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September 2, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

RE: Petition of PPL Electric Utilities Corporation for Approval for a Distribution System Improvement Charge; Docket No. P-2012-2325034

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission are the Reply Exceptions of the PP&L Industrial Customer Alliance ("PPLICA") concerning the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Thank you.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By
Adeolu A. Bakare

Counsel to PP&L Industrial Customer Alliance

/lmc
Enclosure
c: Honorable Kandace F. Melillo (via e-mail and First Class Mail)
Certificate of Service (via e-mail and First Class Mail)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

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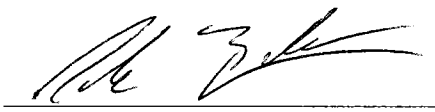

Adeolu A. Bakare

Counsel to PP&L Industrial Customer Alliance

Dated this 2nd day of September, 2014, at Harrisburg, Pennsylvania.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation for Approval for a Distribution System Improvement Charge	: : :	Docket No. P-2012-2325034

REPLY EXCEPTIONS OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE

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Dated: September 2, 2014

I. Introduction

On February 14, 2012, Governor Corbett signed into law House Bill 1294, or Act 11 of 2012 ("Act 11" or "Act"). Among other effects, Act 11 amended Chapter 13 of Title 66 of the Code, 66 Pa. C.S. §§ 1350, et seq., to allow the Pennsylvania Public Utility Commission ("Commission" or "PUC") to approve a Distribution System Improvement Charge ("DSIC") for Electric Distribution Companies ("EDCs").

On August 2, 2012, the Commission issued a Final Implementation Order setting forth the procedures for complying with the requirements of Act 11, and permitting EDCs to petition the Commission for a DSIC beginning January 1, 2013.[1]

On January 15, 2013, PPL Electric Utilities Corporation ("PPL" or "Company") filed with the Commission Supplement No. 127 to Electric – Pa. P.U.C. No. 201, proposing to implement a DSIC.[2] On May 23, 2013, the Commission issued an Order approving PPL's DSIC effective July 1, 2013, but assigning several outstanding issues to the Office of Administrative Law Judge ("OALJ") for hearing and a recommended decision, including the application of PPL's DSIC to customers served by PPL's Rate Schedule LP-5 and the inclusion of certain riders in the distribution revenues used to calculate PPL's 5% cap on DSIC collections.[3]

An evidentiary hearing was held in this proceeding on October 29, 2013. Following the hearing, parties filed briefs addressing the issues reserved for litigation. Of relevance to these Reply Exceptions the PP&L Industrial Customer Alliance ("PPLICA") and PPL filed Main Briefs on November 26, 2013, with Reply Briefs following on December 20, 2013. Consistent

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[1] Implementation of Act 11 of 2012; Docket No. M-2012 -2293611, Final Implementation Order (Aug. 2, 2012) (hereinafter, "Implementation Order").
[2] Petition of PPL Electric Utilities Corporation for Approval of a Distribution System Improvement Charge; Docket No. P-2012-2325034 (hereinafter, "DSIC Petition").
[3] Petition of PPL Electric Utilities Corporation for Approval of a Distribution System Improvement Charge; Docket Nos. P-2012-2325034, et al., Opinion and Order (May 23, 2013) (hereinafter "May 23 Order").

with directives from Administrative Law Judge ("ALJ") Kandace F. Melillo, both PPLICA and PPL filed revised Main Briefs on April 3, 2014.[4] In response to PPLICA's revised Main Brief, PPL filed a revised Reply Brief, on April 10, 2014.[5]

On July 25, 2014, ALJ Melillo issued a Recommended Decision ("R.D.") recommending that the application of the DSIC to the LP-5 customer class be denied as unjust and unreasonable and that the inclusion of revenues from the Act 129 Compliance Rider ("ACR") and the Competitive Enhancement Rider ("CER") in the DSIC calculation be rejected as unjust and unreasonable. Consistent with the May 23 Order identifying all DSIC charges as subject to refund pending resolution of the litigated issues, ALJ Melillo further directed PPL to issue refunds for DSIC charges collected from LP-5 customers or due to inclusion of the ACR or CER within the calculation of PPL's 5% DSIC cap, retroactive to July 1, 2013.

On August 21, 2014, PPL filed Exceptions to the R.D. taking particular issue with the ALJ's recommendation to exclude the ACR and the CER from the calculation of the 5% DSIC cap.[6]

Pursuant to the schedule established by the ALJ, PPLICA hereby replies to the Exceptions of PPL.

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[4] PPLICA also filed a revised Reply Brief on May 1, 2014. This filing adopted only non-substantive revisions to conform the previously filed Reply Brief to the revised PPLICA Main Brief.

[5] All subsequent citations to PPLICA's Main and Reply briefs refer to the revised versions.

[6] PPL did not file Exceptions to the ALJ's recommendation to exclude Rate Schedule LP-5 customers from the DSIC. *See* PPL Exceptions, p. 1. As a result, PPL and PPLICA now agree that the LP-5 customers should not pay the DSIC.

II. REPLIES TO EXCEPTIONS

A. Reply to PPL Exceptions No. 1 and No. 2: The R.D. Applied the Correct Legal Standard to Determine that the ACR and CER are not Distribution Rates.

PPL's claim that the R.D. applied an incorrect standard when recommending the exclusion of ACR and CER revenues from the calculation of PPL's 5% DSIC cap is erroneous and should be rejected. The R.D. correctly: (1) observed that Act 11 allows applicable distribution rates to be used to calculate a utility's 5% DSIC cap; (2) determined that the terms "applicable" and "distribution rates" are undefined in the statute and therefore subject to Commission interpretation; and (3) concluded that PPL failed to prove that the ACR and CER are "applicable" distribution rates. *See* R.D., p. 58. As set forth in detail below, PPL fails to rebut the ALJ's statutory analysis. Therefore, the Commission should adopt the R.D. and issue an Order directing PPL to remove ACR and CER revenues from the calculation of the 5% DSIC cap and issue refunds directly related to such prior collections retroactive to July 1, 2013, to date.

i. The R.D. Applied the Correct Statutory Analysis.

A brief review of the R.D. and Pennsylvania's principles of statutory construction clarify that the R.D. properly construed the relevant provisions of Act 11. R.D., p. 58. To the contrary, PPL's alternative interpretation ignores well-established and codified principles of statutory construction. The Commission should consider the strong legal basis supporting the ALJ's application of Act 11 and uphold the R.D.

The R.D. properly identified the rates to be applied to calculate the 5% DSIC cap as "applicable rates of the water utility or distribution rates of the electric distribution company." R.D., p. 58. In assessing what the legislature intended by use of the words "applicable" and "distribution rate," the ALJ found that the terms are undefined in Act 11 and therefore subject to Commission interpretation consistent with the purpose of the Act. *Id. citing* 1 Pa. C.S. §

1921(c)(4). Referencing the Commission's Implementation Order, ALJ Melillo observed that the Commission applied the term "applicable" as a modifier of "distribution rates," meaning that distribution rates must meet an "applicability" standard for inclusion in a DSIC. R.D., p. 58. As such, the ALJ concurred with PPLICA Witness Richard Baudino and agreed that:

> Act 11, as codified at Section 1358(a)(i) of the Public Utility Code states: "except as provided under paragraph (2), the distribution system improvement charge may not exceed 5% of the amount billed to customers under the... distribution rates of the electric distribution company... ." "Distribution rates" are paid by customers for "distribution service," which is transmitting electricity to customers at distribution voltages. In my opinion, some of PPL's riders are unrelated to PPL's distribution services and should not be considered applicable riders for purposes of establishing PPL's DSIC revenues

See R.D., p. 49; *see also* PPLICA M.B., p. 14 *citing* PPLICA Stmt. No. 1, p. 5. Consistent with this well-supported statutory construction, the ALJ identified ample record evidence demonstrating that revenues from PPL's ACR and CER are not related to PPL's distribution services. *See* R.D, pp. 58-59.

To the contrary, PPL's application of Act 11 lacks any basis in law. PPL claims that the ALJ erred in excluding ACR and CER revenues because the Act states that "[T]he distribution system improvement charge may not exceed 5% of the amount billed to customers under the ... distribution rates of the electric distribution company." PPL Exceptions, p. 4. From this language, PPL reasons that the sole inquiry is whether ACR and CER revenues are "distribution rates" as referenced in the Act. *Id.* PPL then claims that because the ACR and CER meet the broad definition of "rates" set forth in Section 102 of the Public Utility Code and are billed by an EDC, both riders are "distribution rates" under Act 11. *Id.*

First, PPL ignores the fact that the term "distribution rate" as used in Act 11 must be distinguished from the term "rate," which Section 102 of the Public Utility Code defines "as every individual, or joint fare, toll, charge, rental or other compensation whatsoever of any

public utility." *See id.* The Pennsylvania rules of statutory construction require that each word in a statute be given effect, such that the term "distribution rate," as used in Act 11, must mean something more specific than the term "rate," as used in Section 102 of the Public Utility Code. 1 Pa. C.S. § 1922(2). The ALJ thus properly studied the types of riders that were contested below to confirm whether each rider was a "distribution" rate and properly concluded that neither the CER nor the ACR recover expenses for distribution services.

Second, PPL impermissibly draws an inference from language in Act 11 which directly conflicts with explicit statutory language in the Act. *See* PPL Exceptions, p. 8. PPL posits that all rates other than public fire protection and the State Tax Adjustment Surcharge ("STAS") should be included in the DSIC because only public fire protection and STAS were explicitly excluded from the 5% cap calculation under 66 Pa. C.S. § 1357(d)(2). *Id.* PPL argues that Act 11 prohibits the Commission from applying additional exemptions based on statutory construction principles barring courts from supplying omissions appearing to be intentionally omitted from a statute. *Id.* This argument is not applicable to Act 11 because, as set forth in the R.D., the Act unambiguously defers ratemaking matters to the Commission's expertise by establishing that: "[e]xcept as otherwise expressly provided under this subchapter, nothing under this subchapter shall be construed as limiting the existing ratemaking authority of the commission." R.D., p. 58 *citing* 66 Pa. C.S. § 1358(c). As the Act contains no explicit restrictions on excluding additional rates or riders from the 5% DSIC cap calculation if the rider does not qualify as a "distribution rate," the ALJ appropriately exercised discretion to interpret the undefined language in Act 11 consistent with the overall purpose of the Act and the Commission's Implementation Order. *See* R.D., pp. 58-59. PPL has not identified a credible legal basis supporting its claim that Act 11 excludes solely public fire protection and STAS

revenues from distribution rates. Accordingly, for the reasons stated above, the Commission should adopt the legal standard articulated by ALJ Melillo.

ii. The Fact that Other Riders Could Potentially be Excluded From the DSIC Cap Calculation Under the Legal Standard Adopted by the ALJ Should Not Disturb the Findings in the R.D.

In a further attempt to support its opposition to the R.D., PPL claims that the R.D. will result in an inconsistent application of its DSIC. PPL Exceptions, p. 5. The Company asserts that excluding ACR and CER revenues from the calculation of its 5% DSIC conflicts with allowing recovery of certain unidentified Operations and Maintenance ("O&M") expenses in tariffed distribution rates and the continued inclusion of certain other riders within the 5% DSIC cap calculation. *Id.* At most, PPL raises limited issues that should be considered for potential prospective refinements to its DSIC. This possibility of additional justified modifications to the DSIC does not change the fact that PPL failed to meet its burden of proving that ACR and CER revenues are applicable distribution rates under Act 11.

PPL's claim that some revenues associated with O&M expenses are unrelated to the DSIC lacks any evidentiary foundation and misrepresents the legal standard applied by the ALJ. PPL failed to produce the slightest indicia of record evidence to support its claim that any O&M expenses that are in its tariffed distribution rates are unrelated to distribution service. *See* PPLICA Exceptions, p. 5. Moreover, this allegation arises from an apparent misinterpretation of the relevant legal inquiry, which PPL deems to be whether costs to be included in the 5% DSIC cap calculation are "related to the DSIC." PPL Exceptions, p. 5.

By way of clarification, the ALJ did not require revenues to be "related to the DSIC" for inclusion in the 5% cap, but instead agreed with PPLICA that such costs must be related to "distribution service." *See* R.D., p. 58; *see also* PPLICA M.B., p. 15. As stated in PPLICA's

Main Brief, "the Act's limitation of DSIC revenue to "applicable" rates and charges restricts the scope revenue included in the calculation of PPL's DSIC cap to rates and charges *sufficiently related to PPL's distribution services.*" PPLICA M.B., p. 15 (Emphasis added). PPL emphasizes the ALJ's reference to the definition of eligible property in the Implementation Order, but fails to acknowledge that the ALJ cited this language only to support the legal standard requiring that revenue applied to the 5% DSIC cap calculation relate to distribution services, including both costs directly related to distribution plant and costs related to distribution services. *See* PPL Exceptions, p. 5. The ALJ did not articulate a new standard limiting the calculation of PPL's 5% DSIC cap to revenue from DSIC-eligible plant, as this standard would be redundant and could omit revenues from various services that are related to PPL's distribution system. *Cf.* PPL Exceptions, p. 15 n. 1.

The Commission should also reject PPL's argument that designating the ACR and CER as non-distribution related riders cannot be reconciled with the inclusion of the Smart Meter Rider ("SMR") revenues in the 5% DSIC cap calculation. PPL attempts to analogize the SMR to the non-distribution-related ACR and CER because the Implementation Order excludes all meters funded by the SMR from DSIC-eligible property. *See* PPL Exceptions, p. 5. PPL's analogy is based on a flawed interpretation of the ALJ's R.D. as requiring that a charge collect the cost of DSIC-eligible property in order to be an "applicable" "distribution rate." *See id.* As explained above, this was not the basis for the ALJ's exclusion of the ACR and CER. As set forth in the R.D. and additionally discussed in PPLICA's Main Brief, the SMR is directly related to distribution plant because it funds installation of distribution meters and is thereby easily distinguished from the ACR and CER, which target generation-related services. *See* R.D., p. 49 n. 21 *citing* PPLICA Stmt. No. 1, p. 6. PPL raises a separate question, which is whether

distribution-related plant funded by another mechanism should also be excluded from the calculation of the 5% DSIC cap. PPL Exceptions, p. 5. Although PPLICA did not advocate for this modification, PPLICA would welcome this further refinement to the DSIC and would not oppose Commission efforts to further investigate or consider this question.

PPLICA did not take a position on whether the USC is a distribution-related charge and would not oppose further Commission investigation or consideration of this question. Large C&I customers do not pay the USC and, as such, PPLICA declined to expend its resources to determine whether the USC is a distribution rate. *See* PPLICA Stmt. No. 1, p. 7. However, the fact that additional riders beyond those challenged by PPLICA may also be properly excluded as non-distribution plant is not inconsistent with the ALJ's decision to immediately exclude the ACR and CER riders from the 5% DSIC cap calculation. If PPL or any other party desires further review of the applicability of riders other than those specifically challenged by PPLICA in this docket, these issues can be prospectively resolved through other proceedings.

iii. The ACR and CER are Not Distribution Rates for Purposes of Act 11.

In alleging that the R.D. applied an incorrect legal standard, PPL misunderstands the basis of the ALJ's findings. PPL continually argues that excluding the ACR and CER because they are non-bypassable riders creates an arbitrary distinction between riders and base rates. *See* PPL Exceptions, p. 6. As set forth in the R.D., the basis for excluding the ACR and CER has no bearing on the method of cost recovery, but is rather drawn from the underlying purpose of the charge. R.D., p. 58. PPL has not met its burden of proving that the ACR and CER are applicable distribution rates under Act 11 or the Implementation Order.

PPL's Exceptions restate exactly the same arguments properly rejected by the R.D. PPL claims that the ACR and CER are "clearly" not associated with generation and transmission

because the rates are bypassable and not paid by shopping customers. PPLICA Exceptions, p. 9. The Company alleges that both charges are issued by the EDC, recovered from distribution customers, and identified as distribution charges on each customer's bill. *Id.* at 10. The R.D. rejected these claims and concurred with the following analysis from PPLICA Witness Richard Baudino:

> [u]nder the proposed DSIC, any charge paid by distribution customers on a non-bypassable basis has been included in PPL's calculation of its DSIC cap. This formula is overly broad. In an unbundled rate environment, it is inappropriate to assume that all non-bypassable charges are for "distribution service." Rather, the purpose of each rider must be considered individually.

PPLICA M.B., p. 14 *citing* PPLICA Stmt. No. 1, p. 5; *see also* R.D., p. 59. As such, the ALJ properly declined to limit the relevant analysis to the billing methodology, but rather, agreed with PPLICA that "it is appropriate to further scrutinize whether the revenues to be included are sufficiently related to the distribution services." *See* R.D., p. 59; *see also* PPLICA M.B., p. 17.

As stated in the R.D., PPL has not shown that the ACR and CER are sufficiently related to the distribution system. R.D., p. 59. PPL argues that the ACR and CER target distribution customers and recover costs for educating distribution customers. *See* PPL Exceptions, pp. 9-10. However, PPL erroneously characterizes Act 129 as a program developed to "reduce the total amount of electricity distributed to end-use customers." *Id.* at 10. As more accurately described in the R.D., the "ACR recovers expenses associated with end-user consumption conservation programs and not distribution plant." R.D., p. 59. As further observed by PPLICA Witness Richard Baudino, "the fact that the General Assembly directed PPL to administer a program targeting peak load reductions does not transform peak load reduction services into a component of distribution service." PPLICA M.B., p. 17. Similarly, the education funded by the CER exclusively advises customers about opportunities to obtain electric supply services from

competitive EGSs. *See* R.D., p. 59; *see also* PPLICA M.B., p. 16. Therefore, both the ACR and CER are supply-related rates, despite the fact that the billing mechanism is administered by an EDC.

B. Reply to PPL Exception No. 3: Any State-Wide Effects of Applying the R.D.'s Construction of Act 11 are Necessary and Appropriate for the Protection of Customers.

PPL claims that the exclusion of its riders from the calculation of the 5% DSIC cap will have a significant state-wide impact and cautions the Commission of the far reaching repercussions of "adopting the incorrect legal standard relied upon in the R.D." PPL Exceptions, p. 13. As set forth above, the R.D. applied the correct legal standard established by Act 11 and the Implementation Order. PPL argues that excluding certain riders would limit EDCs' ability to fund infrastructural repairs and replacements, but ignores the fact that Act 11 intended the DSIC to serve as a limited tool used to accelerate cost recovery between base rate proceedings. Correcting the 5% DSIC cap calculation consistent with the language in Act 11 and the Implementation Order would reduce the total DSIC revenues available to utilities, but the DSIC would still meet its intended purpose of providing an opportunity to fund significant infrastructural investment between base rate filings.

PPL argues that Act 11 was intended to provide utilities with financial incentive to undertake expensive repair and replacement programs for distribution infrastructure. *See* PPL Exceptions, p. 13. PPL reasons that in order for this incentive to be effective, the DSIC cap must not be set so low as to cause the DSIC to become ineffective at meeting the financial needs of the utilities. *Id.* According to PPL, excluding additional riders from the 5% DSIC cap calculation would force EDCs to "reduce, delay or abandon their planned investment in infrastructure repair

and replacement." *Id.* at 13-14. These characterizations of the DSIC and the impacts of excluding riders are incorrect.

The DSIC represents a departure from the normal ratemaking process for EDCs and, as evidenced by the customer safeguards set forth in Act 11, is intended to provide only a limited source of additional revenue between base rate proceedings. *See* 66 Pa. C.S. § 1358. PPL, and all EDCs, have a duty to provide safe adequate and reliable service. 66 Pa. C.S. § 1501. That duty is a cornerstone of public utility service and predates Act 11. *See id.* Act 11 was intended to serve as a limited tool to allow EDCs to adopt specific and enforceable Long Term Infrastructure Improvement Plans and, in return, provide the utility with some financial relief from having to file frequent base rate cases to place the new distribution plant into base rates in order to earn a return on the investment. It does not, however, eliminate the utility's obligations to provide safe, adequate and reliable service, nor does it condition those obligations on the existence of the DSIC.

In addition, PPL's allegations that excluding riders would cause the DSIC to be "immediately ineffective at meeting the financial needs of utilities" are greatly exaggerated. *See* PPL Exceptions, p. 13. As set forth in PPLICA Stmt. No. 1, Exhibit__(RAB-6), PPL previously projected revenues for the period May 2013 through December 2013 as follows:

Customer Class	**Base Rates**	**ACR**	**CER**
Large C&I	$22,565,799	$9,544,720	$847
Small C&I	$145,051,531	$23,972,144	$125,728
Residential	$342,071,358	$19,233,796	$791,198
Total	$509,688,688	$52,750,660	$917,773

See PPLICA Stmt. No. 1, Exhibit__(RAB-6). PPL's 2013 revenue projections clearly indicate that excluding ACR and CER revenues from the 5% DSIC cap calculation cannot substantially impede the effectiveness of PPL's DSIC or render the mechanism "immediately ineffective." *Cf.* PPL Exceptions, p. 13. Additionally, PPLICA submits that any effects on existing DSICs approved for other utilities is a secondary consideration and should not take precedence over the necessity to properly construe the directives and customer protections in Act 11.

For the reasons set forth above, the Commission should adopt the R.D.'s directive to prohibit PPL from applying ACR and CER revenues to the calculation of its 5% DSIC cap and require the Company to issue refunds associated with prior inclusion of both riders retroactive to July 1, 2013.

III. CONCLUSION

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that the Pennsylvania Public Utility Commission:

(a) Deny the Exceptions of PPL Electric Utilities Corporation;

(b) Adopt the Recommended Decision issued by ALJ Kandace F. Melillo;

(c) Order PPL Electric Utilities Corporation to cease incorporating revenues from the ACR and CER into the calculation of its 5% DSIC cap; and

(d) Direct PPL Electric Utilities Corporation to issue refunds retroactive to July 1, 2013, for DSIC collections directly related to inclusion of ACR and CER revenues into the calculation of its 5% DSIC cap.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By _____

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Dated: September 2, 2014