

Jay Larry Moyer
370 W. Johnson Street (C-1)
Philadelphia, PA 19144
267-693-2633
gtown73@hotmail.com

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

RECEIVED

APR 0 4 2014

March 31, 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Docket #C-2011-2273645
(PPL Electric "Compilation" in response to Commission directive of January 9, 2014)

This letter is a response to the recent documents provided by PPL Electric Utilities in answer to directives #6 and #7 in the Opinion and Order issued by the Public Utility Commission on January 9, 2014. It is to be noted, first, that only the cover letter was provided to the Commission, and the accompanying data ("Compilation") was apparently withheld from the record. The Complainant received the Compilation and cover letter and objects to having the Compilation withheld from the record.

It is included here for the benefit of the Commission, and the Complainant asks that it be entered into the formal record.

The Complainant is disheartened by the Company's answer and finds little to offer hope of a solution based on "actual" data. In a conversation with Mr. Christopher Wright, PPL's counsel, on March 28, he indicated that the Company would not discuss billing procedures, but that the review must be limited only to the amount of compensation.

What is now evident is PPL's inability or unwillingness to produce a complete, consistent, and accurate record of past billing. The improvised, "manual" system which the Company acknowledges using has been woefully inadequate, and an accurate reconstruction is not achievable.

According to the AEPS Act, generation credit must be applied “by means of the EDC’s billing process” (52 PA Code § 75.12-“virtual meter aggregation”). That “process” requires production of accurate data “once every billing period” (52 PA Code § 56.11; 52 PA Code § 56.15). The documents which have been produced from time to time (PPL Exhibit #5, Exhibit #7, year-end Tabulation, May, 2013; Compilation) have yielded little but confusion and should not be construed as “billing records”.

The printed bills which were issued to the Complainant must be regarded as the sole official, and legal, record of the “billing process” used for the Complainant’s aggregated accounts.

The official record, furthermore, must be subject to verification. What PPL Electric has provided is a series of insupportable and contradictory attempts at reconstruction. The recent “Compilation” is only the most recent effort at a “reconstruction” of data.

The Company’s response to the Opinion and Order (January 9, 2014) does not provide a sound basis for negotiating in good faith, based on the facts cited below.

1. The Respondent arbitrarily withheld the “compilation” from the formal record, although the Commission’s Order explicitly says, “Absent an objection from the Complainant, the revisions to Exhibit No. 7 shall be included in the formal record of this proceeding.” (Opinion and Order, January 9, 2014, footnote 8).
2. The revision failed to include “any payments made by Mr. Moyer”. (Order #6.f).
3. The revision failed to include “any excess energy that was banked at the satellite account”. (6.g)
4. The revision failed to include “the total energy banked” (Order #6.h)
5. Instead of filing the revision “with the Office of Administrative Law Judge”, as ordered, the Respondent elected to address its answer to a specific judge, whose Initial Decision has been vacated (Opinion and Order p. 20 and directive #4, January 9, 2014)

Complicating matters even further is the Commission’s guidance urging that “This information should be presented in a format that enables the Parties to directly associate the monthly bills with the credits and cash-out payments” (Opinion and Order, January 9, 2014 p. 16).

Unfortunately, it is impossible to associate the recent “Compilation” with the monthly billing record as is evident from the side-by-side information in the various charts enclosed.

1. Chart A – PPL’s different versions of credits show serious discrepancies.
2. Chart B - The Applied Credits do not match.
3. Chart C - Data is omitted from the Compilation.
4. Chart D - The meter readings do not concur.
5. Chart E - The Customer payments have been omitted.

If there is to be meaningful negotiation, it must be based on reliable (“actual”) data, which has been the most elusive target of all.

The Commission was right to point out in its Opinion and Order of January 9, 2014 (p. 15) that “some of the information on PPL Exhibit No. 7 does not match the information on PPL Exhibit #5.” Unfortunately, the new “Compilation” provided by the Company only adds more “data disarray” to the record.

The pursuit of the “actual” record seems to have become a fruitless quest, and there is no agreement on what constitutes the “actual” record. This insurmountable “actual problem” exists on two levels.

First, the Complainant has shown, and is prepared to show again, that Company records are in disarray, and that various Company documents conflict with each other. Furthermore, it is apparent that an “actual”, coherent record may not exist or cannot be recovered. Certainly, it is impossible to ascertain which of the four extant versions is the “actual” one. (See Chart A, enclosed)

Second, it is difficult to decipher what the Commission’s intent was in Order #6 of its Opinion and Order on January 9, 2014. Earlier in the Opinion and Order (page 16) the Commission directed PPL to “file a revised version of Exhibit No. 7 that contains actual data”. This directive is surprising, since PPL, in a formal hearing on August 15, 2012, claimed that the “actual” record is PPL Exhibit #5. (Hearing transcript pp 183-184)

The problem is compounded further by the format proposed in directives #6 and #7 of the Opinion and Order issued on January 9, 2014, a format which is not compatible with PPL Exhibit #7 or with the monthly bills provided to the Complainant.

Meanwhile, the Order issued on January 9, 2014, encourages the Parties “to meet and review the Complainant’s actual bills and the information to be supplied by PPL” (p. 16). Given the complications cited above and the circumstances which have developed, any attempt to “meet and review” shows little promise.

The record has become indecipherable, and the Complainant is disinclined to expend still more time and energy attempting to harness the wind. The Complainant has concluded that there is no prospect of reaching agreement on actual records, actual credits, or actual compensation.

The “Compilation” supplied by PPL in response to the Opinion and Order of January 9, 2014, lends support to the Complainant’s contention that the Company’s billing procedures have been in disarray. This disarray precludes any possibility of accurate reconstruction, and the Complainant has abandoned all hope of achieving consensus on the data history. The data has

now been produced in four different forms, and the different versions offered to date are rife with confusion, error, contradiction, improvisation and retroactive "fixes".

The Complainant reiterates his belief that the printed bills issued to him are the only legitimate, legal record of his aggregated accounts. It is also his belief that those bills are flawed, incomplete and inaccurate.

In lieu of full, accurate, and consistent data from the past, which the Complainant deems unachievable, the Complainant is prepared to negotiate a reasonable compensation. He is entitled, however, to billing data that is complete, transparent and verifiable. Since that is not yet forthcoming, he believes that a "compensation agreement" is premature and ill-advised and will render only a prospect of future discrepancies.

The Commission's charge to the Complainant was that "he must be prepared to demonstrate that the specific credits and payments made by PPL are inaccurate" (p. 16). This he has done and is prepared to do again.

The Complainant first demonstrated the inaccuracies to the Company repeatedly in 2010-2012. He demonstrated them again in the formal hearing when he submitted sample bills, a comparison chart, and a running tabulation (Complainant's Exhibits # 7, #11, #12, and #13). That evidence, regrettably, was either dismissed or disregarded as inconsequential:

In short, the Complainant has assembled an exhaustive list of the inaccuracies, discrepancies, and errors, and he is not averse to presenting the full billing record in the tedious manner that would be required, whether before a judge or with an independent, qualified arbitrator.

The Complainant appreciates the Commission's commitment to a fair resolution and would like to offer an "Alternative Proposal" which would spare all of the Parties undue and protracted expenditure of time and effort.

In that hope that his proposal will be accepted, the Complainant requests that the following steps be taken:

1. That the Commission suspend its call for further direct negotiations between the Complainant and PPL Electric Utilities.
2. That the Commission agree to pursue an "Alternative Proposal".
3. That the Commission arrange a meeting to negotiate such an "Alternative Proposal".
4. That the meeting include the following: The Complainant; The Complainant's agent; Mr. Christopher Wright, representing PPL Electric Utilities; A representative of the Commission; and a representative of PennFuture.

5. That the Commission authorize the assembled group to negotiate an "Alternative Proposal" which would a) recommend, prospectively, the terms of the billing process for virtual meter aggregation and b) resolve the dispute regarding past compensation that may be owed to the Complainant.

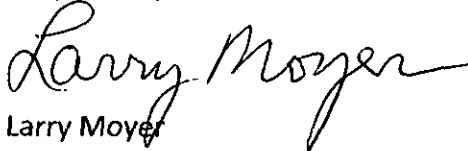
The Complainant believes that the following suggestions would provide a framework for an "Alternative Proposal" that would assure a coherent billing process in the future:

1. PPL Electric and the Complainant, acknowledging irregularities in past billing, will postpone the issue of compensation until a review of the billing procedures has been completed.
2. The Commission will agree to review the "billing process" which has been utilized by PPL for virtual metering.
3. Prospectively, in the month-to-month "billing process", credits for virtual meter aggregation will be recorded strictly in kwh's rather than in dollars, except for the year-end "cash-out", which will be credited and paid in dollar amounts according to the proper weighted average of the "price to compare".
4. The meter at the generating system will be used only to determine the generation data that shall be applied to the customer's account.
5. The aggregated data for the Complainant's meters will be provided in a single bill as clearly implied in 52 Pa. § 75.14(e).
6. The Complainant will agree to pay a reasonable "incremental expense" that has been duly proposed, reviewed and adopted by the Commission in a Final Rulemaking Order.
7. The Complainant will agree to assume the cost of a transformer necessary for interconnection of his renewable generating system.
8. PPL Electric will agree to implement a "billing process" using a single account that, on a monthly basis, provides the Complainant (and all virtual metering customers) with aggregated data from the various meters that is current, complete, and verifiable*, both in print and in electronic form.
9. The Commission will propose a uniform "billing process" for virtual meter aggregation that clarifies the "incremental expense entailed in processing his account" which PPL electric (or any utility company) is permitted to impose on the Complainant or any virtual metering customer. 52 Pa. § 75.14(e)
10. The elimination of billing irregularities, errors, and confusion can best be assured when the Company implements an automated system that integrates virtual meter aggregation into the general billing process. The Company has clearly acknowledged that such an integrated system is available (ALJ Hearing, Transcript 218), and the Complainant's legal right to an accurate, verifiable record cannot be denied under the pretext of "prudent" financial considerations.

It is the Complainant's hope that his plan for an "Alternative Proposal" will be given serious consideration. If, however, his plan for an "Alternative Proposal" is considered unacceptable to the Commission, the Complainant hereby requests "further hearings" before an Administrative Law Judge where the full details of the billing record can be reviewed.

**The monthly data provided on the customer's bill must include a) meter readings, b) Start and end dates for readings, c) Total kWh's generated during the most recent period, d) Total kWh's of generation applied to the satellite account(s) for the most recent period; e) The total "excess" kWh's of credit added to the "bank" for the most recent period; f) The cumulative total of kWh's of "banked" credit; g) Relevant price-per-unit for all credits; and h) The total dollar value for all credit.*

Respectfully submitted,


Larry Moyer

March 31, 2014

Encl: Chart A - T.3 PPL Credit data – 4 PPL Versions
(Comparison of PPL documents: Printed bills; Exhibit #5; Exhibit #7; Compilation)
Chart B – Applied Credits, Printed Bills vs Compilation (satellite account-21001)
Chart C – Data omitted from Compilation
Chart D – Comparison-Meter Readings (Printed Bills vs Compilation)
Chart E – Customer Payments (Printed Bills vs Compilation-21001 & 97002)
PPL "Compilation" (March 10, 2014)

Chart A

	A	B	C	D	E
1	Date	Applied \$ Credits (PPL Exhibit # 5) "ACTUAL"	Applied \$ credits (PPL Exhibit # 7)	Applied \$ "excess" credit (PPL, Printed Bills)	Applied \$ Credits-PPL "Compilation"
2	March, 09				0
3	Apr, 09		0.97	0	0
4	May, 09		33.31	0	0
5	June, 09		33.79	0	0
6	July, 09		19.98	0	0
7	Aug, 09		30.11	0	0
8	Sept, 09		23.04	0	0
9	Oct, 09		34.08	0	0
10	Nov, 09		56.65	0	0
11	Dec., 09		46.39	0	0
12	Jan, 10	11.96	41.29	0	0
13	Feb., 10	41.26	41.42	0	0
14	Mar., 10	48.44	48.6	0	0
15	April, 10	49.88	49.89	0	0
16	May, 10	39.73	39.74	151.54	151.54
17	June, 10	0	30.48	143.09	39.73
18	July, 10	0	33.18	104.17	41.62
19	Aug., 10	0	28.82	0	36.2
20	Sept., 10	0	38.13	26.35	26.35
21	Oct., 10	0	38.77	0	0
22	Nov., 10	0	46.5	0	0
23	Dec., 10	0	50.67	0	0
24	Jan, 11	0	0	0	0
25	Feb., 11	0	72.71	0	0
26	Mar., 11	0	56.61	0	0
27	April, 11	0	53.49	0	0
28	May, 11	196.43	55.37	0	0
29	June, 11	26.21	26.21	0	0
30	July, 11	36.6	36.6	0	0
31	Aug., 11	39.5	39.5	0	0
32	Sept., 11	24.14	24.14	250.49	298.74
33	Oct., 11	41.37	41.35		0
34	Nov., 11	28.13	28.11		0
35	Dec., 11	42	41.98		135.64
36	Jan., 12	37.68	37.68	135.64	37.68
37	Feb., 12	32.47	32.47	37.68	32.47
38	Mar., 12	49.38	49.36	32.47	49.38
39	April., 12	44.03	44.03	49.38	44.03
40	May, 12	35.7	35.7	44.03	35.7
41	June, 12	20.18		35.7	31.87
42	July, 12			31.87	26.76
43	Aug., 12			26.76	33.91

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

APR 04 2014

RECEIVED

	A	B	C	D	E
44	Sept., 12			33.91	30.61
45	Oct., 12			30.61	31.96
46	Nov., 12			31.96	43.33
47	Dec., 12			43.33	90.07
48	Jan., 13			90.07	89.15
49	Feb., 13			89.15	65.07
50	Mar., 13			65.07	33.43
51	April., 13			33.43	49.83
52	May, 13			49.83	40.28
53	June, 13			40.28	0
54	July, 13			0	69.47
55	Aug., 13			28.03	24.6
56	Sept., 13			24.6	41.79
57	Oct., 13			41.79	22.97
58	Nov., 13			22.97	55.78
59	Dec., 13			56.95	91.09

Missing from
Bells!

Applied Credits
Bills vs Compilation

Chart B

	A	B	C
1	Billing Date	"excess credit" applied to 21001 (Printed Bills)	Credits applied to 21001-PPL "Compilation"
2	March, 09	0	0
3	Apr, 09	0	0
4	May, 09	0	0
5	June, 09	0	0
6	July, 09	0	0
7	Aug, 09	0	0
8	Sept, 09	0	0
9	Oct, 09	0	0
10	Nov, 09	0	0
11	Dec., 09	0	0
12	Jan, 10	0	0
13	Feb., 10	0	0
14	Mar., 10	0	0
15	April, 10	0	0
16	May, 10	151.54	151.54
17	June, 10	143.09	39.73
18	July, 10	104.17	41.62
19	Aug., 10	0	36.2
20	Sept., 10	26.35	26.35
21	Oct., 10	0	0
22	Nov., 10	0	0
23	Dec., 10	0	0
24	Jan, 11	0	0
25	Feb., 11	0	0
26	Mar., 11	0	0
27	April, 11	0	0
28	May, 11	0	0
29	June, 11	0	0
30	July, 11	0	0
31	Aug., 11	0	0
32	Sept., 11	250.49	298.74
33	Oct., 11		0
34	Nov., 11		0
35	Dec., 11		135.64
36	Jan., 12	135.64	37.68
37	Feb., 12	37.68	32.47
38	Mar., 12	32.47	49.38
39	April., 12	49.38	44.03
40	May, 12	44.03	35.7
41	June, 12	35.7	31.87
42	July, 12	31.87	26.76
43	Aug., 12	26.76	33.91

RECEIVED

APR 04 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Applied Credits
Bills vs Compilation

	A	B	C
44	Sept., 12	33.91	30.61
45	Oct., 12	30.61	31.96
46	Nov., 12	31.96	43.33
47	Dec., 12	43.33	90.07
48	Jan., 13	90.07	89.15
49	Feb., 13	89.15	65.07
50	Mar., 13	65.07	33.43
51	April., 13	33.43	49.83
52	May, 13	49.83	40.28
53	June, 13	40.28	0
54	July, 13	0	69.47
55	Aug., 13	28.03	24.6
56	Sept., 13	24.6	41.79
57	Oct., 13	41.79	22.97
58	Nov., 13	22.97	55.78
59	Dec., 13	56.95	91.09

Data Omitted from
Compilation

Chart C

	A	B	C	D	E	F
	Billing Date-PPL "Compilation"	kwh "load" reported- Host Bill- 97002	Total PPL Electric Charge- Host bill 97002	"Excess Credit"- Solar (Host) account	kwh added to bank (current month)	Running bank total (kwh)
1						
2	March, 09	0	11.54		NA	NA
3	Apr, 09	0	11.54		NA	NA
4	May, 09	5	12.14		NA	NA
5	June, 09	4	12.02		NA	NA
6	July, 09	5	12.14		NA	NA
7	Aug. 09	4	12.02		NA	NA
8	Sept, 09	5	12.14		NA	NA
9	Oct, 09	6	12.28		NA	NA
10	Nov, 09	6	12.28		NA	NA
11	Dec., 09	5	12.14		NA	NA
12	Jan, 10	7	12.62		NA	NA
13	Feb., 10	7	13		NA	NA
14	Mar., 10	6	12.86		NA	NA
15	April, 10	6	4.8	-8.06	NA	NA
16	May, 10	1	11.29	-0.85	NA	NA
17	June, 10				NA	NA
18	July, 10	1	12.01	-0.13	NA	NA
19	Aug., 10	5	12.72	-1.42	NA	NA
20	Sept., 10	5	12.71	-0.7	NA	NA
21	Oct., 10	6	12.85	-0.84	NA	NA
22	Nov., 10	7	12.99	-0.98	NA	NA
23	Dec., 10	8	13.12		NA	NA
24	Jan, 11				NA	NA
25	Feb., 11				NA	NA
26	Mar., 11		43.44		NA	NA
27	April, 11	0	16.15		NA	NA
28	May, 11		14.8		NA	NA
29	June, 11		14.8		NA	NA
30	July, 11		14.8		NA	NA
31	Aug., 11		14.8		NA	NA
32	Sept., 11		15.49		NA	NA
33	Oct., 11		14.8		NA	NA
34	Nov., 11		14.8		NA	NA
35	Dec., 11		14.8		NA	NA
36	Jan., 12		14.8		NA	NA
37	Feb., 12		14.79		NA	NA
38	Mar., 12		14.79		NA	NA
39	April, 12		14.79		NA	NA
40	May, 12		14.79		NA	NA
41	June, 12		14.79		NA	NA
42	July, 12		14.79		NA	NA

RECEIVED

APR 04 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Data Omitted from
Compilation

	A	B	C	D	E	F
43	Aug., 12		14.79		NA	NA
44	Sept., 12		14.79		NA	NA
45	Oct., 12		14.79		NA	NA
46	Nov., 12		14.79		NA	NA
47	Dec., 12		14.79		NA	NA
48	Jan., 13		15.52		NA	NA
49	Feb., 13		17.03		NA	NA
50	Mar., 13		17.03		NA	NA
51	April., 13		17.03		NA	NA
52	May, 13		17.03		NA	NA
53	June, 13		17.03		NA	NA
54	July, 13				NA	NA
55	Aug., 13		34.22		NA	NA
56	Sept., 13				NA	NA
57	Oct., 13		35.93		NA	NA
58	Nov., 13		17.22		NA	NA
59	Dec., 13		17.22		NA	NA

Comparison-Meter Readings

Chart D

	A	B	C
	Billing Date-PPL "Compilation"	Meter readings- 97002 "Compilation"	Meter Readings- 97002- printed Bills
1			
2	March, 09	20026	375
3	Apr, 09	20017	0
4	May, 09	19448	5
5	June, 09	18886	9
6	July, 09	18310	14
7	Aug. 09	17696	18
8	Sept, 09	17125	23
9	Oct, 09	16698	29
10	Nov, 09	16340	35
11	Dec., 09	16122	40
12	Jan, 10	15805	47
13	Feb., 10	15487	54
14	Mar., 10	15113	60
15	April, 10	14526	66
16	May, 10	13933	67
17	June, 10	13379	68
18	July, 10	12705	73
19	Aug., 10	12126	78
20	Sept., 10	11563	83
21	Oct., 10	11022	89
22	Nov., 10	10612	96
23	Dec., 10	10319	104
24	Jan, 11	10013	NA
25	Feb., 11	99727	NA
26	Mar., 11	99276	0
27	April, 11	98850	0
28	May, 11	98374	0
29	June, 11	97835	0
30	July, 11	97187	0
31	Aug., 11	96743	0
32	Sept., 11	96749	0
33	Oct., 11	96759	0
34	Nov., 11	96635	NA
35	Dec., 11	96334	0
36	Jan., 12	96025	0
37	Feb., 12	95732	0
38	Mar., 12	95252	0
39	April., 12	94654	0
40	May, 12	94161	0
41	June, 12	96517	94161
42	July, 12	92860	94161

RECEIVED

APR 04 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Comparison-Meter Readings

	A	B	C
43	Aug., 12	92325	94161
44	Sept., 12	91749	94161
45	Oct., 12	91262	94161
46	Nov., 12	90975	94161
47	Dec., 12	90578	94161
48	Jan., 13	90367	94161
49	Feb., 13	90136	94161
50	Mar., 13	89814	94161
51	April., 13	89664	94161
52	May, 13	88747	94161
53	June, 13	88141	94161
54	July, 13	87586	94161
55	Aug., 13	87041	94161
56	Sept., 13	86444	NA
57	Oct., 13	85933	94161
58	Nov., 13	85820	94161
59	Dec., 13	85745	94161

Chart E

	A	B	C
1	Billing Date	Customer Payment "received"- 97002	customer payments- 97002-PPL compilation- 3/10/2014
2	March, 09	11.54	NA
3	Apr, 09	23.08	NA
4	May, 09	12.14	NA
5	June, 09	12.02	NA
6	July, 09	12.14	NA
7	Aug. 09	12.02	NA
8	Sept, 09	12.14	NA
9	Oct, 09	12.28	NA
10	Nov, 09	12.28	NA
11	Dec., 09	12.14	NA
12	Jan, 10	12.62	NA
13	Feb., 10	13	NA
14	Mar., 10	12.86	NA
15	April, 10	4.8	NA
16	May, 10	11.29	NA
17	June, 10	0	NA
18	July, 10	0	NA
19	Aug., 10	24.6	NA
20	Sept., 10	11.3	NA
21	Oct., 10	12.01	NA
22	Nov., 10	12.01	NA
23	Dec., 10	12.01	NA
24	Jan, 11	0	NA
25	Feb., 11	0	NA
26	Mar., 11	0	NA
27	April, 11	43.44	NA
28	May, 11	16.15	NA
29	June, 11	14.8	NA
30	July, 11	14.8	NA
31	Aug., 11	14.8	NA
32	Sept., 11	14.8	NA
33	Oct., 11	15.49	NA
34	Nov., 11	0	NA
35	Dec., 11	14.8	NA
36	Jan., 12	14.8	NA
37	Feb., 12	14.8	NA
38	Mar., 12	14.79	NA
39	April., 12	14.79	NA
40	May, 12	14.79	NA
41	June, 12	14.79	NA

RECEIVED

APR 04 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

	A	B	C
42	July, 12	0	NA
43	Aug., 12	29.58	NA
44	Sept., 12	14.79	NA
45	Oct., 12	14.79	NA
46	Nov., 12	14.79	NA
47	Dec., 12	14.79	NA
48	Jan., 13	14.79	NA
49	Feb., 13	15.52	NA
50	Mar., 13	17.03	NA
51	April., 13	17.03	NA
52	May, 13	17.03	NA
53	June, 13	0	NA
54	July, 13	0	NA
55	Aug., 13	34.06	NA
56	Sept., 13	0	NA
57	Oct., 13	17.11	NA
58	Nov., 13	35.93	NA
59	Dec., 13	17.22	NA

RECEIVED

APR 04 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Billing Date	Host Meter Reading	Host Excess kWh	Value of Excess Gen		Satellite Meter Reading	Satellite Usgae kWh	Credits Applied to Satellite (\$)	Balance of Credits Due (\$)	Cash-Out Payment		Satellite Account - Account Balance on Bill (\$)	Comments
			Cents per kWh	Monthly Value (\$)					Cents per kWh	Payment (\$)		
Mar-09	20026	-	-	-	21394	-			-	-		Installed in Feb 2009.
Apr-09	20017	9	10.777	0.97	21959	565	0.00	0.97				Not available
May-09	19448	569	10.376	59.04	22280	321	0.00	60.01				Not available
Jun-09	18886	562	10.365	58.25	22606	326	0.00	118.26				Not available
Jul-09	18310	576	10.8	62.21	22791	185	0.00	180.47				Not available
Aug-09	17696	614	10.454	64.19	23079	288	0.00	244.66				Not available
Sep-09	17125	571	10.716	61.19	23294	215	0.00	305.84				Not available
Oct-09	16698	427	10.358	44.23	23623	329	0.00	350.07				Not available
Nov-09	16340	358	10.08	36.09	24185	562	0.00	386.16				Not available
Dec-09	16122	218	10.173	22.18	24641	456	0.00	408.34				Not available
Cash Out								0.00	\$11.1800	493.88		FRR of balance of credits remaining at 12/09 Paid in April 2010. Represents payment for all 3904 credits incurred 3/09-12/09. Also an additional 512 kwh was included in cash out from removed meter. At time of cash out, tariff required FRR at Satellite. Balance zeroed out.
Jan-10	15805	317	13.025	41.29	25420	779	0.00	41.29				Not available
Feb-10	15487	318	13.025	41.42	25796	376	0.00	82.71				Not available
Mar-10	15113	374	12.994	48.60	26235	439	0.00	131.31			65.42	
Apr-10	14526	587	12.992	76.26	26619	384	0.00	181.20			58.33	
May-10	13933	593	13.029	77.26	26924	305	151.54	106.92			-103.36	Excess host kWh from January through April 2010 were applied in May 2010 as a total bill credit of \$151.54. This credit was carried forward and credited against the total bill in the subsequent months.
Note												Virtual net metering not applied June through December 2010 because no non-generation load. No credits or cash-outs were given for excess generation produced during this time.
Jun-10	13379	554	13.081	72.47	27157	233	39.73	139.66			-104.17	
Jul-10	12705	674	13.062	88.04	27411	254	41.62	186.08			-62.55	
Aug-10	12126	579	13.342	77.25	27627	216	36.20	227.13			-26.35	
Sep-10	11563	563	13.285	74.79	27914	287	26.35	275.57			18.36	
Oct-10	11022	541	13.277	71.83	28206	292	0.00	347.40			45.33	
Nov-10	10612	410	13.247	54.31	28557	351	0.00	401.71			52.71	
Dec-10	10319	293	13.229	38.76	28940	383	0.00	440.47			59.11	FRR of balance of credits remaining at 12/10
Note								0.00				Made exception to allow Moyer to be on virtual net metering in an effort to resolve issue. Bank started at zero.

Billing Date	Host Meter Reading	Host Excess kWh	Value of Excess Gen		Satellite Meter Reading	Satellite Usgae kWh	Credits Applied to Satellite (\$)	Balance of Credits Due (\$)	Cash-Out Payment		Satellite Account - Account Balance on Bill (\$)	Comments	
			Cents per kWh	Monthly Value (\$)					Cents per kWh	Payment (\$)			
Jan-11 to Feb-11	old meter: 10319 to 10013 new meter: 100000 to 99727	579	12.557	72.71	30526	1586	0.00	72.71			92.39	Meter on host account was changed out in February 2011. Billing periods were combined into one bill issued for February.	
Mar-11	99276	451	12.552	56.61	31102	576	0.00	129.32			81.08		
Apr-11	98850	426	12.556	53.49	31693	591	0.00	182.81			82.95		
May-11	98374	476	12.555	59.76	32134	441	0.00	242.57			64.12		
Jun-11	97835	539	12.078	65.10	32351	217	0.00	307.67			35.66		
Jul-11	97187	648	12.079	78.27	32654	303	0.00	385.94			45.35		
Aug-11	96743	444	12.079	53.63	32981	327	0.00	439.57			48.25		
Sep-11	96749	-6	11.718	-0.70	33187	206	298.74	140.13			-217.07	Credit applied to satellite for period 1/6/11 thru 8/10/11	
Oct-11	96759	-10	11.713	-1.17	33540	353	0.00	138.96			-215.22		
Nov-11	96635	124	11.712	14.52	33780	240	0.00	153.48			-178.36		
Dec-11	96334	301	11.077	33.34	34159	379	135.64	51.18			-125.92	Credit applied to satellite for period 8/10/11 thru 12/9/11	
Jan-12	96025	309	11.083	34.25	35257	1098	37.68	47.75			-131.01		
Feb-12	95732	293	11.083	32.47	35818	561	32.47	47.75			-97.58		
Mar-12	95252	480	10.288	49.38	36413	595	49.38	47.76			-57.01		
Apr-12	94654	598	10.288	61.52	36841	428	44.03	65.25			-53.64		
May-12	94161	493	10.288	50.72	37188	347	35.70	80.27			-53.24	FRR of balance of credits remaining at 5/12	
Cash Out								0.00		6.387	20.18		Annual cash out. At time, tariff requierd cash out at PTC of host account. Balance zeroed out.
Jun-12	93517	644	11.341	73.04	37469	281	31.87	41.17			-50.30		
Jul-12	92860	657	11.341	74.51	37705	236	26.76	88.92			-46.68		
Aug-12	92325	535	11.341	60.67	38004	299	33.91	115.68			-30.80		
Sep-12	91749	576	11.255	64.83	38276	272	30.61	149.90			-25.22		
Oct-12	91262	487	11.255	54.81	38560	284	31.96	172.76			-15.15		
Nov-12	90975	287	11.255	32.30	38945	385	43.33	161.73			4.91		
Dec-12	90578	397	10.891	43.24	39772	827	90.07	114.89			57.51		
Jan-13	90367	211	10.702	22.58	40605	833	89.15	48.33			10.62		
Feb-13	90136	231	10.702	24.72	41516	911	65.07	7.98			22.51		
Mar-13	89814	322	10.381	33.43	42184	668	33.43	7.97			19.81		
Apr-13	89334	480	10.381	49.83	42981	797	49.83	7.97			63.47		
May-13	88747	587	10.381	60.94	43369	388	40.28	28.63			68.25	FRR of balance of credits remaining at 5/13	
Cash Out								0		10.814	21.52		Annual cash out. At time, tariff requierd cash out at PTC of host account. Balance zeroed out.

Billing Date	Host Meter Reading	Host Excess kWh	Value of Excess Gen		Satellite Meter Reading	Satellite Usgae kWh	Credits Applied to Satellite (\$)	Balance of Credits Due (\$)	Cash-Out Payment		Satellite Account - Account Balance on Bill (\$)	Comments
			Cents per kWh	Monthly Value (\$)					Cents per kWh	Payment (\$)		
Jun-13	88141	606	11.08	67.14	43743	374	0.00	67.14			82.21	
Jul-13	87586	555	11.08	61.49	43996	253	69.47	59.16			125.69	June credit 41.44 applied 7/15/13, July credit 28.03-7/17/13
Aug-13	87041	545	11.08	60.39	44218	222	24.60	94.95			96.23	
Sep-13	86444	597	11.641	69.50	44577	359	41.79	122.66			127.94	
Oct-13	85933	511	11.659	59.58	44774	197	22.97	159.26			124.93	
Nov-13	85820	113	11.868	13.41	45244	470	55.78	116.90			173.33	
Dec-13	85745	75	11.845	8.88	46013	769	91.09	34.69			223.35	

Value (\$) of Total Gen from 3/09 to 2/14 = 2,819.81 (Sum of Column E)
 Value (\$) of Total Credits Applied = 1801.05 (Sum of Column H)
 Value (\$) of Cash Outs = 535.58 (Sum of Cash Outs in Column K)

Total Owed to Moyer = 483.18 (Total Gen - Credits Applied - Cash Outs)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the foregoing Submittal and Pleading upon the persons listed below by the means indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via First Class Mail

Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, L-M West
Harrisburg, PA 17120

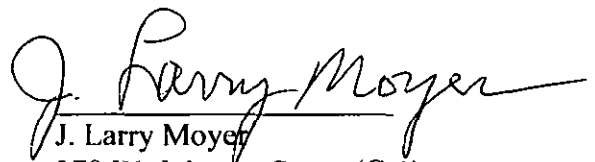
Christopher T. Wright, Esquire
Post & Schell PC
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

RECEIVED

APR 04 2014

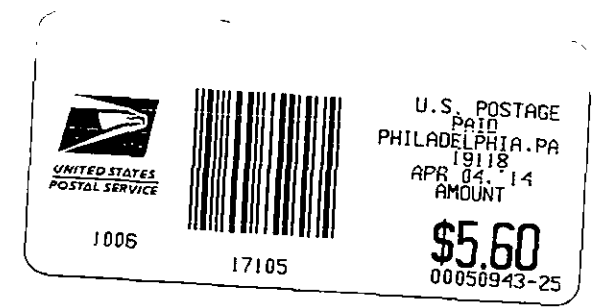
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Date: March 31, 2014


J. Larry Moyer
370 W. Johnson Street (C-1)
Philadelphia, PA 19144
(267) 693-2633
gtown73@hotmail.com



Larry Moyer
 370 W. Johnson St. Apt. C1
 Philadelphia, PA 19144-3119



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



APR 07 2014

