

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

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JUN 19 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

June 19, 2019

RE: C-2017-2629683

Dear Secretary Chiavetta:

The enclosed new material is submitted for filing in the above case. This material is submitted in support of my Petitions to re-open the above case. The enclosed material shows still more evidence of disarray in PPL's billing process for virtual meter aggregation as well as confusion and internal contradictions regarding PPL's year-end spreadsheets.

Sincerely,


Jay Larry Moyer

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June 19, 2019

Ms. Cheryl Oehler
Director of Billing
Net Metering Program
PPL Electric Utilities Corporation
827 Hausman Road
Allentown, PA 18104-9392

Dear Ms. Oehler:

With the end of another Reporting Year (May 31, 2019), the question again arises regarding PPL's policy for issuing the detailed "spreadsheet" for virtual metering customers. As the record shows, I requested such a spreadsheet in April, 2017, but none was provided until October, 2017, after I filed the above Complaint (C-2017-2629683) That spreadsheet, which was presented at the Formal Hearing (PPL Exhibit #10) includes data only through February, 2018.

As reported by the Public Utility Commission, the company promised to make the spreadsheet available on a regular basis.

In 2014, the PUC cited the sworn testimony of Aloysius P. Cannon and said:

"Mr. Cannon also explained that for the 2013 PJM Planning Year, PPL would provide these statements to all virtual metering customers as a standard practice. Tr. at 221." (Opinion and Order, January 9, 2014, footnote 5, at 13)

In 2016, the PUC asserted

"... while the additional information the Complainant sought was not on his bill, PPL offers such information on a spreadsheet on a monthly basis. Opinion and Order, May 19, 2016, at 17

In the same Opinion and Order, the Commission asserted,

“As noted above, after the end of the 2012 PJM planning year, PPL began sending to its virtual meter aggregation customers, upon request, a calculation spreadsheet which depicts their monthly credits. PPL has continued this practice after the end of each PJM planning year.” Opinion and Order, May 19, 2016, at 28

Unfortunately, information provided in Discovery contradicts those claims and suggests that PPL is no longer providing these spreadsheets. The enclosed email refers to Mr. Aloysius P. Cannon, who had been “responsible for the billing applications, policies, and processes”. (PPL Electric Statement No. 1, March 6, 2015)

The email states explicitly that “Larry Moyer sent a letter requesting year end sheets but Al had said we were not providing them.” The email is dated May 26, 2017, one month after my letter of April 25, 2017, in which I requested spreadsheets for 2016 and 2017. The email also indicates that the “Procedures for monthly VM customer calculations” are no longer being followed. Those “Procedures”, of course, were used to prepare the spreadsheets, according to PPL’s own testimony.

This present letter is not a request for spreadsheets. It is asking, instead, for clarification about PPL’s current policy with regard to providing them. Are they no longer being provided as the email indicates?

If they are no longer being provided, what means is available to me to obtain comprehensive data (monthly meter readings; total kilowatt hours of generation on a monthly and annual basis; “excess” kilowatt hours that were “banked” from month to month; per-unit values; cash-out and true-up; etc.) from my renewable facility for the two Reporting Years, June 1, 2017 to May 31, 2018 and June 1 to May 31, 2019?

Thank you for your response.

Yours sincerely,

A handwritten signature in black ink that reads "J. Larry Moyer". The signature is written in a cursive style with a long, sweeping tail on the "y".

J. Larry Moyer

Cc: Mr. Devin Ryan
Hon. Joel H. Cheskis, ALJ
Rosemary Chiavetta, Secretary, Public Utility Commission
Office of Special Assistants, PUC

[REDACTED]

From: Keiser, Deborah L
Sent: Friday, May 26, 2017 1:09 PM
To: Oehler, Cheryl T
Subject: RE: Look what I found from Al Cannon --- Procedures for monthly VM customer calculations.doc

Larry Moyer sent a letter requesting year end sheets but Al had said we were not providing them [REDACTED]
[REDACTED] I came across this and it is also in Al's testimony.

From: Oehler, Cheryl T
Sent: Friday, May 26, 2017 12:55 PM
To: Keiser, Deborah L; Nalesnik, Tammy L
Subject: RE: Look what I found from Al Cannon --- Procedures for monthly VM customer calculations.doc

I mentioned this document to Tammy -- I think Shannon schwarte created this process document with screen shots...I'm sure this will help Tammy. Cheryl

From: Keiser, Deborah L
Sent: Friday, May 26, 2017 12:49 PM
To: Oehler, Cheryl T; Nalesnik, Tammy L
Subject: Look what I found from Al Cannon --- Procedures for monthly VM customer calculations.doc

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Certificate of Service

Letter to PPL regarding Year-end spreadsheets for virtual metering

RE: Docket No. C-2017-2629683

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

Via USPS

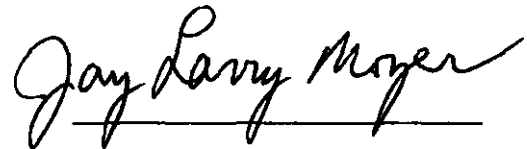
Devin T. Ryan
Post & Schell PC
17 North Second Street, 12th floor
Harrisburg, PA 17101-1601
(Served via email and USPS First Class Mail)

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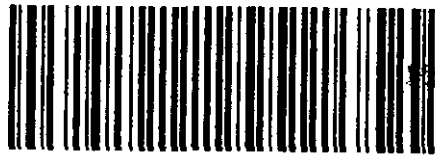
June 19, 2019



Jay 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



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

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