



September 1, 2015

KENNETH L. MICKENS, ESQUIRE LLC
LEGAL CONSULTING

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

Re: PPL Electric Utilities Corporation
Distribution Rate Proceeding
Docket No. R-2015-2469275
Sustainable Energy Fund Statement in Support
of Joint Petition for Approval of Settlement of
All Issues – e-filing

Dear Secretary Chiavetta:

Enclosed please find the Sustainable Energy Fund's Statement in Support of Joint Petition for Approval of Settlement of All Issues in the above referenced proceeding. All parties and the Administrative Law Judge have been served copies of this document. Please contact me if you have any questions concerning this filing.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth L. Mickens".

Kenneth L. Mickens, Esq.

cc: Parties of Record
Honorable Susan D. Colwell

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation :
Distribution Rate Proceeding : **Docket No. R-2015-2469275**
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**Sustainable Energy Fund
Statement In Support of
Joint Petition for Approval of
Settlement of All Issues**

To The Honorable Susan D. Colwell, Administrative Law Judge:

The Sustainable Energy Fund (“SEF”)¹, by and through its Attorney, submits that the terms of the foregoing Joint Petition for Approval of Settlement of All Issues (“Joint Petition”) are in the public interest and represent a fair, just, reasonable and equitable balance of the interests of PPL Electric Utilities Corporation (“PPL Electric” or “Company”) and its customers. After settlement discussions, SEF, PPL Electric, the Bureau of Investigation and Enforcement (“I&E”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services, PP&L Industrial Customer Alliance (“PPLICA”), Commission for Economic Opportunity (“CEO”), the Clean Air Council (“CAC”), The Alliance for Solar

¹ SEF is a non-profit organization dedicated to the use of renewable energy, clean energy technologies, energy conservation and energy education. Founded in 1999 pursuant to a settlement of PPL Electric

Choice (“TASC”), Energy Efficiency in Pennsylvania (“CAUSE-PA”), Keystone Energy Efficiency Alliance Energy Education Fund (“KEEF”), Natural Resources Defense Council (“NRDC”), Environmental Defense Fund (“EDF”) and Eric Joseph Epstein have agreed upon the terms embodied in the foregoing Joint Petition.²

I. BACKGROUND

SEF submits that the foregoing Joint Petition is in the public interest for the following reasons:

1. On March 31, 2015, PPL Electric filed with the Pennsylvania Public Utility Commission (“Commission”) a request for an overall annual increase in distribution revenues of approximately \$167.5 million based upon a future test year ending December 31, 2015 and a proposed allowed rate of return on equity of 10.95 %. If granted by the Commission as filed, this request would have produced a system average increase in distribution rates of approximately 18.5 % and an increase in total rates (distribution, transmission and generation charges) of approximately 3.9 % for default service customers.

Utility Corporation’s electric deregulation proceeding, SEF promotes clean and renewable energy initiatives to benefit customers within the PPL Electric service territory and throughout Pennsylvania.

2. SEF filed a timely Petition to Intervene. A Prehearing Conference was held on May 7, 2015, at which time a litigation schedule was set. Two Public Input Hearings were held in Harrisburg on June 2, 2015. A separate Public Input Hearing was held in Allentown on June 4, 2015. An evidentiary hearing was held in this proceeding on August 11, 2015, at which time SEF Statement 1 and SEF Cross Examination Exhibits 1 through 8 were admitted to the record.

4. Settlement discussions resulted in the foregoing Joint Petition.

II. SETTLEMENT TERMS

5. The specific details of the Settlement terms are provided in Paragraphs 19 through 64 of the Joint Petition. However, SEF initially observes that the settlement enhances PPL Electric's relationship with its customers because the customer charge for Rate Schedule RS will not be increased. This result helps to ensure that PPL Electric's customers will have the opportunity to reduce their energy costs by modifying their energy use profile.

III. PUBLIC INTEREST

6. SEF submits that the foregoing Joint Petition is in the public interest for the following reasons:

(a). Net Metering: Under the terms of the Settlement, PPL Electric will withdraw its proposal to revise Net Metering tariff pages 19L.2 and 19L.4. SEF believes that such a result ensures that Net Metering customers will continue to have access to all of the net metering options required under the Commission's Regulations.

(b). Discontinue Litigation: The Joint Petition discontinues expensive and unnecessary rate litigation and administrative burden.

7. The foregoing Joint Petition addresses and adjusts all substantial issues that are the subject of dispute. It appears unlikely that full litigation of these matters would result in SEF obtaining a superior outcome.

8. SEF supports the foregoing Joint Petition because it is in the public interest. However, in the event this matter proceeds to full litigation, SEF is prepared to take litigation positions that may differ from the terms of the proposed Joint Petition of Partial Settlement.

Respectfully submitted,



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Fund
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(717) 343-3338

Dated: September 1, 2015

CERTIFICATE OF SERVICE

Docket No. R-2015-2469275

I hereby certify that I have this day served a copy of the foregoing SEF Statement in Support of Joint Petition for Approval of Settlement of All Issues upon the following persons via e-mail and first class mail in accordance with the requirements of 52 Pa. Code § 1.54 et seq.

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(Cover Letter & Certificate of Service Only)

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Dated: September 1, 2015