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File #: 140074

July 16, 2019

VIA ELECTRONIC FILING

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: Jay Larry Moyer v. PPL Electric Utilities Corporation
Docket No. C-2017-2629683

Dear Secretary Chiavetta:

The purpose of this letter is to respond to the letter dated June 19, 2019, submitted by Jay Larry Moyer (“Complainant”) in the above-captioned proceeding. Therein, the Complainant asks Ms. Cheryl Oehler at PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) to clarify the Company’s current policy on providing year end calculation sheets to virtual meter aggregation customer-generators.

As a preliminary matter, PPL Electric notes that the first page of the document filed with the Pennsylvania Public Utility Commission (“Commission”) was not provided to PPL Electric. Therefore, PPL Electric was unaware of the Complainant’s request that his letter addressed to Ms. Cheryl Oehler dated June 19, 2019, be considered “in support of [his] Petitions to re-open the above case.” Thus, to the extent that the Complainant’s letter is considered by the Commission, this letter in response should be considered as well.

In addition, the Company has been clear about its policy for providing year end calculation sheets to virtual meter aggregation customer-generators. Specifically, PPL Electric stated that it will provide “upon request” a virtual meter aggregation customer-generator’s “calculation spreadsheet which depicts their monthly credits.” *See Moyer v. PPL Electric Utilities Corp.*, Docket Nos. C-2011-2273645, C-2014-2444864, p. 28 (Order entered May 19, 2016). The Commission should soundly reject the Complainant’s argument that the May 2017 email included in the Complainant’s July 19, 2019 letter states otherwise. The Complainant fails to recognize that the May 2017 email concerned whether to provide the Complainant with the

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spreadsheets, even though he requested the spreadsheets in discovery in his Third Complaint proceeding at Docket No. C-2015-2511904 and, at the time of his request for those spreadsheets, discovery was stayed by order of the presiding administrative law judge. *See Moyer v. PPL Electric Utilities Corp.*, Docket No. C-2015-2511904 (Jan. 13, 2016). Ultimately, the Complainant was sent the year end calculation sheets on October 23, 2017, and PPL Electric stated that it would be willing to send the Complainant the year end calculation sheets on an annual basis. All of this, including the Company's May 2017 email, was specifically addressed at the evidentiary hearing in this proceeding on March 6, 2018. (Tr. 147-50, 185-86.)

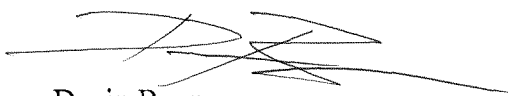
Finally, this May 2017 email is nothing new. In fact, it was admitted into the record as Complainant's Exhibit No. 42, and the Complainant cross-examined PPL Electric witness Tammy Nalesnik about the letter at the evidentiary hearing. (Tr. 147-50, 196-97.) Thus, the May 2017 email and the Complainant's allegations in the June 19, 2019 letter are not "material changes of fact or law" that would warrant reopening of the record. 52 Pa. Code § 5.571.

For these reasons, and as previously explained in PPL Electric's pleadings filed in response to the Complainant's multiple petitions to reopen the proceeding, the Complainant's petitions to reopen the proceeding should be denied.

A signed verification from Ms. Cheryl Oehler attesting to the statements in this letter is enclosed.

Copies of the letter and verification will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan


DTR/jl
Enclosures

cc: Office of Special Assistants
Certificate of Service

VERIFICATION

I, CHERYL T. OEHLER, being a Project Manager at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 7/15/19



Cheryl T. Oehler


CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA E-MAIL &
REGULAR MAIL**

Jay Larry Moyer
370 West Johnson Street
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Philadelphia, PA 19144
E-mail:gtown73@hotmail.com

Date: July 16, 2019



Devin T. Ryan