

**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jay Larry Moyer, Complainant

V.

RE: Docket No. C-2017-2629683

PPL Electric Utilities Corporation, Respondent

**Petition to Reopen Proceeding**

**October 25, 2018**

Pursuant to 52 Pa. Code § 5.571, this petition asks the Public Utility Commission to reopen the proceeding in the above case to include relevant material which was not available at the time the record was closed. That relevant material is associated with PPL's claim that there is a "post" for accessing virtual meter aggregation data on the company's website. The relevant material is described in two letters which are attached with this petition.

Beyond claiming that a "virtual net meter aggregation post" exists, PPL had never described the process for utilizing it. PPL's attorney, Mr. Devin Ryan, has now described that process of obtaining data. According to Mr. Ryan, the process involves an online tool that PPL refers to as its "Energy Analyzer". That process requires extraordinary skill; it is cumbersome and unwieldy; and it fails to yield comprehensive information which PPL claims.

This petition asks that the Commission include as evidence the details which Mr. Ryan provided on October 16 and October 24. I also ask that the two attached letters be included as evidence as well.

Respectfully Submitted

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Encl: Letter of October 18  
Letter of October 25

Jay Larry Moyer  
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October 18, 2018

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: Docket No. C-2017-2629683

PLEASE NOTE: When this letter was submitted, it was identified incorrectly with Docket # C-2015-2511904.)

Dear Ms. Chiavetta:

This letter is to inform the Commission of several recent interactions with PPL and the company's attorney. These interactions occurred since the Exceptions were filed in the above case, and they are pertinent to the case.

As I indicated in my exceptions dated September 24, 2018, I contacted PPL seeking assistance in locating the "virtual net meter aggregation post" which PPL professed to make available online. On Tuesday, September 25, 2018, after filing my exceptions, I had a conversation with Ms. Tammy Nalesnik, who returned my

earlier call. I described the “post” which the company had described, and asked Ms. Nalesnik if she could direct me to my generation and aggregation details on that online “post”. Ms. Nalesnik said she was not aware of any such “post”. She said that there is no other detailed online information besides that available on the “Energy Analyzer”. She also indicated that she would ask PPL’s attorney, Mr. Devin Ryan, to contact me regarding my question.

On Tuesday, October 16, 2018, I had a follow-up phone conversation with Mr. Ryan. I began by referring to the earlier phone conversation with Tammy Nalesnik on September 25, 2018 and to the “virtual net meter aggregation post” which PPL has claimed to make available on its website. I reminded him that Ms. Nalesnik was not aware of any such online “post” that could provide me with generation or aggregation data related to my renewable system.

Mr. Ryan then indicated that he could explain how to navigate PPL’s website and offered to demonstrate the various steps to me. I initially accepted his offer and agreed to sign in to my PPL accounts. He directed me to open my solar account, which I did. I followed for a few minutes on my computer as he navigated the site. It became clear that we were utilizing the company’s “Energy Analyzer”, as I have done often in the past. These steps were, in fact, the same ones I had used in previous efforts to locate the “post”. It soon became apparent that there was no

information about generation or aggregation. The solar account referred only to “electricity usage”, which was reported as “0 kwh”.

I further expressed my confusion about Mr. Ryan’s optimism in light of what I had heard from Ms. Nalesnik and stopped navigating the site because it offered nothing new. I also expressed my view that a customer service representative of PPL seemed a more appropriate person to explain the company’s website.

At that point, Mr. Ryan informed me that he had advised PPL not to engage with me in any way about the net metering post unless he was present. He asserted that the issue of the “post” was not raised in the present complaint and could not be litigated now. He also expressed concern that there was some risk of ex parte communication. The nature of that risk was not clear, but he seemed to imply that it was in some way related to the PRO SE status of my case. When the conversation ended, I continued to explore the information on my solar account and could find nothing related to generation or aggregation.

What Mr. Ryan failed to acknowledge is that my question regarding the “virtual net meter aggregation post” was in response to the Initial Decision of ALJ Joel H. Cheskis, who alluded to the post in his Initial Decision. Judge Cheskis reiterated a claim from earlier proceedings that monthly information for my

generation and aggregation is available “by other means”. The “post” is merely one of the “other means” alluded to by ALJ Judge Cheskis. When Judge Cheskis claims that information is available “by other means”, he is, in fact, quoting PPL’s own claim as described in the Opinion and Order from an earlier case.

(consolidated cases C-2011-2273645 and C-2014-2444864, issued May 19, 2016)

It is disingenuous to suggest that I am responsible for raising the issue of the virtual metering post or any of the “other means” which PPL claims to make available to virtual metering customers. I ask the Commission to note that my comments about the “post” were offered in response to the Initial Decision of Judge Cheskis.

Respectfully,

Larry Moyer

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October 25, 2018

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RE: Docket No. C-2017-2629683

Dear Ms. Chiavetta:

As noted in my filing of Exceptions on September 24, 2018, I called PPL asking if Ms. Nalesnik would walk me through the online information for my solar generating system. My phone call to PPL regarding the online data was eventually returned by Mr. Devin Ryan, PPL's attorney. That first conversation is described in the attached letter of October 18, 2018.

Mr. Ryan and I spoke again on October 24, 2018, and in that conversation he described the process of accessing online data for my generating system. I navigated my own solar account online while he described the required steps.

Those steps (shown below) required moving between the online solar account and several house bills. We were unable to continue beyond step #8 when the promised Excel document did not appear. The remaining steps are based on Mr. Ryan's descriptions.

As I understand Mr. Ryan's explanation, the online process of obtaining virtual meter aggregation data involves the following steps.

1. Access the solar account online.
2. Click on "Usage summary" (generation is not shown).
3. A bar graph will appear with the heading "Daily Electric Usage".
4. Locate the actual house bill for the selected billing period.
5. Note the beginning and ending dates on the house account.
6. Return to the solar account online ("Daily Electric Usage").
7. Enter the beginning and ending dates from the house account.
8. Click on the "Export" button. (Excel spreadsheet is required)
9. Open the Excel spreadsheet which appears. (no spreadsheet appeared.)
10. Make note of "negative usage" for the billing period (kWh total).
11. Reopen the house bill for the selected billing period.
12. Add together the three per kWh rates as shown on the house bill to determine the "full retail" value.
13. Multiply the total from step #12 by the total kWh of "negative usage" in step #10.
14. Locate the house bill for the subsequent billing period (the billing period following the one selected in step #4 above).
15. Note the dollar amount of "Excess Credit" on that subsequent house bill.
16. Check to see if the "Excess Credit" matches the total amount computed from the previous month as shown in step #13.

Please note the following conditions:

- a. The process requires multiple manual calculations.
- b. The process must be adjusted for PPL's "one-month lag".

- c. All steps must be completed each month to review the generation credit.
- d. There is no combination of meter readings as the regulations require.
- e. The amount of actual generation is never shown (before usage at the solar panels is subtracted).
- f. Instead of showing actual generation, “negative usage” is re-defined as “generation”.
- g. The use of the “Energy Analyzer” must not be confused with the “billing process” itself.
- h. The process requires special knowledge of computer operations.
- i. The process requires special software (Microsoft Excel)
- j. The process requires knowledge of website navigation.

Although there is measurable usage at the location of the solar panels, it is never reported on the website or on the solar bills. That “usage” is consistently reported as zero (0 kWh).

Knowledge of Microsoft Excel is required to complete the “export” that Mr. Ryan described (Step #8, above). I was simply unable to complete the process of exporting data to an Excel spreadsheet.

The process that Mr. Ryan described is unwieldy; information must be retrieved from different accounts; it involves many steps; it requires multiple independent calculations; and it fails to provide comprehensive virtual metering data.

In order to assure that I have not misrepresented the above process, I will be happy to complete PPL's online process in the presence of Commission staff and under their supervision.

Respectfully submitted,

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