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File #: 175564

April 22, 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: 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:

On April 12, 2024, Tesla, Inc. (“Tesla”), Sun Directed, American Home Contractors (“AHC”), Sunrun, Inc. (“Sunrun”), and the Solar Energy Industries Association (“SEIA”) (collectively, “Joint Solar Parties”) filed a letter (“Letter”) related to their Petition for Rescission or Amendment of PPL Electric’s Distributed Energy Resources Management Pilot and Request for Expedited Proceeding (“Petition”).¹ In their Letter, the Joint Solar Parties request, once again,² that the Commission rule on their Petition. (Letter, pp. 1-2.)

¹ In the Petition, the Joint Solar Parties requested that the Pennsylvania Public Utility Commission (“Commission”) take the radical step of rescinding its unanimous December 17, 2020 Order (“Order”), which approved the Joint Petition for Settlement of All Issues (“Settlement”) that was achieved and filed by all the active parties in the above referenced proceeding, or, alternatively, amending the Order to create an opt-out for customers participating in the Distributed Energy Resources (“DER”) Management pilot program. The Joint Solar Parties also requested that the Commission grant expedited review of their Petition. For the reasons set forth in PPL Electric’s Answer to the Petition filed on January 29, 2024, the JSPs’ Petition should be denied.

² The Joint Solar Parties previously filed a letter on March 7, 2024, requesting that the Petition “be assigned for hearing and disposition before an administrative law judge without delay.” (March 7, 2024 Letter, p. 2.) PPL Electric filed a letter responding to the March 7, 2024 Letter on March 8, 2024. The Joint Solar Parties then filed a letter on March 13, 2024, responding to PPL Electric’s March 8, 2024 Letter.

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The Commission should deny the Joint Solar Parties' Petition and their related request for expedited relief.

Concurrent with filing this letter, PPL Electric is submitting its Annual Report for Program Year 2 of the DER Management pilot program. That Annual Report shows that based on the data gathered through Program Year 2, PPL Electric's DER Management pilot program **has reduced the Company's capital expenditures by approximately \$6.60 million and the Company's operation and maintenance expenses by approximately \$15.33 million.**³ When compared to the \$6.38 million of capital costs and \$128,000 of operation and maintenance expenses that the pilot program has cost to date, the pilot program has produced substantial benefits compared to its costs. Yet, the Joint Solar Parties request that the Commission terminate the pilot program immediately or, alternatively, amend the pilot program to make participation voluntarily, both of which would severely undermine a pilot program that is improving power adequacy, reliability of service, and DER hosting capacity, while also driving down costs that will ultimately be borne by customers and DER interconnection applicants.

Furthermore, as explained in PPL Electric's Answer, the Settlement contained a carefully-crafted process to review the merits of the pilot program and evaluate whether it should continue. Specifically, under Paragraph 62 of the Settlement, PPL Electric must file a Petition by May 20, 2024, to continue or expand the pilot program. Therefore, in less than a month, PPL Electric's DER Management pilot program, and any modifications thereto, can be thoroughly evaluated and litigated before the Commission. Thus, no need exists to initiate a separate, on-the-record proceeding to evaluate the merits of PPL Electric's DER Management pilot program.

Finally, the Joint Solar Parties request the rescission or amendment of a Settlement that was: (1) achieved by all active parties in this proceeding; and (2) unanimously approved by the Commission. As such, the Commission should take the time it needs to examine fully the arguments in the Joint Solar Parties' Petition.

For these reasons, and as set forth in the Company's prior filings, the Commission should deny the Joint Solar Parties' Petition and their related request for expedited relief.

Respectfully submitted,



Devin Ryan

DTR/dmc
Enclosures

³ The DER Pilot has increased hosting capacity by an estimated 29 MW. If that additional 29 MW were fully utilized as of March 21, 2024, it would have produced additional generation and reduced distribution and transmission losses valued at approximately \$4.57 million.

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cc: Certificate of Service

CERTIFICATE OF SERVICE

(Docket No. P-2019-3010128)

I hereby certify that a true and correct copy of this filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Sustainable Energy Fund

Date: April 22, 2024



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