

**RE: Docket L-2023-3044115, Distributed energy resources (DER)**

Dear PUC Commissioners,

I am a ratepayer in Pennsylvania and am a member of Third Act PA.

At a minimum, we must double current transit transmission capacity by the end of this decade to meet the increased demands and to foster the necessary transition to a clean energy economy. Building more gas-powered power plants, especially to be used for peaker plants, is not a viable immediate solution because these projects are extremely expensive and take years to build. We need cheaper and quicker solutions now. Non-wire solutions such as virtual power plants, especially when aggregated into distributed energy resource management systems that participate in the PJM and PA utility markets are an immediate and viable solution because they are cheaper, easier, and quicker to deploy.

As you know, FERC Order 2222 requires that the public, especially environmental justice communities' best interests are considered. While utility companies may not like virtual power plants or distributed energy resource management systems because they do not make more money on them, ratepayers like me very much support them.

These solutions are not subject to the interconnection queue delays that are limiting deployment of large-scale resources. Aggregated DERs can be "built" as quickly as customers can be enrolled in the program and other states show that they can be very popular. Recent studies found that VPPs and DERs can provide the same reliability benefits as other conventional resources — such as gas peakers and utility-scale batteries — at only 40% to 60% of the cost.

Most ratepayers do not think about their electricity until they have a power outage. Unfortunately, power outages are becoming more frequent especially with extreme weather such as abnormally hot or cold periods. Several years ago, the Philadelphia area had four northeasterners with high winds and ice on the power lines during the month of March. Many households and businesses lost their power. My neighborhood was without power for over a week. People who regularly rely on electricity for medical devices were unable to get the care they needed to live. Individuals, especially in my upper middle-class neighborhood decided that they no longer wanted to be without power even for a brief time. So numerous households invested in fossil fuel powered generators. Unfortunately, many PA residents do not have the luxury of installing personal generators. The next time we had a short power outage the buzz from these generators was deafening. These individual generators also create health risks as they cause carbon pollution. Instead of power outages and more home generators we need to have a more dependable and whether resilient grid.

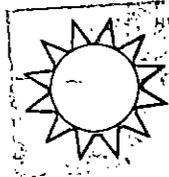
Virtual power plants and distributed energy resource management systems can help us avoid needing peaker plants and can also cut down energy demand on a regular basis. I know from personal experience that having a solar array on my roof and using smart technologies for energy conservation made me more aware of my energy usage. I became both a consumer of power and a contributor back to the grid. As a consequence, I understood the grid and its issues better and I encourage others to become more invested in the transition to clean energy.

I urge you to quickly establish rules and incentives that enable ratepayers to experience the benefits of virtual power plants and distributed energy resource management systems even if they themselves do not participate in these solutions.

To be compliant with Order 2222, you need to remove barriers to DERs participation in PJM markets, enhance competition and, in turn, help to ensure that PJM markets produce just and reasonable rates.

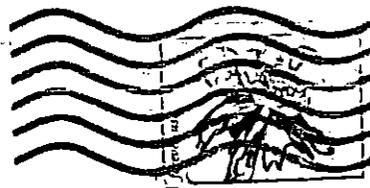
Sincerely,   
Phyllis Blumberg

1209 W. Wynnewood Rd. Apt 205 Wynnewood, PA 19096



Phyllis Blumberg  
1209 W Wynnewood Rd PHILADELPHIA PA 190  
Wynnewood, PA 19096-2129

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Pennsylvania Public Utility Commission  
Attention: secretary  
P.O. Box 3265  
Harrisburg, PA 17105-3205

7105-326565

