

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

November 30, 2020

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P. O. Box 3265
Harrisburg, PA 17105-3265

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DEC 02 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Docket No. C-2017-2629683

Dear PUC:

The attached material relates to the above pending case and reflects the continuing disparities in PPL's billing methodology for my virtual metering system. These materials document once more PPL's disordered and capricious billing procedures for virtual meter aggregation.

A recent letter from Mr. Ryan on November 20, 2020 (attached) compounds the problems and resolves nothing. Mr. Ryan's letter asserts that "the satellite account's meter now separately records the delivered and received kilowatt hours". His letter does not explain how that is possible.

In fact, the claim is not plausible. The satellite meter (meter #301131523) records only what is delivered to my house. What is received by PPL is recorded on the separate,

solar meter (meter # 301181118). How the satellite meter could record both is not explained.

Notably (and curiously), this information (“delivered and received kilowatt hours”) appeared briefly in 2019, not on my satellite bill, but on my solar bill. The sudden appearance of that information on May 13, 2019, is described in my letter to the PUC on May 30, 2019, where I noted the “marked improvement” in reporting.

Indeed, for four months in 2019 (April 10, May 13, June 12, and July 12, 2019), that information (kwh’s “delivered and received”) was included in my solar (i.e. ‘host’) bill, but it has not been included even there since July 12, 2019.

It has never appeared in my satellite bill, despite Mr. Ryan’s claims about the satellite account’s meter.

PPL is obviously capable of including that information in my bills, but once again makes it available only upon request. PPL’s selective and disingenuous practice betrays a “sleight of hand” that is unbecoming a public utility or any respectable company.

Mr. Ryan’s letter fails to acknowledge these jarring facts and this convoluted history.

PPL’s sudden, arbitrary, unannounced, and unexplained changes in billing practice are an insult to customers and burden the Commission as it tries to untangle the disarray in PPL’s disordered billing methodology.

The new spreadsheets, meanwhile, contain an ongoing flaw. They do not indicate precise billing periods or exact reading dates. Only the month is shown (see attached sheet). Without information that is precise and congruent with my bills, the billing

process itself remains inscrutable, and the data, unverifiable. A vigilant Commission will not continue to endorse this system of “blind trust”.

There is, finally, a striking irony in the spreadsheets which PPL has provided to me. The fact that many months of data appear on a single sheet of paper belies PPL’s claim that similar data for a single month “would not fit on a standard bill” of the same size. (See Initial Decision at 20 and PPL spreadsheet attached)

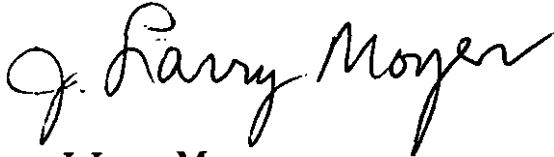
Despite my urgent pleas over many years, PPL does not provide me with bills that include current meter readings or the amount of generation. When my monthly bill arrives, it is impossible to verify the “Excess Credit” that appears. Generation data are withheld for over a year, and even then, are available only by special request.

For ten years, PPL has charged me every month for two separate bills, but refuses to include in either bill the most essential generation data or the aggregation of the two meters (the “combination of readings”) as required for virtual meter aggregation.

In the original Complaint for this case, I asked for a remedy that could even now end a decade of incoherent bills for my PV system. Once more, I urge the Commission to endorse Remedy ‘B’ as described in Part 5 of my Formal Complaint (Docket No. C-2017-2629683). Such an endorsement could facilitate a settlement and end the protracted litigation which has occupied the time and energy of so many for so long. That remedy would permit me, at PPL’s expense, to convert my system to physical meter aggregation. Upon completion of the conversion, I would receive a single, detailed bill each month, as does every customer with “physical meter aggregation”.

Please accept this material for submission into the record and include this information in your review.

Respectfully submitted,



J. Larry Moyer

Cc: Devin Ryan
Office of Special Assistants

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**J. Larry Moyer
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November 30, 2020

Mr. Devin Ryan
17 North Second Street 12th Floor
Harrisburg, PA 17101-1601

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Mr. Ryan,

I received your cover letter of November 20, 2020, as well as the attached spreadsheets which were prepared by PPL and which you sent to me recently via Fed Ex.

Once again, the information from PPL is misleading. Once again, the careful reader can observe the misrepresentation that is inherent in PPL's response.

Your cover letter conveys half-truths and omits critical facts. It asserts that "the satellite account's meter now separately records the delivered and received kilowatt hours", but it does not explain how that is possible. In fact, the claim is not plausible. The satellite meter records only what is delivered to my house. What is received by PPL is recorded on the separate, solar meter.

Curiously, in 2019, this information ("delivered and received kilowatt hours") appeared on my solar bill, but it has never appeared in my satellite bill, which is presumably based on the satellite meter.

Indeed, for four months in 2019 (April 10, May 13, June 12, and July 12, 2019), that information (kwh's "delivered and received") was included in my solar (i.e. 'host') bill, but it has not been included even there since July 12, 2019. Your letter fails to acknowledge these facts and this enigmatic history.

The sudden appearance of that information on May 13, 2019, is described in my letter to the PUC on May 30, 2019, where I noted the "marked improvement" in reporting. PPL is obviously capable of including that information in my bills, but once again makes it available only upon request. PPL's selective and disingenuous practice betrays a "sleight of hand" that is unbecoming a public utility or any respectable company.

PPL's sudden, arbitrary, and unannounced changes in billing practice are inconsiderate of customers and undermine public trust. They are also burdensome to the Commission as it tries to untangle the disarray in PPL's disordered billing methodology.

The new spreadsheets, furthermore, contain an ongoing flaw. They do not indicate precise billing periods or exact reading dates. Only the month is shown. Without information that is precise and congruent with my bills, the billing process itself remains inscrutable, and the data, unverifiable. A vigilant Commission will not continue to endorse this system of "blind trust".

There is, finally, a striking irony in the spreadsheets which PPL has provided to me. The fact that many months of data appear on a single sheet of paper belies PPL's claim that similar data for a single month "would not fit on a standard bill" of the same size. See Initial Decision at 20

What the pending Complaint seeks is fairness, transparency and accuracy in return for the ever-increasing monthly customer charges that PPL continues to impose. After ten years, the company has still not met this fair and reasonable standard of billing for virtual meter aggregation. Until detailed, comprehensive information is available in my monthly bills, those bills will continue to be unreliable and unacceptable.

Respectfully,


Larry Moyer

**Post &
Schell** PC.
ATTORNEYS AT LAW

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File #: 140074

November 20, 2020

***VIA EMAIL
VIA OVERNIGHT DELIVERY***

Jay Larry Moyer
370 West Johnson Street
Apartment C-1
Philadelphia, PA 19144

Re: November 2, 2020 Letter Requesting Year-End Spreadsheets

Dear Mr. Moyer:

Enclosed are copies of the year-end spreadsheets requested in your November 2, 2020 letter addressed to Ms. Cheryl Oehler. Per your request, the year-end spreadsheets provide data for the periods June 1, 2017, through May 31, 2018, June 1, 2018, through May 31, 2019, and June 1, 2019, through May 31, 2020.

As noted in the year-end spreadsheet for the June 1, 2018, through May 31, 2019 period, the existing meters were replaced with new Radio Frequency ("RF") Mesh meters on February 19, 2019. Because of that change, the satellite account's meter now separately records the delivered and received kilowatt hours ("kWh"). Therefore, beginning with the March 2019 billing period, columns showing the delivered and received kWh data were added to the year-end spreadsheets.

If you have any questions, please contact me.

Respectfully submitted,



Devin Ryan

DR/kl
Enclosures

Billing Date	Host Meter Reading (8727787002)	Host Meter Del Reading	Host Meter Del Usage	Host Meter Rec'd Reading	Host Meter Rec'd Usage	Host Excess (Del Usage - Rec Usage)	Value of Excess Gas		Satellite Reading	Satellite Meter Del Reading (0647821001)	Satellite Meter Del Usage	Satellite Meter Rec'd Reading	Satellite Meter Rec'd Usage	Satellite Excess (Del Usage - Rec Usage)	Credits Applied to Satellite (kWh)	Credits Applied to Satellite (\$)	Balance of Buck (kWh)	Cash-Out Payment		Satellite Account - Account Balance on Bill (\$)	Payments by Mr. Meyer Toward the Satellite Account Balance (\$)	Comments	Type of Meter
							Host Excess kWh	Monthly Value (\$)										Cents per kWh	Payment (\$)				
Jun-18				1903	814	813	813	11.1167	68.18	1703	308			308	34.36	304			\$40.37 due 7/2/18	17.56 paid 5/24/18		RF	
Jul-18		10	8	2482	559	653	553	11.2251	62.67	1974	271			271	30.42	686			577.35 due 8/1/18	17.68 paid 6/28/18		RF	
Aug-18		11	1	3058	508	595	595	11.2259	66.78	2244	270			270	30.31	811			578.29 due 9/3/18	17.64 paid 7/31/18		RF	
Sep-18		12	1	3836	578	577	577	11.2236	64.79	2588	322			322	36.14	1188			602.93 due 10/1/18	17.78 paid 8/23/18		RF	
Oct-18		14	2	4129	492	491	491	11.2509	55.24	2841	275			275	30.54	1363			600.89 due 10/31/18	17.75 paid 10/23/18		RF	
Nov-18		15	1	4821	382	381	381	12.0684	47.13	3478	335			335	18.64	1138			624.19 due 12/2/18	17.65 paid 12/6/18		RF	
Dec-18		17	2	4877	328	324	304	11.8307	35.89	4834	1183			1183	137.20	234			483.98 due 12/31/18	17.68 paid 12/28/18		RF	
Jan-20		18	2	5065	231	228	238	11.7482	27.78	5720	1080			1080	64.50	0			572.08 due 2/3/20	17.75 paid 2/7/20		RF	
Feb-20		20	1	6355	260	288	288	11.7474	33.83	7042	1322			1322	33.83	0			704.20 due 3/2/20	17.84 paid 3/3/20		RF	
Mar-20		22	2	6803	443	446	446	11.7468	52.58	7883	841			841	62.39	0			822.83 due 4/1/20	17.84 paid 3/28/20		RF	
Apr-20		23	1	6241	434	437	437	11.8188	50.78	8870	887			887	50.78	0			883.34 due 5/8/20	NA		RF	
May-20				4731	418	498	488	11.8188	57.58	8230	708			708	57.58	0			873.16 due 5/2/20	NA		RF	

Certificate of Service

Follow-up letter to PUC (with attachments)

RE: Docket No. C-2017-2629683

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

Devin T. Ryan
Post & Schell PC
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Harrisburg, PA 17101-1601
(Served via USPS First Class Mail)

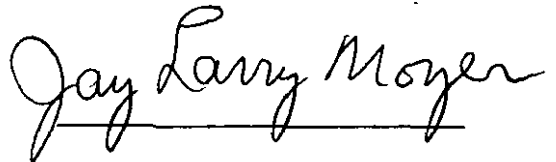
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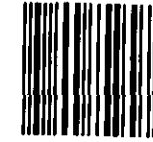
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