

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

May 30, 2019

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

**RECEIVED**

MAY 31 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

RE: C-2017-2629683

I ask respectfully that this letter (with attachments) be added, for review, to previous communications in which I requested re-opening of the above case. In a noted improvement, the most recent solar bills have added some new data. For the first time in ten years, with this new information ("kWh received"), I am now able to see current generation data on a monthly basis.

This is an important step toward correcting past failures. Regrettably, however, the box does not show cumulative data or allow me to verify monthly credit. It does not show the number of kilowatt hours carried forward (i.e. "banked") or the per-unit value of the generation. It does not correct the ongoing failure to provide cumulative data that is current, complete and verifiable. The attached letter from PPL, moreover, and the associated bills, offer dramatic evidence of that continuing failure.

My purpose for filing the above Complaint, as in previous cases, was to obtain consistent, accurate and verifiable data in my monthly bills. (As I've shown before, this data is not even available on PPL's Energy Analyzer, despite the Company's earlier claims.)

New information of several kinds is represented in the attachments to this letter: 1)

Unlike in recent years, my generation (apparently) exceeded my usage for the year; 2) As noted

above, PPL has altered the solar bill by adding a new box (“kWh received”).<sup>1</sup>; 3) The two solar bills show that a new meter was installed during the year; and 4) The example of Duquesne Electric remains an exemplary, and alternative “billing process” for virtual meter aggregation.

The letter from PPL (May 20, 2019) announces that it will issue me a check for \$9.27 “based on meter readings from 5/09/2018 to 05/10/2019”. Unfortunately, there are no credible meter readings to support that amount, or to substantiate the claim that I generated 128 kWh more than I used.

First of all, there is no evidence in any of PPL’s documents that the meter readings were taken on the dates that are identified (05/09/2018 and 05/10/2019). In fact, the bills for those two months are dated May 14 and May 13 respectively.

Second, there is nothing to indicate the total number of kilowatt hours that were generated during the year. While PPL’s letter alludes to totals for the year, those totals are not shown, either in the letter or in the solar bills.

Third, because the meter was replaced during the year, the two bills show separate and independent numbering sequences. One bill (May 14, 2018) shows readings from meter number 10069153, while the other bill (May 13, 2019) reports readings from meter number 301181118. It is impossible to know how many kilowatt hours were reported by the first meter (10069153) and how many by the second meter (301181118).

Finally, there is nothing in the “Energy Analyzer” to indicate when readings were taken, nor is there any report of yearly totals.

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<sup>1</sup> The format of my bills has been tweaked repeatedly, and dozens of changes have been made to the bills since my system was approved in 2009.

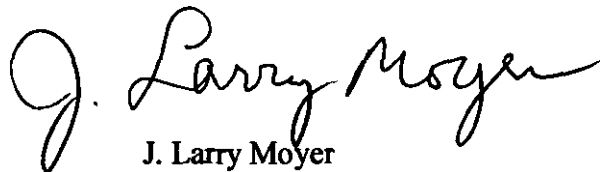
Data for my PV system, when it does exist, is fragmented, incomplete, and scattered across various documents. In PPL's billing process, virtual meter aggregation simply does not occur. Until the relevant data is reported each month in a coherent, comprehensive, and cumulative manner, my bills will not be reliable, and PPL's message to me and the Commission will remain, "Trust us".

Note: PPL has chosen to employ a most arcane and complicated methodology for virtual metering. By contrast, the method used by Duquesne Light in the attached sample bill, offers a direct and coherent alternative to PPL's method. Credit is always current; credit is shown in kilowatt hours; and "banked" kilowatt hours are cumulative

PPL now effectively bars homeowners from access to virtual meter aggregation, but it should not, willy nilly, be permitted to continue its opaque and disordered billing procedures for those few homeowners that were approved soon after the AEPS Act was passed.

PPL has also argued that bills after May 22, 2018, are not properly a part of the above Complaint. (PPL Answer to Second Request to Re-open, at 9-10) There is no merit to that claim, since the billing process itself is the issue in dispute. It would be regrettable, moreover, if still another Complaint should be required to address the new circumstances outlined here.

Respectfully submitted



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

Cc: Office of Special Assistants

RECEIVED

MAY 31 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**PPL Electric Utilities**  
827 Hausman Road  
Allentown, PA 18104-9392  
Tel. 800.342.5775 Fax 484.634.3484  
www.pplelectric.com



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

**Service Address:**  
73 WOODS RD, SOLAR  
PANELS  
KLINGERSTOWN, PA  
17941

May 20, 2019

**Bill Account Number: 67277-97002**

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Dear LARRY MOYER:

Based on meter readings from 05/09/2018 to 05/10/2019, our records show that you generated 128 kWh more than you used for this period with your renewable generation system.

As a result, we will issue you a check in the amount of \$9.27. We based the amount of the check on the difference between the kWh generated and used as well as current reimbursement rate of 7.244 cents per kW.

For clarification, the reimbursement period above differs from the typical January through December income tax period because we based this reimbursement period on your meter reading in May rather than December. As a result, the reimbursement amount reported for tax purposes will likely differ from the amount of the check sent to you.

If you have any questions, please contact us at [RenewableEnergyApplications@pplweb.com](mailto:RenewableEnergyApplications@pplweb.com) or at 1-800-342-5775.

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

Sincerely,

---

**PPL Electric Utilities**

May 10, 2019 01289  
May 9, 2018 68584

**RECEIVED**

MAY 31 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



PPL Electric Utilities



Pay/Manage your account online at pplelectric.com



Questions? Please contact us by May 30. 1-800-DIAL-PPL (1-800-342-5775) Mon-Fri: 8am to 5pm

Adjusted Bill

Page 1

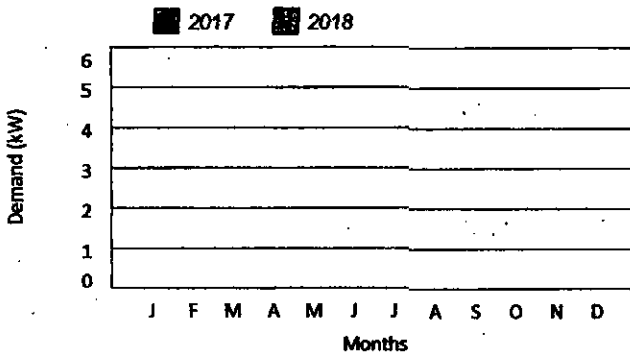
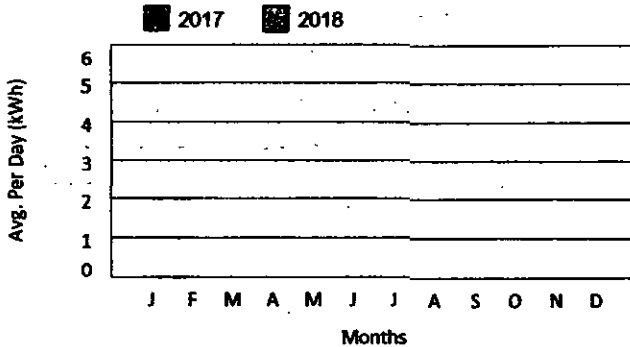
| Bill Acct No | Due Date     | Amount Due |
|--------------|--------------|------------|
| 67277-97002  | May 30, 2018 | \$342.04   |

### Your Electric Usage Profile

Service to:  
LARRY MOYER  
73 WOODS RD, SOLAR PANELS  
KLINGERSTOWN, PA 17941

Your next meter reading is on or about Jun 8, 2018.

This section helps you understand your year-to-year electric use by month. Meter readings are actual unless otherwise noted.



### Billing Summary

(Billing details on back)

|                                   |                 |
|-----------------------------------|-----------------|
| Balance as of May 14, 2018        | \$311.69        |
| Charges:                          |                 |
| Total Distribution Charges        | \$30.35         |
| Total Current Charges             | \$342.04        |
| <b>Amount Due By May 30, 2018</b> | <b>\$342.04</b> |
| Account Balance                   | \$342.04        |

### How To Shop For Electricity

You can choose the company that supplies your electricity. Visit [papowerswitch.com](http://papowerswitch.com) or [www.oca.state.pa.us](http://www.oca.state.pa.us) for supplier offers. If you are shopping, know your contract expiration date.

Here's the information you need to shop:

Bill Account Number: **67277-97002** Rate Schedule: **GS1**  
Current Supplier: **PPL Electric Utilities**

PPL Electric Utilities price to compare for your rate is \$0.07701 per kWh. This changes the 1st of June and December.

### Manage Your Account

| Pay Your Bill   | Online Options (pplelectric.com)   |
|---|--|
| Online: Visit <a href="http://pplelectric.com">pplelectric.com</a>                      | - Report an outage/check outage status   |
| Phone: Call 1-800-342-5775  | - Make a payment, view your bill and usage history.  |
| Mail: Use envelope provided   | - Sign up for alerts.  |
| Card: MasterCard, Discover, Visa or debit, call 1-844-278-3310 (service fee applies)    | - Enroll in paperless billing, automatic bill pay, budget billing.                             |
|   | - View your rate schedule at: <a href="http://pplelectric.com/rates">pplelectric.com/rates</a> |
| <b>Correspondence:</b><br>Customer Services, 827 Hausman Road, Allentown, PA 18104-9392 |  |

Other important information on the back of this bill →

Return this stub in the envelope provided with a check payable to PPL Electric Utilities.



PPL Electric Utilities

AB 01 002620 45653 B 11 C



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

| Bill Acct No | Due Date     | Amount Due |
|--------------|--------------|------------|
| 67277-97002  | May 30, 2018 | \$342.04   |

Amount Enclosed:



PPL ELECTRIC UTILITIES  
2 NORTH 9TH STREET CPC-GENN1  
ALLENTOWN, PA 18101-1175



1 3900003420490000342044 6727797002

## 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).
- 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)

Page 2

|  |          |                 |
|--|----------|-----------------|
| Previous Balance                             | \$311.69 |                 |
| Balance as of May 14, 2018                   |          | \$311.69        |
| <b>Charges for - PPL Electric Utilities</b>  |          |                 |
| General Service Rate: GS1 for Apr 10 - May 9 |          |                 |
| Distribution Charge:                         |          |                 |
| Customer Charge                              | 22.00    |                 |
| Smart Meter Rider - Phase 2                  | 6.58     |                 |
| Competitive Enhancement Rider                | 0.06     |                 |
| System Improvement Charge at -0.02%          | -0.01    |                 |
| PA Sales Tax                                 | 1.72     |                 |
| Total Distribution Charges                   |          | \$30.35         |
| <b>Amount Due By May 30, 2018</b>            |          | <b>\$342.04</b> |
| Account Balance                              |          | \$342.04        |

## 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 \$3.30 of this bill to pay state taxes and about \$20.07 is used to pay the PA Gross Receipts Tax.

| kWh Use By Meter            |         |          |          |                 |          |
|-----------------------------|---------|----------|----------|-----------------|----------|
| kWh Delivered (to Customer) |         |          |          |                 |          |
| Reading Dates               |         | Meter    | Meter    | Meter Reading   | Kilowatt |
| Previous/                   | Present | Number   | Constant | Previous/       | Hours    |
| Apr 10                      | May 9   | 10069153 | 1        | 68584           | 68584    |
| Days Billed: 29             |         |          |          | Total Delivered | 0        |

## Understanding Your Bill

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

**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.

**kWh Delivered to Customer** - The amount of electricity we delivered to you for your use.

### Type(s) of Meter Readings:

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

\*Federal I.D. 23-0959590



PPL Electric Utilities



Pay/Manage your account online at [ppllectric.com](http://ppllectric.com)



Questions? Please contact us by May 29. 1-800-DIAL-PPL (1-800-342-5775) Mon-Fri: 8am to 5pm

Corrected Bill

Page 1

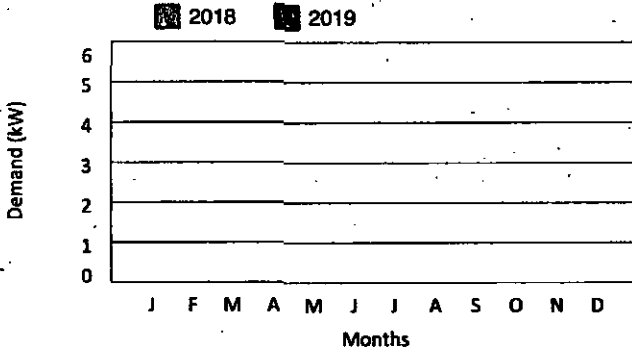
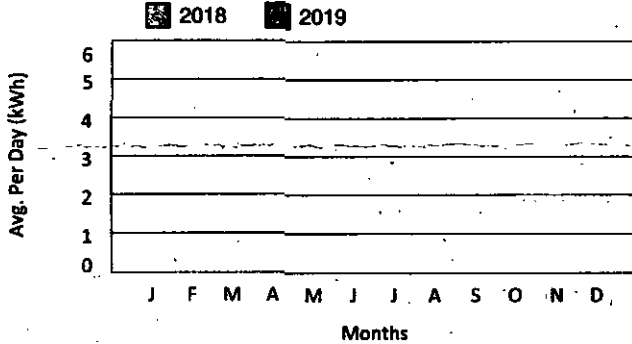
| Bill Acct. No. | Due Date     | Amount Due |
|----------------|--------------|------------|
| 67277-97002    | May 29, 2019 | \$693.70   |

### Your Electric Usage Profile

Service to:  
LARRY MOYER  
73 WOODS RD, SOLAR PANELS  
KLINGERSTOWN, PA 17941

Your next meter reading is on or about Jun 11, 2019.

This section helps you understand your year-to-year electric use by month. Meter readings are actual unless otherwise noted.



### Billing Summary (Billing details on back)

|                                   |                 |
|-----------------------------------|-----------------|
| Balance as of May 13, 2019        | \$664.46        |
| Charges:                          |                 |
| Total Distribution Charges        | \$29.24         |
| Total Current Charges             | \$693.70        |
| <b>Amount Due By May 29, 2019</b> | <b>\$693.70</b> |
| Account Balance                   | \$693.70        |

### How To Shop For Electricity

You can choose the company that supplies your electricity. Visit [papowerswitch.com](http://papowerswitch.com) or [www.oca.state.pa.us](http://www.oca.state.pa.us) for supplier offers. If you are shopping, know your contract expiration date.

Here's the information you need to shop:

Bill Account Number: 67277-97002 Rate Schedule: GS1

Current Supplier: PPL Electric Utilities

PPL Electric Utilities price to compare for your rate is \$0.07244 per kWh. This changes the 1st of June and December.

### Manage Your Account

| Pay Your Bill  | Online Options ( <a href="http://ppllectric.com">ppllectric.com</a> )                        |
|--|--|
| Online: Visit <a href="http://ppllectric.com">ppllectric.com</a>                     | - Report an outage/check outage status   |
| Phone: Call 1-800-342-5775   | - Make a payment, view your bill and usage history.  |
| Mail: Use envelope provided  | - Sign up for alerts.  |
| Card: MasterCard, Discover, Visa or debit, call 1-844-278-3310 (service fee applies) | - Enroll in paperless billing, automatic bill pay, budget billing.                           |
|  | - View your rate schedule at: <a href="http://ppllectric.com/rates">ppllectric.com/rates</a> |

### Correspondence:

Customer Services, 827 Hausman Road, Allentown, PA 18104-9392

Other important information on the back of this bill →

Return this stub in the envelope provided with a check payable to PPL Electric Utilities.



PPL Electric Utilities

| Bill Acct. No. | Due Date     | Amount Due |
|----------------|--------------|------------|
| 67277-97002    | May 29, 2019 | \$693.70   |

Amount Enclosed:

|   |   |   |   |   |   |   |   |
|---|---|---|---|---|---|---|---|
| □ | □ | □ | □ | □ | □ | □ | □ |
|---|---|---|---|---|---|---|---|

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

PPL ELECTRIC UTILITIES  
2 NORTH 9TH STREET CPC-GENN1  
ALLENTOWN, PA 18101-1175

1 1600006937060000693704 6727797002

## 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 [pplelectric.com](http://pplelectric.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.

## 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 \$6.71 of this bill to pay state taxes and about \$40.83 is used to pay the PA Gross Receipts Tax.

## Understanding Your Bill

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

**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.

**Tax Cut and Jobs Act Credit** - Monthly adjustment for federal tax changes.

**kWh Delivered to Customer** - The amount of electricity we delivered to you for your use.

**kWh Received from Customer** - The amount of electricity you returned to the grid.

\*Federal I.D. 23-0959590

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

Page 2

|  |                 |
|--|-----------------|
| Previous Balance                             | \$693.93        |
| <i>Balance as of May 13, 2019</i>            | \$664.46        |
| <b>Charges for - PPL Electric Utilities</b>  |                 |
| General Service Rate: GS1 for Apr 9 - May 10 |                 |
| Distribution Charge:                         |                 |
| Customer Charge                              | 22.00           |
| Tax Cut and Jobs Act Credit at -7.81%        | -1.72           |
| Smart Meter Rider - Phase 2                  | 7.30            |
| PA Sales Tax                                 | 1.66            |
| <b>Total Distribution Charges</b>            | <b>\$29.24</b>  |
| <b>Amount Due By May 29, 2019</b>            | <b>\$693.70</b> |
| Account Balance                              | \$693.70        |

| kWh Use By Meter             |         |           |          |               |                 |          |
|------------------------------|---------|-----------|----------|---------------|-----------------|----------|
| kWh Delivered (to Customer)  |         |           |          |               |                 |          |
| Reading Dates                |         | Meter     | Meter    | Meter Reading |                 | Kilowatt |
| Previous/                    | Present | Number    | Constant | Previous/     | Present         | Hours    |
| Apr 9                        | May 10  | 301181118 | 1        | 00000         | 00000           | 0        |
| Days Billed: 31              |         |           |          |               | Total Delivered | 0        |
| kWh Received (from Customer) |         |           |          |               |                 |          |
| Reading Dates                |         | Meter     | Meter    | Meter Reading |                 | Kilowatt |
| Previous/                    | Present | Number    | Constant | Previous/     | Present         | Hours    |
| Apr 9                        | May 10  | 301181118 | 1        | 00805         | 01289           | 484      |
| Days Billed: 31              |         |           |          |               | Total Received  | 484      |
| Net (Delivered - Received)   |         |           |          |               |                 | -484     |

**kWh Net:** kWh Delivered - kWh Received.

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

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

Duquesne Light Non-Basic Services/Special Charges

Currently you are not subscribing to any Non-Basic Services.

JLM-7

Duquesne Light Company Rider 21 -Net Metering Service

1 Calculation of excess kilowatt-hours (kWh)

Meter Number: G15524584 ← ①

|                                   |                           |                  |
|-----------------------------------|---------------------------|------------------|
| Present Read:                     | September 25, 2014 Actual | 9825             |
| Prior Read:                       | August 26, 2014 Actual    | 9854             |
|                                   | Difference                | -29              |
| Your meter multiplier             |                           | 10               |
| Excess kWh for this billing cycle |                           | (290)            |
| Excess kWhs from prior billing    |                           | (320)            |
| Total excess kWh to date          |                           | (480) See note C |

2 Meter Number: G0473 [REDACTED] ← ②

|  |                           |       |
|--|---------------------------|-------|
| Present Read:                          | September 25, 2014 Actual | 68    |
| Prior Read:                            | August 26, 2014 Actual    | 55    |
|  | Difference                | 13    |
| Your meter multiplier                  | x                         | 10    |
| kWh used this billing cycle            |                           | 130   |
| Excess kWh from Meter Number G15524584 |                           | (610) |
| Billed kWhs for acct [REDACTED]        |                           | -     |

A) You have received credit for each kilowatt-hour you delivered to Duquesne Light Company (DLC) up to the total amount of electricity DLC delivered to you during the billing period. The credit is at the full retail rate. Any excess kilowatt-hours are carried forward to your next bill.

B) On May 31 each year, we will credit your account for any kilowatt-hours we received from you in excess of the kilowatt-hours we delivered to you during the preceding year. The credit will be calculated at the Price to Compare (PTC) for your account.

C) If you select an alternative electric generation supplier, it is your responsibility to alert them of your participation in Duquesne Light's Rider 21 Net Metering Service. Your supplier may require you to sign a contract or provide them with additional information to allow them to properly service your account.

Please be aware that the annual true-up payment is the responsibility of the company that supplies your electricity. If you choose another electric supplier, Duquesne Light no longer will provide an annual true-up payment since it is not providing the power supply.

## **Certificate of Service**

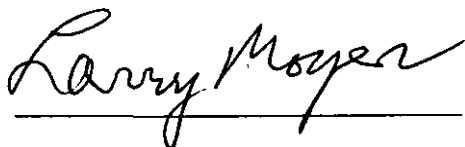
### **Letter: Supplement to Second Petition to Reopen Proceedings**

RE: Docket No. C-2017-2629683

I hereby certify that I have this day served a true copy of the foregoing letter upon the parties listed below in accordance with the requirements of § 1.54 (relating to service by a party).

Devin T. Ryan  
Post & Schell PC  
17 North Second Street, 12<sup>th</sup> floor  
Harrisburg, PA 17101-1601  
(Served via USPS First Class Mail)

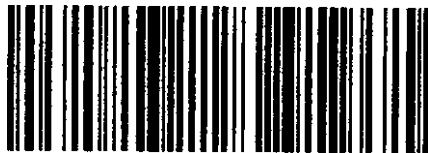
May 30, 2019

A handwritten signature in cursive script that reads "Larry Moyer". The signature is written in black ink and is positioned above a solid horizontal line.

Larry Moyer, Complainant  
370 W. Johnson Street  
Philadelphia, PA 19144  
267-693-2633



Mr Larry Moyer  
 Apt C1  
 370 W Johnson St  
 Philadelphia, PA 19144



7018 0360 0001 6689 1457

Ms. Rosemary Chiavetta  
 Secretary's Bureau  
 Pennsylvania Public Utility Commission  
 PO Box 3265  
 Harrisburg , PA 17105-3265

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