

---

Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1985 Direct Fax  
File #: 205510

May 20, 2024

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of its Second Distributed Energy Resources Management Plan  
Docket No. P-2024**

---

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) for Approval of its Second Distributed Energy Resources (“DER”) Management Plan. PPL Electric is filing its Petition pursuant to Paragraph 62 of the Joint Petition for Settlement of All Issues approved by the Pennsylvania Public Utility Commission’s (“Commission”) at Docket No. P-2019-3010128. If approved, the Company’s Second DER Management Plan would become effective on March 22, 2025, the day after PPL Electric’s First DER Management Plan’s Pilot Program is set to end.

PPL Electric notes that Proprietary and Non-Proprietary copies of the filing are being submitted. The Proprietary version contains **HIGHLY CONFIDENTIAL** PPL Electric Exhibits CD-5 through CD-7, CD-9 through CD-12, and KM-2 through KM-5. These exhibits contain proprietary and sensitive information about PPL Electric’s distribution system and operations. Accordingly, PPL Electric respectfully requests that the Proprietary version of the filing be afforded proprietary treatment and placed in a non-public folder.

Due to file size restrictions, the Non-Proprietary and Proprietary versions are being uploaded separately to the Commission’s ShareFile for large filings.

Additionally, under separate cover, PPL Electric is sending the Commission a CD containing PDF copies of the Proprietary and Non-Proprietary versions of the filing.

The Company's filing consists of the following documents:

1. Petition for Approval of PPL Electric's Second DER Management Plan;
2. PPL Electric St. No. 1 – Direct Testimony of Salim Salet, including PPL Electric Exhibits SS-1 and SS-2;
3. PPL Electric St. No. 2 – Direct Testimony of Aliesha Dombrowski-Diamond, including PPL Electric Exhibits AD-1 through AD-7;
4. PPL Electric St. No. 3 – Direct Testimony of Cody M. Davis, including PPL Electric Exhibits CD-1 through CD-4 and CD-8 and **HIGHLY CONFIDENTIAL** PPL Electric Exhibits CD-5 through CD-7 and CD-9 through CD-12;
5. PPL Electric St. No. 4 – Direct Testimony of Reigh A. Walling, including PPL Electric Exhibit RW-1;
6. PPL Electric St. No. 5 – Direct Testimony of Jay Johnson, including PPL Electric Exhibit JJ-1;
7. PPL Electric St. No. 6 – Direct Testimony of Dr. Elizabeth Cook, including PPL Electric Exhibit EC-1;
8. PPL Electric St. No. 7 – Direct Testimony of Lee Krevat, including PPL Electric Exhibits LK-1 through LK-11;
9. PPL Electric St. No. 8 – Direct Testimony of Dr. Karen Miu, including PPL Electric Exhibit KM-1 and **HIGHLY CONFIDENTIAL** PPL Electric Exhibits KM-2 through KM-5; and
10. PPL Electric St. No. 9 – Direct Testimony of Kevin Underwood.

As shown on the attached Certificate of Service, PPL Electric has served the Non-Proprietary copy of the filing on the Office of Consumer Advocate, Office of Small Business Advocate, the

Rosemary Chiavetta, Secretary  
May 20, 2024  
Page 3

Commission's Bureau of Investigation and Enforcement, and all parties from the First DER Management Plan proceeding. The Company is also serving the Non-Proprietary copy of the filing on Tesla, Inc. ("Tesla"), Sun Directed, American Home Contractors ("AHC"), Sunrun, Inc. ("Sunrun"), and the Solar Energy Industries Association ("SEIA") (collectively, the "Joint Solar Parties"), as evidenced by the Certificate of Service.

The Company also requests that the Commission publish notice of this filing in the *Pennsylvania Bulletin* and that a reasonable deadline for intervention be set as part of that notice.

PPL Electric believes that these various communications initiatives will provide all interested parties with full notice of the Company's proposed Second DER Management Plan and an opportunity to participate in any Commission proceeding about this Petition. However, if the Commission concludes that additional notice would be appropriate, the Company will provide such additional notice as the Commission may direct.

Lastly, as set forth in the Petition, PPL Electric respectfully requests Commission approval of the Second DER Management Plan no later than its February 20, 2025 public meeting, so that the Company has sufficient time to implement the Second DER Management Plan before the Pilot Program ends on March 21, 2025.

Respectfully submitted,



Devin Ryan

DTR/dmc  
Enclosures

cc: Certificate of Service

## CERTIFICATE OF SERVICE

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).

### VIA E-MAIL AND FIRST-CLASS MAIL

NazAarah Sabree  
Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1st Floor  
Harrisburg, PA 17101  
Ra-sba@pa.gov  
*Office of Small Business Advocate*

Allison Kaster, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
Email: akaster@pa.gov  
*Bureau of Investigation & Enforcement*

Darryl A. Lawrence, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
Email: dlawrence@paoca.org  
*Office of Consumer Advocate*

Andrew J. Karas, Esquire  
Emily A. Collins, Esquire  
Fair Shake Environmental Legal Services  
647 E. Market Street  
Akron, OH 44302  
Email: akaras@fairshake-els.org  
Email: ecollins@fairshake-els.org  
*Natural Resources Defense Council*

Adam E. Gersh, Esquire  
Flaster Greenberg P.C.  
1717 Arch Street, Suite 3300  
Philadelphia, PA 19103  
Email: adam.gersh@flastergreenberg.com  
*Sunrun, Inc.*

Beren Argetsinger, Esquire  
Keyes & Fox LLP  
PO Box 166  
Burdett, NY 14818  
Email: bargetsinger@keyesfox.com  
*Sunrun, Inc.*

Bernice I. Corman, Esquire  
BICKY CORMAN LAW PLLC  
1250 Connecticut Avenue, NW, Suite 700  
Washington, DC 20036  
Email: bcorman@bickycormanlaw.com  
*Tesla, Inc., Sun Directed, American Home Contractors, Sunrun, Inc., and Solar Energy Industries Association*

Judith D. Cassel, Esquire  
Micah R. Bucy, Esquire  
Hawke, McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
Email: jdcassel@hmslegal.com  
Email: mrbucy@hmslegal.com  
*Sustainable Energy Fund*

Date: May 20, 2024

A handwritten signature in blue ink, consisting of several overlapping, fluid strokes that form a stylized, somewhat abstract representation of the name Devin T. Ryan.

---

Devin T. Ryan