

Michael J. Shafer
Senior Counsel

PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.2599 Fax 610.774.4102
MJShafer@pplweb.com



E-File

September 1, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

**Re: Amended Policy Statement on Diversity at Major Jurisdictional
Utilities
Docket No. M-2020-3018089**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") are PPL Electric's Comments in the above-captioned proceeding. These Comments are being filed pursuant to the Order issued on May 21, 2020 in this matter and the publication of the Proposed Policy Statement and Order in the *Pennsylvania Bulletin* on July 18, 2020.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on September 1, 2020 which is the date it was filed electronically using the Commission's E-filing system.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A blue ink signature of Michael J. Shafer, written in a cursive style.

Michael J. Shafer

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Amended Policy Statement on Diversity at Major	:	Docket No.	M-2020-3018089
Jurisdictional Utilities	:		

**COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

On May 21, 2020, the Pennsylvania Public Utility Commission (“PUC” or the “Commission”) entered a Proposed Policy Statement and Order in the above-captioned proceeding. In the Order, the Commission issued, for public comment, proposed updates to its Policy Statement on Diversity at Major Jurisdictional Utility Companies at 52 Pa. Code §§ 69.801-69.809 (“Policy Statement”). Specifically, the Commission has proposed, among other things, to update the Policy Statement’s definition of diversity to include veterans, disabled persons, and people who are lesbian, gay, bisexual, transgender, queer, or questioning their sexuality (“LGBTQ”).

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) agrees with and supports the Comments being submitted by the Energy Association of Pennsylvania (“EAP”) on the Commission’s Proposed Policy Statement and Order. However, the Company submits these separate Comments to outline PPL Electric’s own efforts to promote diversity within its workforce and suppliers, including expanding opportunities for veterans, individuals who are disabled and persons in the LGBTQ+ community.

I. COMMENTS OF PPL ELECTRIC

PPL Electric values diversity and promotes it at all levels of the Company¹. The communities and customers PPL Electric serves, as well as its employees, are diverse. Therefore, the Company believes that its workforce and suppliers should reflect the diversity of those communities and customers.

To that end, the Company strongly supports the Commission's efforts to review and update its Policy Statement. Much has changed since the original Policy Statement was adopted in 1995. By undertaking a thorough review and update of its Policy Statement, the Commission is taking a critical next step to further encourage diversity at the major jurisdictional utilities. This is especially true for veterans and persons who identify as LGBTQ+, who are not currently mentioned in the Commission's Policy Statement. The Company includes these individuals in diversity efforts and supports efforts to include these groups in the Policy Statement.

In its diversity reports submitted to the Commission², PPL Electric has detailed its many efforts to encourage the hiring and advancement of veterans and members of the LGBTQ+ community. Among other actions, PPL Electric ensures that all qualified applicants for positions at the Company receive consideration for employment without regard to race, color, age, religion, sex, national origin, protected veteran status, sexual orientation, gender identity, genetic information, disability status, or any other protected characteristic. PPL Electric also utilizes Business Resource Groups ("BRGs") to engage employees in advancing diversity and inclusion

¹ PPL Corporation supports diversity at its highest levels, with former CEO Bill Spence taking the CEO Action for Diversity and Inclusion pledge in June 2017, which was recently reaffirmed by PPL Corporation's new CEO, Vincent Sorgi, in June 2020. See www.ceoaction.com/pledge/ceo-pledge. The PPL leadership team stands united in support of the CEO's pledge and all of the leadership, including PPL Electric's President, signed the same pledge for internal purposes.

² PPL Electric Utilities Corporation – Report on Diversity to the Pennsylvania Public Utilities Commission, dated March 1, 2020.

throughout the Company. These BRGs advance the interests of the Company and employees in three areas: culture, career, and community. Each BRG has a slate of officers and an Executive Sponsor and the Director — Diversity, Inclusion and Talent Management serves as the BRG Coordinator. PPL Electric’s BRG Leadership Roundtable and its Steering Committee function as vehicles for expanding diversity awareness throughout the Company.

For veterans specifically, PPL Electric has explained that veteran-focused community events are an effective recruiting and hiring strategy. In 2018, PPL Electric participated in the following veteran-focused community events: (1) Professional & Technology Diversity Career Fair; (2) RecruitMilitary Career Fair; (3) Orion Distinguished Candidate Conference; and (4) PUC Veteran Career Fair. The Company also uses the Career Page military translator, which matches military jobs to PPL Electric employment opportunities and helps assist veterans’ transition to civilian jobs.

As for the LGBTQ+ community, PPL Electric’s BRGs have led to the Company receiving a rating of 100 out of 100 in the Human Rights Coalition’s Corporate Equality Index for 2019 because of both culture and benefits that support LGBTQ+ employees. This is the 4th year in a row that PPL received a score of 100, making PPL a Best Place to Work for LGBTQ Equality. Likewise, PPL Electric’s work with the businesses REACH business resource group resulted in PPL receiving a 100 out of 100 rating in the 2019 and 2020 Disability Equality Index, making PPL a Best Place to Work for Disability Inclusion.

On the supplier side, PPL Electric has interested firms complete its Supplier Registration Form. The completed form is entered into the Company’s supplier database to be reviewed by buyers (*i.e.*, category managers). Distinct codes are added to a firm’s listing to indicate “Minority,” “Woman-Owned,” “Veteran,” “Disability-Owned,” or other/additional specific categories

depending on their identification as such. These indicators enable buyers to easily identify special characteristics when developing a bidders list for a particular solicitation.

While these are only some of the efforts PPL Electric takes to promote diversity within its workforce and suppliers, they are fundamental to the Company's diversity initiatives. PPL Electric hopes that by highlighting them here, it reinforces the need for the Commission to review and update its Policy Statement, especially to add definitions and provisions for veterans, individuals who are disabled and persons who identify as LGBTQ+.

II. 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 Order on the Policy Statement.

Respectfully submitted,

/s/ Michael J. Shafer

Kimberly A. Klock (ID # 89716)

Michael J. Shafer (ID # 205681)

PPL Services Corporation

Office of General Counsel

Two North Ninth Street

Allentown, PA 18106

Phone: 610-774-2599

Fax: 610-774-4102

E-mail: kklock@pplweb.com

mjshafer@pplweb.com

Date: September 1, 2020

Attorneys for PPL Electric Utilities Corporation