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May 29, 2014

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 for Approval of a New Pilot Time of Use Program P-2013-2389572

Dear Secretary Chiavetta:

Enclosed for filing are Exceptions of the Dauphin County Industrial Development Authority for the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Very Truly Yours,

SALZMANN HUGHES, P.C.

Scott T. Wyland

STW/lgk
Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE
(Docket No. P-2013-2389572)

The foregoing document was filed electronically on the Public Utility Commission's electronic filing system. I hereby certify that I have this day served a true and correct copy of the foregoing document upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL AND FIRST CLASS MAIL

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Dated this 29th day of May, 2014

Scott T. Wyland

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation For Approval of a New Pilot Time-of-Use Program	: : :	P-2013-2389572

A case stemming from:

Petition of PPL Electric Utilities Corporation For Approval of a Default Service Program For the Period June 1, 2013 through May 31, 2015	: : :	(P-2012-2302074)

EXCEPTIONS OF THE DAUPHIN COUNTY INDUSTRIAL DEVELOPMENT AUTHORITY

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Dated: May 29, 2014

I. INTRODUCTION

On October 24, 2013, PPL Electric Utilities Corporation ("PPL") filed a Petition with the Pennsylvania Public Utility Commission ("Commission") seeking approval of a new Pilot Time-of-Use ("TOU") Program (the "Pilot Program" or "Pilot"). Under the Pilot, PPL, an electric distribution company ("EDC"), sought to discontinue its current TOU rate option and to rely on retail electric generation suppliers ("EGS") to provide a TOU rate option to PPL's customers. The Dauphin County Industrial Development Authority ("DCIDA"), a net-metered customer-generator that operates a solar generation facility in parallel with the power grid, intervened in the proceeding to contest the Petition. DCIDA receives net-metered service with a TOU rate from PPL and opposed PPL's proposal to offer TOU rates through EGSs.

After an evidentiary hearing, all parties, with the exception of DCIDA, filed a Joint Petition for Partial Settlement ("Partial Settlement") on April 11, 2014. DCIDA, for its part, continued to oppose the Pilot as contravening applicable law. DCIDA, through its testimony and briefs, established that the law requires PPL, as an EDC, to offer both net-metered service and a TOU rate to DCIDA. Moreover, DCIDA demonstrated that PPL's Pilot operated to exclude DCIDA, a net-metered customer, from its TOU rate option by divesting PPL of its obligation to offer TOU service and by offering a TOU rate only through EGSs, which do not have a legal obligation or economic incentive to offer net-metered service with a TOU rate. Accordingly, DCIDA sought to show the Commission that the Pilot Plan was unlawful.

On May 1, 2014, the Office of Administrative Law Judge issued the Recommended Decision ("R.D.") of ALJs Susan Colwell and Joel Cheskis. The R.D. adopted the Partial Settlement without modification and ordered PPL to file a tariff consistent with the Partial

Settlement for the Pilot TOU Program. Pursuant to 52 Pa. Code § 5.533 and the Secretary's letter, dated May 9, 2014, DCIDA respectfully submits the following Exceptions to the R.D.

II. EXCEPTIONS

A. Exception 1: The Recommended Decision erred by approving PPL's Pilot Plan, which failed to satisfy PPL's legal obligation to provide a TOU rate option to DCIDA, a net-metered PPL customer.

The R.D. concluded, in part, that PPL "sustained its burden of proving that the TOU Plan, as presented in the [Partial Settlement], is just, reasonable, and *compliant with applicable law*." R.D. at 30 (emphasis added). In fact, the Pilot Plan directly contravenes applicable law and the R.D. erred in adopting a Partial Settlement incorporating the Pilot.

As stated more fully in DCIDA's Main Brief ("M.B.") and Reply Brief ("R.B."), PPL has a legal obligation to provide a TOU rate option to DCIDA, a net-metered PPL customer. DCIDA M.B. at 9-12; DCIDA R.B. at 1-3. As DCIDA argued before the ALJs, Pennsylvania's Alternative Energy Portfolio Standards Act ("AEPS Act"), 73 P.S. §§ 1648.1 – 1648.8, and the Commission's implementing regulations mandate, without exception, that PPL as an EDC offer net-metered service to DCIDA, a customer-generator. *See* 73 P.S. §§ 1648.2, 1648.5; 52 Pa.Code § 75.13(a).[1] As a customer-generator operating in parallel with the electric grid, DCIDA is entitled to take net-metered service with PPL. Moreover, as a customer-generator, DCIDA must receive full retail value from the PPL for its excess power generation. *See* 73 P.S. § 1648.5. As such, PPL credits DCIDA for the power DCIDA produces in a given billing period and cashes out any excess kWh accumulated annually, pursuant to applicable law and PPL's Commission-approved tariff. *See* 52 Pa.Code. §§ 75.13(c) – (d); DCIDA M.B. at 3-4; PPL Elec. Stat. No. 2-R, pp. 13-14; Exh. JMR-5; DCIDA Stat. No. 1, pp. 3-6.

[1] Commission regulations provide that EDCs must offer net-metered service to customer-generators, while specifying that EGSs may offer such service. *See* 52 Pa.Code § 75.13(a).

Additionally, Act 129 of 2008 further obligates EDCs, like PPL, to offer TOU rates to customers with smart-meter technology, including net-metered customers. *See* 66 Pa.C.S. § 2807(f)(5); DCIDA M.B. at 10-11; DCIDA R.B. at 1-2. Like the net-metering requirement, this statutory provision is mandatory and contains no exceptions. Because neither of these legal frameworks contains exceptions, both mandates apply to PPL and PPL must offer TOU rates to customers taking net-metered service, without exception or exclusion. Indeed, as DCIDA pointed out to the ALJs, the Commission itself has, in the past, prohibited PPL from excluding net-metering customers from a proposed, optional TOU rate. *See Pa. P.U.C. v. PPL Electric Utilities Corporation*, Docket No. R-2009-2122718 (Order Entered March 9, 2010); DCIDA M.B. at 11; DCIDA R.B. at 2.

Despite being obligated to comply with the above-stated requirements, PPL proposed, and the R.D. approved, a Pilot whereby PPL divested DCIDA, a net-metered customer, of its TOU rate. The Pilot forces DCIDA either to elect to take service from an EGS if it wants to continue with a TOU rate or to take net-metered service from PPL at fixed price default rate. PPL Petition at 12-13; DCIDA M.B. at 12-16. This is so because EGSs do not have the same obligation as EDCs to offer net-metered service with a TOU rate, nor do they have any incentive to do so. Furthermore, PPL's Pilot does nothing to ensure that PPL or a participating EGS would purchase DCIDA's excess generation if DCIDA wanted to keep a TOU rate. This one-or-the other scenario ignores the applicable law spelled out above,[2] which requires that both options be available to DCIDA.

Nevertheless, the R.D. erred by adopting, without modification, the Partial Settlement incorporating the Pilot. Despite a passing reference to DCIDA's argument that PPL has a

[2] As detailed in DCIDA's Reply Brief, there is no validity to the argument that PPL is satisfying its statutory obligation by maintaining a portion of the TOU program, while representing it to be a whole program. *See* DCIDA R.B. at 3-5.

statutory responsibility to offer net-metered service with a TOU rate, the R.D. failed to address PPL's proposal in the context of all of applicable statutory and regulatory requirements in any meaningful way. To the extent the ALJs viewed these authorities as conflicting or believed one mandate to be more important or controlling than the other, the R.D. did nothing to explain that position or to reconcile PPL's non-compliant Pilot with the governing legal framework. Moreover, despite DCIDA's observation that the Commission previously concluded that PPL could not exclude net-metered customers from its TOU rate, the R.D. did not comment on that prior decision, nor did it explain why the reasoning stated therein no longer applies. The only former Commission case law or commentary that the R.D. addressed were those instances where the Commission suggested that EDCs using EGSs to offer TOU rates may be permissible. The R.D., however, failed to acknowledge or address the fact that, apparently, in none of those instances was the issue of exclusion of net-metered customers addressed.[3]

In short, the R.D. seems more targeted at arriving at the desired result of a "workable" TOU program than a program that fully complies with all applicable law. Effectively, the R.D. reasons that framing a compliant TOU program may be too difficult, so the Commission should simply accept this "honest effort" by PPL to overcome its pricing difficulties. R.D. at 29. Indeed, throughout these proceedings, PPL's dissatisfaction with its own Commission-approved tariff was manifest. Likewise, the ALJs made their desire to use this proceeding to arrive at a final program without the need for additional proceedings well known. R.D. at 3.

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[3] *See Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan*, Docket No. P-2012-2302074 (Order Entered January 24, 2013); *Investigation of Pennsylvania's Retail Electricity Market: Recommendations Regarding Upcoming Default Service Plans,* Docket No. I-2011-2237952 (Order entered December 16, 2011) (*December 16 Upcoming DSP Order*); *Petition of PECO Energy Company for Expedited Approval of its Dynamic Pricing Plan Vendor Selection and Dynamic Pricing Plan Supplement*, Docket No. P-2012-2297304 (Opinion and Order entered September 26, 2012). In these proceedings and commentary, the Commission did not address the impact on net-metered customers or how an EDC may fail to comply with its obligations.

Convenience, difficulty in developing a compliant program, or the subjective preferences of PPL or the Commission, however, are not valid bases for releasing PPL from its legal obligation to provide net-metered service together with a TOU rate. Whatever the views of the parties or the Commission may be with respect to the applicable legal framework, legislative action, not Commission action, would be needed to render compliance with the applicable legal principles discretionary, rather than mandatory.

The R.D. simply observed that this case illustrates that "the policy objectives of rate reduction and renewable energy promotion may not always be compatible." R.D. at 28. The R.D. reasons that it is "clear" that the "legislature did not intend to create a system whereby one party realized financial gain at the expense of other ratepayers when requiring that EDCs with smart meter capability use that capability to offer a TOU or real-time price to its customers, as the default service statute requires that the EDC provide adequate and reasonable service by obtaining a prudent mix of contract to obtain least cost results." R.D. at 28-29. The statutes and applicable regulations, however, are clear. Neither the mandate to offer TOU rates, nor the requirement to offer net-metered service contains any applicable exceptions. Absent action by the General Assembly, these laws on their faces require PPL to offer net-metered service with a TOU rate to DCIDA. That legal obligation, deriving directly from positive statutory law, cannot be shrugged off. The Commonwealth Court has reversed Commission decisions that ignored plain statutory language in favor of attempting to divine some legislative intent to justify the desired outcome of a case. *See Pennsylvania Power Company v. Public Utility Commission*, 932 A.2d 300, 308 (Pa. Cmwlth. 2006) (reversing a Commission decision where the Commission improperly engaged in a legislative intent analysis instead of applying the AEPS Act's plain language).

By adopting the Partial Settlement, the R.D. moved PPL from a compliant TOU program under a Commission-approved tariff to a TOU program that conflicts with the plain language of applicable statutes, regulations, and at least one prior Commission decision by excluding DCIDA, a net-metered customer, from any TOU rate offering. More to the point, the R.D. took this action without any substantive effort at construing the above-stated rules in a manner that would justify its decision or at distinguishing its earlier case law forbidding PPL from excluding net-metered customers from a TOU rate. The R.D., therefore, is in error and the Commission should decline to adopt it.

B. Exception 2: The Recommended Decision erred in adopting the Partial Settlement based on its conclusion that the issue of whether an EGS will offer TOU rates is not ripe.

Instead of interpreting or distinguishing the applicable provisions of law in such a manner as to justify its decision, the R.D. brushed aside DCIDA's concerns that DCIDA would be excluded from a TOU rate and that the Pilot would be unlawful because no EGS would offer a TOU program to net-metered customer generators. Instead, the R.D. concluded that the issue was not ripe for determination. Effectively, the R.D. seemed to concede that net-metered customers must have a TOU rate available to them in that the R.D. states, "[t]he concern that no EGS would offer net metering services has not yet come to fruition, as there is no experience with EGS-related TOU plans in the PPL service territory" and, therefore, "[t]here is no reason to assume that no EGS would seek to fill this *need*." R.D. at 28 (emphasis added). The Pilot does not satisfy this need and PPL, accordingly, has not carried its burden of proposing a lawful TOU plan.

Despite its acknowledgment of the need of EGS to offer net-metered service with a TOU rate, the R.D. simply dismisses any concern regarding this issue by observing that the issue is not

yet ripe because no EGS has refused to offer such a product. This is akin to allowing hospitals to turn away patients because it is "not yet proven" that the patient will be turned away by all other health care providers. The record here demonstrates that no EGS has declared its intent to offer net-metered service with a TOU rate and the R.D. failed to point to even a hint of evidence in the record that an EGS will offer such a product. Indeed, as DCIDA observed throughout its Main Brief, EGSs have neither a legal obligation nor economic incentive to offer net-metering. *See* M.B. at 8, 12. Similarly, PPL failed to include any default provision whereby PPL offers TOU rates to net-metered customers if no EGS elects to do so.

The parties to this proceeding evidently do not believe that an EGS would offer such a program, as demonstrated by their strict opposition to including such a requirement as eligibility criteria for EGS participation in the Pilot on the grounds that it would bar EGS participation altogether. *See generally* PPL Petition (expressly refusing to include eligibility criteria requiring EGSs to offer net-metered service with a TOU rate); PPL Stat. No. 2-R, p. 16; R.D. at 24-25 (citing FES Stat. in Support at 4, and recounting First Energy Solutions' position regarding EGS offerings). Moreover, PPL has not proven that any EGS will provide a net-metered service with a TOU rate and there is no basis whatsoever in the record to support the belief that any will.

Declining to require EGSs to offer net-metered service with a TOU rate (or to provide for such an offering from PPL in lieu of an EGS election to do so) and attempting to dismiss any concerns on ripeness grounds was illogical and an error. First, from a policy or logic based viewpoint, it makes little sense to approve a program that violates the law, where safeguards could have been put in place from the program's inception. Accordingly, at the very least, the R.D. should have required PPL to include as eligibility criteria for EGS participation in the Pilot Program, that the EGS offer net-metered service with a TOU rate, regardless of the difficulty in

garnering EGS participation in the Pilot. Second, EGSs must offer net-metering in order for the proposed program to comply with the applicable law. To the extent the R.D. did not require such an offering as part of the eligibility criteria for EGS participation in the Pilot, the Commission will approve a program that fails to comply with relevant legal mandates and, therefore, is itself a violation of law.

The conclusion that the issue is not ripe for determination served as a significant basis for the R.D. and for the R.D.'s failure to analyze or distinguish the applicable laws in any meaningful way. This conclusion, however, was error and the Commission should, therefore, refuse to adopt the R.D.

C. Exception 3: The Recommended Decision erroneously seeks to assign a burden of proof to DCIDA, despite the fact that DCIDA made no proposal before the Commission.

The R.D. correctly recognized that the public utility has the burden of proof in this case. R.D. at 15, 30. The ALJs, however, went on to observe that a party proposing an adjustment to the utility's proposal or proffering a proposal of its own bears the burden of presenting some evidence or analysis tending to demonstrate the reasonableness of the adjustment. R.D. at 15. Here, the R.D. concludes that "DCIDA has not met its burden regarding its proposal." R.D. at 32.

First, by intervening in this proceeding, DCIDA was not offering a "proposal" of its own. The purpose of DCIDA's intervention was to protect its interests as a net-metered customer-generator and to point out to the Commission that PPL's Pilot contravened applicable law by divesting DCIDA, as a net-metered customer-generator, of its right to take a TOU rate. To the extent that the Commission is endeavoring to ascribe more to DCIDA's participation, and to rest

its decision on DCIDA's supposed failure to satisfy an applicable burden of proof, the R.D. is in error and should not be adopted.

Second, even if the burden of proof that the R.D. prescribes did apply, DCIDA respectfully submits that the evidence here overwhelmingly shows that DCIDA has satisfied the burden. A proposed adjustment to PPL's program that would make it legally compliant where it would otherwise directly contravene the law must be deemed reasonable. Accordingly, if, as the R.D. described, the burden on DCIDA was to rebut PPL's prima facie case, DCIDA did so handily by demonstrating that the Pilot does not meet statutory and regulatory requirements. A program must be considered unreasonable where it is unlawful and a proposal to bring such a program into compliance must be deemed reasonable. Accordingly, the R.D. erred in assigning this burden of proof to DCIDA and in determining that DCIDA failed to satisfy the alleged burden. Consequently, the Commission should refuse to adopt the R.D.

D. Exception 4: The Recommended Decision is inconsistent with the policy embodied in the Alternative Energy Portfolio Standards Act.

Throughout the proceedings before the ALJs, DCIDA demonstrated that the purpose behind its solar project was to position DCIDA the forefront of public investment in renewable energy resources in the Commonwealth and to obtain a return on its $2.5 million investment of public debt and generate revenue to facilitate its public purpose. DCIDA M.B. at 2, 16; DCIDA Stat. No. 1, pp. 3-6. DCIDA's goal comports with the clear intent of Pennsylvania's AEPS Act, i.e., to "encourage[ ] research, development and deployment of alternative energy systems." Implementation of Act 35 of 2007; Net Metering an Interconnection, L-00050174, Final Omitted Rulemaking Order, at p. 18. Indeed, in amending 52 Pa. Code § 75.13 of the regulations to conform to certain amendments to the AEPS Act, the Commission noted that customer-

generators, like DCIDA, must receive annual compensation for their excess generation in a manner that facilitates that purpose. *Id.*

DCIDA has elected to take part in the programs under PPL's current Commission-approved tariff that are best suited to achieve its goals. The R.D., by approving the Partial Settlement and Pilot, removed DCIDA's ability to do so by forcing it to choose either a TOU rate with an EGS or to remain a net-metered customer of PPL. This reduces any incentive and discourages continued investment in alternative energy systems where potential investors, including DCIDA, will fear that PPL and the Commission will simply divest them of their ability to obtain the best return on their investment simply because a utility is dissatisfied with its own Commission-approved tariff structure. DCIDA and similarly situated entities will hesitate to invest in renewable resources where a utility can simply obliterate their expectation of a return on investment. To conform to the policy goals of the AEPS Act, the Commission and PPL should be doing more to encourage the development of renewable energy projects.[4]

As approved by the R.D., the Pilot does not comport with the general policies embodied in the AEPS Act of encouraging investment in renewable resources and the R.D. erred by adopting the Partial Settlement. The R.D. seemed to justify the decision on the conclusion that "the policy objectives of rate reduction and renewable energy promotion may not always be compatible." R.D. at 28. Whether or not these policies are compatible, a legislative change or a shift in legislative policy would be needed for PPL's Pilot to be deemed legally compliant. Respectfully, it is not for the Commission to legislate this change here by approving an unlawful Pilot Plan.

[4] Note that, as fully stated in DCIDA's Main Brief, PPL's present compensation scheme for annual cash out of accrued excess generation is already suspect with respect to the purpose of the AEPS Act and the Commission's regulations. PPL's cash-out procedure fails to take into account the time period in which excess power was actually generated and delivered to the grid, which in the case of DCIDA is almost exclusively during peak daylight hours. DCIDA M.B. at 18.

Moreover, to the extent that the R.D. agreed with PPL's appeal to the alleged inequities of other ratepayers subsidizing DCIDA's solar operation, such an agreement is an unsound one to try to discount DCIDA's objection. R.D. at 29. The record here demonstrated that the impact that DCIDA's excess generation had on other ratepayers was minimal and that PPL enjoyed the benefits of the excess generation with respect to delivering locally generated solar power during periods of peak demand. M.B. at 13; N.T. 27-29, 32-35. Furthermore, if as a matter of policy a rate may be deemed invalid merely because it benefits one group of ratepayers at the expense of another group, then the Commonwealth's entire tariff-based structure would crumble, as it is rife with subsidies, both overt and subtle. Here, the Legislature requires support for alternative energy projects, and PPL's reluctance, while perhaps understandable, cannot defeat its duty.

To the extent, therefore, that the R.D. contravenes the general policy of the Commonwealth of encouraging investment in and development of renewable energy resources, the R.D. is in error and the Commission should decline to adopt it.

III. CONCLUSION

For the reasons set forth above, in DCIDA's Main Brief, and in DCIDA's Reply Brief, DCIDA respectfully submits that the Recommended Decision erred in adopting the Joint Petition for Settlement without modification. Accordingly, DCIDA respectfully requests that the Commission decline to adopt the Recommended Decision.

Respectfully Submitted,

SALZMANN HUGHES, P.C.

Date: May 29, 2014

By: _____

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