

COMMONWEALTH OF PENNSYLVANIA
(Public Utility Commission)

-----*
ED FREY, *
Complainant * CASE:
v. * C-2023-3042130
PPL ELECTRIC UTILITY *
COMMISSION *
Respondent. *
-----*

Pages 1 through 79 TELEPHONIC HEARING
Judge's Chambers
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, Pennsylvania

Wednesday, November 1, 2023
Met, pursuant to notice, at 1:33 p.m.

BEFORE: THE HONORABLE JOHN M. COOGAN
Administrative Law Judge

INDEX TO EXHIBITS
Docket No.: C-2023-3042130
Hearing Date: November 1, 2023

EXHIBITS INDEX

EXHIBITS: FOR IDENTIFICATION IN EVIDENCE

COMPLAINANTS **(Attached)**

EXHIBITS:

1 (Rate Comparison Report)	29	29
2 (Rate Comparison Report 2023)	29	29
5 (Rate Schedule)	29	29
6 (Safety Results)	29	29

PPL **(Not Attached)**

EXHIBITS:

5 (Notification of Price Change)	63	67
6 (June 1, 2023 Notification of Price Change)	64	67
7 (PPL Electric's A 2023 Newsletter)	65	67
8 (Generation Supply Charge-1)	57	67
9 (Calculation of the Transmission Service Charge)	60	67

INDEX TO EXHIBITS
Docket No.: C-2023-3042130
Hearing Date: November 1, 2023

EXHIBITS INDEX

EXHIBITS: FOR IDENTIFICATION IN EVIDENCE

PPL

EXHIBITS:

10 (Approval of Default Service Plan filing)	46	53
---	----	----

Exhibit 1



Pennsylvania Public Utility Commission
Rate Comparison Report
April 15, 2023


Prepared by:
Bureau of Technical Utility Services

Rate Comparison Report – Page 6

Section 1: Average Residential Usage and Bill

This section contains tables displaying the 2022 average monthly residential usage and corresponding bill amount for all 11 EDCs and the seven large NGDCs. Please see Sections 2 and 3 of this Report for a detailed comparison of the rates of all regulated electric and gas utilities across the state on a fixed usage basis.

Electric

EDCs	Avg. Monthly Usage (kWh)	Avg. Monthly Bill (\$)
Citizens' Electric Co.	987	162.59
Duquesne Light Co.	609	134.46
Metropolitan-Edison Co.	951	164.20
PECO Energy Co.	787	130.56
Pennsylvania Electric Co.	731	138.86
Pennsylvania Power Co.	933	161.79
Pike County Light & Power Co.	686	157.87
PPL Electric Utilities Corp.	 963	199.85
UGI Utilities Inc. - Electric	1,000	190.43
Wellsboro Electric Co.	736	145.98
West Penn Power Co.	953	133.75

Citizens' Electric Co.

Citizens' Electric Co. (Citizens'), a subsidiary of C&T Enterprises Inc., serves about 5,900 residential, 1,100 commercial and 40 industrial customers. Its service territory consists of Lewisburg Borough and the townships of East Buffalo, Buffalo and Kelly in Union County, as well as West Chillisquaque in Northumberland County. Citizens' operates under the terms of Electric Tariff Pa. P.U.C. No. 14. With a service area of 55 square miles, Citizens' is one of the smallest electric companies, both in area and in number of customers, included in this rate comparison. C&T Enterprises Inc. is a holding company owned by the Claverack and Tri-County Rural Electric Cooperatives for their for-profit enterprises. C&T also owns the Pennsylvania utilities of Valley Energy Inc. (gas) and Wellsboro Electric Co. On Dec. 8, 2022, the Commission approved a settlement allowing for a \$930,000 base rate increase for Citizens'.

Utility:	Citizens' Electric Co.									
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania										
Rates for Default Service										
Rate Classification	Customer Charge	Distribution Charges	Generation Charges*	Transmission Charges	CTC (if applicable)	DSIC	Universal Service	GRT**	STAS	TOTAL
Residential										
using 500 KWH	\$13.10	\$16.84	\$63.12					\$3.96	(\$0.01)	\$97.01

Shopping Update: As of March 2023, no EGSs were making offers to Citizens' residential customers. However, 55 commercial and industrial customers (15.6% of load) were using a competitive supplier. Information, including Citizens' price to compare and competitive offers, is available at www.PAPowerSwitch.com.

Duquesne Light Co.

Duquesne Light Co. (Duquesne), a subsidiary of Duquesne Light Holdings, serves about 543,000 residential, 60,800 commercial and 1,000 industrial customers. Duquesne’s service territory consists of parts of Allegheny, Beaver, Butler and Westmoreland counties in Western Pennsylvania. Duquesne operates under the terms of Electric Tariff Pa. P.U.C. No. 25.

Utility:	Duquesne Light Co.									
<u>Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania</u>										
<u>Rates for Default Service</u>										
Rate Classification	Customer Charge	Distribution Charges	Generation Charges	Transmission Charges	DSIC	Universal Service	EE&C Charges	Education Charges	STAS	TOTAL
Residential										
using 500 KWH	\$12.50	\$35.50	\$44.17	\$12.11	(\$0.05)	\$7.72	\$0.75		(\$0.08)	\$112.62
Notes:	*All Duquesne customers with a peak demand greater than or equal to 200 KW on average are enrolled in an hourly price plan for the generation component of their bill. The generation rate used for this report was a calculated average based on historic hourly price service data throughout the past year.									

Shopping Update: As of March 2023, 113 EGS offers were being made to Duquesne’s customers. Furthermore, 135,796 customers (22.2% of customers; 62.3% of the load) were using a competitive supplier. Information, including Duquesne’s price to compare and competitive offers, is available at www.PAPowerSwitch.com.

Metropolitan Edison Co.

Metropolitan Edison Co. (Met-Ed), a subsidiary of FirstEnergy Corp., serves about 514,000 residential, 67,200 commercial and 1,700 industrial customers. With a total service area of about 3,300 square miles, Met-Ed's service territory consists of parts of the Easton, Lebanon and Reading areas in Eastern Pennsylvania and the York Area in South Central Pennsylvania. Met-Ed operates under the terms of Electric Tariff Pa. P.U.C. No. 52. FirstEnergy, headquartered in Akron, Ohio, is one of the country's largest investor-owned electric systems, serving approximately 6 million customers through its 10 electric utility operating companies in Pennsylvania, Ohio, Maryland, West Virginia and New Jersey.⁴

Utility:		Metropolitan Edison Co.								
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania										
Rates for Default Service										
Rate Classification	Customer Charge	Distribution Charges	Generation Charges	DSIC	DSSR*	EE&C Charges	Smart Meter Charge	Universal Service	TCJA**	TOTAL
Residential										
using 500 KWH	\$11.25	\$24.00	\$51.52	\$1.06	\$2.38	\$0.72	(\$0.65)	\$3.16	(\$2.27)	\$91.17

Shopping Update: As of March 2023, 108 EGS offers were being made to Met-Ed's customers. Furthermore, 124,388 customers (21.3% of customers; 52.7% of the load) were using a competitive supplier. Information, including Met-Ed's current price to compare and competitive offers, is available at www.PAPowerSwitch.com.

⁴ Other FirstEnergy electric utility operating companies in Pennsylvania are the Pennsylvania Electric Co., Pennsylvania Power Co. and West Penn Power Co.

PECO Energy Co.

PECO Energy Co. (PECO), a subsidiary of the Exelon Corp. (Exelon), is Pennsylvania’s largest electric utility, serving approximately 1.52 million residential, 155,300 small commercial and industrial, and 3,100 large commercial and industrial customers within parts of the following counties in Southeastern Pennsylvania: Bucks, Chester, Delaware, Montgomery, Philadelphia and York. PECO operates under the terms of Electric Tariff Pa. P.U.C. No. 7. PECO also provides gas service to more than 500,000 customers in the Philadelphia area. Exelon, headquartered in Chicago, is the nation’s largest utility company, that, through its six utility operating companies, provides electric and natural gas service to more than ten million customers in Illinois, Maryland, Washington D.C., Delaware, New Jersey and Pennsylvania.

Utility:		PECO Energy Co.									
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania											
Rates for Default Service											
Rate Classification	Customer Charge	Distribution Charges	Generation Charges	Transmission Charges	NDCA*	NBT**	EE&C Charges	Universal Service	Education Charges	STAS	TOTAL
Residential											
using 500 KWH	\$10.50	\$35.77	\$45.64	\$3.64	(\$0.30)	\$1.73	\$0.92	\$0.43	\$0.01	(\$0.05)	\$98.29

Shopping Update: As of March 2023, 130 EGS offers were being made to PECO’s customers. Furthermore, 391,229 customers (23% of customers; 51% of the load) were using a competitive supplier. Information, including PECO’s price to compare and competitive offers, is available at www.PAPowerSwitch.com.

Pennsylvania Electric Co.

Pennsylvania Electric Co. (Penelec), a subsidiary of the FirstEnergy Corp., serves approximately 498,000 residential, 84,000 commercial and 1,700 industrial customers. Penelec's service territory consists of 17,600 square miles spanning more than 30 counties throughout mostly rural areas of Northern and Central Pennsylvania. Penelec operates under the terms of Electric Tariff Pa. P.U.C. No. 81. FirstEnergy, headquartered in Akron, Ohio, is one of the country's largest investor-owned electric systems, serving approximately 6 million customers through its 10 electric utility operating companies in Pennsylvania, Ohio, Maryland, West Virginia and New Jersey.⁵

Utility:		Pennsylvania Electric Co.									
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania											
Rates for Default Service											
Rate Classification	Customer Charge	Distribution Charges	Generation Charges	DSIC	DSSR*	EE&C Charges	Smart Meter Charge	Universal Service	TCJA**	STAS	TOTAL
Residential											
using 500 KWH	\$11.25	\$30.37	\$49.45	\$1.38	\$3.84	\$0.73	(\$1.22)	\$4.60	(\$2.30)	\$0.02	\$98.12

Shopping Update: As of March 2023, 104 EGS offers were being made to Penelec's customers. Furthermore, 118,086 customers (20.1% of customers; 58.7% of the load) were using a competitive supplier. Information, including Penelec's current price to compare and competitive offers, is available at www.PAPowerSwitch.com.

⁵ Other FirstEnergy electric utility operating companies in Pennsylvania are the Metropolitan Edison Co., Pennsylvania Power Co. and West Penn Power Co.

Pennsylvania Power Co.

Pennsylvania Power Co. (Penn Power), a subsidiary of FirstEnergy Corp., serves approximately 149,000 residential, 20,700 commercial and 550 industrial customers. Penn Power's service territory consists of 1,100 square miles in parts of the following Western Pennsylvania counties: Allegheny, Beaver, Butler, Crawford, Lawrence, Mercer and Venango. Penn Power operates under the terms of Electric Tariff Pa. P.U.C. No. 36. FirstEnergy, headquartered in Akron, Ohio, is one of the country's largest investor-owned electric systems, serving approximately 6 million customers through its 10 electric utility operating companies in Pennsylvania, Ohio, Maryland, West Virginia and New Jersey.⁶

Utility:	Pennsylvania Power Co.									
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania										
Rates for Default Service										
Rate Classification	Customer Charge	Distribution Charges	Generation Charges	DSIC	DSSR*	EE&C Charges	Smart Meter Charge	Universal Service	TCJA**	TOTAL
Residential										
using 500 KWH	\$11.00	\$22.19	\$52.56	\$2.60	\$1.59	\$0.84	(\$0.53)	\$3.45	(\$2.13)	\$91.57

Shopping Update: As of March 2023, 85 EGS offers were being made to Penn Power's customers. Furthermore, 33,921 customers (19.9% of customers; 57.9% of the load) were using a competitive supplier. Information, including Penn Power's current price and competitive offers, is available at www.PAPowerSwitch.com.

⁶ Other FirstEnergy electric utility operating companies in Pennsylvania are the Metropolitan Edison Co., Pennsylvania Electric Co. and West Penn Power Co.

Pike County Light & Power Co.

Pike County Light & Power Co. (Pike), a subsidiary of Corning Natural Gas Holding Corporation (Corning), serves about 3,200 residential and 750 commercial customers. Pike’s service territory includes Westfall, Milford and Dingman townships, as well as Matamoras and Milford boroughs in Pike County, Northeastern Pennsylvania. Pike operates under the terms of Electric Tariff Pa. P.U.C. No. 8. Corning, headquartered in Corning, NY, also owns the Pennsylvania natural gas utility of Leatherstocking Gas Co. and provides natural gas service to approximately 15,000 customers across the southern and central regions of New York State. Additionally, Pike provides natural gas service in Pennsylvania in Westfall Township and Matamoras Borough, Pike County.

Utility:	Pike County Light & Power Co.									
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania										
Rates for Default Service										
Rate Classification	Customer Charge	Distribution Charges*	Generation Charges**	Transmission Charges	CTC (if applicable)	DSIC	Universal Service	SBC***	STAS	TOTAL
Residential using 500 KWH	\$8.80	\$46.37	\$62.32						\$0.03	\$117.52

Shopping Update: As of March 2023, no EGSs were making offers to Pike’s residential customers. However, 1,025 customers (19.7% of customers; 16.1% of the load) were using a competitive supplier. Information, including Pike’s price to compare and competitive offers, is available at www.PAPowerSwitch.com.

PPL Electric Utilities Corp.

PPL Electric Utilities Corp. (PPL), a subsidiary of the PPL Corp., serves approximately 1.28 million residential, 183,400 commercial and 3,200 industrial customers. PPL’s service territory consists of parts of the following counties in Eastern Pennsylvania: Berks, Bucks, Carbon, Chester, Clinton, Columbia, Cumberland, Dauphin, Juniata, Lackawanna, Lancaster, Lebanon, Lehigh, Luzerne, Lycoming, Mifflin, Monroe, Montgomery, Montour, Northampton, Northumberland, Perry, Pike, Schuylkill, Snyder, Sullivan, Susquehanna, Union, Wayne, Wyoming and York. PPL operates under the terms of Electric Tariff Pa. P.U.C. No. 201. PPL Corp., headquartered in Allentown, Lehigh County, delivers energy to roughly 3.5 million customers in Kentucky, Virginia, Rhode Island and Pennsylvania.

Utility:	PPL Electric Utilities Corp.											
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania												
Rates for Default Service												
Rate Classification	Customer Charge	Distribution Charges	Generation Charges	Transmission Charges	DSIC	SDER**	TCJA***	EE&C Charges	Smart Meter	Universal Service	STAS	TOTAL
Residential												
using 500 KWH	\$14.09	\$17.67	\$61.48	\$11.58	\$1.82	(\$0.20)	(\$2.61)	\$0.65	\$1.90	\$4.92	(\$0.06)	\$111.24

Shopping Update: As of March 2023, 134 EGS offers were being made to PPL’s customers. Furthermore, 553,631 customers (39% of customers; 63.6% of the load) were using a competitive supplier. Information, including PPL’s current price to compare and competitive offers, is available at www.PAPowerSwitch.com.

West Penn Power Co.

West Penn Power Co. (West Penn), a subsidiary of FirstEnergy Corp., serves approximately 633,000 residential, 99,200 commercial and 2,300 industrial customers. West Penn's service territory consists of portions of 25 counties throughout Southwestern and Central Pennsylvania. West Penn operates under the terms of Electric Tariff Pa. P.U.C. No. 40. FirstEnergy, headquartered in Akron, Ohio, is one of the country's largest investor-owned electric systems, serving approximately 6 million customers through its 10 electric utility operating companies in Pennsylvania, Ohio, Maryland, West Virginia and New Jersey.⁷

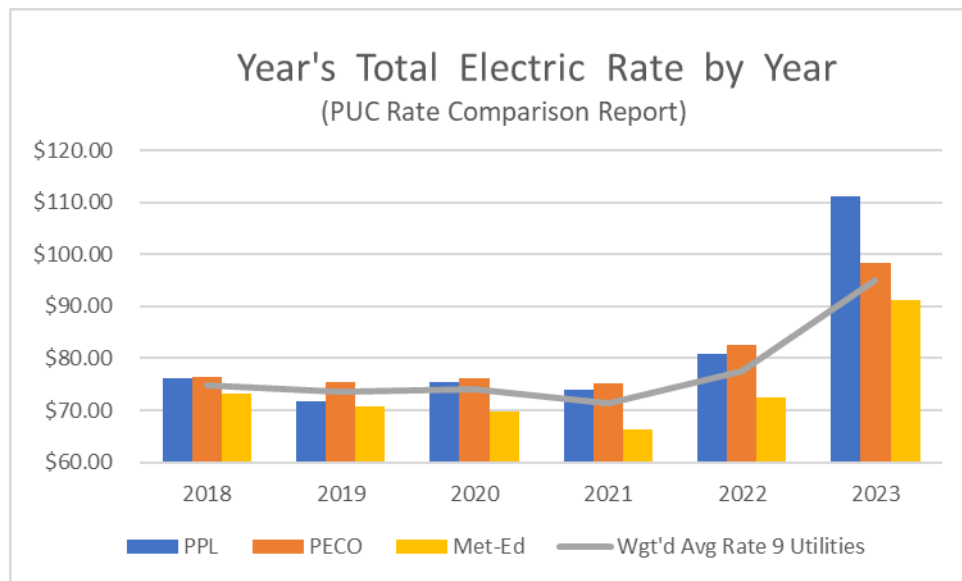
Utility:	West Penn Power Co.										
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania											
Rates for Default Service											
Rate Classification	Customer Charge	Distribution Charges	Generation Charges	DSIC	DSSR*	Smart Meter Charge	EE&C Charges	TCJA**	Universal Service	STAS	TOTAL
Residential											
using 500 KWH	\$7.44	\$17.44	\$42.59	\$0.98	\$3.81	(\$0.24)	\$0.45	(\$1.12)	\$2.46	(\$0.03)	\$73.78

Shopping Update: As of March 2023, 94 EGS offers were being made to West Penn's customers. Furthermore, 138,153 customers (18.3% of customers; 55.8% of the load) were using a competitive supplier. Information, including West Penn's price to compare and competitive offers, is available at www.PAPowerSwitch.com.

⁷ Other FirstEnergy electric utility operating companies in Pennsylvania are the Metropolitan Edison Co., Pennsylvania Electric Co. and Pennsylvania Power Co.

a. PPL to “shop” for supplier default rates and consistently acquire the offered Supplier Default Rate at a cost per kWh below or equal to their geographical peers; MetEd and PECO.

Report Yr	500 kWh costs displayed from PA PUC Rate Comparison Report										Weighted Avg Mthly Cost
Year	Citizens	Duquesne	Met-Ed	PECO	Penelec	Penn Power	Pike County	PPL	West Penn	Non-PPL Customers	
Residential Customers=>	5,900	543,000	514,000	1,520,000	498,000	149,000	3,200	1,280,000	663,000	3,896,100	
2018	\$ 59.95	\$ 84.27	\$ 73.10	\$ 76.33	\$ 81.71	\$ 71.74	\$ 78.58	\$ 76.25	\$ 60.46	\$ 74.80	
2019	\$ 67.10	\$ 84.41	\$ 70.76	\$ 75.31	\$ 79.05	\$ 73.23	\$ 90.86	\$ 71.66	\$ 59.26	\$ 73.65	
2020	\$ 62.33	\$ 84.09	\$ 69.86	\$ 76.19	\$ 79.80	\$ 71.83	\$ 53.96	\$ 75.35	\$ 60.37	\$ 74.02	
2021	\$ 59.81	\$ 85.29	\$ 66.19	\$ 75.30	\$ 74.16	\$ 67.67	\$ 65.02	\$ 73.85	\$ 53.85	\$ 71.37	
2022	\$ 66.97	\$ 93.73	\$ 72.57	\$ 82.59	\$ 77.25	\$ 74.20	\$ 104.48	\$ 80.73	\$ 57.39	\$ 77.52	
2023	\$ 97.01	\$ 112.62	\$ 91.17	\$ 98.29	\$ 98.12	\$ 91.57	\$ 117.52	\$ 111.24	\$ 73.78	\$ 94.91	



- Used the PA PUC Rate Comparison Reports for the Data in the table
- Graph shows the Total Electric Rate for PPL, PECO, MetEd and the Weighted Average of 8 PA Electric Utilities, excluded PPL in the calculations
- PPL’s 1.28 million customers pay the highest DSR rate versus the large electric customer based utilities compared in the above table
- The right most column on the table is the weighted average of the 8 electric utilities supplying electricity to 3,896,000 residential customers
- UGI Electric and Wellsboro, 54,900 and 5,100 residential customers respectively, were not included as they cover ~ 1% of residential customers and their rates were also below PPL

Exhibit 2

Established an excel table with supplier information provided on the PA PUC – Rate Comparison Report – 2023.

> Arrow is the row in the table capturing DSR charges for the 9 utilities shown at a monthly residential demand of 500 kWh

> Last row in the table is the SDR rate for each electric utility

Source PUC - Rate Comparison Report - 2023									
	Citizens	Duquesne	Met-Ed	PECO	Penelec	Penn Power	Pike County	PPL	West Penn
	500	500	500	500	500	500	500	500	500
Total Customers - All States	NA	NA	6,000,000	USA Largest	6,000,000	6,000,000	NA	3,500,000	6,000,000
Pa Number of Counties Serving	1	4		5	30	7	1	30	25
Pa Square Miles Serving			3,300		17,600	1,100			
Residential Customers	5,900	543,000	514,000	1,520,000	498,000	149,000	3,200	1,280,000	663,000
Commercial Customers		60,800	67,200	155,300	84,000	20,700	750	183,400	99,200
Industrial Customers		1,000	1,700	3,100	1,700	5,500		3,200	2,300
Alternate Percentage - Residential Customers EGSs	0			391,229					
Alternate Percentage - Com & Ind Customers EGSs	55								
ESG offerings	-	113	108	130	104	85	-	134	94
Customers using Competitive Supplier		135,796	124,388	391,229	118,086	33,921	1,025	553,631	138,153
ESGs Percent of Customers		22.20%	21.30%	23.00%	20.10%	19.90%	19.70%	39.00%	18.30%
ESGs Percentage of Load	15.60%	62.30%	52.70%	51.00%	58.70%	57.90%	16.10%	63.60%	55.80%
Customer Charge - 2023	\$ 13.10	\$ 12.50	\$ 11.25	\$ 10.50	\$ 11.25	\$ 11.00	\$ 8.80	\$ 14.09	\$ 7.44
Distribution Charges - 2023	\$ 16.84	\$ 35.50	\$ 24.00	\$ 35.77	\$ 30.37	\$ 22.19	\$ 46.37	\$ 17.67	\$ 17.44
Generation Charges - 2023	\$ 63.12	\$ 44.17	\$ 51.52	\$ 45.64	\$ 49.45	\$ 52.56	\$ 62.32	\$ 61.48	\$ 42.59
Transmission Charges - 2023		\$ 12.11		\$ 3.64				\$ 11.58	
2023 - Default Supplier Charges	\$ 63.12	\$ 56.28	\$ 51.52	\$ 49.28	\$ 49.45	\$ 52.56	\$ 62.32	\$ 73.06	\$ 42.59
2023 - Default Supplier Rate kWh	\$ 0.12624	\$ 0.11256	\$ 0.10304	\$ 0.09856	\$ 0.09890	\$ 0.10512	\$ 0.12464	\$ 0.14612	\$ 0.08518



Populated an excel table with the 9 electric SDR rates for each year, 2018 from 2023, using the PA Rate Comparison Report information for each year displayed. Year 2023 shows rates from prior slide, last row.

Default Supplier Charges - Derived from Annual Rate Comparison Report											Weighted Average Default Supplier Rate Excluding PPL
Avg Monthly kWh - 2022=>	987	609	951	787	731	933	686	963	952		
Year	Citizens	Duquesne	Met-Ed	PECO	Penelec	Penn Power	Pike County	PPL	West Penn		
Residential Customers	5,900	543,000	514,000	1,520,000	498,000	149,000	3,200	1,280,000	663,000	3,896,100	
2018	\$ 0.07132	\$ 0.07826	\$ 0.06816	\$ 0.07216	\$ 0.06742	\$ 0.07202	\$ 0.06584	\$ 0.07464	\$ 0.06150	\$ 0.07005	
2019	\$ 0.07780	\$ 0.07442	\$ 0.06684	\$ 0.06822	\$ 0.06288	\$ 0.07714	\$ 0.10088	\$ 0.07040	\$ 0.06354	\$ 0.06781	
2020	\$ 0.07586	\$ 0.07098	\$ 0.06510	\$ 0.06738	\$ 0.06446	\$ 0.07572	\$ 0.03012	\$ 0.07634	\$ 0.05760	\$ 0.06584	
2021	\$ 0.06468	\$ 0.05200	\$ 0.06174	\$ 0.06426	\$ 0.05668	\$ 0.06436	\$ 0.02896	\$ 0.07318	\$ 0.05198	\$ 0.05914	
2022	\$ 0.07800	\$ 0.07980	\$ 0.07414	\$ 0.07024	\$ 0.06508	\$ 0.07594	\$ 0.09796	\$ 0.08942	\$ 0.05698	\$ 0.06942	
2023	\$ 0.12624	\$ 0.11256	\$ 0.10304	\$ 0.09856	\$ 0.09890	\$ 0.10512	\$ 0.12464	\$ 0.14612	\$ 0.08518	\$ 0.09918	

Multiplied each utility's SDR rate times the PPL average monthly usage (963 kWh) annualized to arrive at the total dollars for SDR that each utilities rate would generate. Show PPL, 2023 example and the same methodology was applied to all utility/year cells

Default Supplier Charges - Annually at the 2022 average kWh for PPL customers and the Generation and Transmission Default Rate for the Utility										
Avg Monthly kWh - 2022=>	987	609	951	787	731	933	686	963	952	
Year	Citizens	Duquesne	Met-Ed	PECO	Penelec	Penn Power	Pike County	PPL	West Penn	
Residential Customers	5,900	543,000	514,000	1,520,000	498,000	149,000	3,200	1,280,000	663,000	
2018	\$ 824.17	\$ 904.37	\$ 787.66	\$ 833.88	\$ 779.11	\$ 832.26	\$ 760.85	\$ 862.54	\$ 710.69	
2019	\$ 899.06	\$ 860.00	\$ 772.40	\$ 788.35	\$ 726.64	\$ 891.43	\$ 1,165.77	\$ 813.54	\$ 734.27	
2020	\$ 876.64	\$ 820.24	\$ 752.30	\$ 778.64	\$ 744.90	\$ 875.02	\$ 348.07	\$ 882.19	\$ 665.63	
2021	\$ 747.44	\$ 600.91	\$ 713.47	\$ 742.59	\$ 654.99	\$ 743.74	\$ 334.66	\$ 845.67	\$ 600.68	
2022	\$ 901.37	\$ 922.17	\$ 856.76	\$ 811.69	\$ 752.06	\$ 877.56	\$ 1,132.03	\$ 1,033.34	\$ 658.46	
2023	\$ 1,458.83	\$ 1,300.74	\$ 1,190.73	\$ 1,138.96	\$ 1,142.89	\$ 1,214.77	\$ 1,440.34	\$ 1,688.56	\$ 984.34	



PPL 2023 Example	
Average Monthly Usage	963
DSR Rate	\$ 0.14612
Monthly Cost	\$ 140.71
Monthly Cost times 12	12
Annual Cost	\$1,688.56



PPL's annual SDR cost, at the 963 average monthly use for PPL customers had each other electric utility's DSR for that year times the PPL average monthly use annualized subtracted from the PPL annual SDR. One example is shown for PPL 2023 versus PECO 2023 to validate the savings shown in the excel table

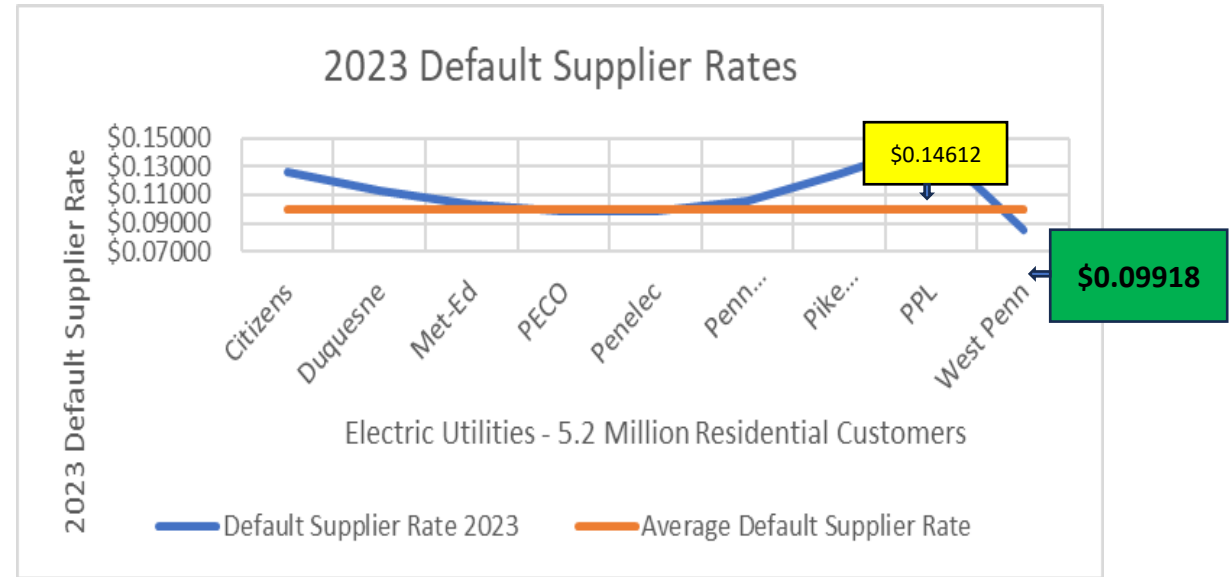
Default Supplier Charges - Annually - Math compares Electric Utility in the column's annual DSR dollars at PPL's Avg Monthly kWh vs PPL's DSR										Wgt'd Avg Annual Savings at Other Electric Utilities at their DSR at 963 kWh/Mth
Avg Monthly kWh - 2022	987	609	951	787	731	933	686	963	952	
Year	Citizens	Duquesne	Met-Ed	PECO	Penelec	Penn Power	Pike County	PPL	West Penn	
Residential Customers	5,900	543,000	514,000	1,520,000	498,000	149,000	3,200	1,280,000	663,000	3,896,100
2018	\$ 38.37	\$ (41.83)	\$ 74.88	\$ 28.66	\$ 83.43	\$ 30.28	\$ 101.69	\$ -	\$ 151.85	\$ 53.03
2019	\$ (85.51)	\$ (46.46)	\$ 41.14	\$ 25.19	\$ 86.90	\$ (77.89)	\$ (352.23)	\$ -	\$ 79.27	\$ 29.98
2020	\$ 5.55	\$ 61.94	\$ 129.89	\$ 103.54	\$ 137.29	\$ 7.16	\$ 534.12	\$ -	\$ 216.56	\$ 121.28
2021	\$ 98.23	\$ 244.76	\$ 132.20	\$ 103.08	\$ 190.67	\$ 101.92	\$ 511.01	\$ -	\$ 244.99	\$ 162.30
2022	\$ 131.97	\$ 111.17	\$ 176.58	\$ 221.64	\$ 281.27	\$ 155.77	\$ (98.69)	\$ -	\$ 374.88	\$ 231.08
2023	\$ 229.73	\$ 387.82	\$ 497.83	\$ 549.60	\$ 545.67	\$ 473.80	\$ 248.22	\$ -	\$ 704.22	\$ 542.40
Total - 2018-23	\$ 418.33	\$ 717.40	\$ 1,052.52	\$ 1,031.72	\$ 1,325.24	\$ 691.05	\$ 944.13		\$ 1,771.77	\$ 1,140.08

PECO - 2023 Saved versus PPL \$549.60	
Average Monthly Usage	963
PECO 2023 DSR	\$ 0.09856
Monthly Cost	\$ 94.91
Monthly Cost times 12	12
Annual Cost	\$ 1,138.96
PPL Annual Cost	\$ 1,688.56
PECO 2023 Annual Saved	\$ 549.60



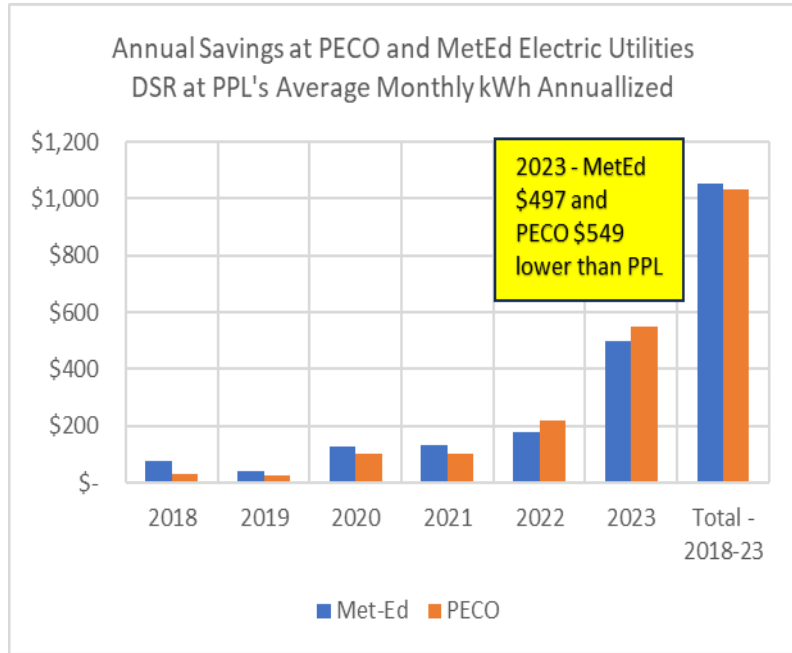
b. PPL to benchmark the work practices/methods/procedures that their geographical electric utility peers utilize to consistently acquire lower cost Supplier Default Rates and apply these practices for future DSR's offered to PPL customers. PPL's current DSR "shopping" practices on average cost PPL customers several hundred dollars above their MetEd and PECO peers.

- PPL's DSR for 2023, \$0.14612 per kWh is the highest of the 8 Electric Utilities shown from the PA PUC Rate Comparison Report
- The average DSR for the 8 Electric Utilities is \$0.09918, less than 4.6 cents below PPL's DSR of \$0.14612



Default Supplier Charges - Derived from Annual Rate Comparison Report											Weighted Average								
Avg Monthly kWh - 2022=>	987		609		951		787		731		933		686		963		952		Default Supplier Rate
Year	Citizens	Duquesne	Met-Ed	PECO	Penelec	Penn Power	Pike County	PPL	West Penn										Excluding PPL
Residential Customers	5,900	543,000	514,000	1,520,000	498,000	149,000	3,200	1,280,000	663,000										3,896,100
2018	\$ 0.07132	\$ 0.07826	\$ 0.06816	\$ 0.07216	\$ 0.06742	\$ 0.07202	\$ 0.06584	\$ 0.07464	\$ 0.06150										\$ 0.07005
2019	\$ 0.07780	\$ 0.07442	\$ 0.06684	\$ 0.06822	\$ 0.06288	\$ 0.07714	\$ 0.10088	\$ 0.07040	\$ 0.06354										\$ 0.06781
2020	\$ 0.07586	\$ 0.07098	\$ 0.06510	\$ 0.06738	\$ 0.06446	\$ 0.07572	\$ 0.03012	\$ 0.07634	\$ 0.05760										\$ 0.06584
2021	\$ 0.06468	\$ 0.05200	\$ 0.06174	\$ 0.06426	\$ 0.05668	\$ 0.06436	\$ 0.02896	\$ 0.07318	\$ 0.05198										\$ 0.05914
2022	\$ 0.07800	\$ 0.07980	\$ 0.07414	\$ 0.07024	\$ 0.06508	\$ 0.07594	\$ 0.09796	\$ 0.08942	\$ 0.05698										\$ 0.06942
2023	\$ 0.12624	\$ 0.11256	\$ 0.10304	\$ 0.09856	\$ 0.09890	\$ 0.10512	\$ 0.12464	\$ 0.14612	\$ 0.08518										\$ 0.09918

c. PPL to change practices/methods/procedures to regularly acquire Supplier Default Rates that in the best case are best/lower kWh in PA for their residential customers and worst case have a SDR equal to their MetEd and PECO peers SDR



- Used the PA PUC Rate Comparison Reports for the Data in the table
- Graph shows the yearly savings realized by residential customers using MetEd and PECO SDR at the average PPL kWh monthly demand annualized.
- Table below shows 8 Electric Utility SDR comparison, 2018 through 2023. Total weighted average annual savings for non-PPL customers totals \$1140.08, years 2018 through 2023. The 2023 weighted average annual savings for non-PPL customers is \$542.40.

Default Supplier Charges - Annually - Math compares Electric Utility in the column's annual DSR dollars at PPL's Avg Monthly kWh vs PPL's DSR											Annual Savings at Other Electric Utilities at Their DSR							
Avg Monthly kWh - 2022	987		609		951		787		731		933		686		963		952	
Year	Citizens		Duquesne		Met-Ed		PECO		Penelec		Penn Power		Pike County		PPL		West Penn	
Residential Customers	5,900		543,000		514,000		1,520,000		498,000		149,000		3,200		1,280,000		663,000	
2018	\$ 38.37	\$ (41.83)	\$ 74.88	\$ 28.66	\$ 83.43	\$ 30.28	\$ 101.69	\$ -	\$ 151.85	\$ 53.03								
2019	\$ (85.51)	\$ (46.46)	\$ 41.14	\$ 25.19	\$ 86.90	\$ (77.89)	\$ (352.23)	\$ -	\$ 79.27	\$ 29.98								
2020	\$ 5.55	\$ 61.94	\$ 129.89	\$ 103.54	\$ 137.29	\$ 7.16	\$ 534.12	\$ -	\$ 216.56	\$ 121.28								
2021	\$ 98.23	\$ 244.76	\$ 132.20	\$ 103.08	\$ 190.67	\$ 101.92	\$ 511.01	\$ -	\$ 244.99	\$ 162.30								
2022	\$ 131.97	\$ 111.17	\$ 176.58	\$ 221.64	\$ 281.27	\$ 155.77	\$ (98.69)	\$ -	\$ 374.88	\$ 231.08								
2023	\$ 229.73	\$ 387.82	\$ 497.83	\$ 549.60	\$ 545.67	\$ 473.80	\$ 248.22	\$ -	\$ 704.22	\$ 542.40								
Total - 2018-23	\$ 418.33	\$ 717.40	\$ 1,052.52	\$ 1,031.72	\$ 1,325.24	\$ 691.05	\$ 944.13	\$ -	\$ 1,771.77	\$ 1,140.08								

Exhibit #5

PPL Electric Utilities Corp.

PPL Electric Utilities Corp. (PPL), a subsidiary of the PPL Corp., serves approximately 1.28 million residential, 183,400 commercial and 3,200 industrial customers. PPL’s service territory consists of parts of the following counties in Eastern Pennsylvania: Berks, Bucks, Carbon, Chester, Clinton, Columbia, Cumberland, Dauphin, Juniata, Lackawanna, Lancaster, Lebanon, Lehigh, Luzerne, Lycoming, Mifflin, Monroe, Montgomery, Montour, Northampton, Northumberland, Perry, Pike, Schuylkill, Snyder, Sullivan, Susquehanna, Union, Wayne, Wyoming and York. PPL operates under the terms of Electric Tariff Pa. P.U.C. No. 201. PPL Corp., headquartered in Allentown, Lehigh County, delivers energy to roughly 3.5 million customers in Kentucky, Virginia, Rhode Island and Pennsylvania.

Utility:	PPL Electric Utilities Corp.											
Default Rate Schedule for Electric Service in the Commonwealth of Pennsylvania												
Rates for Default Service												
Rate Classification	Customer Charge	Distribution Charges	Generation Charges	Transmission Charges	DSIC	SDER**	TCJA***	EE&C Charges	Smart Meter	Universal Service	STAS	TOTAL
Residential												
using 500 KWH	\$14.09	\$17.67	\$61.48	\$11.58	\$1.82	(\$0.20)	(\$2.61)	\$0.65	\$1.90	\$4.92	(\$0.06)	\$111.24

Shopping Update: As of March 2023, 134 EGS offers were being made to PPL’s customers. Furthermore, 553,631 customers (39% of customers; 63.6% of the load) were using a competitive supplier. Information, including PPL’s current price to compare and competitive offers, is available at www.PAPowerSwitch.com.

ELECTRIC POWER OUTLOOK FOR PENNSYLVANIA 2021–2026

August 2022

Published by:
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17105-3265
www.puc.pa.gov

Technical Utility Services

Paul T. Diskin, *Director*

Statewide Review of Electrical Energy Usage

As shown on Tables 5 and 6 below, Pennsylvania's Total electrical consumption energy usage (residential, commercial, industrial, sales for resale, and other) in 2021, was 142,827 GWh, as compared to: 139,185 GWh in 2020; and 145,090 GWh in 2019. The year-over-year (YOY) increase for electrical usage in 2021 was 2.62%. In general, commercial and industrial usage increased YOY by 5.15% and 2.46%, respectively. Residential usage increased by 1.26%. The increase in residential, commercial, and industrial usage is likely indicative of rebound of the economy from the economic impacts of the COVID-19 pandemic. Pennsylvania's GDP for 2021 saw a YOY increase of 8.75%, as compared to Pennsylvania's GDP in 2020, which experienced a YOY decrease of 3.5%.⁶³

In 2021, the total number of electrical customers increased to 5,918,122 as compared to 5,876,336 in 2020, which is a YOY increase of 0.7%.

Table 5: PA EDC customers served, energy usage, and peak load (2021)

Company	Total Customers Served	Residential (MWh)	Commercial (MWh)	Industrial (MWh)	Other (MWh)	Sales For Resale (MWh)	Total Consumption (MWh)	System Losses (MWh)	Company Use (MWh)	Net Energy For Load (MWh)	Peak Load (MW)
Duquesne	607,349	4,214,577	5,778,492	2,509,208	55,025	23,975	12,581,277	556,932	18,308	13,156,517	2,760
Met-Ed	583,251	5,832,422	2,151,245	6,201,037	26,511	536,842	14,748,057	1,006,954	0	15,755,011	3,072
Penelec	588,548	4,362,887	2,389,755	6,426,713	33,179	2,759,650	15,972,184	1,254,866	0	17,227,050	2,898
Penn Power	169,954	1,662,849	705,941	2,062,762	3,263	164,714	4,599,529	254,890	0	4,854,419	971
PPL	1,466,277	14,879,215	13,807,121	8,339,688	77,690	0	37,103,714	2,675,386	54,430	39,833,530	7,314
PECO	1,686,527	14,262,461	7,597,167	14,002,669	565,755	3,372	36,431,424	1,973,908	30,212	38,435,544	8,479
West Penn	734,971	7,206,217	2,714,385	9,333,865	22,081	773,022	20,049,570	1,305,049	0	21,354,619	3,940
UGI	62,714	581,522	305,921	102,408	5,568	189	995,608	67,825	1,381	1,064,814	216
Citizens'	7,085	87,772	28,193	50,227	364	0	166,556	6,532	128	173,216	43
Pike County	5,047	32,899	42,041	0	430	0	75,370	0	0	75,370	16
Wellboro	6,399	44,815	31,276	27,616	66	90	103,863	7,385	211	111,459	21
Total	5,918,122	53,167,636	35,551,537	49,056,193	789,932	4,261,854	142,827,152	9,109,727	104,670	152,041,549	29,730
% of Total		37.23%	24.89%	34.35%	0.55%	2.98%	100.00%				

⁶³ US Bureau of Economic Analysis: <https://www.bea.gov/>.

f. PPL provide the formula with actual calculations utilized by PPL to validate their claim, in their information to the public "...is to be the best utility company in the U.S. This means delivering safe, reliable, affordable and sustainable energy to our customers..." As an alternative, provide a graphical display of how they determine that as a utility they are providing affordable electric to their customers. All of PPL's customers, whether on the Default Supplier Rate or Alternate Supplier rate pay for less affordable electric than their geographic peers. PPL encounters zero competition for their customers resulting in all customers paying for higher cost, less affordable electric, so provide the formulas used by PPL to ensure their cost to customers is "affordable". Provide the formula(s) and the last 10 years of data to validate their assertion of providing affordable energy to customers. The higher costs of the PPL DSR only customers annualized is total more dollars than the 2023 budget for Dauphin (\$221.6 million general fund) and Lancaster Counties (\$288.4 million)

	Company	Total Customers Served (residential and commercial)	Residential (Mkh)	Total Consumptions (MWh)	kWh
2021 Data from the August 2022 PA PUC - Electric Power Outlook Report	PPL	1466277	14879215	37103714	37103714000
March 2023, Percent of customers utilizing competitive supplier		39%			
Number of Customers, not utilizing a competitive supplier		894429.0			
% Load Utilizing Competitive Supplier				63.6%	
Load not alternative				13505751.9	13,505,751,896
Take the PPL DSR rate from 2023 Annual Rate Comparison Report	\$	0.14612			
Subtract the weighted average DSR rate for 8 PA Electric Companys, 2023	\$	0.09918			
PPL's 2023 DSR rate above 9 PA electric utilities	\$	0.04694			
Multiply the DSR premium paid by PPL Customers times kWh not using competitive supplier		13,505,751,896			
Annual Premium paid by PPL customers on \$.14612 Default Supplier	\$	633,959,994			
5 month Premium paid by PPL customers, through 6/1/2023	\$	264,149,997			

Dauphin + Lancaster County 2023, \$510 mil

Exhibit 6

Safety is the first item mentioned by PPL; “Safe, Reliable and Affordable...” Universally companies work to improve their safety performance. Recognizing there are credible safety programs deployable by companies, it is expected that PPL works to continually improve their safety results for employees and contractors. No companies has all the best practices, programs, policies and procedures in support of Safe, Reliable and Affordable performance and seek best practices, programs, policies and procedures from sources outside their company.

1. What is the OSHA TRIR (Total Recordable Incident Rate) and DART rate (Days Away, Restricted, & Transferred) for PPL, employees for the years 2022, 2021 and 2020?
2. What is the OSHA TRIR (Total Recordable Incident Rate) and DART rate (Days Away, Restricted, & Transferred) for PPL, employees and contractors for the years 2022, 2021 and 2020?
3. What is the metric that PPL utilizes to determine that their employee safety program is continuously improving year to year?
4. What safety benchmarking or business to business exchanges of safety practices, procedures and policies has PPL conducted 2020, 2021, 2022 and 2023 year to date.