



COMMONWEALTH OF PENNSYLVANIA

June 30, 2014

**E-FILED**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Petition of PPL Electric Utilities Corporation for A Declaratory Order to Resolve Uncertainty Whether Certain Applicants Qualify as a Customer Generator Eligible to Participate in Net Metering  
Docket No. P-2014-2420902**

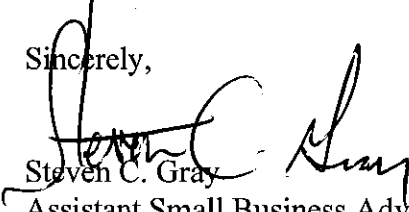
Dear Secretary Chiavetta:

I am delivering for filing today the Notice of Intervention, Verification, and Public Statement, on behalf of the Office of Small Business Advocate, in the above-captioned proceeding. As discussed with Commission staff, the legislatively-mandated Public Statement is included behind the Notice of Intervention.

Two copies have been served today on all known parties in this proceeding. A Certificate of Service to that effect is enclosed.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Steven C. Gray  
Assistant Small Business Advocate  
Attorney ID No. 77538

Enclosures

cc: Parties of Record  
Robert D. Knecht

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation** :  
**for a Declaratory Order to Resolve Uncertainty** : **Docket No. P-2014-2420902**  
**Whether Certain Applicants Qualify as a** :  
**Customer Generator Eligible to Participate in** :  
**Net Metering** :

**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

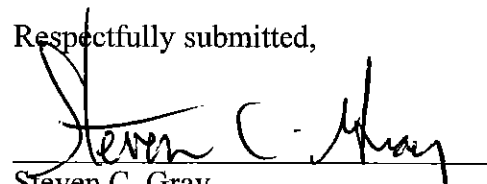
The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Petition of PPL Electric Utilities Corporation (“PPL” or the “Company”) for a Declaratory Order to Resolve Uncertainty whether Certain Applicants Qualify as a Customer Generator Eligible to Participate in Net Metering (“Petition”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on May 9, 2014. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Steven C. Gray, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, Pennsylvania 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
sgray@pa.gov

Respectfully submitted,



Steven C. Gray  
Assistant Small Business Advocate  
Attorney I.D. No. 77538

For:  
John R. Evans  
Small Business Advocate

Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101  
(717) 783-2525

Date: June 30, 2014

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation** :  
**for a Declaratory Order to Resolve Uncertainty** :  
**Regarding Whether Certain Applicants Qualify** : **Docket No. P-2014-2420902**  
**As a “Customer-Generator” Eligible to** :  
**Participate in Net Metering** :

**PUBLIC STATEMENT OF  
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of an Intervention in the above-captioned Commission proceeding.

On May 9, 2014, PPL Electric Utilities Corporation (“PPL” or the “Company”) filed a Petition for a Declaratory Order to Resolve Uncertainty whether Certain Applicants Qualify as a Customer Generator Eligible to Participate in Net Metering (“Petition”) with the Commission.

The Small Business Advocate is intervening in this proceeding in order to protect the interests of the Company’s small business customers. A thorough inquiry by the Commission into the issues raised by the Petition is necessary to ascertain whether the Company’s request for a declaratory order is just, reasonable, and nondiscriminatory.

In view of the foregoing, the Small Business Advocate will participate in the proceeding examining the Petition before the Commission.

Dated: June 30, 2014

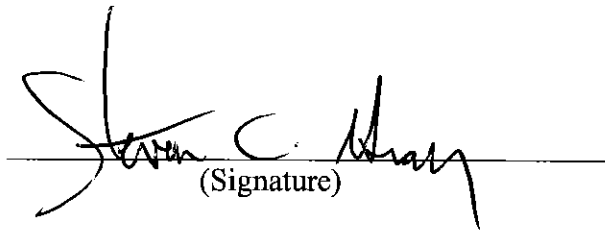
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation** :  
**for a Declaratory Order to Resolve Uncertainty** :  
**Regarding Whether Certain Applicants Qualify** : **Docket No. P-2014-2420902**  
**As a "Customer-Generator" Eligible to** :  
**Participate in Net Metering** :

**VERIFICATION**

I, Steven C. Gray, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: June 30, 2014

  
(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities Corporation** :  
**for a Declaratory Order to Resolve Uncertainty** :  
**Regarding Whether Certain Applicants Qualify** : **Docket No. P-2014-2420902**  
**As a "Customer-Generator" Eligible to** :  
**Participate in Net Metering** :

**CERTIFICATE OF SERVICE**

I certify that I am serving two copies of the Notice of Intervention, Verification, and Public Statement, on behalf of the Office of Small Business Advocate, by e-filing, e-mail, and/or first-class mail (unless otherwise noted) upon the persons addressed below:

Hon. Charles E. Rainey, Jr.  
Administrative Law Judge  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105  
(717) 787-1191  
(717) 787-0481 (fax)  
[crainey@pa.gov](mailto:crainey@pa.gov)  
**(E-mail and Hand Delivery)**

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[tmccloskey@paoca.org](mailto:tmccloskey@paoca.org)  
**(E-mail and Hand Delivery)**

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Sunrise Energy, LLC  
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Pittsburgh, PA 15220  
**(First-class Mail Only)**

Christopher T. Wright, Esquire  
Post & Schell  
17 North Second Street - 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
(717) 731-1970  
(717) 731-1995 (fax)  
[cwright@postschell.com](mailto:cwright@postschell.com)

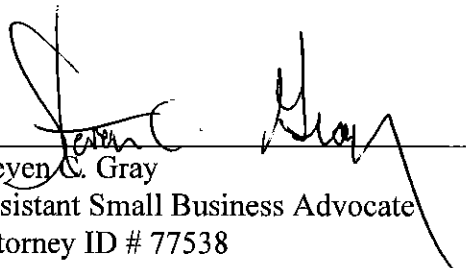
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**(First-class Mail Only)**

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Dated: June 30, 2014



Steven C. Gray  
Assistant Small Business Advocate  
Attorney ID # 77538