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File #: 175564

October 29, 2021

VIA ELECTRONIC FILING

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

**Re: Petition of PPL Electric Utilities Corporation for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan
Docket No. P-2019-3010128**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) is Tariff Supplement No. 322 to Electric Pa. P.U.C. No. 201. The proposed tariff supplement modifies Tariff Rule 12 – Distributed Energy Resource (DER) Interconnection Service, which was originally adopted pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) December 17, 2020 Opinion and Order (“*December 2020 Order*”) in the above-referenced proceeding.

The tariff modification’s purpose is to address the unexpected delay in the release of Underwriters Laboratories (“UL”) Standard 1741 Supplement B (“UL 1741 SB”) and its impact on the Distributed Energy Resources (“DER”) Management pilot program approved by the Commission’s *December 2020 Order*. Specifically, UL 1741 SB was published on September 28, 2021, when it was originally expected to be released months ago. This delay will make it extremely difficult for smart inverter manufacturers to have their products certified to UL 1741 B by January 1, 2022, which is the date currently contemplated in Tariff Rule 12(c). Indeed, Tariff Rule 12(c) provides:

From January 1, 2021, through December 31, 2021, all new inverters connected to the distribution system must meet: (1) UL 1741 Supplement A as amended or supplemented and (2) the communication requirements under IEEE 1547-2018 as

tested by or on behalf of the Company. Beginning January 1, 2022, new inverters connecting to the distribution system must comply with IEEE 1574-2018 and must be certified to UL 1741 Supplement B. The list of smart inverters that meet these requirements will be made publicly available and regularly updated on the Company's REMSI website.

Supplement No. 311 to Electric Pa. P.U.C. No. 201, Original Page 14C.1.

As such, beginning January 1, 2022, no DERs will be able to interconnect with PPL Electric's distribution system unless they have UL 1741 SB certified inverters.

However, under Paragraph 49 of the Commission-approved Settlement at Docket No. P-2019-3010128, it states that effective January 1, 2022, "the Company will transition to requiring new DERs to have smart inverters installed that meet IEEE 1547-2018 and have been certified with IEEE 1547.1 / UL 1741 Supplement B ('UL 1741 SB')." (emphasis added). As shown above, that transition period currently is a compliance deadline that starts on January 1, 2022, with no exceptions.

But, in light of the issues caused by UL 1741 Supplement B's unexpected delay, PPL Electric proposes to modify the transition period outlined in Tariff Rule 12(c) as follows:

From January 1, 2021, through December 31, 2021, all new inverters connected to the distribution system must meet: (1) UL 1741 Supplement A as amended or supplemented and (2) the communication requirements under IEEE 1547-2018 as tested by or on behalf of the Company. Beginning January 1, 2022, PPL Electric will transition to requiring new inverters that connect to the distribution system to comply with IEEE 1547-2018 and to be certified to UL 1741 Supplement B. During the transition period of January 1, 2022, through December 31, 2022, each new inverter connecting to PPL Electric's distribution system must either: (1) meet UL 1741 Supplement A (as amended or supplemented) and the communication requirements under IEEE 1547-2018 (as tested by or on behalf of the Company); or (2) comply with IEEE 1547-2018 and be certified to UL 1741 Supplement B. Beginning January 1, 2023, new inverters connecting to the distribution system must comply with IEEE 1547-2018 and must be certified to UL 1741 Supplement B. The list of smart inverters that meet these requirements will be made publicly available and regularly updated on the Company's REMSI website.

Supplement No. 322 to Electric Pa. P.U.C. No. 201, First Revised Page 14C.1.

The proposed tariff modification will provide manufacturers and installers with approximately 15 months since UL 1741 SB's release to transition to the new IEEE 1547-2018 and UL 1741 SB requirements. PPL Electric believes this is more than sufficient time, given that, under the current tariff, it was expected that manufacturers and installers would have less than a year to transition. Moreover, as manufacturers bring smart inverters to market that meet the new

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requirements, those smart inverters can be used during the transition period of January 1, 2022, through December 31, 2022. Finally, the proposed tariff modification is consistent with Paragraph 49 of the Commission-approved Settlement in this proceeding and, therefore, does not require any changes to that Settlement.

For the tariff modification to be effective by January 1, 2022, PPL Electric is filing the proposed tariff supplement on October 29, 2021 (*i.e.*, more than 60 days before the effective date). *See* 52 Pa. Code § 53.31.

Prior to filing the enclosed tariff supplement, PPL Electric consulted with all of the parties in the above-reference proceeding. The Company's understanding is that none of the parties oppose the proposed tariff modification.

Copies of this filing are being provided to the parties as indicated on the Certificated of Service.

Respectfully submitted,



Devin Ryan

DR/jl
Enclosure

cc: Certificate of Service
Bureau of Technical Utility Services

CERTIFICATE OF SERVICE

(Docket No. P-2019-3010128)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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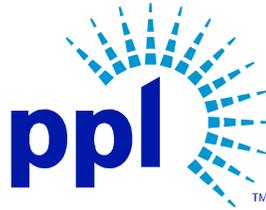
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Date: October 29, 2021



Devin Ryan



PPL Electric Utilities Corporation

GENERAL TARIFF

RULES AND RATE SCHEDULES FOR ELECTRIC SERVICE

In the territory listed on pages 4, 4A, and 4B
and in the adjacent territory served.

ISSUED: October 29, 2021

EFFECTIVE:

STEPHANIE R. RAYMOND, PRESIDENT

Two North Ninth Street
Allentown, PA 18101-1179

NOTICE

THIS TARIFF MAKES CHANGES (C) IN EXISTING RATES. SEE PAGE TWO.

LIST OF CHANGES MADE BY THIS SUPPLEMENT

CHANGES:

Rule 12 - Distributed Energy Resource
Interconnection Service

Page No. 14C.1

Rule 12(c) is amended to provide a transition period of January 1, 2022, through December 31, 2022, during which time each new inverter connecting to PPL Electric's distribution system must either: (1) meet UL 1741 Supplement A (as amended or supplemented) and the communication requirements under IEEE 1547-2018 (as tested by or on behalf of the Company); or (2) comply with IEEE 1547-2018 and be certified to UL 1741 Supplement B. Then, beginning January 1, 2023, new inverters connecting to the distribution system must comply with IEEE 1547-2018 and must be certified to UL 1741 Supplement B.

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RULES FOR ELECTRIC SERVICE
RULE 12- DISTRIBUTED ENERGY RESOURCE (DER) INTERCONNECTION
SERVICE

A. PURPOSE

The Distributed Energy Resource Interconnection Service (DERIS) shall be applied to all new DER interconnections with the distribution system effective January 1, 2021, and as further provided in this Rule. DERs shall include inverter-based alternative energy sources and systems, as defined in the Alternative Energy Portfolio Standards Act of 2004 (73 P.S. §§ 1648.1 - 1648.8), and storage resources (batteries).

B. APPLICATION

- (1) This Rule shall apply to all inverter-based DERs, whose interconnection applications are received on or after January 1, 2021.
- (2) This Rule shall apply to all customers who receive Basic Utility Supply Service under Rate Schedules RS, GS-1, GS-3, and LP-4.

C. DEVICE REQUIREMENTS

(1) Renewable Energy Connection –

The online portal allows customers to apply to interconnect the DER Management Devices with the distribution system. Refer to the REMSI Renewable Energy Connection under PPL Electric's Electric Rates and Rules for additional information.
<https://www.pplelectric.com/utility/about-us/electric-rates-and-rules.aspx>

(2) Smart Inverters —

From January 1, 2021, through December 31, 2021, all new inverters connected to the distribution system must meet: (1) UL 1741 Supplement A as amended or supplemented and (2) the communication requirements under IEEE 1547-2018 as tested by or on behalf of the Company. Beginning January 1, 2022, PPL Electric will transition to requiring new inverters that connect to the distribution system to comply with IEEE 1547-2018 and to be certified to UL 1741 Supplement B. During the transition period of January 1, 2022, through December 31, 2022, each new inverter connecting to PPL Electric's distribution system must either: (1) meet UL 1741 Supplement A (as amended or supplemented) and the communication requirements under IEEE 1547-2018 (as tested by or on behalf of the Company); or (2) comply with IEEE 1547-2018 and be certified to UL 1741 Supplement B. Beginning January 1, 2023, new inverters connecting to the distribution system must comply with IEEE 1547-2018 and must be certified to UL 1741 Supplement B. The list of smart inverters that meet these requirements will be made publicly available and regularly updated on the Company's REMSI website.

(C)

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