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May 8, 2015

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

VIA ELECTRONIC FILING

**RE: PP&L Industrial Customer Alliance v. PPL Electric Utilities Corporation;
Docket Nos. C-2013-2398440 and C-2013-2398442**

Dear Secretary Chiavetta:

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

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By

Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

c: Administrative Law Judge Susan D. Colwell (via Email and First-Class Mail)
Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PP&L Industrial Customer Alliance	:	PA.P.U.C.
	:	SECRETARY'S BUREAU
v.	:	C-2013-2398440
PPL Electric Utilities Corporation	:	
PP&L Industrial Customer Alliance	:	
	:	
v.	:	C-2013-2398442
PPL Electric Utilities Corporation	:	

**PETITION FOR RECONSIDERATION OF THE
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Pursuant to Sections 703(f) of the Pennsylvania Public Utility Code, and Section 5.572 of the Pennsylvania Public Utility Commission's ("PUC" or Commission") regulations, the PP&L Industrial Customer Alliance ("PPLICA") files this Petition for Reconsideration of the Opinion and Order of the Commission entered April 23, 2015, in the above-captioned proceeding ("Petition"). 66 Pa. C.S. § 703(f); 52 Pa. Code § 5.572.

I. INTRODUCTION

1. On April 23, 2015, the Commission issued a Final Order addressing Complaints regarding PPL's Phase I and Phase II Act 129 Compliance Riders ("ACR-1," "ACR-2," collectively "ACRs") filed by PPLICA on December 23, 2013, at the above-captioned dockets ("ACR Order"). PPLICA's Complaints requested that the Commission suspend, investigate, and as necessary, refund rate increases implemented on November 1, 2013, pursuant to Supplement No. 139 to PPL Tariff – Electric Pa. P.U.C. No. 201, Docket No. M-2009-2093216 (Oct. 22,

2013) ("Supplement No. 139")¹ and Supplement No. 140 to PPL Tariff – Electric Pa. P.U.C. No. 201, Docket No. M-2012-2334388 (Oct. 22, 2013) ("Supplement No. 140").² The ACR Order granted one count of PPLICA's Complaint to Supplement No. 139 and denied the remaining requests for relief. This Petition for Reconsideration requests that the Commission: (1) reconsider its finding that the record in this proceeding fails to demonstrate whether PPL fully knew the extent to which its actual GNI expenses incurred for each customer class exceeded its initial projections; (2) order refunds of the Phase I Large Commercial & Industrial ("C&I") GNI costs in excess of PPL's initial 1% allocation; and/or (3) order refunds for the total GNI program expenses incurred in excess of PPL's GNI sector budget.

2. The ACR Order provided a general summary of the relevant procedural history and is incorporated herein by reference.³ As summarized in further detail therein, Supplement No. 139 proposed two changes to the Phase I ACR on ten days notice. First, Supplement No. 139 proposed to revise PPL's Phase I costs to modify the costs allocated to each customer class under the Company's Phase I Energy Efficiency and Conservation ("EE&C") Plan. This revision was caused by PPL's distribution of grants to GNI accounts in the Large C&I customer class in excess of its Commission-approved allocation for the Plan and failure to accurately reflect actual GNI costs in its Phase I end-of-phase reconciliation. Additionally, Supplement No. 139 proposed to correct the billing demands for Large C&I customers, following PPL erroneously calculating the ACR-1 reconciliation charges effective as of June 1, 2013, based on customers' monthly billing demand data instead of the appropriate PJM Peak Load Contribution ("PLC") data.

¹ The Commission's Secretary subsequently assigned Supplement No. 139 to Docket No. M-2013-2389549.

² The Commission's Secretary subsequently assigned Supplement No. 140 to Docket No. M-2013-2389551.

³ See DSIC Order, pp. 1-8.

3. Supplement No. 140, also on ten days notice, proposed to revise PPL's Phase II ACR to reflect a new allocation of the Company's Phase II EE&C Plan cost for GNI programs that was consistent with the actual GNI grants that PPL paid during the Company's Phase I EE&C Plan. Additionally, Supplement No. 140 proposed to correct the billing demands for Large C&I customers, following PPL erroneously calculating the ACR-2 effective as of June 1, 2013, based on customers' monthly billing demand data instead of the appropriate PLC data.

4. On October 31, 2013, the Commission issued Secretarial Letters permitting Supplement Nos. 139 and 140 to take effect on November 1, 2013. See *PPL Electric Utilities Corporation Act 129 Compliance Rider – Phase I*, Secretarial Letter, M-2013-2389549 (November 1, 2013) ("Supplement No. 139 SL"); *PPL Electric Utilities Corporation Act 129 Compliance Rider – Phase II*, Secretarial Letter, M-2013-2389551 (November 1, 2013) ("Supplement No. 140 SL").

5. On December 23, 2013, PPLICA filed individual Complaints to Supplement Nos. 139 and 140 requesting that, *inter alia*, the Commission suspend and investigate Supplement Nos. 139 and 140.

6. Following the Commission's assignment of PPLICA's Complaints to the Commission's Office of Administrative Law Judge ("OALJ"), PPLICA pursued its Complaints through full litigation. In addition to PPL, the Office of Consumer Advocate ("OCA") and Office of Small Business Advocate ("OSBA") intervened in the proceeding.

7. On May 23, 2014, PPLICA submitted PPLICA Statement No. 1, Direct Testimony of Jeffry Pollock ("PPLICA Stmt. No. 1") and PPLICA Statement No. 2, Direct Testimony of Michael K. Messer ("PPLICA Stmt. No. 2"). On June 13, 2014, PPLICA received PPL Statement No. 1, Direct Testimony of Peter D. Cleff ("PPL Stmt. No. 1") and PPL

Statement No. 2, Direct Testimony of Bethany L. Johnson ("PPL Stmt. No. 2"). On July 1, 2014, PPLICA submitted PPLICA Statement No. 3, Rebuttal Testimony of Jeffry Pollock ("PPLICA Stmt. No. 3"). Finally, on July 15, 2014, PPLICA received PPL Statement No. 3, Surrebuttal Testimony of Peter D. Cleff ("PPL Stmt. No. 3").

8. Following evidentiary hearings, PPLICA filed Main and Reply Briefs on September 9, 2014 and October 14, 2014 respectively. PPL filed a Response Brief on September 30, 2014. On December 24, 2014, the presiding Administrative Law Judge ("ALJ") entered a Recommended Decision ("R.D.") denying PPLICA's Complaints and finding that PPL implemented Supplement Nos. 139 and 140 consistent with its tariff, Act 129, and the Commission's EE&C Implementation Orders.

9. PPLICA filed Exceptions on January 13, 2015, requesting that the Commission reverse the R.D., suspend Supplement Nos. 139 and 140, and order refunds of all GNI sector costs paid to Large C&I customers in excess of PPL's original allocation or, alternatively, order refunds of all GNI sector cost incurred in excess of PPL's total budgeted costs for the GNI sector. PPL filed Replies to PPLICA's Exceptions on January 23, 2015.

10. Following review of parties' Exceptions and Replies, the Commission entered the ACR Order. The Commission's Order denied PPLICA's Complaints on all counts, but one, concurring solely with PPLICA's contention that PPL should have filed a Major Plan Change Petition to recover Phase I GNI revenues in excess of its total GNI sector budget. In denying PPLICA's request to order refunds for all GNI sector revenues shifted from the Residential and Small C&I customer classes to the Large C&I customer class, the Commission determined that the record evidence set forth in this proceeding failed to show whether PPL knew the degree to

which its initially projected GNI customer class costs departed from the actual GNI costs that PPL was paying to each customer class.

11. PPLICA is concerned that the Commission overlooked key facts in finding that the evidentiary record was not clear as to the extent to which PPL knew that actual GNI Large C&I expenses far exceeded initial projections. The willful actions of PPL in ignoring the class-based divergences of its expenditures warrants granting PPLICA's Complaint with respect to the ACR-1, and ordering refunds to the Large C&I class. Additionally, PPLICA requests that the Commission reconsider its decision to withhold refunds for the component of the \$7.7 million of PPL's GNI sector expenses incurred in excess of the Company's total \$21 million GNI sector cap.

12. To address the issues noted above and discussed more fully herein, PPLICA respectfully submits this Petition for Reconsideration of the ACR Order.

II. LEGAL STANDARDS

13. Section 703(f) of the Public Utility Code authorizes the Commission to reopen the record in a proceeding to clarify or reconsider a prior Order.⁴ Similarly, Section 5.572 of the Commission's Regulations sets for the procedures for petitioning for reconsideration of a Commission Order.

14. The Commission enumerated its standard for reconsidering orders in *Duick v. Pennsylvania Gas and Water Co.*, 56 Pa. P.U.C. 553, 559 (1982). In pertinent part, the Commission stated that a "petition for reconsideration, under the provisions of 66 Pa. C.S. § 703(g), may properly raise any matters designed to convince the Commission that it should exercise its discretion under this code section to rescind or amend a prior order in whole or in part," and that the Commission "expect[s] to see raised in such petitions... new and novel

⁴ See 66 Pa. C.S. § 703(f).

arguments, not previously heard, or considerations which appear to have been overlooked or not addressed by the Commission." *Id.*

15. PPLICA submits that each argument or consideration set forth in this Petition is either new and novel, was overlooked, or not addressed by the Commission in rendering the DSIC Order. Therefore, the standards of *Duick* have been satisfied, and PPLICA respectfully requests that the Commission exercise its discretion to grant this Petition for Reconsideration and issue a new or amended order incorporating the changes discussed herein. PPLICA also reserves the right to pursue an appeal of any and all issues previously raised in its briefs or Exceptions, regardless of whether those items are discussed herein.

III. ARGUMENT

A. **PPLICA Met its Burden of Proof In Showing that PPL Knew of the Divergence of the Actual GNI Expenses Incurred On Behalf of Large C&I Customers and the Originally Projected GNI Expenses to be Incurred On Behalf of Large C&I Customers.**

16. PPLICA requests reconsideration of the Commission's determination that record evidence in this proceeding failed to establish, beyond a preponderance of a doubt, that PPL knew the degree to which its actual GNI expenses for the Large C&I class exceeded its originally budgeted GNI costs. The Commission's findings on this matter fail to reflect the evidentiary record or the burden of proof standard adopted in the ACR Order. Uncontested record evidence shows that the initial allocation of PPL's GNI costs was developed by the Company, approved by the Commission, and made part of the public record. As further confirmed by the record, PPL's monthly GNI expenses for Large C&I customers exceeded 40% of total GNI expenses in almost every month the Phase I Plan dating back to Program Year ("PY") 1. The record also affirms that PPL tracked all GNI expenses by customer class throughout the Phase I Plan. On the whole, these undisputed record facts constitute substantial evidence showing PPL's knowledge of the

extent to which GNI sector expenses exceeded initial projections. Accordingly, PPLICA requests that the Commission reconsider the ACR Order as necessary to reverse this determination and order appropriate refunds to Large C&I customers.

17. The ACR Order established the burden of proof applicable to PPLICA's presentation of evidence. Specifically, the Commission ruled that PPLICA bears the burden of proof in this proceeding and therefore must substantiate any allegations "by a preponderance of the evidence." ACR Order, p. 18. The Commission further described the requisite evidentiary presentation as follows:

That is, PPLICA's evidence must be more convincing, even by the smallest amount, than that presented by PPL. Additionally, this Commission's decision must be supported by substantial evidence in the record. More is required than a mere trace of evidence or a suspicion of the existence of the evidence of a fact sought to be established.

Id. PPLICA hereby avers that consideration of the preponderance of evidence standard warrants reconsideration of the ACR Order. Contrary to the Commission's statements, the evidentiary record contains substantial evidence supporting a finding that PPL knew the extent to which its actual GNI expenses attributable to the Large C&I customer class exceeded initial projections.

18. Undisputed record evidence in this proceeding demonstrates that PPL knew the extent to which actual GNI expenses incurred on behalf of the Large C&I customer class exceeded the initial projections. As acknowledged in the ACR Order, PPL assigned set rates for the Phase I EE&C Plan "based on an estimated GNI cost allocation of approximately 14% to the Residential class, 85% to the Small C&I class, and 1% to the Large C&I class." ACR Order, p. 6. This initial allocation was approved as part of PPL's Phase I Plan and therefore made part of the public record. *See id.*

19. Additionally, the record confirms that PPL paid approximately 40% of total GNI expenses to accounts in the Large C&I class in almost every month of the Phase I EE&C Plan. Based on discovery responses provided by PPL, PPLICA's Witness, Jeffrey Pollock, compiled a detailed spreadsheet comparing the Company's total GNI expenses to the GNI expenses incurred on behalf of Large C&I customers. *See* PPLICA Stmt. No. 1, Exhibit JP-1 (attached hereto as Appendix A). As set forth therein, PPL incurred approximately 40% of its total monthly GNI costs on behalf of Large C&I customers in every month between October 2010 and August 2013. *See* PPLICA R.B, p. 14. Importantly, the R.D. also made the following findings of fact confirming that PPL's GNI expenses for the Large C&I customer class remained at 40% throughout the duration of the Phase I Plan:

22. In 2010, PPL's total cumulative GNI expenses for Large C&I customers was \$1.3 million or 46.1% of total GNI expenses. PPLICA Stmt. 1, Exhibit JP-1.

23. In 2011, PPL's total cumulative GNI expenses for Large C&I customers was \$4.3 million or 39.7% of total GNI expenses. PPLICA Stmt. 1, Exhibit JP-1.

24. In 2012, PPL's total cumulative GNI expenses for Large C&I customers was \$7.1 million or 42% of total GNI expenses. PPLICA Stmt. 1, Exhibit JP-1.

25. In 2013, PPL's total cumulative GNI expenses for Large C&I customers was \$9.3 million or 42.6% of total GNI expenses. PPLICA Stmt. 1, Exhibit JP-1.

R.D., p. 7 (Findings of Fact 22-25). PPL did not except to the R.D. and the Commission adopted the Findings of Fact in the ACR Order. *See* ACR Order, p. 11. As such, the record clearly unequivocally shows that even the most cursory review of PPL's GNI payments by customer class, at any point during Phase I, would consistently show a substantial deviation between the

Company's initial 1% projection for the Large C&I share of PPL's GNI expenses and the amount actually paid to Large C&I accounts.

20. The Company cannot credibly claim to have monitored actual GNI sector expenses on a customer class level and yet disclaim knowledge of the consistent divergence between the 1% projected Large C&I share of GNI expenses and the actual 40% share paid throughout the Phase I Plan. The record affirms that PPL personnel actively tracked the Company's incurrence of GNI sector expenses for each customer class throughout the Phase I Plan. Cross-examination of a PPL witness elicited the following confirmation of the Company's ongoing monitoring practices:

Q. So... [text omitted] you may not have compared the large C and I GNI program costs to the residential and small C and I program costs[?]

A. We were managing the GNI budget in aggregate. So, we knew how much authorized GNI expenditures we had in the EE and C plan for each program, and we were looking at actual costs compared to our GNI budget. We were tracking the GNI costs to a customer class level, but we were not comparing them to any revenue collected for those customer classes within GNI, because that is something we only do at the end of the phase.

Q. Can you please explain the distinction between "tracking" and "comparing"?

A. **By tracking, I mean we are collecting the cost information and assigning it to a proper account, which is by program and also by rate class, customer class.** We're tracking those transactions by putting them in the right customer account or classification of account.

Tr. 111-112 (Emphasis added); *see also* PPLICA M.B., pp. 19-20. As evidenced by the above excerpt, Mr. Peter Cleff, PPL's Manager of Energy Efficiency Evaluation and Performance, regularly tracked PPL's incurrence of GNI expenses by customer class, meaning that the Company at all times had knowledge that it was incurring approximately 40% of total GNI expenses on behalf of Large C&I customers. *See id.*; *see also* PPL Stmt. No. 1, p. 1 (confirming

Mr. Cleff's title with PPL). PPL clearly had knowledge of its 1% initial allocation of GNI expenses to Large C&I customers, as it was developed and proposed by PPL before the Commission. PPL is the entity in charge of its EE&C Plans. Therefore, with regard to the Phase I Plan, its employees must communicate with each other to ensure that the Plan is being implemented consistent with the Act 129 and the Commission's directives. PPL's EE&C Plan implementation team failed to do so here, and the Company must bear the consequences of that failure. Viewed in the appropriate context, the record evidence confirms that PPL had knowledge that it was consistently incurring approximately 40% of GNI sector costs on behalf of Large C&I customers throughout the duration of the Phase I Plan, significantly exceeding the Company's initial 1% projection.

21. Taken as a whole, PPLICA has produced substantial un rebutted evidence affirming that PPL had knowledge of both the initial 1% projection of GNI expenses to be incurred on behalf of Large C&I customers and the actual monthly GNI costs reflecting an approximately 40% usage rate for Large C&I customers. PPL does not dispute that the Company monitored the actual GNI expenses on a customer class basis. *See* PPL Reply Exceptions, p. 17 (stating that "... PPL Electric monitored actual costs for each of the five customer sectors and three customer classes..."). The fact that the Company alleges it did not conduct a reconciliation of projected expenses to actual costs does not change the fact that the Company had knowledge of both the initially projected Large C&I share of GNI sector expenses and the fact that it consistently incurred approximately 40% of total GNI costs on behalf of Large C&I customers. *See id.*

22. Because the Company had full knowledge of the divergence between the projected Large C&I share of GNI costs and the actual GNI payments to Large C&I accounts,

the Commission should take action to incentivize more proactive and responsible administration of EE&C Plans for all customers. The negligent administration of PPL's Phase I Plan demonstrated no regard for the potential rate shock to customers and violated its obligation to ensure that all Act 129 costs are prudently incurred. See Phase I Implementation Order, p. 38. The PUC should send a strong message to all EDCs that their role as stewards of the ratepayer resources for EE&C Plans must be taken seriously. For this reason alone, the Commission should direct PPL to deny Supplement No. 139, limit the Large C&I share of PPL's GNI expenses to the initial 1% allocation, and order refunds of the additional GNI costs recovered from Large C&I customers pursuant to Supplement No. 139.

23. In summary, where the evidentiary record confirms that PPL publicly projected to recover 1% of GNI costs from Large C&I customers and subsequently tracked actual expenses showing it consistently incurred 40% of GNI costs on behalf of Large C&I customers, the preponderance of evidence standard compels a finding that PPL had knowledge of the extent that actual GNI costs diverged from projected GNI expenses on a customer class level. For these reasons, PPLICA requests that the Commission grant reconsideration, modify the ACR Order as necessary to affirm that PPL knew the degree to which its actual GNI expenses attributable to Large C&I customers exceeded its initial projections, and order refunds of the Phase I GNI collections in excess of PPL's initially projected 1% allocation.

B. The Commission's Decision to Withhold Refunds for PPL's Total GNI Sector Expenses Exceeding the Total GNI Sector Budget Overlooked or Failed to Consider the Company's Failure to Disclose the Extra-Budget Expenditures and the Unjust and Unreasonable Result of Forcing Non-GNI Large C&I Customers to Pay For Unauthorized GNI Sector Expenses.

24. Although denying many of the claims in PPLICA's Complaints, the Commission concurred with PPLICA's contention that Supplement No. 139 improperly proposed to incur

approximately \$7.7 million in excess of PPL's budgeted GNI sector expenses. *See* ACR Order, p. 41; *see also* PPLICA Reply Brief, p. 20, n. 8; PPLICA Exceptions, p. 25 (Proposed Ordering Paragraph 7). Despite agreeing with PPLICA that PPL should have filed a Major Plan Change Petition prior to including the excess GNI expenses in the Phase I ACR, the Commission denied to order refunds for the excess GNI sector expenses. *See* ACR Order, p. 42. PPLICA respectfully requests that the Commission reconsider this determination in light of PPL's failure to initially disclose the incurrence of GNI expenses in excess of budget and the adverse rate impacts upon Large C&I customers that do not benefit from GNI sector programs. PPL violated its Plan by incurring the additional costs. The Company was only entitled to recovery of costs incurred consistent with its Commission-approved Plan and had no authority to recover costs in excess of its GNI budget.

25. The Commission should order PPL to refund the GNI sector revenues collected in excess of budgeted GNI sector revenues in order to encourage PPL to improve customer disclosures. Through this proceeding, PPLICA has addressed the need for more comprehensive disclosures regarding PPL's actual EE&C costs. *See* PPLICA M.B., p. 33, *see* PPLICA R.B., pp. 21. By way of further example, Supplement No. 139, as filed on October 23, 2013, made no mention of the incurrence of GNI expenses in excess of PPL's budget. *See* Supplement No. 139, PPL Transmittal Letter, p. 2. PPL averred only that it filed Supplement No. 139 to correct the interclass allocation of GNI costs, which turned out to be "substantially different than the costs estimated for each customer class in the original ACR-1 filing." *Id.* However, as referenced in the ACR Order, PPL knew that it had exceeded its GNI sector budget by approximately \$7.7 million by September 2013. *See* ACR Order, p. 41. Regardless, this component of Supplement

No. 139 did not come to light until the Commission opened an investigation pursuant to PPLICA's Complaint.

26. As part of PPL's Commission-approved EE&C Plan, PPLICA members are obligated to pay for *prudent and reasonable* EE&C costs *that have been assigned to each class...*" See PPLICA M.B., p. 15 *citing* Phase I Implementation Order, p. 38. (Emphasis added). However, Act 129 does not contemplate payment for EE&C costs that were not assigned to the class, particularly where many members of the Large C&I customer class cannot benefit from the programs. As recognized by the Commission, PPL filed Supplement No. 139 proposing to recover GNI sector expenses including approximately \$7.7 million of expenses over and above the budget previously approved by the Commission *without referencing the extra-budget expenditures*. See ACR Order, p. 41; See Supplement No. 139, PPL Transmittal Letter, p. 2.

27. Notwithstanding PPLICA's primary argument that exceeding the original 1% allocation to Large C&I customers evidenced a lack of prudence, the Commission's ACR Order would, if not modified, set a precedent affirming that an EDC can exceed a \$21 million GNI sector budget by approximately \$7.7 million (36%), request cost recovery without referencing the error, and still meet the "prudent and reasonable" standard for cost recovery under Act 129. See ACR Order, pp. 41-42. PPLICA avers that these facts warrant reconsideration of the ACR Order as necessary to fulfill the customer protections set forth in Act 129 and the Commission's Implementation Orders. See Phase I Implementation Order, p. 38; see also Pa. C.S. § 2806.1(b)(1)(i)(H). The PUC must treat PPL's GNI budget as a cap, as it recognized in the Minor Plan Change Order. See PPLICA M.B., p. 5 *citing Energy Efficiency and Conservation Program*, Docket No. M-2008-206987 (June 10, 2011). A cap means that the set dollar amount cannot be exceeded. Otherwise, the protections in the Act that are designed to protect customers, such as

the cap limiting PPL's total annual EE&C budget to 2% of 2006 revenues, would be rendered superfluous.

28. In reviewing its prior determination, the Commission should consider the adverse and undesirable customer effects of failing to prioritize compliance with its cost recovery guidelines. The ACR Order placed great weight on PPL's stated intentions, declaring that PPL was "apparently not aware that it has exceeded its GNI budget until September 2013." *See* ACR Order, p. 41. Regardless of when PPL become aware of its overspending or how genuinely PPL intended to maximize efficiency reductions from its available GNI budget, PPLICA submits that the customer rate impacts associated with incurring \$7.7 million of unauthorized GNI expenses mitigates in favor of denying recovery of such expenses, particularly as PPL acted in violation of the Commission's Act 129 procedures by failing to file a Major Plan Change Petition before incurring costs in excess of its Commission-approved sector budgets. To do otherwise would subject customers to unjust and unreasonable rates, contrary to the General Assembly's intention to limit Act 129 costs to prudent, reasonable costs assigned to each customer class. *See* Phase I Implementation Order, p. 38; *see also* Pa. C.S. § 2806.1(b)(1)(i)(H).

29. For these reasons, PPLICA respectfully requests that the Commission reconsider its decision and order refunds for the portion of GNI expenses incurred in excess of PPL's total GNI sector budget.

IV. CONCLUSION

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that the Pennsylvania Public Utility Commission reconsider its Order of April 23, 2015, and: (1) find that PPL Electric Utilities Corporation knew the extent to which actual GNI expenses for Large C&I customers exceed the Company's original projections; (2) issue refunds for the actual ACR-1 Large C&I share of GNI costs in excess of the original 1% projection; and (2) issue refunds for GNI expenses incurred in excess of the Commission-approved GNI sector budget.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

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Counsel to the PP&L Industrial Customer Alliance

Dated: May 8, 2015

Appendix A

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Exhibit JP-1
Page 1 of 2

P.A.P.U.C. PPL ELECTRIC UTILITIES CORPORATION
 SECRETARY'S ~~GNI Program~~ GNI Program Incentives Paid by Month by Customer Class

Line	Month	Year	All Classes		Total Large C&I		% Of Total
			Month Total	Cumulative	Month Total	Cumulative	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
1	4	2010	\$1,267	\$1,267	\$75	\$75	5.9%
2	5	2010	\$2,975	\$4,242	\$0	\$75	1.8%
3	6	2010	\$0	\$4,242	\$0	\$75	1.8%
4	7	2010	\$7,446	\$11,687	\$150	\$225	1.9%
5	8	2010	\$182,272	\$193,960	\$18,914	\$19,139	9.9%
6	9	2010	\$21,473	\$215,432	\$10,808	\$29,946	13.9%
7	10	2010	\$877,434	\$1,092,866	\$376,314	\$406,260	37.2%
8	11	2010	\$1,083,606	\$2,176,472	\$688,716	\$1,094,976	50.3%
9	12	2010	\$717,901	\$2,894,373	\$240,742	\$1,335,718	46.1%
10	1	2011	\$777,314	\$3,671,688	\$267,920	\$1,603,638	43.7%
11	2	2011	\$124,983	\$3,796,670	\$29,038	\$1,632,676	43.0%
12	3	2011	\$77,285	\$3,873,956	\$53,290	\$1,685,966	43.5%
13	4	2011	\$764,316	\$4,638,271	\$300,637	\$1,986,603	42.8%
14	5	2011	\$1,639,659	\$6,277,931	\$675,870	\$2,662,472	42.4%
15	6	2011	\$40,048	\$6,317,979	\$28,987	\$2,691,459	42.6%
16	7	2011	\$654,263	\$6,972,242	\$308,272	\$2,999,731	43.0%
17	8	2011	\$538,694	\$7,510,936	\$86,703	\$3,086,435	41.1%
18	9	2011	\$495,383	\$8,006,320	\$134,519	\$3,220,953	40.2%
19	10	2011	\$833,190	\$8,839,509	\$229,313	\$3,450,266	39.0%
20	11	2011	\$1,174,699	\$10,014,209	\$246,976	\$3,697,242	36.9%
21	12	2011	\$949,679	\$10,963,888	\$650,696	\$4,347,938	39.7%
22	1	2012	\$556,529	\$11,520,417	\$209,590	\$4,557,528	39.6%
23	2	2012	\$852,571	\$12,372,988	\$555,171	\$5,112,698	41.3%
24	3	2012	\$658,985	\$13,031,973	\$130,527	\$5,243,226	40.2%
25	4	2012	\$353,062	\$13,385,035	\$65,661	\$5,308,887	39.7%
26	5	2012	\$725,867	\$14,110,902	\$587,081	\$5,895,969	41.8%
27	6	2012	\$164,934	\$14,275,836	\$29,875	\$5,925,843	41.5%
28	7	2012	\$471,739	\$14,747,576	\$263,900	\$6,189,743	42.0%
29	8	2012	\$364,203	\$15,111,779	\$106,577	\$6,296,320	41.7%
30	9	2012	\$396,209	\$15,507,988	\$142,182	\$6,438,502	41.5%
31	10	2012	\$626,621	\$16,134,609	\$423,069	\$6,861,571	42.5%
32	11	2012	\$473,268	\$16,607,877	\$237,932	\$7,099,503	42.7%
33	12	2012	\$506,927	\$17,114,804	\$88,236	\$7,187,739	42.0%

PPL ELECTRIC UTILITIES CORPORATION
GNI Program Incentives Paid by Month by Customer Class

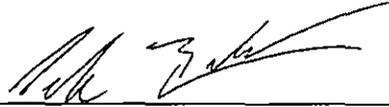
<u>Line</u>	<u>Month</u>	<u>Year</u>	<u>All Classes</u>		<u>Total Large C&I</u>		<u>% Of Total</u>
			<u>Month Total</u>	<u>Cumulative</u>	<u>Month Total</u>	<u>Cumulative</u>	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
34	1	2013	\$276,201	\$17,391,005	\$14,168	\$7,201,906	41.4%
35	2	2013	\$162,606	\$17,553,611	\$31,373	\$7,233,279	41.2%
36	3	2013	\$824,807	\$18,378,419	\$438,681	\$7,671,960	41.7%
37	4	2013	\$327,289	\$18,705,708	\$95,748	\$7,767,708	41.5%
38	5	2013	\$497,416	\$19,203,124	\$70,325	\$7,838,033	40.8%
39	6	2013	\$538,505	\$19,741,629	\$114,730	\$7,952,764	40.3%
40	7	2013	\$1,129,931	\$20,871,559	\$806,651	\$8,759,414	42.0%
41	8	2013	\$1,136,066	\$22,007,626	\$608,359	\$9,367,774	42.6%

VERIFICATION

I, Adeolu A. Bakare, counsel to the PP&L Industrial Customer Alliance ("PPLICA"), hereby state that the facts above set forth are true and correct (or 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).

5/8/15

Date



Signature

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

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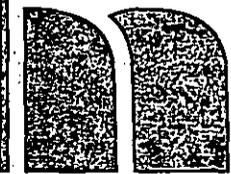
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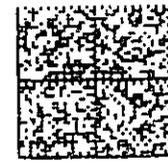
Dated this 8th day of May, 2015, in Harrisburg, Pennsylvania.

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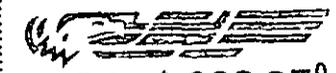


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