

Jay Larry Moyer  
370 W. Johnson Street (C-1)  
Philadelphia, PA 19144  
267-693-2633

July 31, 2017

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
P. O. Box 3265  
Harrisburg, PA 17105-3265

RE: C-2015-2511904

Dear Secretary Chiavetta:

The attached documents are submitted for filing with the above case. A copy of these materials has been provided, under separate cover, to ALJ Dennis J. Buckley, Presiding Judge in this case.

Sincerely,

J. Larry Moyer

Cc: ALJ Dennis J. Buckley

Jay Larry Moyer  
370 W. Johnson Street (C-1)  
Philadelphia, PA 19144  
267-693-2633

Administrative Law Judge Dennis J. Buckley  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2nd Floor, L-M West  
Harrisburg, PA 17120

July 28, 2017

Judge Buckley:

I'm writing to draw your attention to three new violations in PPL's treatment of my two PPL accounts which are part of virtual meter aggregation. These recent incidents are continuing evidence of the ongoing disarray in PPL's methodology for virtual meter aggregation. That methodology involves "manual" procedures which the Company applies only to virtual meter aggregation.

The first of these recent incidents is an abrupt suspension of credit in the July house bill (Acct. #06476-21001). This lapse is a repetition of other, similar omissions in the past. Credit (when it does appear) appears on the house bill (never on the solar bill) but in July, there is no credit applied to either bill.

This missing credit occurred even though my PV system continued to generate throughout the period, as evident from the GATS reporting (Attachment 1). PPL's own meter, in fact, shows 2051 kWh of generation from April 3 to July 20, but this is not reflected in any of the bills because the PUC exempts PPL entirely from showing generation data. (The only relevant

data on any bill is the applied “credit”, and that credit, when it does appear, appears without any supporting data.)

It is ironic that PPL required a separate solar account specifically to report activity at the PV facility, but the Company does not include any generation data on that bill. From month to month, the meter readings are static and unchanging, as shown in Attachment 4. What explanation PPL might offer for this suspension of credit in July, 2017, is anyone’s guess. The following documents are attached to show the violation.

- The house bill for June showing “Excess Credit” (Attachment 2).
- The house bill for July which shows no “Excess Credit” is also enclosed (Attachment 3).
- The solar bills for June and July are included to show the static meter readings on that bill (Attachment 4).

The missing credit means that the balance on the bill is inevitably incorrect. The missing data also follows closely on the heels of a separate error in early June. In that instance, PPL sent me a Termination Notice dated June 7, 2017, which demanded payment of a disputed balance (Attachment 5). This Termination Notice is a striking repetition of the conduct which led to the Formal Complaint now pending, and of which you are the Presiding Officer (C-2015-2511904). A copy of PPL’s new Termination letter is enclosed (Attachment 5).

On June 13, 2017, I did receive a call from PPL apologizing for the Termination Notice. In spite of PPL’s apology, however, a late payment charge was added to the June bill (Attachment 4). Although I appreciated the call and the apology, the Company’s repeated claims of “inadvertent error” will not suffice. Until the Company’s “methodology” for virtual meter aggregation is corrected, the pattern of error is likely to be compounded by still more errors.

A third lapse is PPL's failure to provide the promised year-end "calculation sheets" in 2016 and in 2017. These auxiliary sheets ("tabulation sheets" approved by the PUC) are the sole source of monthly data showing PV generation and generation credit. These sheets were requested in a certified letter (Attachment 6), but PPL has made no response. For the past two years, PPL has not provided any data that would permit me to verify the kilowatt hours of generation, the relevant per-unit price, or the kilowatt hours of credit. The only figure (when it does appear) is the unsupported dollar amount on the house bill identified as "Excess Credit". In July, once again, even that figure is missing.

In earlier proceedings, I have provided abundant evidence to show that PPL's methodology for implementing virtual meter aggregation has been inconsistent, disordered, flawed, and unreliable. Throughout those proceedings, the PUC judged these persistent anomalies to be "reasonable", including PPL's failure to provide the "combination of readings and billing" that the Code stipulates.

"Virtual meter aggregation--The combination of readings and billing for all meters regardless of rate class on properties owned or leased and operated by a customer-generator by means of the EDC's billing process".) (*Emphasis added*) (52 Pa. Code § 75.12: "virtual meter aggregation")

With scores of examples over eight years, I have catalogued the errors, omissions, and changes which have plagued my bills and prevented trustworthy, verifiable balances. Unfortunately, despite this detailed evidence of confusion and error, very few of the documented irregularities have even been acknowledged by the Commission. In the eyes of the PUC, this stream of evidence does not constitute a "preponderance". What the Commission might "preponder" as sufficient evidence is impossible to ascertain.

This present letter (with accompanying documents) is to inform you of this continuing pattern of error, even as I hold out hope that the PUC will intervene. My two-fold hope is to

obtain a suitable settlement for myself and a guarantee of a reliable, transparent, and lawful billing process for all virtual metering customers statewide. (NOTE: Recent contacts with other virtual customers indicate that they experience similar aberrations.)

It is my hope, too, that the pending Formal Complaint (C-2015-2511904), now before you, may yet yield a satisfactory conclusion. I remain firm in my conviction, however, that PPL's current, improvised arrangements for virtual meter aggregation are unacceptable and must be corrected.

Unfortunately, if I am to obtain redress for these new and recent occurrences, it seems possible that a new, separate legal action may yet be necessary. I say this based on recent action by the Pennsylvania Supreme Court.

As you are aware, the Supreme Court of Pennsylvania recently affirmed the Commonwealth Court's determination that the "[AEPS] Act confers no authority upon the PUC to adjudicate matters arising under the [AEPS] Act." *Sunrise*, 148 A.3d at 904.

Commonwealth Court, meanwhile, prior to the Supreme Court Decision, ordered that the pending Complaint continue before the PUC. In light of the Supreme Court decision, it appears that any new litigation on these recent violations would have to be initiated in Common Pleas Court.

Before taking that action, however, I decided to communicate directly with you.

If the PUC will recognize these new lapses as symptoms of a truly flawed system, its recognition of this fact might provide the occasion and the incentive for a course correction. That course correction should lead to standard, statewide billing procedures for virtual meter

aggregation that are transparent, complete, consistent, and accurate. It should also assure rigorous enforcement of those standard procedures.

Until now, the PUC has approached virtual meter aggregation with seeming indifference and has permitted PPL to apply its own “self-regulation”. The Commission, until now, has chosen to view the many irregularities in PPL’s methodology as inconsequential and to regard PPL’s explanations as “reasonable”. The PUC, in effect, has permitted PPL to make policy, interpret the law, implement procedures at will, and enforce its own rules as it sees fit.

The long-continuing pattern of disarray is indisputable, and the recent incidents only confirm the serious and lingering problem. It is my sincere hope that you will use your authority to delve into the irrefutable evidence of disarray in PPL’s methodology; that you will demand equal recognition for virtual meter aggregation and physical meter aggregation; and that you will protect the integrity of the Public Utility Code which promises that “Meter aggregation may be completed through physical or virtual meter aggregation.” (52 Pa. Code § 75.12: “meter aggregation”)

Net metering is assured by the AEPS Act, and the Act is unequivocal in stating that virtual meter aggregation “shall be eligible for net metering”. (Section 2, definition of “net metering”). The Public Utility Code, in turn, elaborates a thorough definition of virtual meter aggregation in 52 Pa. Code § 75.12. It also offers specific guidance for the application of credits [52 Pa. Code § 75.13(d)] as well as steps for implementing virtual meter aggregation (52 Pa. Code § 75.14).

This letter and the enclosed attachments will be submitted for filing with the pending case now under review (C-2015-2511904).

Respectfully submitted,

J. Larry Moyer

- Encl: 1: GATS reporting data  
2. House bill (Acct. #06476-21001) for June 9, 2017, showing applied credit  
3: House bill (Acct. #06476-21001) for July, 2017, showing absence of credit  
4. Solar bill (Acct. #67277-97002) showing static meter readings  
5: Termination letter dated June 7, 2017  
6. Correspondence  
    Moyer letter to PPL requesting year-end data sheets.  
    Moyer letter to Secretary Chiavetta protesting the Termination notice

Attachment 1

GATS REPORTING DATA

Showing monthly generation

January-June, 2017



Generation Attribute Tracking System

Wit's End Gardens  
jotaele09

Home

Sign Out

Accounts

Assets

Certificates

Reports

Training

**Generators**  1 generators

Type	Units	Unit ID	Facility Name
Meter	kWh	NON39339	Wit's End Gardens - Moyer

**Selected Generator**

**Unit ID:** NON39339 **Facility Name:** Wit's End Gardens - Moyer **Generation Start Date:** 03/2009

[Upload Meter Picture](#)

<< < **Processed Generation** > >>

<< < **Unprocessed Generation**

Period	Jan 2017	Feb 2017	Mar 2017	Apr 2017	May 2017
Source	Self (Meter)	Self (Meter)	Self (Meter)	Self (Meter)	Self (Meter)
Units	kWh	kWh	kWh	kWh	kWh
Meter Read					
Meter Generation					
Meter 1 Read					29,855
Meter 1 Generation	387	410	596	565	598
Generation					
Date					06/11/2017

Period	Jun 2017
Source	Self (Meter)
Units	kWh
Last Read	29,855
Read	30,472
Generation	617
Date (mm/dd/yyyy)	07/15/2017

When entering data and months are skipped the data will be split on monthly production estimates that are created using your system of extrapolation of data please delete the last entry and re-enter the de

The rule for a meter date is that it must be between the 1st of the m being entered and the 15th of the following month. For example, a v generation is between 01/01/2013 and 02/15/2013.

[Privacy Policy](#)

Attachment 2

HOUSE BILL – JUNE 9, 2017

Showing applied credit of \$65.91

Acct. #06476 - 21001

## Your Message Center

- With paperless billing, you can receive and pay your PPL Electric Utilities bills online. The process is free, quick, convenient and secure. To learn more or sign up, visit [ppllectric.com](http://ppllectric.com).
- Learn how to save energy and get information about energy efficiency rebates on our website, [ppllectric.com](http://ppllectric.com).
- Before digging around your home or property, you should always call the state's One Call notification system to locate any underground utility lines. You can do this by simply dialing 811, which will connect you to the One Call system. Be safe and call 811 before you dig.
- Air conditioning is probably the biggest part of your summer energy needs. You can save money while keeping cool. Check air conditioner filters monthly. Clean or change filters as needed. You'll stay cool and your system will use less energy.

## General Information

Generation prices and charges are set by the electric generation supplier you have chosen. The Public Utility Commission regulates distribution rates and services. The Federal Energy Regulatory Commission regulates transmission prices and services.

PPL Electric Utilities uses about \$1.29 of this bill to pay state taxes and about \$6.07 is used to pay the PA Gross Receipts Tax.

## Understanding Your Bill

**Customer Charge** - Monthly charge to recover costs of billing, meters and equipment.

**Distribution Charge** - Monthly charge to recover costs of local equipment used to deliver electricity from high-voltage transmission lines (see Transmission Charge) and safely step down voltage for use in your home or business.

**System Improvement Charge** - Monthly charge to recover costs for improving, repairing and replacing equipment that delivers electricity to your home or business.

**Generation Charge** - Monthly charge to recover the cost of the production or purchase of electricity.

**kWh (Kilowatt-hour)** - A measure of how much electricity your household uses. One kilowatt-hour equals the amount of electricity used by ten 100-watt lights left on for one hour.

**Rate RS** - Rate for service to a private home.

## Billing Details - (Bill Acct. 06476-21001)

Page 2

Previous Balance	\$51.17
Payment Received Jun 2, 2017 - Thank You!	-\$51.17
<b>Balance as of Jun 9, 2017</b>	<b>\$0.00</b>
<b>Charges for - PPL Electric Utilities</b>	
Residential Rate: RS for May 10 - Jun 9	
Distribution Charge:	
Customer Charge	15.71
710 kWh at 4.57830000¢ per kWh	32.51
System Improvement Charge at -0.47%	-0.23
PA Tax Adj Surcharge at -0.01400000%	-0.01
<b>Total Distribution Charges</b>	<b>\$47.98</b>
Generation & Transmission Charges for May 10 - Jun 9	
Transmission Charge:	
710 kWh at 1.58990000¢ per kWh	11.29
Generation Charge:	
Capacity and Energy	
710 kWh at 6.16500000¢ per kWh	43.77
<b>Total Generation &amp; Transmission Charges</b>	<b>\$55.06</b>
<b>Other Charges for PPL Electric Utilities</b>	
Excess Credit	-65.91
<b>Total of Other Charges</b>	<b>-\$65.91</b>
<b>Amount Due By Jul 3, 2017</b>	<b>\$37.13</b>
<b>Account Balance</b>	<b>\$37.13</b>

**Smart Meter Rider** - Monthly charge to recover costs associated with the smart meter programs approved by the PUC.

**State Tax Adjustment Surcharge** - Monthly charge or credit to reflect changes in various state taxes. The surcharge may vary by bill component.

**Transmission Charge** - Monthly charge to recover the cost of moving electricity over high-voltage transmission lines from generation facilities to PPL Electric Utilities' distribution lines (see Distribution Charge).

**Type(s) of Meter Readings:**

**Actual** - Measures your monthly electricity use based on an actual reading.

Attachment 3

HOUSE BILL – JULY 11, 2017

Showing NO CREDIT

Acct. #06476 - 21001

## Your Message Center

- With paperless billing, you can receive and pay your PPL Electric Utilities bills online. The process is free, quick, convenient and secure. To learn more or sign up, visit [ppllectric.com](http://ppllectric.com).
- Learn how to save energy and get information about energy efficiency rebates on our website, [ppllectric.com](http://ppllectric.com).
- Before digging around your home or property, you should always call the state's One Call notification system to locate any underground utility lines. You can do this by simply dialing 811, which will connect you to the One Call system. Be safe and call 811 before you dig.
- Close drapes, blinds and shades on the sunny side of your home during the hottest part of the day. It eases the load on your cooling system and saves energy.
- Save postage and late charges - sign up for Automated Bill Payment.

## General Information

Generation prices and charges are set by the electric generation supplier you have chosen. The Public Utility Commission regulates distribution rates and services. The Federal Energy Regulatory Commission regulates transmission prices and services.

PPL Electric Utilities uses about \$1.59 of this bill to pay state taxes and about \$7.44 is used to pay the PA Gross Receipts Tax.

## Understanding Your Bill

**Customer Charge** - Monthly charge to recover costs of billing, meters and equipment.

**Distribution Charge** - Monthly charge to recover costs of local equipment used to deliver electricity from high-voltage transmission lines (see Transmission Charge) and safely step down voltage for use in your home or business.

**System Improvement Charge** - Monthly charge to recover costs for improving, repairing and replacing equipment that delivers electricity to your home or business.

**Generation Charge** - Monthly charge to recover the cost of the production or purchase of electricity.

**kWh (Kilowatt-hour)** - A measure of how much electricity your household uses. One kilowatt-hour equals the amount of electricity used by ten 100-watt lights left on for one hour.

**Rate RS** - Rate for service to a private home.

**Smart Meter Rider** - Monthly charge to recover costs associated with the smart meter programs approved by the PUC.

**State Tax Adjustment Surcharge** - Monthly charge or credit to reflect changes in various state taxes. The surcharge may vary by bill component.

**Transmission Charge** - Monthly charge to recover the cost of moving electricity over high-voltage transmission lines from generation facilities to PPL Electric Utilities' distribution lines (see Distribution Charge).

**Type(s) of Meter Readings:**

**Actual** - Measures your monthly electricity use based on an actual reading.

## Billing Details - (Bill Acct. 06476-21001)

Page 2

Previous Balance	\$37.13
Payment Received Jun 29, 2017 - Thank You!	-\$37.13
<b>Balance as of Jul 11, 2017</b>	<b>\$0.00</b>
<b>Charges for - PPL Electric Utilities</b>	
Residential Rate: RS for Jun 9 - Jul 11	
Distribution Charge:	
Customer Charge	15.87
852 kWh at 4.45300000¢ per kWh	37.95
System Improvement Charge at 0.21%	0.11
PA Tax Adj Surcharge at -0.01400000%	-0.01
<b>Total Distribution Charges</b>	<b>\$53.92</b>
Generation & Transmission Charges for Jun 9 - Jul 11	
Transmission Charge:	
852 kWh at 1.66200000¢ per kWh	14.16
Generation Charge:	
Capacity and Energy	
852 kWh at 6.83000000¢ per kWh	58.19
<b>Total Generation &amp; Transmission Charges</b>	<b>\$72.35</b>
<b>Amount Due By Aug 1, 2017</b>	<b>\$126.27</b>
Account Balance	\$126.27

Enroll in Automatic Bill Pay (ABP) and your monthly electric payment will be automatically deducted from your bank checking account. To enroll, sign and date this form and return with your check payment (voided check not required). Money orders, cashier and foreign checks do not qualify for enrollment.

I authorize PPL Electric Utilities to automatically deduct from the checking account as shown on my enclosed check, all future payments for the PPL Electric Utility bill account number listed on this payment stub. I will notify PPL Electric Utilities if I decide to cancel this authorization.

Checking Account holder signature \_\_\_\_\_

Date \_\_\_\_\_

**NOTE:** To enroll using a savings account for ABP, visit the billing and payments section at [www.ppllectric.com/my-account](http://www.ppllectric.com/my-account)

\$126.27

Attachment 4

Solar bills – June and July, 2017

showing static meter readings

ACCT. #67277-97002



**Your Message Center**

- The \$27.68 balance includes \$1.24 in prior late payment charges.
- With paperless billing, you can receive and pay your PPL Electric Utilities bills online. The process is free, quick, convenient and secure. To learn more or sign up, visit [ppllectric.com](http://ppllectric.com).
- Before digging around your home or property, you should always call the state's One Call notification system to locate any underground utility lines. You can do this by simply dialing 811, which will connect you to the One Call system. Be safe and call 811 before you dig.
- Save postage and late charges - sign up for Automated Bill Payment.

**Billing Details - (Bill Acct. 67277-97002)**

Previous Balance	\$860.37
Payment Received Jun 16, 2017 - Thank You!	-\$832.69
<b>Balance as of Jul 12, 2017</b>	<b>\$27.68</b>
<b>Charges for - PPL Electric Utilities</b>	
General Service Rate: GS1 for Jun 9 - Jul 11	
Distribution Charge:	
Customer Charge	22.00
Smart Meter Rider - Phase 2	3.37
Competitive Enhancement Rider	-0.01
System Improvement Charge at 0.21%	0.05
PA Sales Tax	1.53
<b>Total Distribution Charges</b>	<b>\$26.94</b>
<b>Amount Due By Jul 28, 2017</b>	<b>\$54.62</b>
Account Balance	\$54.62

**General Information**

Generation prices and charges are set by the electric generation supplier you have chosen. The Public Utility Commission regulates distribution rates and services. The Federal Energy Regulatory Commission regulates transmission prices and services.

PPL Electric Utilities uses about \$0.66 of this bill to pay state taxes and about \$3.13 is used to pay the PA Gross Receipts Tax.

**kWh Use By Meter**

Reading Dates Previous/Present	Meter Number	Meter Constant	Meter Reading Previous/Present	Kilowatt Hours
Jun 9 Jul 11	10069153	1	68584 68584	0
Days Billed: 32				Total 0

**Understanding Your Bill**

**Act 129 Compliance Rider** - Monthly charge to recover costs for energy efficiency and conservation programs approved by the PUC.

**Type(s) of Meter Readings:**  
**Actual** - Measures your monthly electricity use based on an actual reading.

**Competitive Enhancement Rider** - Monthly charge to recover costs to support shopping for retail electricity supply.

\*Federal I.D. 23-0959590

**Customer Charge** - Monthly charge to recover costs of billing, meters and equipment.

**System Improvement Charge** - Monthly charge to recover costs for improving, repairing and replacing equipment that delivers electricity to your home or business.

**kWh (Kilowatt-hour)** - A measure of how much electricity your household uses. One kilowatt-hour equals the amount of electricity used by ten 100-watt lights left on for one hour.

**Smart Meter Rider** - Monthly charge to recover costs associated with the smart meter programs approved by the PUC.

67277-97002	Jul 28, 2017	\$54.62
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PPL ELECTRIC UTILITIES  
 2 NORTH 8TH STREET CPC-GENM1  
 ALLENTOWN, PA 18101-1178

LARRY MOYER  
 376 W JOHNSON ST UNIT C7  
 PHILADELPHIA, PA 19104-3719

\$26.94

2 24000004500002454 P57373005

Attachment 5

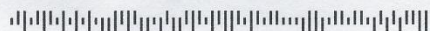
**TERMINATION LETTER FROM PPL**

June 7, 2017

**PPL Electric Utilities**  
2 North 9th Street CPC-GENN1 Allentown, PA 18101-1175  
Tel. 800.358.6623 Fax 484.634.3713  
ppelectric.com



AB 01 006061 69756 E 14 B



LARRY MOYER  
370 W JOHNSON ST UNIT C1  
PHILADELPHIA PA 19144-3119

June 07, 2017

Billie = 6/13/17  
- Audio  
-

Bill Account No: 67277-97002      Acct Balance: \$832.69  
For: 73 Woods Rd, Solar Panels      Amt Past Due: \$832.69  
Klingerstown Pa 17941  
Shut-off Date: June 15, 2017

Under the rules established by the Public Utility Commission, we are notifying you that we intend to terminate electric service to the service address listed above on or after 8:00 AM on the above termination date. This action is being taken because your bill is overdue in the amount stated above. You may avoid discontinuance of service by paying the past due amount prior to the termination date or by CALLING A SERVICE REPRESENTATIVE AT 1-800-358-6623 to make arrangements for payment. YOU SHOULD ALSO CONTACT US AS SOON AS POSSIBLE IF YOU FEEL THAT YOU HAVE BEEN IMPROPERLY BILLED OR YOU NEED FURTHER INFORMATION.

IF AFTER YOU HAVE DISCUSSED WITH US YOUR BILLING OR PAYMENT PROBLEM, YOU ARE NOT SATISFIED, YOU HAVE THE RIGHT TO CONTACT THE PENNSYLVANIA PUBLIC UTILITY COMMISSION AT 1-800-782-1110, OR BY WRITING TO PO BOX 3265, HARRISBURG, PENNSYLVANIA 17120 FOR FURTHER INFORMATION AND ASSISTANCE. IF YOU ARE CALLING FROM OUT-OF-STATE, CALL 1-717-783-1740. THE COMMISSION WILL HAVE STAFF AVAILABLE TO ATTEMPT TO MEDIATE YOUR BILLING PROBLEM IN ORDER TO AVOID TERMINATION.

PPL Electric Utilities service personnel do not accept payments. Please do not wait for a service person to arrive at your door; the service person will not accept payments or negotiate payment plans. As of April 1, 2005, the service person will terminate service at the first visit to your property. In addition, PPL Electric Utilities will terminate service Mondays through Fridays, except holidays.

Go to an authorized payment agency today. Pay the full amount past due and contact one of our service representatives with your receipt information. If you pay by credit card, contact one of our service representatives with the confirmation number.

If termination takes place, a security deposit will be required for reconnection, and a

006061 1/1



006061 1/1

Attachment 6

LETTER TO PPL (Keith Erney)

Larry Moyer  
370 W. Johnson Street (C-1)  
Philadelphia, PA 19144  
email: gtown73@hotmail.com

April 25, 2017

RE: Accts. 6727797002 and 0647621001

Mr. Keith Erney, Staff Analyst  
PPL Electric Utilities  
877 Hausman Road  
Allentown, PA 18104-9392

Mr. Erney:

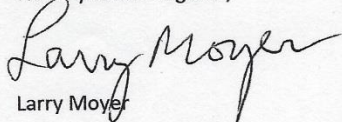
With this letter, I hope to clarify my expectations regarding the 12-month "calculation sheets" which are prepared by PPL Electric for virtual meter aggregation customer-generators at the end of the reporting year.

In 2016, PPL withheld those year-end spreadsheets related to my accounts, saying that I had "refused" them. This claim is incorrect. I did not refuse these or any other spreadsheets that were provided in earlier years. My position simply was, and is, that those supplemental calculation sheets do not constitute the "billing process" and that the complete data in those sheets should appear in the actual monthly bills that I receive.

I'm requesting that the year-end sheets for reporting year 2015-2016, which were withheld, will be sent to me promptly.

I am also expecting that, soon after May 31 of this year, I will receive the year-end sheets for the 2016-2017 reporting year. I will appreciate confirmation that PPL intends to provide these documents as I've requested.

Thank you and regards,

  
Larry Moyer

**Jay Larry Moyer**  
**370 W. Johnson Street (C-1)**  
**Philadelphia, PA 19144**  
**215-844-8224**

**RE: Docket No. C-2015-2511904**

**RE: PPL Electric Account # 67277-97002**

June 13, 2017

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor North  
P. O. Box 3265  
Harrisburg, Pennsylvania 17120

Dear Secretary Chiavetta:

This is to register my objections to a Notice of Termination dated June 7, 2017 which I received (see copy attached). In the Notice, PPL Electric states its intention to terminate electric service to Account # 67277-97002 on or after June 15, 2017.

Although I have decided to pay the amount specified (\$832.69), this payment does not indicate agreement with the balance demanded, and I reserve the right to seek reimbursement in the future.

The Notice of Termination is being contested for three reasons:

First, the Notice is improper because an outstanding Complaint before the Public Utility Commission (C-2015-2511904) directly associates the meter at this account with a second, active meter (Acct. # 06476-21001). Under the law, these two meters must be aggregated, and may not be treated as separate, independent accounts.

Second, both of these accounts will be directly affected by litigation now before the Pennsylvania Supreme Court. In two separate Petitions for Allowance of Appeal (25 WAL 2017 and 235 MAL 2017), The Pennsylvania Supreme Court is being asked to review the PUC's authority. In the former Petition, the Supreme Court is being asked to review an Order of Commonwealth Court, in which the Commonwealth Court ruled that ". . .*the Alternative Energy Act confers no authority upon the PUC to adjudicate matters arising under the Alternative Energy Act.*" (Docket No. 1282 C.D. 2015 p.

15) The disposition of my Petition depends substantially on the decision(s) of the Supreme Court in the Petition by First Energy.

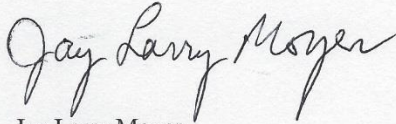
Should the Supreme Court affirm the Commonwealth Court Order in *Sunrise Energy, LLC v. First Energy Corp. and West Penn Power Company*, the PUC's adjudication of my Complaints would be overturned and nullified.

The third reason for contesting the Notice of Termination is PPL's disregard for a provision which the legislature added in 52 Pa. Code § 75.14(e) That provision permits PPL to impose an "incremental expense entailed in processing his [Moyer's] account on a virtual meter aggregation basis". Instead of implementing, or seeking permission to implement, the "incremental expense" charge, PPL arbitrarily imposes an alternate "commercial charge" on my residential PV system.

The PUC defends that practice, but its adjudication and defense of the practice may also be nullified by the Supreme Court's affirmation of the Commonwealth Court's Order.

For the reasons above, the Notice of Termination must be considered impermissible, and my objection to it is here, accordingly, expressed.

Respectfully Yours,

A handwritten signature in cursive script that reads "Jay Larry Moyer". The signature is written in black ink and is positioned above the printed name.

Jay Larry Moyer

Encl: Notice of Termination