

April 12, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
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: **JOINT SOLAR PARTIES' PETITION FOR RESCISSION OR MODIFICATION**

Dear Secretary Chiavetta:

Tesla, Inc., Sun Directed, American Home Contractors, Sunrun, Inc., and the Solar Energy Industries Association (the Joint Solar Parties (or "JSPs")) again write to ask that the Commission act on their Petition to rescind or modify a December, 2020 Order issued in the above-captioned docket, which authorized PPL Electric Utilities Corporation's ("PPL's") implementation of a Distributed Energy Resource ("DER") Management Pilot ("Pilot").

It has been just shy of three months since the JSPs filed their Petition and Request for Expedited Relief,¹ more than two weeks since all conceivable briefing on the Petition was complete,² and more than one month since the JSPs first wrote to request the Commission's attention.³ During this period of Commission inaction, the harms detailed in the Petition (namely, severe technical failures in customers' solar energy systems caused by incompatibility with PPL's DER Management Device; and severe market failures resulting from the Pilot's restrictions on the types of equipment customers may deploy in their solar systems) have continued and will continue.

The JSPs' Petition asks that the Commission create means for customers and installers to opt out of participating in this otherwise mandatory Pilot, which is not set to expire until March, 2025. PPL opposes changes being made in the present Pilot program, and offers that the JSPs may

¹ The Petition and Request were filed on January 18, 2024.

² In response to the JSPs' January 18 Petition, PPL Answered on January 29, the JSPs filed a Reply on February 16, 2024, PPL filed a Motion to Strike the JSPs' Answer on March 7, and the JSPs' Answered said Motion on March 26, 2024.

³ The JSPs filed a letter on March 7 requesting that the Commission assign an ALJ, PPL filed its opposition to the JSPs' request on March 8, and the JSPs responded on March 13.

propose changes to an extended Pilot, which, if approved, would not commence before April, 2025, through a proceeding PPL may initiate in May, 2024 by petitioning to extend the Pilot.

Critically, even if some or all of the JSPs do seek to intervene in a proceeding aimed at improving the next version of the Pilot launching a year from now (in April, 2025), that will not afford them much needed mid-course relief. Thus, the JSPs are concerned that the Commission's failure to determine if the JSPs' Petition will get to a hearing, and to set a hearing, is tantamount to its having denied the JSPs' Petition without a hearing.

As the Petitioners and their customers are continuing to experience harms on a daily basis, the JSPs again respectfully urge the Commission to act on their January 18, 2024 Petition and Request for Expedited Relief.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties listed below via electronic mail, in accordance with 52 Pa. Code § 154:

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Dated this 12th day of April, 2024

/s/ Bernice I. Corman