

September 9, 2019

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: Petition of PPL Electric Utilities Corporation for Approval of Tariff
 Modifications and Waivers of Regulations Necessary to Implement its
 Distributed Energy Resources Management Plan
 Docket No. P-2019-3010128**

Prehearing Conference Memorandum of Sunrun Inc.

Secretary Chiavetta:

Enclosed please find the Prehearing Conference Memorandum of Sunrun Inc. for filing in the above-referenced proceeding. Please contact me if you have any questions concerning this matter.

Sincerely,

/s/ James M. Van Nostrand

James M. Van Nostrand
Keyes & Fox, LLP

Counsel to Sunrun Inc.

cc: The Honorable Emily I. DeVoe, ALJ

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation	:	
for Approval of Tariff Modifications and	:	
Waivers of Regulations Necessary to	:	Docket No. P-2019-3010128
Implement its Distributed Energy Resources	:	
Management Plan	:	

PREHEARING CONFERENCE MEMORANDUM OF SUNRUN INC.

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DATE: September 9, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Tariff Modifications and :
Waivers of Regulations Necessary to : Docket No. P-2019-3010128
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PREHEARING CONFERENCE MEMORANDUM OF SUNRUN INC.

Pursuant to 52 Pa.Code § 5.221 - § 5.223 and the Prehearing Conference Order (“Order”) issued August 28, 2019 by Administrative Law Judge DeVoe (“Judge DeVoe” or “Presiding Judge”), Sunrun Inc. (“Sunrun”) hereby submits this Prehearing Conference Memorandum.

I. Procedural Background

On May 24, 2019, PPL Electric Utilities Corporation (“PPL”) submitted the *Petition of PPL Electric Utilities for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan* (“Petition”). PPL’s Petition requests the Commission’s waiver of certain regulations and approval of certain modifications to the Company’s net metering and interconnection requirements to implement PPL’s proposed “DER Management Plan” (“Plan”).¹ PPL’s Plan would, among other things, require customers applying to interconnect new DERs to PPL’s distribution system to (1) use Company-approved smart inverters that are compliant with IEEE Standard 1547-2018 and

¹ Docket No. P-2019-3010128, *Petition of PPL Electric Utilities Corporation for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan* at p. 1 (May 24, 2019).

forthcoming UL Standard 1741; and (2) install devices that enable PPL to monitor and proactively manage customers' DERs.²

On July 30, 2019, Sunrun, the Natural Resources Defense Council ("NRDC"), and the Office of Consumer Advocate ("OCA") filed petitions to intervene and answers ("Answer" or "Answers") to the Petition. The Answers of Sunrun, NRDC and the OCA recommended the Commission deny PPL's Petition. In the alternative, Sunrun, NRDC and OCA each requested the Commission investigate the issues raised in PPL's Petition through a procedure applicable on a statewide basis.³ On July 30, 2019, Sustainable Energy Fund filed comments recommending the Commission deny PPL's Petition. On July 30, 2019, Trinity Solar; Grid Lab; Solar Unified Network of Western Pennsylvania; Independent Energy Solutions, LLC; the Interstate Renewable Energy Council, Inc.; the Pennsylvania Solar Energy Industries Association; and Exact Solar filed comments recommending the Commission deny PPL's Petition and expressly supporting NRDC's Answer.⁴

² *Id.* at p. 2.

³ See Docket No. P-2019-3010128, *Answer of Sunrun Inc. to Petition of PPL Electric Utilities Corporation* at p. 17 (July 30, 2019) (stating "Sunrun requests the Commission suspend the proposed tariff revisions and open a new proceeding applicable statewide to investigate the technical, policy and other issues raised by the Petition and allow all interested parties to participate and engage through a full and robust stakeholder process."); *Answer of Natural Resources Defense Council to Petition of PPL Electric Utilities Corporation* at p. 16 (July 30, 2019) (stating "[i]mplementing a DER Management System in Pennsylvania is premature, given the current levels of penetration in the state and the lack of comprehensive standards and regulations in the industry. At such time as consideration of a DER Management System is warranted, it should be done through a generic rulemaking process to amend Chapter 75 rather than implemented piecemeal by an individual utility, which would create the possibility of disparate interconnection requirements across the Commonwealth."); *Answer of the Office of Consumer Advocate* at p. 10 (July 30, 2019) (stating "[t]he OCA submits that PPL's proposal presents a broader set of questions that affects numerous stakeholders, including regulatory, utilities and consumers alike. Indeed a statewide approach to this issue may be beneficial for several reasons.").

⁴ See Docket No. P-2019-3010128, Trinity Solar, *Comments in Support of Answer Filed by Natural Resources Defense Council* (July 30, 2019); Grid Lab, *Comments in Support of Answer Filed by Natural Resources Defense Council* (July 30, 2019); Solar Unified Network of Western

On August 6, 2019, this matter was assigned to the Office of Administrative Law Judge and the Office of Special Assistants.⁵

On August 22, 2019, the petitions to intervene of Sunrun and NRDC were granted.⁶ On August 22, 2019, PPL filed a Letter in response to the Answers of Sunrun, NRDC and OCA.⁷

On August 28, 2019, Judge DeVoe issued a Notice of Prehearing Conference setting the prehearing conference date and a Prehearing Conference Order directing the parties to file prehearing conference memorandums.

On August 30, 2019, Sunrun and NRDC filed jointly a Preliminary Objection to PPL's Letter.⁸ As of the date of this filing, the Preliminary Objection has not been ruled on. On August 30, 2019, Sunrun and NRDC filed, in the alternative, a Motion for Leave to Reply and Reply to PPL's Letter. As of the date of this filing, the Motion for Leave to Reply has not been ruled on.

On September 3, 2019, Sustainable Energy Fund filed a petition to intervene.⁹ As of the date of this filing, Sustainable Energy Fund's petition to intervene has not been ruled on.

Pennsylvania, *Comments in Support of Answer Filed by Natural Resources Defense Council* (July 30, 2019); Independent Energy Solutions, LLC, *Comments in Support of Answer Filed by Natural Resources Defense Council* (July 30, 2019); Interstate Renewable Energy Council, Inc., *Comments in Support of Answer Filed by Natural Resources Defense Council* (July 30, 2019); Pennsylvania Solar Energy Industries Association, *Comments in Support of Answer Filed by Natural Resources Defense Council* (July 30, 2019); Exact Solar, *Comments in Support of Answer Filed by Natural Resources Defense Council* (July 30, 2019); and *Comments of Sustainable Energy Fund* (July 30, 2019).

⁵ See Docket No. P-2019-3010128; see also 66 Pa.C.S. § 331(b).

⁶ Docket No. P-2019-3010128, *Interim Order Granting Petitions of Natural Resources Defense Council and Sunrun Inc. to Intervene* (Aug. 22, 2019).

⁷ Docket No. P-2019-3010128, *Letter of PPL Electric Utilities Corporation to Secretary Chiavetta* (Aug. 22, 2019).

⁸ Docket No. P-2019-3010128, *Preliminary Objection of Sunrun Inc. and Natural Resources Defense Council to PPL Electric Utilities Corporation Letter Response and Request for Hearing* (Aug. 30, 2019).

⁹ Docket No. P-2019-3010128, *Petition to Intervene of Sustainable Energy Fund* (Sept. 3, 2019).

II. Position on How The Matter Should Proceed

Sunrun's position on how the matter should proceed is as follows:

1. The Petition should be denied, with no further action taken on PPL's Plan, as recommended in the Answers of Sunrun, NRDC and OCA, and as supported by the comments submitted by eight non-parties. Given the nascent market for DERs in Pennsylvania, and the lack of currently effective industry standards that could form the basis for a DER management plan, there is no reason to take up the issues raised by PPL's Petition now, either in this proceeding or in a separate, statewide proceeding. The Petition is simply premature.
2. The Petition should be denied, with the issue of DER management plans to be considered, if at all, on a statewide basis in a separate proceeding, to be commenced at such time as the Commission determines that, among other things, projected levels of DER penetration in Pennsylvania, as well as industry action to formally adopt standards that could form the basis for a DER management plan, warrant Commission action on these issues.
3. If the Commission determines that current circumstances warrant consideration of the issues raised in PPL's Petition, such issues should be considered only in the context of a generic statewide proceeding. The Petition should be denied in favor of commencing such a proceeding.

Sunrun submits that its position is consistent with the orderly disposition of the matters raised in PPL's Petition, as explained below.

52 Pa. Code § 5.222(c)(4) provides that "matters that may aid in expediting the orderly conduct and disposition of the proceeding and the furtherance of justice" "shall be considered at prehearing conference." Before this matter proceeds further, Sunrun requests that the Prehearing Conference include discussion of the issue of whether a ruling will be issued, based on the current record, addressing the recommendations of the intervening parties' and the eight non-parties that PPL's Petition be denied.¹⁰ Given the unanimous opposition to PPL's Petition and the fundamental concerns raised in the parties' Answers and the non-parties' comments, a ruling on this foundational issue is warranted. Ruling on this foundational issue now will aid in expediting the orderly conduct and disposition of the proceeding and the furtherance of justice.

¹⁰ See *supra* note 3, 4.

Sunrun requests that the Presiding Judge determine at the Prehearing Conference that such a ruling is appropriate and issue such ruling in accordance with the Procedural Schedule recommended below.

In the event that the Presiding Judge does not determine that such a ruling is warranted at this juncture, or if the Presiding Judge does not issue a ruling denying the Petition based on the current record prior to this matter proceeding further, Sunrun requests that this proceeding be stayed to enable the question to be certified to the Commission as to whether the issues raised in the Petition, and the numerous public policy and technical questions implicated by the Petition and discussed in the parties' Answers, should be addressed, if at all, through a statewide rulemaking proceeding instead of an administrative litigation process. 66 Pa.C.S. § 331(e) provides:

A presiding officer may certify to the commission, or allow the parties an interlocutory appeal to the commission on any material question arising in the course of a proceeding, where [s]he finds that it is necessary to do so to prevent substantial prejudice to any party or to expedite the conduct of the proceeding. The presiding officer or the commission may thereafter stay the proceeding if necessary to protect the substantial rights of any of the parties therein. The commission shall determine the question forthwith and the hearing and further decision shall thereafter be governed accordingly. No interlocutory appeal to the commission shall otherwise be allowed, except as may be allowed by the commission.

While as a matter of administrative practice PPL's Petition and the parties' Answers protesting the Petition resulted in this docket being designated as a contested case proceeding and thus assigned to the Office of Administrative Law Judge and to a Presiding Judge,¹¹ the issues raised in PPL's Petition are in fact issues of statewide concern. These issues should thus be addressed, if at all, in a statewide proceeding at such time as the Commission determines appropriate. Sunrun submits that if the Presiding Judge does not deny the Petition, the question

¹¹ 66 Pa.C.S. § 331(b).

of whether Pennsylvania will adopt advanced inverter standards on statewide basis or if it will adjudicate these issues on a utility-by-utility basis is a material question that should be presented to the Commission. If the Presiding Judge does not elect to certify this question to the Commission, Sunrun respectfully requests that she allow the parties an opportunity to pursue an interlocutory appeal to the Commission on this question.

The implementation of advanced inverter standards implicates foundational public policy questions and complex technical questions about the standards for advanced inverters themselves, as well as related rules and procedures, public policy questions and technical issues implicated by the interplay between adopting advanced inverter standards and these related rules and procedures. These include interconnection standards, DER communication protocols, DER market participation structures and compensation regimes, and numerous other matters discussed in the parties' Answers. Developing a successful advanced inverter implementation regime requires consideration of not only advanced inverter standards themselves, but all of these interrelated issues.

The complexity and number of public policy and technical issues implicated in any proceeding regarding the adoption of advanced inverter standards – many of which are issues of first impression before the Commission – merit consideration on a statewide basis. As Sunrun observed in its Answer, the Interstate Renewable Energy Council recommends “for states with multiple regulated utilities, statewide adoption of IEEE Std 1547-2018 will provide greater consistency across utilities and enable a more streamlined roll out of the Standard, which will benefit consumers, utilities and DER developers alike.”¹²

Predictable implementation timelines and consistent statewide standards are paramount to fostering viable DER markets in Pennsylvania. DER financeability, market stability, consumer

¹² Sunrun Answer at p. 16, FN 10.

protection, the evolution in the use of DERs to address grid needs, future proceedings regarding valuation methodologies and the valuation of DER-provided grid services, and numerous other issues related to advanced inverter standard implementation, require consistent statewide policies. The timing for the adoption of advanced inverter standards and resolving issues around the implementation of those standards raise fundamental technical and public policy questions of statewide concern that should be resolved through a process that results in uniform rules applicable statewide.

The opportunity for the Commission to determine the question of whether to consider these issues on a statewide basis is critical to prevent substantial prejudice to Sunrun. As discussed in Sunrun's Petition to Intervene, Sunrun has an ownership and/or other interests in DERs in Pennsylvania and the PPL service territory.¹³ The adoption of advanced inverter standards, DER communication protocols, and changes to related rules and procedures directly impact Sunrun's interests not only in the PPL service territory, but throughout Pennsylvania. Sunrun submits that it is unwise as a matter of public policy for one utility to dictate the process and timing for the adoption of advanced inverter standards in Pennsylvania, and thereby cause the DER industry to develop in the state on a piecemeal, patchwork basis. A statewide proceeding is the only avenue through which the Commission can bring all affected stakeholders – including all utilities in Pennsylvania – PJM, DER developers, consumer and public interest advocates, and other interested parties, together to engage in the deliberative and robust stakeholder process necessary to thoroughly examine these issues and ensure statewide uniformity in the roll out of advanced inverter standards.

State policy regarding advanced inverter standards has substantial implications for DER development and management. Implementing these standards through a standard administrative

¹³ Sunrun Petition to Intervene.

litigation process on a utility-by-utility basis would require Sunrun (and other stakeholders) to participate in the litigated proceedings of each utility in the Commonwealth at such time that each utility brings forward its own proposal for implementing advanced inverter standards. Such an approach to this important issue is highly prejudicial to Sunrun and other DER developers and stakeholders. This approach would insert substantial uncertainty in the timing of the roll out of advanced inverter standards and related rules, and how they are applied by each individual utility. This would lead to unpredictable implementation timelines and inconsistent advanced inverter standards and related rules and procedures among the different utilities in Pennsylvania. Such an outcome would have a chilling effect on the still nascent DER market in Pennsylvania and substantially prejudice Sunrun.

Moreover, while Sunrun is currently the only DER developer intervenor, in addition to Sunrun, NRDC and OCA, eight other entities submitted comments in opposition to PPL's Petition.¹⁴ Seven of those entities – including major stakeholders in the solar industry such as the Pennsylvania Solar Energy Industries Association, the Interstate Renewable Electricity Council, Inc., Grid Lab, and other DER developers – submitted comments specifically in support of the Answer submitted by NRDC.¹⁵ The fact that each entity – including three intervening parties and eight interested stakeholders – submitted comments in unanimous opposition to PPL's Petition demonstrates broad and significant stakeholder interest in the issues raised by PPL's Petition. This level of stakeholder interest highlights the substantial prejudice that would result if these issues are determined on a utility-by-utility basis through an administrative litigation process and underscores the importance of providing the Commission the opportunity to determine whether these issues should be addressed through a statewide proceeding.

¹⁴ See *supra* note 3, 4.

¹⁵ See *id.*

In addition to preventing substantial prejudice, certifying this question to the Commission would further expedite the conduct of this proceeding. In certifying a question to the Commission, the presiding officer or the Commission may “stay the proceeding if necessary to protect the substantial rights of any of the parties therein [and] [t]he commission shall determine the question forthwith and the hearing and further decision shall thereafter be governed accordingly.”¹⁶ Given the foundational public policy and numerous technical questions implicated by PPL’s Petition, providing the Commission with the opportunity to determine (1) whether the issues currently set for review pursuant to an administrative litigation process should in fact be considered on a statewide basis, and (2) if so, the timing for such statewide consideration, would expedite the conduct of this proceeding.

Indeed, Sunrun is not aware of any other state in the country implementing advanced inverter standards on an individual utility basis. The Commission should be provided the opportunity, like every other state considering the adoption of advanced inverter standards, to determine that the issues raised in the Petition be addressed through a statewide process. If the Commission determines to adopt a statewide proceeding, it is reasonable to assume that the Commission’s determination would include denial of PPL’s Petition or rendering it moot, thereby expediting the conduct of this proceeding.¹⁷

III. Proposed Procedural Schedule

Sunrun respectfully submits that it is premature to set an administrative litigation schedule. As a threshold matter, no ruling has been issued addressing the merits of the parties’ Answers and the comments of the non-party stakeholders requesting that (1) PPL’s Petition be denied; and (2) in the alternative, if the Petition is not denied, but the Commission deems the

¹⁶ 66 Pa.C.S. § 331(b).

¹⁷ See 66 Pa.C.S. § 331(b) (providing in part “[t]he commission shall determine the question forthwith and the hearing and further decision shall thereafter be governed accordingly”).

issues raised in the Petition ripe for review, that these issues be addressed on a statewide basis. As discussed above, these foundational issues should be addressed prior to this matter proceeding further through an administrative litigation process. Accordingly, Sunrun proposes the following procedural schedule.

Date	Action	Notes
September 11, 2019	Ruling on Sunrun and NRDC Preliminary Objection	Date provides for 10 days for any answer to the Preliminary Objection pursuant to 52 Pa. Code § 5.101(b).
September 23, 2019	Ruling on Sunrun and NRDC Motion for Leave to Reply	Date provides for 20 days for any responsive pleadings to the Motion for Leave to Reply pursuant to 52 Pa. Code § 5.103(b).
September 23, 2019	Preliminary Ruling on the Parties' Answers and request that PPL's Petition be denied.	A Ruling should be issued denying the Petition based on the current record.
September 23, 2019	Certification to Commission or Ruling Allowing the Parties Interlocutory Appeal to the Commission on the Question of Whether the Issues Presented in the Petition Should Be Addressed on a Statewide Basis	If the Petition is not denied, the question of whether the issues raised in the Petition should be addressed in a statewide proceeding should be certified to the Commission. In the alternative, the parties should be provided the opportunity for interlocutory appeal to the Commission on this question.

Sunrun reserves the right to propose and/or comment on any proposed litigation schedule in the event that the recommended procedural schedule is not adopted.

IV. Proposed Plan and Schedule for Discovery

As discussed above, a ruling on the foundational issues raised in the Parties' Answers should be issued prior to adopting a plan and schedule for discovery. Sunrun reserves the right to propose and/or comment on any proposed plan and/or schedule for discovery in the event that these recommendations are not adopted.

V. Proposed Witnesses and Subject of Testimony

As discussed above, a ruling on the foundational issues raised in the Parties' Answers should be issued prior to listing proposed witnesses and the subject of their testimony. Sunrun reserves the right to identify a witness or witnesses to present testimony in the event that these recommendations are not adopted. In the event that these recommendations are not adopted, and the issues raised in PPL's Petition and the parties' Answers proceed pursuant to an administrative litigation process, Sunrun anticipates addressing the following subjects in testimony. (The following is a preliminary list of subjects and Sunrun reserves the right to modify this list as it determines appropriate to represent its interests.)

- Technical and public policy issues surrounding PPL's proposal to require new interconnecting DER customers to install advanced inverters prior to the finalization of IEEE 1547-2018 and UL 1741 advanced inverter standards and well ahead of other states contemplating adoption of these standards. This subject includes, but is not limited to, the anticipated timeline for when DER inverters certified to the new standards will be available on the market.
- Technical and public policy issues surrounding PPL's proposal to require new interconnecting DER customers to install a communication device to allow PPL to control customer-sited DERs. This subject includes, but is not limited to: (1) the technical capabilities of smart inverters to facilitate grid support functions from customer-sited DERs without the need for direct utility control; and (2) critical distinctions between the issue of adopting advanced inverter standards and the issue of direct-utility control of customer-sited DERs.
- Technical and public policy issues surrounding the compensation for grid services provided by customer and third-party owned DERs. This subject includes, but is not limited to, the need for statewide uniformity in valuation methodologies and pathways for customer-sited DERs to participate in energy markets to provide different grid support functions and receive compensation for those services to protect consumer and DER developer rights and interests and foster a well-functioning DER market.
- Technical and public policy issues surrounding the importance of uniform rules for the roll out of advanced inverter standards across the Commonwealth. This subject includes, but is not limited to, identification of related rules that must be considered in conjunction with the adoption of advanced inverter standards, including interconnection standards, and the significant DER market disruptions that would occur if advanced inverter standards are adopted on a utility-by-utility basis.

- Technical and public policy issues surrounding the adoption of advanced inverter standards. This subject includes, but is not limited to, category assignments and the level of performance for a technology-specific or use case-specific basis in the “normal” and “abnormal” operating performance categories; the advanced inverter functions to be utilized, which settings should be used, and how enabling these functions will interact with interconnection rules and compensation mechanisms, among other considerations.

While Sunrun provides the above list of preliminary issues that it anticipates it would address in testimony if this matter proceeds through a standard administrative litigation process, the itemization of the above issues is further evidence of the inappropriateness of proceeding under a standard administrative litigation process. The preliminary issues identified above are complex, and raise important technical and public policy issues of significant statewide concern that should be addressed, if at all, in a statewide proceeding.

VI. Designation of Lead Representative for Prehearing Conference

Sunrun hereby designates James M. Van Nostrand as lead representative for the Prehearing Conference.

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VII. Conclusion

Sunrun appreciates the opportunity to submit this Prehearing Conference Memorandum and looks forward to further discussion of the issues presented herein at the Prehearing Conference.

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Respectfully submitted this 9th day of September 2019.

/s/ James M. Van Nostrand

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Petition of PPL Electric Utilities Corporation :
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Management Plan :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the following document, the Prehearing Conference Memorandum of Sunrun Inc., upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

VIA E-MAIL

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Dated this 9th day of September 2019.

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