



May 22, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation For Approval  
Of Tariff Modifications And Waiver Of Regulations  
Necessary To Implement Its Distributed Energy Resources  
Management Plan

Docket No. P-2019-3010128

**COMMENTS OF TRINITY SOLAR, INC. ON  
PPL ELECTRIC'S DER MANAGEMENT PILOT PLAN**

Trinity Solar (Trinity) submits these comments on PPL Electric's DER Management Pilot Plan ("DER Management Plan") filed with the Commission on May 24, 2019.

**I. Overview**

This letter is to inform the Committee of the practical hurdles that we are realistically seeing in our day-to-day operations. In pursuit of the objectives outlined in the DER Management Plan, PPL Electric aimed at investigating methods to enhance the integration and management of the growing deployment of DERs within its service territory. Within the DER Management Plan, *"customers applying to interconnect new DERs with PPL Electric distribution system were required to: (1) use Company-approved smart inverters that are compliant with IEE 1547-2018 and forthcoming UL standard 1741; and (2) install devices that enable PPL Electric to monitor and proactively manage DERs."*

Trinity has installed numerous systems under this pilot and would like to take this opportunity to share our experience. We see many methods presented in the DER Management Plan as constricting rather than beneficial. Challenges we are facing include installation delays, additional spending on labor including unnecessary site visits, expenses for additional project management, and increased coordination efforts between PPL and our team. All in all, the pilot is contributing to a more difficult and expensive installation.

Further, due to the limitations within the DER Management Plan, we are confined to using a limited selection of smart inverters that meet the program's specifications. With these specific PPL restrictions, we are unable to choose alternate equipment compliant with IEEE and UL national standards.

**Reading, PA Office**  
170 Corporate Drive, Building 1, Suite 170  
Reading, Pennsylvania 19605  
[www.Trinity-Solar.com](http://www.Trinity-Solar.com)

**1-877-SUN- SAVES**  
Ph: 484-525-4111  
Fax: 732-780-6671

**The official registration number of Trinity Solar, Inc. can be obtained from the Pennsylvania Office of Attorney General's Bureau of Consumer Protection by calling toll-free within Pennsylvania 1-888-520-6680. Registration does not imply endorsement.**



## II. Installation and Service Delays with Additional Costs

The mandated use of the Management Device on all installed systems has presented many practical challenges, leading to delays and additional costs. In addition to height requirements which limit inverter installation placement and necessitate additional work, our teams face added coordination with PPL to activate the system. Once Permission to Operate (“PTO”) is approved, we then need to communicate with PPL so that they can respond to the home and place their Management Device. Promptly thereafter, we must then revisit the same home for an additional cost that we absorb to turn the system on. We find the pilot can prolong the process as we are continuously waiting for scheduling, return communications and coordination between the utility, homeowner, and ourselves. Inevitably, oversight and follow-up are needed on a project that would have otherwise already been up and running in an alternative electric territory.

Also, should there be a service call to the home after the system is turned on, our teams cannot connect or disconnect PPL-owned equipment. Consequently, addressing any service issues requires multiple steps including responding to the home to investigate the issue, coordinating with PPL to respond to home to disconnect their Management Device, our team following up to service the system and finally, another call to PPL to reconnect. This can cause delays for weeks on an issue that otherwise would have been a one-time truck rollout and a quick resolution. Outside of PPL territory, our processes are notably more streamlined and cost effective. Most importantly, the impact is frustrating to ratepayers who were looking forward to their system being installed in a timely and efficient fashion.

## III. Approved List of Smart Inverters

While we agree with the notions behind the DER Management Plan goals, we see challenges within its implementation. In our experience, with the restricted pool of inverters that meet PPL’s requirements, the cost to install systems is increasing and these costs are being borne by the customer.

This constraint contributes to supply and demand challenges, resulting in the inflated pricing of inverters and delays in supply deliveries. Furthermore, we are seeing delays on installations due to equipment availability. As with all resources, with a limited list or supply available to choose from, in turn, we see limiting competition drives costs up for the customer. Also, with pilot restrictions, we see our sales team altering the tie-in plan for systems to ensure we comply with the DER Management Plan criteria.

## IV. Recommendation

We believe that these limitations and constraints can be rectified, and should be, before the end of this pilot program and in a timely fashion. Expanding the list, or allowing customers to opt-out of this program is key. PPL can maintain their pilot while installers and businesses can

**Reading, PA Office**  
170 Corporate Drive, Building 1, Suite 170  
Reading, Pennsylvania 19605  
[www.Trinity-Solar.com](http://www.Trinity-Solar.com)

**1-877-SUN-SAVES**  
Ph: 484-525-4111  
Fax: 732-780-6671

**The official registration number of Trinity Solar, Inc. can be obtained from the Pennsylvania Office of Attorney General’s Bureau of Consumer Protection by calling toll-free within Pennsylvania 1-888-520-6680. Registration does not imply endorsement.**



Pennsylvania Home Improvement Contractor Registration Number: PA128551  
For other jurisdictions, please visit: <http://www.trinity-solar.com/about-us/locations-and-licenses>

continue to choose the inverter manufacturer they wish to work with as long as they comply with the national standards already in place.

From a company that is working hard to bring renewable energy systems to the community to assist with meeting our state's climate goals and helping to save homeowners money, we kindly ask that our comments herein are taken into consideration.

Trinity appreciates the chance to provide these comments, and we look forward to engaging with the Commission to ensure the success of renewable energy development in Pennsylvania.

Respectfully Submitted,

Chelsea Farrell  
[Chelsea.Farrell@Trinity-Solar.com](mailto:Chelsea.Farrell@Trinity-Solar.com)  
Policy and Legislative Associate  
Trinity Solar, Inc.

**Reading, PA Office**  
170 Corporate Drive, Building 1, Suite 170  
Reading, Pennsylvania 19605  
[www.Trinity-Solar.com](http://www.Trinity-Solar.com)

**1-877-SUN-SAVES**  
Ph: 484-525-4111  
Fax: 732-780-6671

**The official registration number of Trinity Solar, Inc. can be obtained from the Pennsylvania Office of Attorney General's Bureau of Consumer Protection by calling toll-free within Pennsylvania 1-888-520-6680. Registration does not imply endorsement.**