



May 14, 2015

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

RE: Pennsylvania Public Utility Commission v. Petition of PPL Electric Utility Corporation R-2015-2469275

Attention Filing Center,

Please find enclosed the *Amended Petition to Intervene by The Alliance for Solar Choice* and the accompanying *Certificate of Service*, filed electronically with the Pennsylvania Public Utilities Commission May 14, 2015.

Please contact me if you have any questions regarding this filing.

Sincerely,

A handwritten signature in cursive script that reads "Amanda Vanega".

Amanda Vanega
Policy Research Manager
KEYES, FOX & WIEDMAN LLP
401 Harrison Oaks Blvd, Suite 100
Cary, NC 27513
Phone: 919-825-3340
avanega@kfwlaw.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2015-2469275
	:	
Petition of PPL Electric Utilities Corporation	:	

**AMENDED PETITION TO INTERVENE BY
THE ALLIANCE FOR SOLAR CHOICE**

The Alliance for Solar Choice (TASC), through the undersigned local counsel on May 1, 2015 filed and served with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) to a petition to intervene in the above-captioned proceeding. At the Pre-hearing Conference in Harrisburg on May 7, 2015, in response to PPL’s opposition to the Petition to Intervene, counsel for TASC offered to provide additional information regarding TASC members’ business activity in the PPL service territory. Pursuant to the Amended Scheduling Order issued in this matter on May 7, 2015 counsel for TASC request consideration of this Amended Petition to Intervene. The following paragraphs of this Amended Petition are identical to the original Petition to Intervene except that: Paragraph 1 is shortened to reflect the more specific information contained in new paragraphs 1a, 1b and 1c; and, the second and third sentences of paragraph 6 are rearranged for better clarity. A new Verification Statement has been added. In support of its Petition to Intervene, TASC states as follows:

1. The Petitioner is an organization founded by the largest solar rooftop companies in the nation. TASC members provide services to the vast majority of the rooftop solar

market. Its members include: Demeter Power, SolarCity, Solar Universe, Sungevity, Sunrun, and Verengo.

1a. TASC member SolarCity has established an operations center in Montgomery County, located at 2562 Boulevard of the Generals, Norristown PA. While the actual office location is not in the PPL service territory, this office serves a broad geographic area including parts of Montgomery County that are located in the PPL's service territory. See, <https://www.pplelectric.com/at-your-service/electric-rates-and-rules/remsi/map-of-ppl-service-area.aspx>.

1b. TASC member SolarCity has existing customers located in the cities of Allentown and Bethlehem, and the Boroughs of Dauphin, East Greenville, Elverson, Honey Brook, Pennsburg, Quarryville, Richlandtown, and Telford. Parts or all of these municipalities are located within the PPL service territory.

1c. TASC member SolarCity plans to continue to offer services to electric customers in the PPL service territory. It recently issued a public statement of its intent to offer solar electric services in Southeast Pennsylvania, an area that includes PPL's Lancaster and Lehigh regions. In a press release, issued on March 12, 2015, SolarCity states that it offers loans and new power purchase agreement options for homeowners in SE Pennsylvania who wish to install solar on their homes. The initial offering will be to customers of PECO, but SolarCity's press release states that it, "hopes to expand its service area further later this year." This press release also lists SolarCity's license to operate in Pennsylvania as: PA License # HICPA077343. This press release is available at: <http://www.solarcity.com/newsroom/press/solarcity-brings-america%E2%80%99s-most-affordable-solar-loan-southeastern-pennsylvania>.

2. Petitioners are represented by:

David R. Wooley, Esq.
Of Counsel
Keyes, Fox & Weidman LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Tel: (510) 314-8207
E-Mail: dwooley@kfwlaw.com

David Wooley is a member of the Pennsylvania Bar, (Attorney ID Number 22378) on inactive status, is a member in good standing of the New York and New Jersey bars, and has, through local counsel, filed a motion for leave to appear *pro hac vice* in this proceeding.

Jacob J. Schlesinger, Esq.
Associate
Keyes, Fox & Wiedman LLP
1400 16th St.
16 Market Square, Suite 400
Denver, CO 80202
Tel: (970) 531-2525|
Email: jschlesinger@kfwlaw.com

Jacob Schlesinger is a member in good standing of the Bar of the State of Colorado and has, through local counsel filed a motion for leave to appear *pro hac vice* in this proceeding.

Joseph Otis Minott, Esq.
Local Counsel & Counsel of Record for TASC
135 South 19th Street, Suite 300
Philadelphia PA, 19103
joe_minott@cleanair.org
215-567-4004 Ext. 116

Joseph Minott is a member in good standing of the Bar of the Commonwealth of Pennsylvania (Attorney ID Number 36463).

3. On March 31, 2015, PPL Electric Utilities submitted a general base rate filing for electric operations. In its filing PPL proposed to substantially increase fixed charges for residential and commercial customers as well as make other changes to its tariff design.

4. TASC is an industry association of businesses whose members provide a variety of services to residential and commercial electric customers in Pennsylvania, including behind the meter rooftop photovoltaic systems and power storage systems. TASC's office is located at 595 Market Street, 29th Floor, San Francisco, California 94105.

5. TASC and its members have a direct, immediate, substantial and distinct interest in the PPL general base rate filing for electric operations. PPL has proposed to increase fixed charges for residential and general service customers, which are the principal customer base for TASC members' solar energy services. Increases in fixed charges reduce the economic benefit of investment in customer-sited solar generation and battery storage, and will tend to reduce the market for such systems. TASC has participated in numerous public utility commission proceedings on the subject of fixed charges in other states, including proceedings in Arizona, California, Washington, Hawaii, Wisconsin, Nevada, New Mexico, Utah and Virginia.

5. TASC has preliminarily reviewed the PPL rate filing and intends to examine in this proceeding whether the request to increase fixed charges to residential and commercial customers will result in unjust and unreasonable rates for residential and commercial customers. TASC plans to challenge aspects of the cost basis for the

increased fixed charges and its impact on on-site renewable energy development and associated storage technologies.

6. TASC is also concerned that increases in fixed charges could undermine the market for customer-sited storage and renewable generation investment. Solar photovoltaics, storage, energy efficiency and other forms of distributed energy resources provide a wide range of benefits both to individual customers and to the system as a whole. Increases in fixed costs will tend to suppress investment in these technologies (e.g. harm the payback levels and financial returns for on-site generation) and in the long term lead to higher costs for all customers (e.g. higher distribution, generation and transmission costs). This impact could run counter to a wide range of clean energy policies of this Commission and of the Commonwealth of Pennsylvania.

7. Furthermore, TASC has a general interest in this rate proceeding because PPL's retail rate schedule determines both the value of the kWh that a residential or commercial solar customer avoids purchasing and the value of the kWh bill credit that the same customer receives for any excess generation. Thus, any change to the volumetric component of a rate could impact the cost savings that can be achieved through onsite generation. This could substantially impact the market for TASC's members and could devalue substantial investments already made by self-generating customers.

8. TASC is also concerned about proposed language changes to the Net Metering Tariff, particularly language which eliminates references to retail rates as the basis for net metering credits. Currently we are uncertain about the intent behind and the meaning of the proposed change and may wish to address this matter in briefs or by witness testimony.

WHEREFORE, the Alliance For Solar Choice respectfully requests that the Commission enter an order granting it full status as an intervener in this proceeding with active party status.

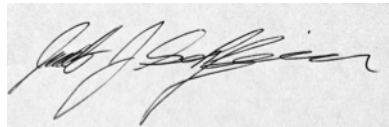
Respectfully submitted,



Joseph Otis Minott, Esq.
Counsel of Record for
The Alliance for Solar Choice
135 South 19th Street, Suite 300
Philadelphia, PA 19103
215-567-4004 Ext 116
joe_minott@cleanair.org
Pa Bar Registration No. 36463



David R. Wooley, Esq.
Of Counsel
Keyes, Fox & Weidman LLP
436 14th Street, Suite 1305
Oakland, CA 94612
Tel: (510) 314-8207
E-Mail: dwooley@kfwlaw.com



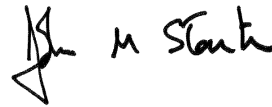
Jacob J. Schlesinger, Esq.
Associate
Keyes, Fox & Wiedman LLP
1400 16th St.
16 Market Square, Suite 400
Denver, CO 80202
Tel: (970) 531-2525|
Email: jschlesinger@kfwlaw.com

May 14, 2015

VERIFICATION

I, John Stanton, on behalf of The Alliance for Solar Choice, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, 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 penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 14, 2015



John Stanton
EVP, Policy & Markets
and Regulatory Counsel
SolarCity
101 Constitution Ave., Suite 525 East
Washington, DC 20001
650-332-0456
jstanton@solarcity.com

CERTIFICATE OF SERVICE

RE: Pennsylvania Public Utility Commission v. Petition of PPL Electric Utilities Corporation
Docket R-2015-2469275

I hereby certify that I have this day served a true copy of the foregoing document upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 14th day of May 2015.

SERVICE BY FIRST CLASS U.S. MAIL, POSTAGE PREPAID
(eServed as a courtesy, if email available)

Hon. Susan D. Colwell
Administrative Law Judge
PO Box 3265
Harrisburg PA 17105-3265
scolwell@state.pa.us

Benjamin Z. Hartung
Clean Air Council
125 S 19th St.
PHILADELPHIA, PA 19103
Clean Air Council

Kimberly A. Klock
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18106
PPL Electric Utilities
kklock@pplweb.com

Lauren M. Burge
Hobart J. Webster
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg, PA 17101-19232
Office of Consumer Advocate

HWebster@paoca.org
LBurge@paoca.org

George Allen
522 Jubilee St., First Floor
Emmaus, PA 18049

Michael W. Gang
Post & Schell PC
17 North Second St., 12th Floor
Harrisburg, PA 17101-1601
PPL Electric Utilities
mgang@postschell.com

Steven C. Gray
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
Office of Small Business Advocate
sgray@pa.gov

Kenneth R. Stark
Bureau of Investigation and Enforcement
PA Public Utility Commission
PO Box 3265

Harrisburg, PA 17105-3265
BIE
kenstark@pa.gov

Patricia McGinty
246 Hillcrest Lane
Elizabethtown, PA 17022

David B. MacGregor
Post & Schell PC
Four Penn Center
1600 John F. Kennedy Blvd
Philadelphia, PA 19103-2808
PPL Utilities
dmacgregor@postschell.com

SERVICE BY eService only

Adeolu A Bakare
Pamela C. Polacek
McNees Wallace & Nurick, LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
PPLICA
abakare@mwn.com
lcharleton@mwn.com
ppolacek@mwn.com
srusso@mwn.com

Elizabeth R. Marx
Harry S. Geller, Executive Director
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101
CAUSE-PA
emarxpulp@palegalaid.net
hgellerpulp@palegalaid.net
pulp@palegalaid.net

Mark Szybist
Natural Resources Defense Council
1152 15th St. NW, Suite 300
Washington, DC 20005
Natural Resources Defense Council
mszybist@nrdc.org

Christopher T. Wright
Post & Schell PC
17 North Second St., 12th Floor
Harrisburg, PA 17101-1601
PPL Electric Utilities
cwright@postschell.com
jlangan@postschell.com

Joseph L. Vullo
Commission on Economic Opportunity
1460 Wyoming Avenue
Forty Fort, PA 18704
Commission on Economic Opportunity
jlvullo@aol.com

Logan Welde
Joe Minott
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103
lwelde@cleanair.org
joe_minott@cleanair.org
loganwelde@gmail.com

Kenneth L. Mickens
Kenneth L. Mickens Esq. LLC
316 Yorkshire Drive
Harrisburg, PA 17111-6933
Sustainable Energy Fund
kmickens11@verizon.net

Eric Epstein
Eric Joseph Epstein
4100 Hillsdale Rd.
Harrisburg, PA 17112
epstein@efmr.org
lechambon@comcast.net

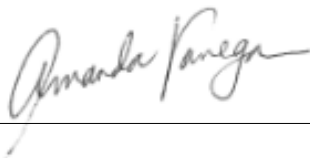
Paul E. Russel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18106
PPL Electric Utilities
perussell@pplweb.com
KSafford@pplweb.com

Gina L. Lauffer
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120
BIE
ginlauffer@pa.gov
wfreet@pa.gov

Scott J. Rubin
Law Office of Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815
IBEW
scott.j.rubin@gmail.com

Darryl A. Lawrence
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg, PA 17101-19232
Office of Consumer Advocate
dlawrence@paoca.org

Richard A. Kanaskie
PU PUC BIE Legal Technical
Second Floor West
400 North St.
Harrisburg, PA 17120
rkanaskie@pa.gov
wfreet@pa.gov



Amanda Vanega
Policy Research Manager
KEYES, FOX & WIEDMAN LLP
401 Harrison Oaks Blvd, Suite 100
Cary, NC 27513