

COMMONWEALTH OF PENNSYLVANIA



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January 31, 2024

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/David T. Evrard
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Enclosures:

cc: The Honorable Mary Long (email only)
The Honorable Emily I. DeVoe (email only)
Paul Diskin, Bureau of Technical Utility Services (email only: pdiskin@pa.gov)
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Certificate of Service

*4861-1398-9793

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 31st day of January 2024.

SERVICE BY E-MAIL ONLY

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Dated: January 31, 2024
*4892-6364-9953

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby provides Notice of Intervention in the above-captioned proceeding. A copy of all correspondence, notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

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Respectfully Submitted,

/s/ David T. Evrard

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January 31, 2024

4863-4708-5985

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene in the proceedings before the Commission involving PPL Electric Utilities Corporation (PPL or Company).

The Office of Consumer Advocate (OCA) intervenes specifically in response to the Petition filed on January 18, 2024 by Tesla, Inc. and a group of solar industry participants (Joint Solar Parties or JSPs) seeking to rescind or amend the December 17, 2020 Order of the Commission in Docket No. P-2019-3010128 (2019 Docket) pursuant to which PPL was authorized to implement a pilot program designed to evaluate the costs and benefits to distribution system operation of passive monitoring of Distributed Energy Resources (DERs) through devices connected to DER inverters versus active management of DERs through the same devices.

The Commission's December 2020 Order approved a carefully-crafted settlement among all parties to the 2019 Docket. That settlement established the design of the pilot program. The program is to run for three years. March 2024 will mark the end of the second year of the program. Under the settlement, PPL is to file a report within 30 days of the end of each program year. The year 2 report will be due in April 2024. The annual reports provide detailed information about the grid support functions monitored or used in the pilot and the costs/benefits associated with the use of those functions.

In addition to the annual report, the settlement provides that within 60 days of the close of program year 2 (May 2024), PPL is to have the opportunity to petition the Commission to extend

the program and propose changes, continue installing DER management devices on new DERs and/or seek authorization to remotely and actively manage DERs under one of several specified scenarios. If PPL elects not to file such a petition, the program will terminate at the end of year 3.

Given these significant near-term program milestones, the OCA is concerned that to grant the relief sought by the Joint Solar Parties at this juncture, would be premature. To date, the Commission has just one year of results from the program. Terminating the program now, before the year 2 results are reported and before any changes PPL might propose based on lessons learned thus far would be needlessly shortsighted. It must be remembered that in authorizing the pilot, the Commission determined that conducting it was in the public interest. Abruptly ending the pilot would thwart the objectives of the program and deny the Commission the information it intended to glean from its results. To the extent the pilot will provide information regarding the safety, quality, efficiency, stability, and reliability of a utility's distribution operations, the pilot should be permitted to run its course.

The OCA further notes that should PPL file a petition in May 2024, as permitted under the settlement, the Joint Solar Parties would be free to seek to intervene and raise any issues or concerns with the current pilot program and propose any modifications they deem necessary. The OCA submits that this is preferable to upending a carefully-crafted program midstream.

The Consumer Advocate determined to intervene in this proceeding to support the completion of the PPL pilot program approved by the Commission in its December 2020 Order. Such completion continues to be in the public interest as originally determined by the Commission.