

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jay Larry Moyer, Complainant

V.

RE: Docket No. C-2017-2629683

PPL Electric Utilities Corporation, Respondent

Fifth Petition to Reopen Proceeding

September 21, 2021

DATE OF DEPOSIT

SEP 20 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

As with previous Petitions to Re-open, this “Fifth Petition to Re-open” the above pending case is submitted pursuant to 52 Pa. Code § 5.571(b) and 52 Pa. Code § 5.571(d)(2). Again, new facts and circumstances have emerged which warrant urgent attention and urge a resolution to this languishing case.

This Petition focuses on discrepancies and errors in recent data provided to me by PPL.

As noted throughout previous filings in this case, the procedures for applying credit under virtual meter aggregation are clear and detailed in the regulations. PPL’s failure to comply with those regulations has also been well-documented, and actions by the PUC to correct that failure and to order a remedy are long overdue.

The billing information available to me follows two different tracks and has two independent sources. One is the monthly statements which I receive, and the other is the “12-month spreadsheet” which PPL provides “upon request” at the end of the Reporting Year. That spreadsheet is decoupled from the monthly statements. Each source gives the appearance of accuracy, but they contradict each other. One of these sources is clearly a

“fiction”, a fabrication and does not provide accurate, real-time information. It is impossible to know whether either source is reliable.

PPL concedes that the monthly bills do not reflect the aggregation of the two meters. Consequently, any credit which appears in the monthly statements cannot be verified. Instead of applying credit through “the combination of readings and billing”, as the regulations prescribe (52 Pa. Code § 75.12), PPL Electric offers to provide the relevant aggregation data only at the end of each Reporting Year. Data issued in this manner is far “out-of-date”, and verification is, again, impossible. As I’ve done in the past, I’m enclosing another recent bill with this petition to show that the relevant data from my generating system does not appear in the monthly statements. (See statement for “solar panels”, July 16, 2021)

As noted, PPL promises, “upon request”, to make a comprehensive, “12-month spreadsheet” available at the end of the Reporting year. In the meantime, because this information is delayed, my monthly bills are of little use to me, and they tell me nothing about how my credit has been calculated.

At my request, PPL Electric recently provided me with a “12-month spreadsheet” for the Reporting year 2020-2021.

The errors and discrepancies between PPL’s two sources can be seen immediately in the first month of the Reporting Year, 2020-2021. This

petition will review the discrepancies and errors for that month, June, 2020. Then, it will describe once more the flawed “manual” billing process which produced this and other, previous errors.

First, the specific credit shown on my monthly statement for June, 2020, is contradicted by the amount shown on the “12-month spreadsheet”. The statement issued to me for my satellite account (06476-21001) on June 10, 2020 (the first month of the Reporting Year) reports a credit of \$57.62 (see satellite bill for June 10, attached). The source of that credit cannot be identified. The credit of \$57.62 cannot be from the current month (June, 2020) because the credit represents far more than the 10 days from June 1 to June 10, when the bill was issued. (Furthermore, if PPL should claim that it is from June, it contradicts PPL’s claim of a “one-month lag” in applying credit.)

If, instead, the credit is from the previous year’s generation, the credit should have been issued as a year-end “cash out” for 2019-2020.

The error is compounded still further. That credit amount on the statement (\$57.62) does not appear anywhere on the spreadsheet -- for June or for any other month.

The pertinent and prevailing facts are not in dispute.

1. My PV system was installed and approved under provisions of “virtual meter aggregation”.
2. PPL requires two separate accounts for the operation of my PV installation, one for the solar panels and the other for my home.
3. PPL issues a separate monthly statement for each of these two accounts.
4. The definition of “virtual meter aggregation” (See 52 Pa. Code § 75.12) requires the “combination of readings and billing” from the separate accounts
5. My monthly statements do not show any evidence of “meter aggregation” or of any “combination of readings and billing”.
6. My solar bill does not show any current meter readings.
7. Data for generation and credit is available to me only at the end of the Reporting Year, and then only upon request.
8. The June, 2020, credit shown on PPL’s “12-month spreadsheet” differs from the amount reported on my monthly satellite bill. (See satellite statement for June 10, 2020)
9. Errors and contradictions persist between PPL’s two sources of data for my virtual metering system.

In the past, similar errors and discrepancies have been presented repeatedly and in detail. This new “12-month spreadsheet” from PPL demonstrates once again that PPL’s billing procedures are unreliable and do not assure accuracy.

Finally, it is evident that data on the “12-month spreadsheet” cannot be reconciled with and are inconsistent with the following:

1. The Reporting Year ends on May 31. 52 Pa. Code § 75.1
2. The regulations in 52 Pa. Code § 75.13(e) specify that “at the end of each year, the DSP (i.e. PPL) “shall compensate the customer-generator for any remaining excess kilowatt hours ... at the DSP’s price to compare rate”, a requirement that PPL does not dispute.

3. Customer-generators are compensated for excess generation at the end of each Reporting Year, and at the start of each new year, the number of kilowatt hours of generation is re-set to zero.
4. 52 Pa. Code §75.13(f) says explicitly that “credits are not carried forward into the next year”.
5. PPL claims to utilize a “one-month lag” when applying credit for virtual meter aggregation.
6. PPL has not explained the credit of \$57.62, as shown on my satellite bill for June 10, 2020.

I urge the Commission to address the following crucial questions.

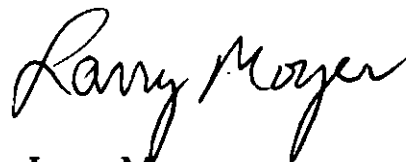
1. On what authority does PPL continue to violate the billing requirements for virtual meter aggregation as delineated in Chapter 75?
2. If credit is applied through a “one-month lag”, as PPL claims, on what basis does my bill show credit in June, the first month in the Reporting Year, as it does each year without fail? (See two spreadsheets attached)
3. What explains the contradiction in June, 2020, between the credit amount on the spreadsheet and the amount shown on my satellite bill for the same month?
4. How does the Commission defend PPL’s system of providing two contradictory sets of billing information?
5. Will the PUC order PPL Electric to provide monthly bills for virtual meter aggregation that are complete, comprehensive, and accurate on the date that they are issued?
6. Will the PUC provide redress to me for the inaccurate and unreliable billing procedures utilized by PPL Electric for virtual meter aggregation?
7. Will the Commission order PPL (and all utilities) to provide virtual metering customers with comprehensive aggregation data (i.e. the “combination of readings and billing”) along with accurate credit in every monthly statement.

This petition requests that the Commission ~~issue an~~ order a halt to PPL’s indefensible “double-speak” in its billing procedures for my virtual meter aggregation system and require that PPL provide, instead, one current,

accurate, and comprehensive document (statement?) showing meter aggregation and generation credit. Finally, this petition asks the Commission to order the remedies described in Item #5 of the original Complaint (with adjustments for the elapsed time).

This petition also requests that PPL receive the maximum penalty available under the law for its persistent, capricious conduct.

Respectfully submitted,



Larry Moyer

370 W. Johnson Street (C-1)

Philadelphia, PA 19144

267-693-2633

DATE OF DEPOSIT

SEP 20 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



PPL Electric Utilities



Pay/Manage your account online at ppelectric.com



Questions? Please contact us by Aug 4. 1-800-DIAL-PPL (1-800-342-5775) Mon-Fri: 8am to 5pm

Corrected Bill

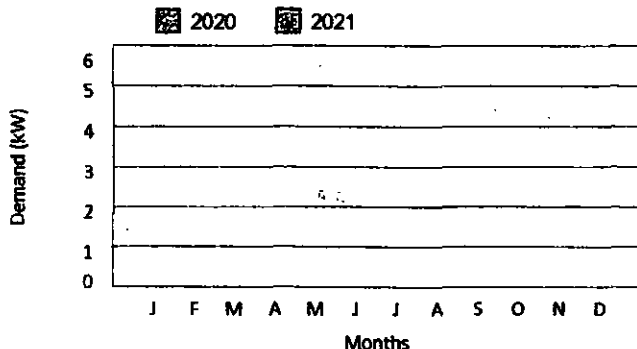
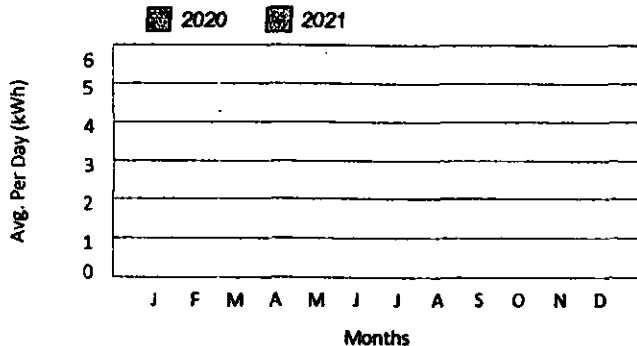
Bill Acct. No.	Due Date	Amount Due
67277-97002	Aug 4, 2021	\$297.94

Your Electric Usage Profile

Service to:
LARRY MOYER
73 WOODS RD, SOLAR PANELS
KLINGERSTOWN, PA 17941

Your next meter reading is on or about Aug 12, 2021.

This section helps you understand your year-to-year electric use by month. Meter readings are actual unless otherwise noted.



Billing Summary

(Billing details on back)

Balance as of Jul 16, 2021	\$266.54
Charges:	
Total Distribution Charges	\$31.40
Total Current Charges	\$297.94
Amount Due By Aug 4, 2021	\$297.94
Account Balance	\$297.94

How To Shop For Electricity

You can choose the company that supplies your electricity. Visit papowerswitch.com or www.oca.state.pa.us for supplier offers. If you are shopping, know your contract expiration date.

Here's the information you need to shop:
 Bill Account Number: **67277-97002** Rate Schedule: **GS1**
 Current Supplier: **PPL Electric Utilities**

PPL Electric Utilities price to compare for your rate is \$0.07541 per kWh. This changes the 1st of June and December.

Manage Your Account

Pay Your Bill	Online Options (ppelectric.com)
Online: Visit ppelectric.com	- Report an outage/check outage status
Phone: Call 1-800-342-5775	- Make a payment, view your bill and usage history.
Mail: Use envelope provided	- Sign up for alerts.
Card: MasterCard, Discover, Visa or debit, call 1-844-278-3310 (service fee applies)	- Enroll in paperless billing, automatic bill pay, budget billing.
	- View your rate schedule at: ppelectric.com/rates

Correspondence:
Customer Services, 827 Hausman Road, Allentown, PA 18104-9392

Other important information on the back of this bill →

Return this stub in the envelope provided with a check payable to PPL Electric Utilities.



PPL Electric Utilities

AB 01 002621 58389 B 11 A



LARRY MOYER
370 W JOHNSON ST UNIT C1
PHILADELPHIA, PA 19144-3119

Bill Acct. No.	Due Date	Amount Due
67277-97002	Aug 4, 2021	\$297.94

Amount Enclosed:



PPL ELECTRIC UTILITIES
2 NORTH 9TH STREET CPC-GENN1
ALLENTOWN, PA 18101-1175





Pay/Manage your account online at ppl.electric.com



Questions? Please contact us by Jul 2.
1-800-DIAL-PPL
(1-800-342-5775)

Mon-Fri: 7am to 8pm

Bill Acct. No.	Due Date	Amount Due
06476-21001	Jul 2, 2020	\$992.02

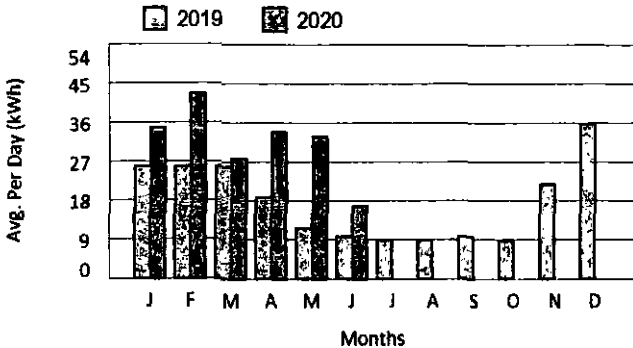
Your Electric Usage Profile

Service to:
LARRY MOYER
73 WOODS RD
KLINGERSTOWN, PA 17941

Meter: 301131523

Your next meter reading is on or about Jul 10, 2020.

This section helps you understand your year-to-year electric use by month. Meter readings are actual unless otherwise noted.



Monthly Comparison	Days Billed	kWh	Average kWh/Day	Average Temp.
Jun 2020	30	524	17	64F
Jun 2019	32	309	10	63F

Billing Period	Type	Reading
Jun 10	Actual	10463
May 11	Actual	9939
30 Days	kWh Billed	524

Yearly Comparison	Total Use	Avg. Monthly
Jul 2019 - Jun 2020	8760	730
Jul 2018 - Jun 2019	6864	572

Billing Summary

(Billing details on back)

Balance as of Jun 10, 2020	\$973.16
Charges:	
Total Distribution Charges	\$37.10
Total Generation & Transmission Charges	\$39.38
Total Other Charges	-\$57.62
Total Current Charges	\$992.02
Amount Due By Jul 2, 2020	\$992.02
Account Balance	\$992.02

How To Shop For Electricity

You can choose the company that supplies your electricity. Visit papowerswitch.com or www.oca.state.pa.us for supplier offers. If you are shopping, know your contract expiration date.

Here's the information you need to shop:

Bill Account Number: **06476-21001** Rate Schedule: **RS (Residential)**
Current Supplier: **PPL Electric Utilities**

PPL Electric Utilities price to compare for your rate is \$0.07284 per kWh. This changes the 1st of June and December.

Manage Your Account

Pay Your Bill	Online Options (ppl.electric.com)
Online: Visit ppl.electric.com	- Report an outage/check outage status
Phone: Call 1-800-342-5775	- Make a payment, view your bill and usage history.
Mail: Use envelope provided	- Sign up for alerts.
Card: MasterCard, Discover, Visa or debit, call 1-844-278-3310 (service fee applies)	- Enroll in paperless billing, automatic bill pay, budget billing.
	- View your rate schedule at: ppl.electric.com/rates

Correspondence:

Customer Services, 827 Hausman Road, Allentown, PA 18104-9392

Other important information on the back of this bill →

Return this stub in the envelope provided with a check payable to PPL Electric Utilities.



PPL Electric Utilities

AB 01 002653 90216 B 12 A



LARRY MOYER
370 W JOHNSON ST UNIT C1
PHILADELPHIA, PA 19144-3119

Bill Acct. No.	Due Date	Amount Due
06476-21001	Jul 2, 2020	\$992.02

Amount Enclosed:



PPL ELECTRIC UTILITIES
2 NORTH 9TH STREET CPC-GENN1
ALLENTOWN, PA 18101-1175



Your Message Center

- With paperless billing, you can receive and pay your PPL Electric Utilities bills online. The process is free, quick, convenient and secure. To learn more or sign up, visit ppllectric.com.
- Learn how to save energy and get information about energy efficiency rebates on our website, ppllectric.com.
- Before digging around your home or property, you should always call the state's One Call notification system to locate any underground utility lines. You can do this by simply dialing 811, which will connect you to the One Call system. Be safe and call 811 before you dig.
- Air conditioning is probably the biggest part of your summer energy needs. You can save money while keeping cool. Check air conditioner filters monthly. Clean or change filters as needed. You'll stay cool and your system will use less energy.
- Save postage and late charges - sign up for Automated Bill Payment.

General Information

Generation prices and charges are set by the electric generation supplier you have chosen. The Public Utility Commission regulates distribution rates and services. The Federal Energy Regulatory Commission regulates transmission prices and services.

PPL Electric Utilities uses about \$10.18 of this bill to pay state taxes and about \$61.92 is used to pay the PA Gross Receipts Tax.

Understanding Your Bill

Act 129 Compliance Rider - Monthly charge to recover costs for energy efficiency and conservation programs approved by the PUC.

Storm Damage Expense Rider - Monthly charge to recover certain costs to make repairs after major storms.

Customer Charge - Monthly charge to recover costs of billing, meters and equipment.

Distribution Charge - Monthly charge to recover costs of local equipment used to deliver electricity from high-voltage transmission lines (see Transmission Charge) and safely step down voltage for use in your home or business.

System Improvement Charge - Monthly charge to recover costs for improving, repairing and replacing equipment that delivers electricity to your home or business.

Rate RS - Rate for service to a private home.

Billing Details - (Bill Acct. 06476-21001)

Previous Balance	\$973.16
Balance as of Jun 10, 2020	\$973.16
Charges for - PPL Electric Utilities	
Residential Rate: RS for May 11 - Jun 10	
Distribution Charge:	
Customer Charge	18.27
524 kWh at 4.41070000¢ per kWh	23.12
Tax Cut and Jobs Act Credit at -13.14%	-4.28
System Improvement Charge at -0.03%	-0.01
Total Distribution Charges	\$37.10
Generation & Transmission Charges for May 11 - Jun 10	
Transmission Charge:	
524 kWh at 2.35499900¢ per kWh	12.34
Generation Charge:	
Capacity and Energy	
524 kWh at 5.16099900¢ per kWh	27.04
Total Generation & Transmission Charges	\$39.38
Other Charges for PPL Electric Utilities	
Excess Credit	-57.62
Total of Other Charges	\$-57.62
Amount Due By Jul 2, 2020	\$992.02
Account Balance	\$992.02

Smart Meter Rider - Monthly charge to recover costs associated with the smart meter programs approved by the PUC.

Tax Cut and Jobs Act Credit - Monthly adjustment for federal tax changes.

Transmission Charge - Monthly charge to recover the cost of moving electricity over high-voltage transmission lines from generation facilities to PPL Electric Utilities' distribution lines (see Distribution Charge).

Generation Charge - Monthly charge to recover the cost of the production or purchase of electricity.

kWh (Kilowatt-hour) - A measure of how much electricity your household uses. One kilowatt-hour equals the amount of electricity used by ten 100-watt lights left on for one hour.

2020-2021

Host Meter Rec'd Usage	Host Excess (Del Usage - Rec Usage)	Host Excess kWh	Value of Excess Gen		Satellite Meter Reading	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 Bank (kWh)	Cash-Out Payment		Satellite Account - Account Balance on Bill (\$)	Payments by Mr. Moyer Toward the Satellite Account Balance (\$)	Comments	Type of Meter
			Cents per kWh	Monthly Value (\$)									Cents per kWh	Payment (\$)				
596	595	595	11.1500	66.34	10463	524			524	58.43	71			992.87 (due 7/2/20)	NA		RF	
643	642	642	11.1520	71.60	10961	498			498	55.54	215			1035.49 (due 8/3/20)	NA		RF	
612	611	611	11.1520	68.14	11527	566			566	63.12	260			1028.32 (due 8/8/20)	NA		RF	
560	559	559	11.1520	62.34	12108	581			581	64.79	238			1047.22 (due 10/5/20)	982.43 paid 10/12/20		RF	
534	532	532	11.1520	59.33	12717	609			609	67.91	161			84.10 (due 11/4/20)	NA		RF	
349	348	348	11.1520	38.81	13482	765			509	56.76	0			117.60 (due 12/3/20)	NA		RF	
296	294	394	11.1850	44.07	14414	932			294	32.88	0			180.86 (due 1/4/21)	NA		RF	
248	246	246	11.3900	28.02	16145	1731			246	28.02	0			582.26 (due 2/4/21)	NA		RF	
268	266	266	11.3900	30.30	17770	1625			266	30.30	0			596.26 (due 3/9/21)	NA		RF	
475	473	473	11.3900	53.87	19131	1361			473	53.88	0			677.85 (due 4/7/21)	NA		RF	
535	534	534	11.3980	60.87	20154	1023			534	60.87	0			767.91 (due 5/10/21)	NA		RF	
498	494	494	11.3980	56.31	20773	622			498	56.31	0			785.69 (due 6/7/21)	NA		RF	

2019-2020

Billing Date	Host Meter Reading (6727797002)	Host Meter Del Reading	Host Meter Del Usage	Host Meter Rec'd Reading	Host Meter Rec'd Usage	Host Excess (Del Usage-Rec Usage)	Host Excess kWh	Value of Excess Gen		Satellite Meter Del Reading	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 Stmt (kWh)	Cash-Out Payments		Satellite Account - Account Balance on Bill (\$)	Payments by Mt. Mansfield to Satellite Account Balance (\$)	Comments	Type of Meter	
								Cents per kWh	Monthly Value (\$)									Cents per kWh	Payment (\$)					
Jun-18				1903	614	613	613	11.1197	68.18	1703	306				306	34.38	304			300.37 due 7/22/18	17.68 paid 8/24/18		RF	
Jul-18		10	6	2462	559	553	553	11.2251	62.07	1974	271				271	30.42	598			377.35 due 8/1/18	17.58 paid 8/25/18		RF	
Aug-18		11	1	3058	568	595	595	11.2259	66.79	2244	270				270	30.31	911			378.20 due 8/23/18	17.84 paid 7/21/19		RF	
Sep-18			1	3638	578	577	577	11.2238	64.76	2508	322				322	36.14	1156			302.83 due 10/7/18	17.28 paid 9/28/18		RF	
Oct-18		14	2	4129	493	491	491	11.2508	55.24	2841	275				275	30.54	1382			320.88 due 10/21/20	17.74 paid 10/23/18		RF	
Nov-18		18	1	4521	352	351	351	12.9880	47.19	3478	635				635	78.64	1138			324.10 due 12/8/18	17.85 paid 12/8/18		RF	
Dec-18		17	2	4827	333	304	304	11.8397	35.97	4834	1188				1188	137.00	284			383.66 due 12/31/18	17.85 paid 1/22/19		RF	
Jan-20		18		5065	238	288	288	11.7482	33.73	5720	1085				1085	85.90	0			371.89 due 2/5/20	17.75 paid 2/22/20		RF	
Feb-20		20	1	5388	290	289	289	11.7474	33.95	7042	1322				1322	155.00	0			378.82 due 3/2/20	17.94 paid 3/2/20		RF	
Mar-20		22	2	5803	448	446	446	11.7468	52.39	7853	541				541	62.50	0			382.88 due 4/1/20	18.04 paid 3/26/20		RF	
Apr-20		23	1	6241	438	437	437	11.8158	51.78	8875	867				867	101.78	0			388.94 due 5/1/20	18.11 paid 5/1/20		RF	
																				377.16 due 5/20/20	18.14			

Certificate of Service

Fifth Petition to Reopen Proceedings

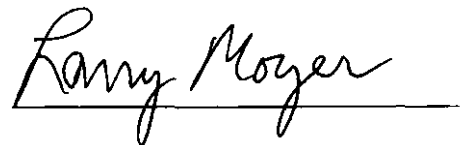
RE: Docket No. C-2017-2629683

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

Mr. Devin T. Ryan
Post & Schell PC
17 North Second Street, 12th floor
Harrisburg, PA 17101-1601
(Served via USPS First Class Mail)

Pennsylvania Public Utility Commission
Office of Special Assistants
Commonwealth Keystone Building
3rd Floor, 9 East
Harrisburg, PA 17101
(Served via USPS First Class Mail)

September 21, 2021



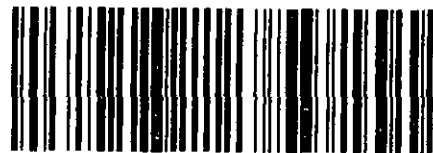
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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

LARRY MOYER
370 W JOHNSON ST
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PHILADELPHIA, PA 19144-3119



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Pennsylvania Public Utility Commission
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Harrisburg, PA 17105-3265

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SEP 24 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU