

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Jay Larry Moyer, Complainant

V.

RE: Docket No. C-2017-2629683

PPL Electric Utilities Corporation, Respondent

Fourth Petition to Reopen Proceeding

April 12, 2021

This “Fourth Petition to Re-open” the above case is submitted pursuant to 52 Pa. Code § 5.571(b) and 52 Pa. Code § 5.571(d)(2). The “conditions of law and of fact” have again changed with significant impact on the above case. A recent decision of the Pennsylvania Supreme Court (*Hommrich v. PUC*) has overturned a regulation that, until now, determined the status of my PV generating system.

When the above Complaint was filed, PPL Electric and the PUC presumed the necessity of “independent load” at my solar panels. As a consequence of that presumption, PPL Electric also required a separate, “independent” commercial (GS-1) account for my solar panels. With the decision of the PA Supreme Court, my PV installation no longer requires such a separate, commercial, and “independent” account.

This Petition requests that the Commission introduce a new rate schedule to accommodate customers like me who install virtual metering solely for residential purposes. The Commission has acknowledged that my PV system has no commercial purpose or use. A new designation (RS-V) would halt the disarray and confusion that has plagued PPL’s billing procedures for virtual metering. It would also permit homeowners who install solar “within two miles” to avoid the commercial, GS-1 designation that PPL Electric currently applies to systems like mine, which has no commercial role.

The central grievance in the above Complaint is the current billing “methodology” employed by PPL Electric for virtual meter aggregation.

My system, and others like mine, are precluded from physical meter aggregation with direct wiring to the house or to an existing meter. For mine, the solar array is 400 yards from my house, across a creek and a large ravine. For others, the ideal site might be across the street, across the highway, across the railroad tracks, or on an empty lot two blocks away.

With the decision of the Pennsylvania Supreme Court in *Hommrich*, homeowners can now avail themselves of virtual meter aggregation without proving “independent load”, and a special rate schedule for residential customers will facilitate that broader availability. It will also permit a consolidated and streamlined billing process that comports with “The combination of readings from and billing for all meters” that the Code prescribes in 52 Pa Code § 75.12 (“meter aggregation”).

Finally, a new (RS-V) rate schedule could utilize a single bill that could report monthly readings; aggregate the separate meters; show kilowatt hours of new and carry-over credit; fulfill the “combination of readings and billing; and incorporate an “incremental expense” for the second meter involved in

“processing” my account “on a virtual meter aggregation basis”, as provided in 52 Pa. Code § 75.14(e).

With a new RS-V rate schedule, my system would be recognized for what it is, a residential system, and PPL’s persistent billing chaos could end.

Respectfully submitted,

J. Larry Moyer

Cc: Devin Ryan
Office of Special Assistants

Certificate of Service

Fourth Petition to Re-Open

RE: Docket No. C-2017-2629683

I hereby certify that I have served a true copy of the attached "Fourth Petition To Re-Open" 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
17 North Second Street, 12th floor
Harrisburg, PA 17101-1601
(Served via USPS First Class Mail)

Office of Special Assistants
Pennsylvania PUC
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265
(served via USPS First Class mail)

April 12, 2021

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

Page left blank

intentionally