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Michael W. Hassell

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January 31, 2024

***VIA ELECTRONIC FILING***

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

**Re: PPL Electric Utilities Corporation – Affiliated Interest Agreement**  
**Docket No. G-2023-3044914**

Dear Secretary Chiavetta:

Attached for filing is the Response of PPL Electric Utilities Corporation (“PPL Electric”) to the Data Requests of the Bureau of Technical Utility Services, Set I, No. 4, in the above-referenced proceeding.

Respectfully submitted,



Michael W. Hassell

MWH/kl  
Attachment

cc: Certificate of Service

**PPL Electric Utilities Corporation  
Response to the Set I Data Requests of  
the Bureau of Technical Utility Services  
Dated January 11, 2024  
Docket No. G-2023-3044914**

TUS I-4                      Reference AIA, exhibit one, please note/explain which affiliates will be transacting directly with PPL EU, explain in detail what goods or services are being provided/received with each affiliate.

PPL Response                      As set forth in paragraph 1 of the AIA, the AIA contemplates that PPL Electric may supply or receive goods and administrative, management, supervisory, construction, engineering, accounting, legal, financial, operating, or similar services to or from its affiliates upon request. This is similar to the approach in the current Commission-approved PPL Services Agreement (Docket No. G-2016-2557635).

Since 2019, PPL Electric has provided to or received from its affiliates the following goods or services:

<b>Good or Service</b>	<b>Affiliate From</b>	<b>Affiliate To</b>
IT Services	LG&E and KU Services Company	PPL Electric
Mutual Assistance	Louisville Gas and Electric Company; Kentucky Utilities Company	PPL Electric
Facilities Management Services	LG&E and KU Services Company	PPL Electric
Management Services	The Narragansett Electric Company (d/b/a Rhode Island Energy)	PPL Electric
Transformer Meters	Louisville Gas and Electric Company; Kentucky Utilities Company	PPL Electric

WITNESSES: Joseph Reither and Gregory Dill

IT Equipment	Louisville Gas and Electric Company; Kentucky Utilities Company	PPL Electric
Facilities Management Services	PPL Electric	PPL Services Corporation; PPL Distributed Energy Resources, LLC <sup>1</sup> PPL Strategic Development, LLC
Acquisition and integration related services	PPL Electric	The Narragansett Electric Company (d/b/a Rhode Island Energy); PPL Energy Holdings, LLC; PPL Strategic Development, LLC
Mutual Assistance	PPL Electric	Louisville Gas and Electric Company; Kentucky Utilities Company
Administrative Services	PPL Electric	LG&E and KU Services Company
Management Services	PPL Electric	PPL Strategic Development, LLC
Engineering Services	PPL Electric	PPL TransLink, Inc.
IT Services	PPL Electric	PPL Services

Additionally, services provided from PPL Services to PPL Electric are identified in Chapter 3 of the current PPL Corporation Cost Allocation Manual. See TUS I-4 Attachment 1.

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<sup>1</sup> On December 31, 2023, PPL Distributed Energy Resources, LLC was merged into PPL Renewables, LLC, which was then merged PPL Energy Resources, LLC, which was then merged into PPL Energy Holdings, LLC.

**PPL CORPORATION**  
**COST ALLOCATION AND TRANSFER PRICING MANUAL**

**Chapter 3 - Transactions with Affiliates**

PPL Services Corporation (“PPL Services”) was formed as a service company to provide services for affiliated companies. PPL Services may enter into service agreements, which may establish the general terms and conditions for providing those services. Services provided are detailed in this chapter.

PPL Services employees may provide services to regulated and non-regulated entities. The provisions included in contracts and service agreements govern transactions among PPL Services and their regulated and non-regulated affiliates.

Regulated affiliates receive services at cost, pursuant to the service agreements.

**PPL Services – Description of Services**

Centralized services provided by PPL Services include, but are not limited to, groups identified in the table below: Corporate Audit Services, Corporate Operations & Integration, Corporate Security, Enterprise Security, Financial, Human Resources, Information Technology, Office of General Counsel, Public Affairs, Supply Chain, and PPL Services Corporate. These centralized services are described further in the chart below.

The “Assignment Method” in the chart reflects the means for allocating the cost of a particular service within the “Department/Activity” listed when the service is being performed concurrently for more than one affiliate and there is no practical means to directly assign the costs of that service to the affiliates benefiting from that service. Each Department/Activity does, however, directly assign costs for services provided to affiliates where work is being performed for a single affiliate or where it is otherwise practical. For example, the Audit Services department will directly assign costs incurred to perform an internal audit to the affiliate being audited. However, if a given audit applies to more than one affiliate, it is allocated using the Number of Operating Segments Ratio to the entities within the scope of that audit. By way of example, a gas compliance audit would be allocated to the operating segments with gas operations. See Chapter 4 for a detailed description of these cost assignment methods and ratios.

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
<b>Corporate Audit Services</b>		
Audit-SOX Testing	Conduct testing of key SOX controls and perform exposure and remediation testing for SOX deficiencies.	Directly Attributable – Number of Controls Ratio
SOX Compliance	Provide coordination, implementation and maintenance of the company’s program for compliance with the Sarbanes-Oxley Act of 2002.	Directly Attributable – Number of Controls Ratio
Auditing	Conduct operating audits and audits of accounting records and other records maintained by the company. Issue audit reports and provide recommendations for improving processes and the internal control framework.	Directly Attributable – Number of Operating Segments Ratio
Corporate Compliance Office	Provide various compliance services for all affiliated entities including compliance assessment and risk management, code of conduct, anti-fraud, ethics, helpline management and Critical Infrastructure Protection (“CIP”) Compliance.	Directly Attributable – Number of Employees Ratio
<b>Chairman</b>		
Office of President	Executive oversight of PPL and all affiliates.	Directly Attributable – Number of Operating Segments Ratio
<b>Corporate Operations &amp; Integration</b>		
Benchmarking Performance and Measurement	Provide corporate level benchmarking analysis	Indirectly Attributable
Corporate Performance Administration	Sets strategy and provides oversight of Corp Performance and Analytics group.	Indirectly Attributable
Data Analytics – Asset Management Support	Specific business line support related to improvement of capital assets and maintenance of in-services assets. This results in identification of assets to be replaced and timing of maintenance schedules and tasks.	Indirectly Attributable
Executive VP & COO	Executive oversight of PPL and all affiliates.	Directly Attributable – Number of Operating Segments Ratio
KPI Performance & Measurement	Identifying corporate key performance indicators, setting KPI standards, and providing management analysis	Indirectly Attributable
Utility Research & Development	Develop and manage an enterprise-wise R&D strategy focused on generation, electric and gas delivery.	Directly Attributable – Number of Operating Segments Ratio

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
<b>Corporate Security</b>		
Board Services	Board travel and security.	Directly Attributable – Number of Operating Segments Ratio
Emergency Management/Business Continuity	Provide services related to administration and coordination of disaster recovery/business continuity plans.	Directly Attributable – Number of Employees Ratio
Executive Services	Executive travel and security.	Directly Attributable – Number of Employees Ratio
Physical Security	Provide security services related to company assets, including routine emergency services and regulatory compliance.	Directly Attributable – Number of Employees Ratio
Corporate Security Administration	Oversight of the corporate security department.	Directly Attributable – Number of Employees Ratio
Protective Services	Provide security-related services to employees, including conducting personal risk assessments, background checks and investigation.	Directly Attributable – Number of Employees Ratio
<b>Enterprise Security</b>		
Cyber Security Risk Management	Services associated with setting cybersecurity strategy, providing security risk management governance and oversight of security controls in the first line of defense, and support and facilitation of risk management activities across the enterprise. This function includes services associated with risk quantification and executive metrics, global cybersecurity policies, cyber hunting/active defense, assessing security posture/maturity, and real time visibility and monitoring of subsidiary cyber hygiene.	Directly Attributable – Number of Network Users Ratio
<b>Financial</b>		
Audit/PCAOB Fees	Corporate audit or PCAOB fees incurred.	Directly Attributable – Book Enterprise Value Ratio
Billing	Billing for miscellaneous transactions.	Directly Attributable – Number of Items Processed Ratio
Budgeting	Provide services related to managing, coordinating and reporting for the budgeting process.	Indirectly Attributable
Cash Management	Manage the daily financing and short-term liquidity needs for the company.	Directly Attributable – Number of Operating Segments Ratio

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
Cash Receipt Exception Posting	Manage the cash receipts that do not have the correct customer billing account number or any account number as well as any unknown checks that were posted or automated payments that were not applied correctly.	Directly Attributable – Number of Items Processed Ratio
Chief Financial Officer	Executive responsibility for financial actions of the company. Includes responsibility for accounting, treasury, financial planning, tax, risk management and investor relations functions.	Directly Attributable – Number of Operating Segments Ratio
Compensation and Benefits Accounting	Provide services relating to the establishment and oversight of compensation for employees. Also, provide services relating to the establishment and oversight of benefits plans for employees, retirees and survivors.	Directly Attributable – Number of Employees Ratio
Corporate Accounting	Provide accounting in conformity with U.S. Generally Accepted Accounting Principles (GAAP) and the FERC Uniform System of Accounts (USofA), performing U.S. GAAP general ledger account analyses, reconciliations and consolidations and business and financial system support consultation.	Indirectly Attributable
Financial Reporting	Provide accounting and reporting in conformity with U.S. Generally Accepted Accounting Principles (GAAP) and the FERC Uniform System of Accounts (USofA), accounting research and interpretation and promulgation of accounting and internal control procedures, and external financial reports	Directly Attributable – Number of Operating Segments Ratio
Financial Planning	Provide services related to managing, coordinating and reporting for the forecasting process.	Directly Attributable – Number of Operating Segments Ratio
Financings	Provide support for the company's credit, investing and financing activities and borrowings.	Directly Attributable – Book Enterprise Value Ratio
Insurance Services – General	Provide overall support for managing the insurance process.	Directly Attributable – Insurance Policies Ratio
Internal Reporting	Provide internal financial reporting.	Directly Attributable – Number of Operating Segments Ratio
Investor Relations	Provide support for handling the company's shareholders and investors meetings and questions.	Directly Attributable – Book Enterprise Value Ratio
Investor Services Fees	Manage fees paid to transfer agent for investor services activity.	Directly Attributable – Book Enterprise Value Ratio

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
Payroll	Provide services relating to payroll, time reporting and employee expenses.	Directly Attributable – Number of Employees Ratio
Pensions – Domestic Only	Provide pension services for domestic companies only.	Directly Attributable – Plan Assets Ratio; Number of Plan Participants Ratio
Pensions – PA Only	Provide pension services for Pennsylvania-based companies only.	Directly Attributable – Number of Plan Participants Ratio
Rating Agencies	Manage the company's credit rating through Moody's and S&P.	Directly Attributable – Book Enterprise Value Ratio
Remittance Processing	Provide remittance processing, customer payments, and collection services.	Directly Attributable – Number of Items Processed Ratio
Risk Strategy	Manage and assess risk within the organizations including liability risks, claims, security, environmental and safety.	Indirectly Attributable
Stock Based Compensation	Provide services relating to the establishment and oversight of stock-based compensation to employees.	Directly Attributable – Number of Employees Ratio
Tax Services	Prepare consolidated and subsidiary federal, state and local income tax returns; current and deferred tax accounting; utility gross receipts tax; sales/use tax; project development. Provide corporate income tax compliance, budgeting and forecasting, including tax legislation.	Indirectly Attributable
Technical Accounting	Provide accounting and reporting in conformity with U.S. Generally Accepted Accounting Principles (GAAP) and the FERC Uniform System of Accounts (USofA), accounting research and interpretation and promulgation of accounting and internal control procedures, and external financial reports.	Directly Attributable – Number of Operating Segments Ratio
Treasury Controls	Manage controls around the files sent to and from the bank daily, receipt disbursements, bank reconciliations, and legal compliances.	Indirectly Attributable
Utility Regulatory Reporting	Provide reporting services for the various regulatory agencies.	Directly Attributable – Number of Operating Segments Ratio
Vendor Servicing	Process payments to vendors for the company.	Directly Attributable – Number of Items Processed Ratio
<b>Human Resources</b>		

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
Board Services	Board member fees and expenses.	Directly Attributable – Number of Operating Segments Ratio
Corporate Compensation and Benefits Services	Provide compensation and benefit services to non-executive employees. This also includes retirement plan services for employees and retirees eligible in the plan.	Directly Attributable – Number of Employees Ratio
Diversity, Equity & Inclusion	Provide services to help attract and retain a high-performing, diverse workforce and maintain a culture of equity and inclusion.	Directly Attributable – Number of Employees Ratio
Employee Benefits	Provide services relating to the establishment and oversight of benefit plans for employees, retirees and survivors. This also includes vendor management, compliance with various laws and regulations, administrative vendor billings and maintenance of all personnel records.	Directly Attributable – Number of Employees Ratio
Employee Communications	Provide services related to administration of PPL Corp employee survey.	Directly Attributable – Number of Employees Ratio
Employee Compensation	Provide services relating to the establishment and oversight of compensation policies for employees.	Directly Attributable – Number of Employees Ratio
Employee Engagement Services	Perform activities measuring level of employee satisfaction of Corporate Services organization.	Directly Attributable – Number of Employees Ratio
Executive Services	Provide services related to the compensation of company executives.	Directly Attributable – Number of Employees Ratio
Health Services	Provide services relating to the establishment and oversight of health services policies, procedures and forms for employees.	Directly Attributable – Number of Employees Ratio
Human Resources Benchmarking	Provide services to measure processes, practices and results for comparison to improve performance.	Directly Attributable - Number of Employees Ratio
Human Resources Compliance	Provide services that define policies and procedures that meet applicable laws and regulations.	Directly Attributable – Number of Employees Ratio
Human Resources Business Partners	Provides consultation and coaching regarding human resource and organizational issues, HR planning, recruitment and selection support and employee relations support.	Directly Attributable – Number of Employees Ratio
Human Resources Information Operations	Provide support for implementing and maintaining information system access, configuration and operation.	Directly Attributable – Number of Employees Ratio
Labor Relations	Provide communication and oversight for union matters, negotiation of union contracts and union	Directly Attributable – Number of Employees Ratio

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
	dispute resolution services.	
Organization Development & Effectiveness	Provide services including succession planning, organizational planning and change management.	Directly Attributable – Number of Employees Ratio
Talent Acquisition Services	Provide services related to the marketing, finding, and acquiring of prospective candidates for available job opportunities.	Directly Attributable – Number of Employees Ratio
Talent Management and D&I Services	Provide training services for PPL Corp employees attending leadership classes and administering Pennsylvania business resource group activities.	Directly Attributable – Number of Employees Ratio
Training & Development	Provide general training costs to employees. Costs for specific training are charged to the appropriate activity. For example, costs for compensation and benefits training would be charged to that activity rather than general training.	Directly Attributable – Number of Employees Ratio
University Relations	Provide support for hiring interns, college relationship building and college career fairs.	Directly Attributable – Number of Employees Ratio
<b>Information Technology</b>		
Cybersecurity	Provide IT Services related to Cyber Risk and Compliance, Identity and Access Management, Security Architecture, Security Operations, Risk Mitigation and Management, Prevention and Detection Systems. This service includes developing and administering security policies and procedures, awareness & training, vulnerability management, and incident response, as well as production support and maintenance of existing systems and implementation and management of IT processes to ensure stability and existing systems and infrastructure. This function includes development, implementation and on-going activities for the NERC Critical Infrastructure Protection (“CIP”) Program.	Directly Attributable – Number of Network Users Ratio
IT - Accounting, Finance, and Compliance	Provide services to manage, coordinate, and report the IT budgeting and forecasting process, implement corporate financial processes and ensure compliance.	Directly Attributable – Number of Network Users Ratio
IT Data & Analytics	Provide IT services related to data analytics platform architecture, data engineering development, data and content governance, analytics enablement, enterprise data warehouse	Directly Attributable - Number of Network Users Ratio

Department/Activity	Description	Assignment Method
	and master data management and data quality. Provide services associated with maintaining data and content management platforms, corresponding tooling and developing standards, and processes for data and content governance and analytics solutions. This function includes delivery of data, reporting & analytics capabilities, including descriptive, predictive, statistical modeling, and artificial intelligence.	
IT Design	Provide IT services related to Experience Design and Research and Strategy to support existing product teams in the implementation and deployment of new technologies.	Directly Attributable - Number of Network Users Ratio
IT Engineering & Platform Architecture	Provide Application Development, RPA, automation, platform engineering and architectural guidance, and support for the IT Product Portfolio. Also responsible for overseeing the Managed Services Providers for the IT Products.	Directly Attributable - Number of Network Users Ratio
IT Infrastructure and Operations	Provide services related to the corporate-wide shared computing infrastructure, including maintenance, servers, storage, and data center operations including cloud contracts. Provide services related to all corporate-wide network capabilities including wide area transport networks, local area networks, wireless networks, telephone systems, telecommunications for SCADA, and two-way radio systems. Provide services related to a number of enterprise applications including e-mail, SharePoint, instant messaging, and others. This function includes the operations of the NERC CIP Program.	Directly Attributable - Number of Network Users Ratio
IT Integration and Strategic Projects	Provide services including change management/work management, project management, and oversight of integration and strategic projects.	Directly Attributable - Number of Network Users Ratio
IT Product	Provide IT services that identify end user needs, defining product portfolio & roadmap, and ensuring distinctive user experience across portfolios. Provide services including business relationship management, project management, requirements, process management, and planning.	

Department/Activity	Description		Assignment Method
	Advanced Metering Infrastructure	Provide services for technology required for the implementation of advanced, digital meters.	Directly Attributable – Number of Meters Ratio
	Customer Operations	Provide services to optimize the end-to-end customer experience for core customer journeys by optimizing and encouraging adoption of digital channels and streamlining internal processes, supporting back-office processes. Focusing on areas such as customer content, communication, self-service, meter to cash (metering, billing, payments, revenue management, customer information management)	Directly Attributable – Number of Customers Ratio
	Employee Experience & Enterprise Enablement	Provide services to digitally enable employee lifecycle experiences to keep our experts engaged, healthy, and focused on high value activities. Focusing on content management - communications, core human benefits management, learning and development, payroll and time management, recruitment, onboarding, performance management, and labor relations.	Directly Attributable – Number of Network Users Ratio

Department/Activity	Description		Assignment Method
	Field Operations	Provide services to optimize the initiation, planning/scheduling, and execution of field work for Distribution, Transmission, and Gas operations jobs through the use of automation, AI, and other technologies to improve efficiency, storm response, and asset data quality. Focusing on areas such as work initiation, scheduling/planning, dispatch, field mobility, storm response, vegetation management, leak response, and supply chain management.	Directly Attributable – Number of Customers Ratio
	Financial Operations	Provide services to enhance core financial activities through the use of technology to help the organization plan efficiently and effectively, manage its financial position and risk, and execute transactions efficiently. Focusing on general ledger, financial reporting, management reporting, budgeting, financial planning, treasury and cash management, core accounting, and other corporate functions such as legal and facilities.	Directly Attributable – Number of Network Users Ratio
	Generation	Optimize generation operations through the use of digital and analytical tools to improve decision making and run the assets at the	Directly Attributable – Number of Customers Ratio

Department/Activity	Description	Assignment Method	
		right time at the lowest cost possible. Focusing on load forecasting, generation planning, plant asset management, and work management.	
	Grid and Pipeline Innovation	Provide services to manage and optimize energy flow across the grid, maximizing throughput and enabling distributed capabilities.	Directly Attributable – Total Assets Ratio (T, D, & G Only)
	Operations	This function enables the strategic operations of the Product organization through governance, digital training, agile processes, and analytics.	Directly Attributable – Number of Network Users Ratio
<b>Office of General Counsel</b>			
Annual Meeting/Proxy	Legal services and Corporate Communications costs to manage the annual meeting and printing of the Proxy and Annual Report.	Directly Attributable – Number of Operating Segments Ratio	
Board Services	Board member fees and expenses.	Directly Attributable – Number of Operating Segments Ratio	
Corporate – FERC Electric Related	Legal services related to PPL Corporate FERC electric related matters.	Directly Attributable – Number of Operating Segments Ratio	
Corporate – Federal Gas Related	Legal services related to PPL Corporate federal gas related matters.	Directly Attributable – Number of Operating Segments Ratio	
Corporate Compliance Office	Provide various compliance services for all affiliated entities including compliance assessment and risk management, code of conduct, anti-fraud, ethics, helpline management and CIP Compliance.	Directly Attributable – Number of Employees Ratio	
Corporate External and Public Affairs	Legal services related to support of lobbying efforts managed by Public Affairs.	Directly Attributable – Rate Base Ratio; Indirectly Attributable	
General Corporate	Legal services related to corporate.	Indirectly Attributable	
Office Expenses	Legal department administrative support expenses including wages, travel, subscriptions,	Indirectly Attributable	

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
	training, etc. not specifically identified to a business line or activity.	
Pensions – PA & KY	Legal expenses related to the pension plans in PA and KY.	Directly Attributable – Number of Plan Participants Ratio
SVP, General Counsel, Corporate Secretary & Chief Legal Officer	Executive responsibility for legal services and compliance services.	Directly Attributable – Number of Operating Segments Ratio
<b>Public Affairs</b>		
Annual Meeting/Proxy	Legal services and Corporate Communications costs to manage the annual meeting and printing of the Proxy and Annual Report.	Directly Attributable – Number of Operating Segments Ratio
Board Services	Board member fees and expenses.	Directly Attributable – Number of Operating Segments Ratio
Corporate Media Relations	Provide internal and external communication support including design of corporate website and publications.	Indirectly Attributable
External Communications	Provide all administrative and management support for external communication services	Directly Attributable – Number of Customers Ratio
General Corporate	Services related to corporate governance and securities.	Indirectly Attributable
Internal Communications	Provide employee and customer-directed communications and including company intranet/internet, employee newsletters, announcements, speeches, graphic design, and presentations.	Directly Attributable – Number of Employees Ratio
Public Affairs and Corporate Communications Administration	Administrative management of Corporate Communications and Public Affairs.	Indirectly Attributable
Sustainability	Provide oversight of corporate sustainability initiatives for all operating companies.	Directly Attributable – Book Enterprise Value
Utility Lobbying – Gas	Federal lobbying for utility gas matters.	Directly Attributable – Rate Base Ratio
Utility Lobbying - Federal	Federal lobbying for matters impacting all operating companies.	Indirectly Attributable
Utility Lobbying - Transmission	Federal lobbying for utility transmission matters.	Directly Attributable – Rate Base Ratio
<b>Supply Chain</b>		
Supply Chain	Provide maintenance and analysis of the supplier base and performing supplier selection activities including contract negotiations and ongoing	Directly Attributable – Total Spend Ratio

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
	compliance. Provide order management and general field support services for system maintenance, developing and monitoring of key performance metrics, supplying day to day variance and reconciliation reporting services and performing supplier certification services. Identify qualified minority and women owned businesses that are able to participate in competitive bidding opportunities.	
<b>PPL Services Corporate</b>		
Administrative Support	Administrative support provided across multiple functions and areas where a single allocation ratio or blend of allocation ratios is not feasible.	Indirectly Attributable
Depreciation	Depreciation recorded over the estimated useful life of property owned by PPL Services.	Indirectly Attributable
PPL Services	Non-support group specific PPL Services' costs, including allocated costs, stock and ICA compensation, as well as high-level benefits adjustments.	Directly Attributable- Operating Segments Ratio
Facilities Charge	Charge for use of facility space utilized by PPL Services employees.	Directly Attributable – Number of Operations Segments Ratio

### **PPL Services Ops Support – Description of Services**

PPL Services Ops Support employees from each department are provided cost collecting numbers allowing them to positive time report for specific projects as well as specific business lines and operating companies they are supporting where appropriate. Remaining department costs are then allocated based on one of the prescribed methods listed below. These services identified in the chart below with green headings are provided to Pennsylvania or Rhode Island affiliates.

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
<b>Business Services</b>		
Emergency Preparedness	Ensure PPL PA entities are prepared to respond effectively to emergency events including but not limited to: storms, IT events such as telephony systems, email systems and system applications, cyber and physical attacks, and pandemic situations.	Directly Attributable- Number of Employees Ratio
<b>Business Transformation</b>		
Business Transformation	Delivery of IT projects that support Customer Service Operations, the	Directly Attributable- Number of Customers Ratio

<b>Department/Activity</b>	<b>Description</b>	<b>Assignment Method</b>
	Customer Experience (Web, IVR, Mobile App) and CSS/Billing for Pa and RI.	
<b>Customer Services</b>		
Metering Support	Provides support to advanced metering functions.	Directly Attributable – Number of Meters Ratio
<b>Facilities Corp</b>		
Building Operations	Support the facility operations and maintenance activities of PPL owned buildings.	Directly Attributable – Number of Employees Ratio
Facilities Management	Facilities leadership support expenses not specifically identified to a specific building or project.	Directly Attributable – Number of Employees Ratio
Project Management	Provide oversight related to facility building managed projects.	Directly Attributable – Number of Employees Ratio
<b>Finance &amp; Regulatory Affairs</b>		
Regulatory Operations	Provide services for PPL Electric's compliance with the regulatory requirements of the PaPUC, the FERC and other regulatory agencies, as necessary. As part of this function, the group is responsible for the preparation, review, technical oversight and guidance of the development, content, and structure of cost of service and revenue requirement studies.	Directly Attributable – Number of Customers Ratio
<b>HR Business Partners</b>		
HR Support	Provide consultation and coaching regarding human resource and organizational issues, HR planning, recruitment, and selection support and employee relations support.	Directly Attributable – Number of Employees Ratio
<b>Utility Communications</b>		
Communications Support	Provide internal and external communication support.	Directly Attributable – Number of Customers Ratio

## VERIFICATION

I, JOSEPH REITHER II, being the Sr. Dir.-Corporate Financial Planning & Analysis at PPL Services Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 01/31/2024

Joseph J Reither II  
Joseph J Reither II (Jan 31, 2024 14:54 EST)  
Joseph Reither II

**VERIFICATION**

I, GREGORY DILL, being the Manager – FP&A at PPL Services Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 01/31/2024

*Gregory Dill*  
Gregory Dill (Jan 31, 2024 15:23 EST)  
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Gregory Dill