



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

June 18, 2024

Docket No.: M-2020-3020824
Utility Code: 110500

Michael J. Shafer, Esquire
PPL Electric Utilities
Two North Ninth St.
Allentown, PA 18101
mjshafer@pplweb.com

RE: Petition of PPL Electric Utilities Corporation for Approval of its Act 129
Phase IV Energy Efficiency and Conservation Plan

Dear Mr. Shaffer:

On June 12, 2024, PPL Electric Utilities (PPL) submitted a filing with the Commission that included five PowerPoint slides broadly outlining its intent to institute a Residential Electric Vehicle (EV) Charging Pilot Program. To assist the Commission in conducting a review of the PPL's Residential EV Charging Pilot Program, please respond with the information requested in the attached TUS Data Request.

Please forward the information to the Secretary of the Commission **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____

Title _____

Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials "CONFIDENTIAL" in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of your response to Mr. Joseph Sherrick, Supervisor of Policy and Planning of the Bureau of Technical Utility Services via e-mail at josherrick@pa.gov. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: TUS Data Request

cc: Thomas McAteer, TJMAteer@pplweb.com
Megan Good, mgood@pplweb.com

TUS Data Request
Act 129 Phase IV EV Charging Pilot
Docket No. M-2020-3020824

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

1. In reference to the filing submitted to the Commission on June 12, 2024, containing a 5-slide PowerPoint (PPT) document referencing a proposal by PPL Electric Utilities (PPL) to engage in an electric vehicle (EV) charging pilot program, please provide responses to the following questions.
 - a. Why has PPL not filed a petition for minor plan change to its Act 129 Phase IV Implementation Plan? Although money is set aside in the Phase IV Implementation Plan for pilot programs, the actual creation of any specific pilot and its associated details does create a change to the Implementation Plan. As identified in Section C, Process for Approving Minor Changes to an EDC EE&C Plan, in the Commission's Order dated June 9, 2011, at Docket M-2008-2069887, the inclusion of the proposed pilot plant warrants filing of a Petition for Minor Plan Change.
 - b. Please explain the process and data used by PPL to determine that 1,000 customers would be an achievable target for this pilot.
 - c. Please explain how any potential energy savings (kWh) from this proposed pilot program are expected to result from EV charging. What baseline information would data collected from the participants of this pilot be compared against to arrive at energy savings (kWh)?
 - d. Please clarify that the terms and conditions for data authorization clearly convey to the consumer/applicant that all data will be treated confidentially and only provided or used in an anonymized aggregate fashion.
 - e. Please provide the cost breakdown of the \$875,000 total cost, for customer incentives, marketing, platform build, and administration.
 - f. Please provide the estimated TRC for the proposed pilot and for the overall Phase IV implementation plan.
 - g. The post-purchase rebate is for specific Level 2 "networked" EV chargers. Please detail which EV charger models and vendors were selected for this pilot and how PPL made this determination.
 - h. How did PPL arrive at the price point for the prescribed chargers?
 - i. Because this is intended to be a residential pilot program, Commission staff do not believe that PPL intends to require that these eligible chargers are truly networked chargers but rather are simply Wi-fi enabled. Please confirm or clarify this aspect.

- j. Please explain the turnkey installation option.
 - i. Has PPL selected an installation vendor? If so, how was this vendor selected?
 - ii. Is there a difference in rebate amount if the customer chooses the turnkey installation option vs hiring their own installer?
- k. The PPT states that PPL's residential CSP "has the necessary software".
 - i. What software is being referenced?
 - ii. Specifically, how will this software be utilized and what data will be collected with this software?
 - iii. Is there any additional cost to utilize this software for this pilot and, if so, what is that cost?
- l. The schedule shown on Slide 5 of the PPT suggests a 6-month enrollment period with a 12-month data collection period. The schedule, however, does not appear to provide time for data collection from participants enrolling in the last half of the enrollment period (months 7 through 9).
 - i. Please address if data collection will continue for a full twelve months for all participants, even if it extends beyond the end of Phase IV.
 - ii. Will PPL be collecting data for a longer period to provide a more robust data set and more meaningful analysis?
- m. Will PPL be claiming savings from this pilot for Phase IV? If not, why not?