

Jay Larry Moyer
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267-693-2633

November 13, 2017

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

RE: C-2017-2629683

Dear Ms. Chiavetta,

A recent letter which I received from PPL Electric, dated November 6, 2017, acknowledges errors in recent bills which were sent to me. In the letter which is attached, PPL offers assurance that “We have corrected this and sent you new bills for the past four months”. The specific bills are not identified, but they are undoubtedly the four bills which are included with the above Formal Complaint (C-2017-2629683).

In the opening of its letter, PPL makes a statement about those four bills which must not be permitted to stand as written. PPL begins by stating, “Your bills initially calculated your virtual metering credit without itemizing on your bill.”

The lack of “itemizing” is merely a symptom of the greater billing confusion. Furthermore, the claim that the original bills “calculated your virtual metering credit” contradicts the bills themselves.

There are no figures, and there is no data in any of the bills, to show that the bills “calculated” credit. Bills for July and September show no credit whatsoever, and the house bills for June and August, which do itemize “Excess Credit”, do so without any supporting data or “calculation”.

Credit which is generated and applied under virtual meter aggregation can be “calculated” only by the actual aggregation of the separate meters. No such aggregation is evident anywhere on the bills, nor is there any “calculation” using data from the separate meters. The bills sent to me are associated with separate meters, and these bills are independent of each other. Nothing in these opaque bills indicates a link between the two different meters. Any calculation of credit that may have occurred is entirely obscure. Any calculation of credit in preparation of these bills was done elsewhere, in a hidden place; on a different document; and in a different format.

PPL Electric should not be permitted to continue its misleading claims in this manner or to distort the facts about its billing process. PPL has made other

such insupportable claims regarding its billing procedures and their reliability. In his Rebuttal testimony in 2015, Aloysius P. Cannon stated that

“. . . the personnel tasked with administering virtual net meter aggregation eventually developed and fine-tuned the manual process, which now allows the Company to perform virtual net meter aggregation in a timely and accurate manner.” Rebuttal, March 6, 2015 at 19 (Emphasis added)

The “timely and accurate” aggregation which PPL professes is simply not evident from the recent bills which were submitted with the above Complaint.

In the same sworn Rebuttal testimony on March 6, 2015, Mr. Cannon claimed that

“There also is a virtual net meter aggregation post where a customergenerator (sic) participating in that program can see the host account’s generation hour by hour each day.” Rebuttal, March 6, 2015 at 46

Multiple efforts to locate this elusive information have been unsuccessful. I have scoured my online accounts and PPL’s website in search of this “post”. I have found data related to “usage”, but none that reports generation or “generation hour by hour”.

PPL is to be commended for acknowledging the errors in these recent bills. Unfortunately, the errors only reinforce the conclusion that the billing methodology is flawed and subject to repeated error. The problem is a systemic one, as shown repeatedly in the face of PPL’s denials and the PUC’s deference to PPL’s current methodology.

Under the present arrangement, the burden of detecting error rests entirely with customer-generators like Larry Moyer. “Fixing” each error on an ad hoc basis is not a satisfactory solution.

This letter is an appeal to the PUC once again to intervene on behalf of virtual metering customers; to require bills that are fully transparent; to demand coherent and credible aggregation; to require bills that report that credible and comprehensive aggregation data; and to demand that PPL institute what it still lacks: a billing process for virtual meter aggregation that is thorough, credible, consistent, accurate, and reliable.

Respectfully Yours,

Larry Moyer
267-693-2633

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LARRY MOYER
370 W JOHNSON ST UNIT C1
PHILADELPHIA, PA 19144

Service Address:
73 WOODS RD
KLINGERSTOWN, PA
17941

November 6, 2017

Bill Account Number: 06476-21001

Dear Larry Moyer:

Your bills initially calculated your virtual metering credit without itemizing on your bill. We have corrected this and sent you new bills for the past four months.

In a separate mailing, you will receive the corrected bill. You do not have to pay the full amount in one lump sum. If you cannot pay the full balance by the due date, we'll be glad to set up a payment plan for you.

If you would like to set up a payment plan or if you would like to discuss this matter, please call one of our Customer Service Representatives at the number on the top of this letter. If we do not hear from you within 15 days, we will assume you can pay the total balance by the due date.

You are a valued customer and we appreciate the opportunity to serve you.

Sincerely,

PPL Electric Utilities