
Michael W. Hassell

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March 20, 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: Affiliated Interest Agreement between PPL Electric Utilities Corporation and PPL Corporation, Kentucky Utilities Company, Louisville Gas and Electric Company, The Narragansett Electric Company d/b/a Rhode Island Energy, LG&E and KU Energy LLC, LG&E and KU Services Company, PPL Services Corporation, and all other affiliated interests of PPL Corporation
Docket No. G-2023-3044914

Dear Secretary Chiavetta:

Attached for filing please find the Supplemental Response of PPL Electric Utilities Corporation to Data Request TUS I-2 of the Bureau of Technical Utility Services in the above-referenced proceeding.

Respectfully submitted,



Michael W. Hassell

MWH/dmc
Attachment

cc: Lee Yalcin – TUS (*via email; w/attachment*)

**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-2 Reference AIA, exhibit two, Cost Allocation Manual (CAM), please indicate if PPL Electric has received approval of its proposed CAM in other jurisdictions. In addition:

- a.) Will the proposed CAM be the standard for allocating costs between all of PPL Electric's affiliates in all jurisdictions per the proposed AIA?
- b.) If not, how is PPL Electric proposing to reconcile any potential differences in cost allocations between jurisdictions?

Supplemental PPL Response: By Order entered March 18, 2024, at Case No. PUR-2023-00228, the Virginia State Corporation Commission ("VCCC") granted approval to Kentucky Utilities Company d/b/a Old Dominion Power Company of the Comprehensive Utility Goods and Service Agreement and the proposed PPL Corporation Cost Allocation Manual.

Original PPL Response The Comprehensive Goods and Services Agreement represents a contract by and among PPL Electric and all other affiliated interests of PPL Electric, including the 4 public utilities that are subsidiaries of PPL Corporation: Kentucky Utilities Company, a public utility organized under Virginia and Kentucky law and doing business in Virginia as Old Dominion Power Company, Louisville Gas and Electric Company, a public utility organized under Kentucky law, PPL Electric Utilities Corporation, a public utility organized under Pennsylvania law and The Narragansett Electric Company d/b/a Rhode Island Energy, a public utility organized under Rhode Island law.

Pennsylvania and Virginia law requires pre-approval of certain affiliate interest contracts or arrangements before such contracts or arrangements are valid or effective. See 66 Pa.C.S. § 2102(a); Va. Code § 56-77(A). Rhode Island and Kentucky law does not require such pre-approval; however, Rhode Island law requires that a public utility file certain affiliate interest contracts or arrangements with the Rhode Island Division of Public Utilities and Carriers ("RI Division")

WITNESS: Bethany Johnson

within 10 days of the date of contract execution or entry into the arrangement per Rhode Island General Laws § 39-3-28.

Consequently, in addition to PPL Electric's instant filing in Pennsylvania, the proposed Comprehensive Goods and Services Agreement and CAM have been submitted for regulatory approval Virginia, but not in Kentucky or Rhode Island. The final executed agreement will be filed with the RI Division once the agreement is executed after the agreement is approved in Pennsylvania and Virginia.

- a.) Yes.
- b.) Not applicable.

VERIFICATION

I, BETHANY L. JOHNSON, being the Sr. Director - Regulatory 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: 03/19/2024

Bethany Johnson
Bethany Johnson (Mar 19, 2024 15:09 EDT)

Bethany L. Johnson