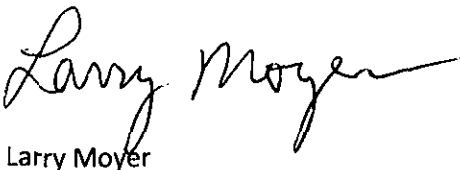
RE: C-2011-2273645 Larry Moyer, Complainant vs PPL Electric utilities, Respondent
(Public Utility Commission's Failure to Certify)

Dear Secretary:

Please find enclosed a copy of the Petition for Review of the Public Utility Commission's failure, in its Opinion and Order dated February 14, 2014, to certify the Motion to Request Certification of an Interlocutory Order for Immediate Appeal which was filed on January 17, 2014, by the appellant.

The Complainant asks that this submittal be received and entered as part of the formal record in the case of Larry Moyer vs PPL Electric (Docket # C-2011-2273645).

Respectfully Yours,



Larry Moyer

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MAR 21 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Jay Larry Moyer
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**PETITION FOR REVIEW OF THE PUBLIC UTILITY
COMMISSION'S FAILURE TO CERTIFY**

Appellant Filing PRO SE

March 12, 2013

Prothonotary, Commonwealth Court
Pennsylvania Judicial Center
601 Commonwealth Avenue
Suite 4500
Harrisburg, PA 17106

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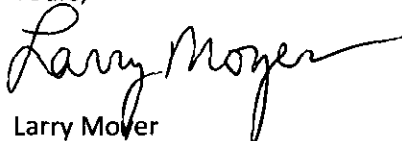
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: PETITION FOR REVIEW OF THE PUBLIC UTILITY COMMISSION'S FAILURE TO CERTIFY A MOTION FOR INTERLOCUTORY ORDER FOR IMMEDIATE APPEAL (attached as a re-submittal of the PETITION FOR REVIEW previously incorporated into the cover letter received by Commonwealth Court on March 14, 2014, but here submitted as separate document)

Dear Prothonotary:

Pursuant to 210 Pa. 1513(c); 1511; 1512, 1514(a); and 1514(c), the above-named appellant hereby submits a Petition for Review of the Public Utility Commission's failure, in its Opinion and Order dated February 14, 2014, to certify the Motion to Request Certification of an Interlocutory Order for Immediate Appeal which was filed on January 17, 2014, by the appellant.

Yours,



Larry Moyer

I hereby certify that a true and accurate copy of the enclosed Petition for Review has been served on the following persons pursuant to 210 Pa. 1514(c) of the PA Code:

Pennsylvania Office of Attorney General
16th Floor, Strawberry Square
Harrisburg, PA 17120

Secretary's Bureau
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg , PA 17105-3265

Christopher T. Wright (ID #203412)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601


Larry Moyer

March 12, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Larry Moyer : Docket Nos. C-2011-2273645
v. :
PPL Electric Utilities Corporation :

**MOTION FOR CERTIFICATION OF INTERLOCUTORY ORDER
FOR IMMEDIATE APPEAL**

Date: January 17, 2014

J. Larry Moyer
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Philadelphia, PA 19144
(267) 693-2633
gtown73@hotmail.com

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MAR 21 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pursuant to 52 Pa. Code §§ 5.572 and 5.633, Pa. R. App. P. 1311(b), and 66 Pa. C.S. § 703, Complainant hereby moves for amendment to the Pennsylvania Public Utility Commission's ("Commission") Opinion and Order entered January 9, 2014 (the "Order")¹ to state that the Order involves controlling questions of law as to which there is substantial ground for difference of opinion and that an immediate appeal from the Order may materially advance the ultimate resolution of the matter.

I. INTRODUCTION

1. The Commission's Bureau of Consumer Services ("BCS") decided the informal complaint in this matter on February 2, 2011, improperly concluding that non-generational load is required to qualify for net metering. In addition, BCS decided that Complainant's two accounts did not qualify for virtual metering under the terms of the PPL Electric Utilities Corporation ("PPL") Net Metering Tariff because there was no non-generational load.

2. By Initial Decision issued January 23, 2013, the ALJ upheld the requirement for non-generational load for virtual metering customers.² In doing so, the ALJ stated that "there should be usage or load that exists [at the host account] regardless of whether the generation equipment is in place."³

3. The Commission's Order declined to address the issue of eligibility for net metering or virtual meter aggregation. The Commission did require PPL to continue to permit the Complainant to utilize net metering and virtual meter aggregation, subject to future changes in applicable laws or tariffs. The Commission referred this important legal issue to the

¹ *Larry Moyer v. PPL Electric Utilities Corporation*, C-2011-2273645 (Opinion and Order entered January 9, 2014) ("Opinion and Order").

² *Larry Moyer v. PPL Electric Utilities Corporation*, C-2011-2273645 (Initial Decision issued January 23, 2013) ("Initial Decision").

³ Initial Decision at 13.

Commission's Law Bureau to consider whether its regulations need to be clarified. However, no time frame was placed on its request.⁴

II. ARGUMENT

A. Legal Standard

4. Section 702(b) of the Judicial Code provides:

“When a court or other government unit, in making an interlocutory order in a matter in which its final order would be within the jurisdiction of an appellate court, shall be of the opinion that such order involves a controlling question of law as to which there is substantial ground for difference of opinion and that an immediate appeal from the order may materially advance the ultimate termination of the matter, it shall so state in such order. The appellate court may thereupon, in its discretion, permit an appeal to be taken from such interlocutory order.” 42 Pa. C.S. § 702(b).

5. Section 5.633 of the Commission's Rules permits parties “to request that the Commission find, and include the findings in the order by amendment, that the order involves a controlling question of law as to which there is a substantial ground for difference of opinion and that an immediate appeal to Commonwealth Court from the order may materially advance the ultimate termination of the matter.” 52 Pa. Code § 5.633. Pennsylvania Rule of Appellate Procedure 1311(b) provides: “An application for an amendment of an interlocutory order to set forth expressly the statement specified in 42 Pa.C.S. § 702(b) shall be filed with the lower court or other government unit within 30 days after the entry of such interlocutory order.” Pa. R. App. P. 1311(b).⁵

⁴ Opinion and Order at 20.

⁵ Section 5.633 of the Commission's rules provides that motions for certification should be filed within 10 days and this motion is filed within the time period required by the Commission.

B. The Order Involves Controlling Questions of Law as to Which There is Substantial Ground for Difference of Opinion

6. The Order involves the following controlling questions of law as to which there is a substantial difference of opinion:

- a. Whether a host account can qualify for net metering or virtual meter aggregation if there is no non-generational load at the host account; and
- b. Whether prior existence of a load, meter or electric service is a prerequisite to net metering or virtual net metering eligibility.

7. These questions are controlling because they impact the Complainant's prospective eligibility for net metering or virtual meter aggregation, as well as the current and prospective eligibility of others who have installed generating facilities.

8. Substantial difference of opinion as to these questions exists, as illustrated by the Commission's Order requiring that PPL continue to permit Complainant to utilize virtual net metering, although declining to address the issue of virtual net metering eligibility for those who may have installed, or who may wish to install, generating facilities in Pennsylvania.

9. PPL's Net Metering Tariff provides that net and virtual metering is "available to installations where any portion of the electricity generated by the renewable energy generating system offsets part or all of the customer-generator's requirements for electricity."⁶ PPL arbitrarily avers that this provision of its Tariff means that solar panels may be installed only where an existing meter and electric service already exist. This policy defies the intent of the Alternative Energy Portfolio Standards Act.⁷

10. If PPL's restrictions are imposed, very few locations, among the hundreds of ideal sites for net metering, could qualify or be used.

⁶ Order at 18.

⁷ 73 P. S. §§ 1648.1-1648.8.

11. Complainant submits that PPL's interpretation of its Tariff is unsupported by the Tariff itself and the Alternative Energy Portfolio Standards Act. Mr. Ronald Celentano, Complainant's expert witness who testified at the hearing on August 15, 2012, emphatically affirmed that Complainant has load on his account.⁸

12. The Commission has sought to promote solar energy goals as evidenced by its Final Policy Statement in Support of Pennsylvania Solar Projects.⁹ The Commission could express no better support for the advancement of solar energy than by squarely addressing: (a) the issue of non-generational load as it pertains to eligibility for net metering or virtual meter aggregation; and (b) whether prior existence of a load, meter or electric service is a prerequisite to net metering eligibility.

13. These important issues will set the future course of virtual metering in Pennsylvania. Further delay in addressing these critical questions of law will only result in missed opportunities for advancement in solar renewable energy.

C. An Immediate Appeal From the Order May Materially Advance the Ultimate Termination of this Matter

14. It is clear that an immediate appeal from the Order may materially advance the ultimate termination of this matter.

15. Issues surrounding non-generational load and its impact on virtual net metering eligibility are likely to increase given the number of those who may have installed, or who may wish to install, generating facilities in Pennsylvania under the provisions of virtual net metering. A definitive determination now will provide guidance to the Commission and the industry going forward.

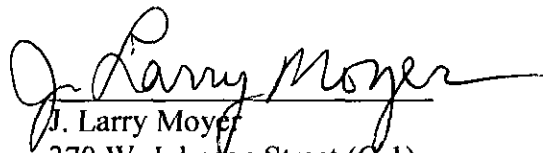
⁸ Hearing Transcript approximately at 161.

⁹ *Policy Statement in Support of Pennsylvania Solar Projects*, Docket No. M-2009-2140263 (Final Policy Statement Order entered September 16, 2010).

III. CONCLUSION

For all of the foregoing reasons, Complainant respectfully requests that the Commission amend the Order to state that the Order “involves a controlling question of law as to which there is substantial ground for difference of opinion and that an immediate appeal from the Order may materially advance the ultimate termination of the matter.” In the alternative, Complainant requests that the Commission direct the Law Bureau to address these issues within the next six (6) months, in an effort to prevent further delay of the advancement of solar renewable energy in Pennsylvania.

Respectfully submitted,



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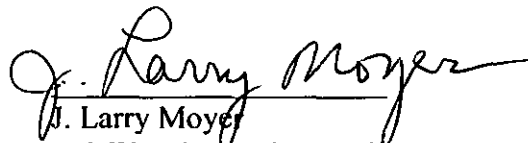
Date: January 17, 2014

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Motion for Certification of Interlocutory Order for Immediate Appeal to be served upon the persons listed below by the means indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via First Class Mail

Christopher T. Wright, Esquire
Post & Schell PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601


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Date: January 17, 2014

PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265

Commissioners:

Robert F. Powelson, Chairman
John F. Coleman, Jr., Vice Chairman
James H. Cawley
Pamela A. Witmer
Gladys M. Brown

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Larry Moyer

C-2011-2273645

v.

PPL Electric Utilities Corporation

OPINION AND ORDER

BY THE COMMISSION:

Before the Commission for consideration is the Motion for Certification of Interlocutory Order for Immediate Appeal (Motion) filed by Larry Moyer (Complainant) on January 17, 2014, in the above-captioned proceeding. The Complainant seeks an amendment to the Commission's Opinion and Order issued on January 9, 2014, in this proceeding (*January 2014 Order*). Specifically, the Complainant requests that the *January 2014 Order* be amended to state that it "involves controlling questions of law as to which there is substantial ground for difference of opinion and that an immediate appeal from the [*January 2014 Order*] may materially advance the ultimate resolution of the matter." Motion at 1. In the alternative, the Complainant requests that the

Commission's Law Bureau be given a deadline of six months to address an issue that was referred to it in the *January 2014 Order* "to prevent further delay of the advancement of solar renewable energy in Pennsylvania." Motion at 5. On January 30, 2014, PPL Electric Utilities Corporation (PPL) filed an Answer in opposition to the Motion.¹ For the reasons explained below, we will grant the Complainant's Motion, in part, and deny it, in part.

History of the Proceeding

On November 15, 2011, the Complainant filed a Formal Complaint (Complaint) alleging, *inter alia*, that PPL failed to properly aggregate his accounts under the virtual net metering provisions of PPL's Net Metering for Renewable Customer-Generators Rider (Net Metering Rider), and that consequently he did not receive proper credits or payments for the electricity that was generated by his solar panels between April 2009 and February 2010. Complaint at 6-8. As relief, the Complainant requested that the Commission order PPL to apply virtual net metering to his two accounts, disclose all credits and/or payments that have been made to him, and, if necessary, fully reimburse him for the electricity generated. *Id.* at 9. On December 8, 2011, PPL filed an Answer to the Complaint requesting that the Complaint be dismissed. PPL acknowledged that it failed to aggregate the excess generation from the Complainant's solar panels with the usage at his residence for the months March 2009 through December 2009. Answer to Complaint at 5.

¹ The Complainant served a copy of his Motion on PPL by electronic mail on January 17, 2014, which is deemed to be the date of service under 52 Pa. Code § 1.56. Pursuant to 52 Pa. Code §§ 5.103(c) and 5.633(a), Answers to the Motion would have been due twenty days after the Motion was served, or by February 6, 2014. However, because Rule 1311 (b) of the Pennsylvania Rules of Appellate Procedure requires the Commission to act on the Motion within thirty days after it was filed, or by February 17, 2014, on January 30, 2014, the Commission issued a Secretarial Letter requiring that any Answers to the Motion be filed on or before February 3, 2014.

An evidentiary hearing was held on August 15, 2012, before Administrative Law Judge (ALJ) Cynthia Williams Fordham. The Complainant appeared *pro se*, testified on his own behalf, and presented two witnesses. The Complainant introduced twenty exhibits, of which ten were admitted into the record. PPL presented two witnesses and introduced ten exhibits, nine of which were admitted into the record. The hearing resulted in a transcript of 254 pages. The record was closed upon the receipt of the transcript on September 7, 2012.

By Initial Decision issued February 22, 2013, the ALJ dismissed the Complaint. On March 15, 2013, the Complainant filed Exceptions to the Initial Decision, with a Request for Oral Argument. PPL filed Reply Exceptions on March 29, 2013.

On May 8, 2013, the Complainant filed a Petition to Reopen the Record (Petition), as well as additional information in support of his Complaint. PPL filed an Answer to the Petition on May 20, 2013, requesting that the Petition be denied. On May 21, 2013, and July 14, 2013, the Complainant again filed additional information in support of his Complaint. PPL filed responsive pleadings on May 21, 2013, and August 1, 2013, requesting that the Commission deny the Complainant's additional attempts to reopen the record.

With respect to the accuracy of the net metering credits that the Complainant received from PPL, the Commission: (1) determined that the record was insufficient to determine whether PPL properly credited the Complainant for his solar generation, and remanded the proceeding to the Office of Administrative Law Judge (OALJ) for further development of the record; (2) directed PPL to file the Complainant's actual data for the period April 2009 through May 2013; (3) encouraged the Parties to meet and attempt to resolve the Complainant's concerns; (4) directed the Complainant to present all of his monthly bills and statements from April 2009 through the entry date of

the *January 2014 Order*; (5) stated that, if the Complainant's concerns were not resolved through the informal discussions with PPL, the Complainant could request further hearings and submit his monthly bills into the record; (6) granted the Complainant's Petition to Reopen the Record, in part, to include this additional information; and (7) denied the Petition in all other respects. The Commission vacated the ALJ's Initial Decision to the extent that it found that PPL properly provided credits to the Complainant. *January 2014 Order* at 6-7, 16. The Commission also denied the Complainant's request for oral argument. *Id.* at 7-8.

With regard to the legal issue raised by this proceeding, namely the Complainant's eligibility for virtual meter aggregation,² the Commission determined that it was not necessary to address the issue, given PPL's waiver of its objections to the Complainant's eligibility for net metering as part of its effort to settle the issues and concerns raised by the Complaint. Consistent with PPL's waiver, the Commission directed PPL "to continue to permit Mr. Moyer to utilize net metering and virtual meter aggregation for his existing 4.75 kW solar array and residence in the future." *Id.* at 20. The Commission also referred "the legal issue raised by this proceeding to the Commission's Law Bureau to consider whether our regulations need to be clarified." *Id.* The Law Bureau was directed to "advise the Commission on whether our Regulations need to be clarified to address the issues raised in this proceeding." *Id.* at 23, Ordering Paragraph No. 10.

² The Complainant's 4.75kW solar array is located approximately 600 yards from his residence, and is interconnected to PPL's distribution system through a dedicated meter (host account meter), separate from the Complainant's meter at his residence. Other than a light installed for the solar array, there is no load interconnected through the host account meter. Rather, the Complainant's load is interconnected through the meter at his residence (satellite account meter). The question is whether the readings and billings from the two meters are eligible for meter aggregation and net metering in the absence of non-generational load interconnected through the host account meter.

Discussion

Legal Standards

Section 5.633 of the Commission's Regulations, which governs the certification of interlocutory orders, provides in pertinent part as follows:

(a) When the Commission has made an order which is not a final order, a party may by motion request that the Commission find, and include the findings in the order by amendment, that the order involves a controlling question of law as to which there is substantial ground for difference of opinion and that an immediate appeal to Commonwealth Court from the order may materially advance the ultimate termination of the matter. The motion shall be filed within 10 days after service of the order, and is procedurally governed by § 5.103(a) – (c) (relating to hearing motions). Unless the Commission acts within 30 days after the filing of the motion, the motion will be deemed denied.

(b) Neither the filing of a motion under subsection (a), nor the adoption of an amended order containing the requested finding, will stay a proceeding unless otherwise ordered by the Commission or Commonwealth Court.

52 Pa. Code § 5.633 (Section 5.633).

Complainant's Motion for Certification of Interlocutory Order

In his Motion, the Complainant notes that the Commission declined to address the issue of his eligibility for net metering or virtual meter aggregation in the *January 2014 Order*, and instead referred the question of whether the Commission's Regulations need to be clarified to the Commission's Law Bureau. The Complainant also

notes that the Commission did not place a time limit on the Law Bureau to respond to the referral. Motion at 1.

The Complainant submits that the legal questions raised by this proceeding will “impact the Complainant’s prospective eligibility for net metering or virtual meter aggregation, as well as the current and prospective eligibility of others who have installed generating facilities.” *Id.* at 3. The Complainant avers that, if the Commission imposes PPL’s restrictions on net metering customers, very few locations among hundreds of ideal sites, could qualify for net metering through virtual meter aggregation. *Id.* The Complainant argues that the Commission should squarely address the issue of non-generational load as it pertains to the eligibility for net metering or virtual meter aggregation, and whether the prior existence of non-generational load is a prerequisite to net metering eligibility. *Id.* at 4.

The Complainant asserts that the resolution of these issues will set the future course of net metering in Pennsylvania, and that “[f]urther delay in addressing these critical questions of law will only result in missed opportunities for advancement in solar renewable energy.” *Id.* The Complainant also asserts that a definitive determination of these legal issues would provide necessary guidance to the Commission and to the industry, and that an immediate appeal to the Commonwealth Court may materially advance the resolution of this matter. *Id.*

For the reasons stated above, the Complainant requests that the Commission amend the *January 2014 Order* to state that it involves a controlling question of law, and that an immediate appeal to Commonwealth Court may materially advance the resolution of this matter. In the alternative, the Complainant requests that the Commission direct its Law Bureau to address these issues within the next six months to prevent further delay to the development of solar renewable energy in Pennsylvania. *Id.* at 5.

PPL's Answer to Motion for Certification of Interlocutory Order

In its Answer, PPL argues that, because the Commission's *January 2014 Order* directed that PPL permit the Complainant to participate in net metering and virtual meter aggregation, the only remaining issue to be resolved is the proper amount of the credits and payments that the Complainant should have received. Answer at 5. PPL submits that the Complainant's Motion is subject to the standards set forth in *Duick v. Pennsylvania Gas and Water Company*, 56 Pa. P.U.C. 533 (1982), such that the Complainant must demonstrate that there are "new and novel arguments" not previously heard, or considerations that appear to have been overlooked by the Commission. PPL submits that the Complainant has not presented any change in law or fact to support an amendment to the Commission's *January 2014 Order*. Answer at 6.

Second, PPL denies that the *January 2014 Order* involves a "controlling question of law as to which there is a substantial difference of opinion," as required by the Commission's provisions governing the certification of interlocutory orders at 52 Pa. Code § 5.633, *infra*. PPL argues that the issue in question is no longer applicable to this proceeding because it has been resolved in the Complainant's favor. PPL states that the Complainant has benefited from the Commission's directive in the *January 2014 Order*, and that PPL "agrees to permit the Complainant to participate in virtual or net metering." Answer at 6-7, 9. PPL submits that, because the Complainant has not been aggrieved, he cannot appeal the *January 2014 Order* to the Commonwealth Court. PPL also submits that the Complainant does not have standing to appeal the *January 2014 Order* on behalf of other customer-generators. *Id.* at 8. PPL states that the impact on other customer-generators will be considered through the referral of the legal issue to the Law Bureau for a generic recommendation.

Finally, PPL denies that an appeal of the Commission's *January 2014 Order* would materially advance the ultimate termination of this matter, as required by the Commission's provisions governing the certification of interlocutory orders. PPL reiterates that the issue has been fully resolved as it pertains to the Complainant, and the Complainant is not authorized to represent other customer-generators in an appeal to the Commonwealth Court. *Id.* at 11.

Disposition

Upon review, we conclude that an immediate appeal of our *January 2014 Order* would not advance the resolution of this proceeding. Our *January 2014 Order* did not address a "controlling question of law" as contemplated by Section 5.633. As we stated therein, given PPL's waiver of its objections to the virtual meter aggregation of the Complainant's 4.75 kW solar array, we concluded that it was unnecessary to address the eligibility of the Complainant's solar array for virtual meter aggregation under the Alternative Energy Portfolio Standards Act of 2004,³ the Commission's Regulations, or PPL's Net Metering Rider. It is, in fact, the absence of a legal conclusion in our *January 2014 Order* that is the basis of the Complainant's concerns. Accordingly, we conclude that an immediate appeal of our *January 2014 Order* to the Commonwealth Court would not advance the termination of this proceeding, and we will deny the Complainant's request for an amendment of the *January 2014 Order* to permit an immediate appeal.

We will, however, grant, in part, the Complainant's alternative request that the Commission establish a six-month deadline for the Law Bureau to provide its advice to the Commission pursuant to the *January 2014 Order*. As stated above, we referred the legal issue raised by this proceeding to the Law Bureau to advise the Commission on

³ Act of November 30, 2004, P.L. 1672, No. 213, codified at 73 P.S. §§ 1648.1 *et seq.*, as amended by Act 35 of 2007.

whether our Regulations need to be clarified. *January 2014 Order* at 23. We did not establish a timeframe for the Law Bureau to submit its recommendation. Although we will deny the Complainant's request that the Law Bureau be directed to provide its advice within six months, we expect the Law Bureau to provide its advice in a timely manner. Therefore, we will require that the Law Bureau submit a status report to the Commission within six months of the issuance of the instant Opinion and Order.

Conclusion

Based upon the foregoing discussion, we will grant, in part, and deny, in part, the Complainant's Motion for Certification of Interlocutory Order for Immediate Appeal; **THEREFORE,**

IT IS ORDERED:

1. That the Motion for Certification of Interlocutory Order for Immediate Appeal, filed by Larry Moyer on January 17, 2014, is granted, in part, and denied, in part, consistent with this Opinion and Order.

2. That the Commission's Law Bureau is directed to provide a status report to the Commission within six months of the date of entry of this Opinion and Order regarding the recommendation requested by the Commission's Opinion and Order issued on January 9, 2014, in this proceeding.

3. That a copy of this Opinion and Order be served on the Parties to this proceeding, the Office of Administrative Law Judge, and the Commission's Law Bureau.

BY THE COMMISSION,



Rosemary Chiavetta
Secretary

(SEAL)

ORDER ADOPTED: February 14, 2014

ORDER ENTERED: **February 14, 2014**

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Secretary's Bureau
Pennsylvania Public Utility
Commission
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