

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

2021 Total Resource Cost (TRC) Test : Docket No. M-2019-3006868

**COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

On September 19, 2019, the Pennsylvania Public Utility Commission (“Commission”) entered its Tentative Order¹ in the above-captioned proceeding. In the Tentative TRC Order, the Commission issued, for public comment, its proposals for modifying the Total Resource Cost Test (“TRC”) as part of its fourth phase (“Phase IV”) of the Energy Efficiency and Conservation (“EE&C”) Program. PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) agrees with and supports the Comments submitted by the Energy Association of Pennsylvania (“EAP”) on the Tentative TRC Order. However, the Company separately submits these Comments to propose a revision to the TRC Benefits_{gross} formula in the Tentative TRC Order.

I. BACKGROUND

PPL Electric is a public utility and an electric distribution company (“EDC”) as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803. PPL Electric furnishes electric distribution, transmission, and default supply services to approximately 1.4 million customers throughout its certificated service territory, which includes

¹ 2021 Total Resource Cost (TRC) Test, Docket No. M-2019-3006868 (Order Entered Sept. 19, 2019) (“Tentative TRC Order”).

all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

Pursuant to Act 129 of 2008, P.L. 1592, 66 Pa. C.S. §§ 2806.1 and 2806.2 (“Act 129”), PPL Electric designed and implemented EE&C Plans in Phases I, II, and III.² PPL Electric’s EE&C Plans have included a broad portfolio of energy efficiency and energy education programs and initiatives. PPL Electric’s portfolios of programs were designed to provide customer benefits and to meet the energy reduction goals set forth in Act 129. The EE&C Plans have included a range of energy efficiency programs that included every customer segment in PPL Electric’s service territory.

PPL Electric continues to support Act 129 EE&C Programs and appreciates the opportunity to provide input regarding this matter. As an EDC operating EE&C Plan, PPL Electric believes that its Comments will provide the Commission with a valuable perspective in its evaluation of the TRC Test applicable for Phase IV.

II. COMMENTS OF PPL ELECTRIC

PPL Electric agrees with and supports the Comments by the EAP on the Tentative TRC Order. In addition to the recommendations set forth in the EAP’s Comments, PPL Electric

² See *Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216 (Order entered Oct. 26, 2009); *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order entered Mar. 14, 2013) (approving the initial Phase II EE&C Plan); *Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2-12-2334388 (Order entered July 11, 2013) (approving the Phase II EE&C Plan compliance filing); *See Petition of PPL Electric Utilities Corp. for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan*, Docket No. M-2015-2515642 (Order entered Mar. 17, 2016) (approving the Phase III EE&C Plan subject to further modifications to be made in a compliance filing); *Petition of PPL Electric Utilities Corp. for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan*, Docket No. M-2015-2515642 (Tentative Order entered June 9, 2016) (tentatively approving the compliance Phase III EE&C Plan); Secretarial Letter, Docket No. M-2015-2515642 (June 27, 2016) (stating that PPL Electric’s compliance Phase III EE&C Plan had become final without further action by the Commission).

requests that the Commission revise the TRC Benefits_{gross} formula appearing in Table 9 on page 5 of Appendix A of the Tentative TRC Order. The current formula reads as follows:

$$TRC\ Benefits_{gross} = \sum_{t=1}^N \frac{EB_t + FB_t + H2OB_t + O\&M_t}{(1 + d)^{t-1}}$$

Although this formula includes electric energy benefits (EB_t), it does not include electric capacity benefits (DB_t). The Company believes that the omission of capacity benefits was inadvertent and, therefore, respectfully requests that capacity benefits be added to the TRC Benefits_{gross} formula.

III. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that the Commission take these Comments into consideration in preparing its Final TRC Order.

Respectfully submitted,



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