

---

Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1985 Direct Fax  
File #: 193598

July 3, 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 Act 129 Phase IV  
Energy Efficiency and Conservation Plan  
Docket No. M-2020-3020824**

---

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) are the Company’s Answers to the Bureau of Technical Utility Services’ Set I of Data Requests, which were served by Secretarial Letter dated June 18, 2024.

Copies of this filing are being provided as indicated below and on the Certificate of Service.

Respectfully submitted,

  
Devin Ryan

DR/dmc  
Enclosures

cc: Certificate of Service  
Joseph Sherrick (*via Email josherrick@pa.gov*)

**CERTIFICATE OF SERVICE**  
**(Docket No. M-2020-3020824)**

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**

Steven C. Gray, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
E-mail: [sgray@pa.gov](mailto:sgray@pa.gov)

Joseph L. Vullo, Esquire  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
E-mail: [jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Commission on Economic Opportunity*

Christy M. Appleby, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
E-mail: [cappleby@paoca.org](mailto:cappleby@paoca.org)

Judith D. Cassel, Esquire  
Micah R. Bucy, Esquire  
Hawke McKeon & Sniscak LLP  
100 North 10<sup>th</sup> Street  
Harrisburg, PA 17101  
E-mail: [jcassel@hmslegal.com](mailto:jcassel@hmslegal.com)  
E-mail: [mrbcy@hmslegal.com](mailto:mrbcy@hmslegal.com)  
*Sustainable Energy Fund*

Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Ria M. Pereira, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
E-mail: [pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
*CAUSE-PA*

Dated: July 3, 2024



---

Devin T. Ryan

**PPL Electric Utilities Corporation  
Response to the Data Requests of  
The Bureau of Technical Utility Services  
Dated June 18, 2024  
Docket No. M-2020-3020824**

TUS A-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 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?

PPL  
Response

- a. PPL Electric disagrees that the EV Charger Pilot Program constitutes a "minor" EE&C Plan change. Nothing in the PUC's Minor Plan Change Order states that the addition of a pilot program constitutes a minor plan change that requires PUC approval. See Energy Efficiency and Conservation

Program, Docket No. M-2008-2069887 (Order entered June 10, 2011) ("Minor Plan Change Order"). In fact, the word "pilot" is not used anywhere in the Minor Plan Change Order. Rather, Section C of the Minor Plan Change Order states that the following changes to an EE&C Plan constitute "minor" plan changes:

1. The elimination of a measure that is underperforming, no longer viable for reasons of cost-effectiveness, savings or market penetration or has met its approved budgeted funding, participation level or amount of savings;
2. The transfer of funds from one measure or program to another measure or program within the same customer class; and
3. Adding a measure or changing the conditions of a measure, such as its eligibility requirements, technical description, rebate structure or amount, projected savings, estimated incremental costs, projected number of participants, or other conditions so long as the change does not increase the overall costs to that customer class.

Minor Plan Change Order, p. 19.

Here, PPL Electric is not eliminating a measure, transferring funds from one measure or program to another measure or program, or adding a measure or changing the conditions of a measure. The EV Charger Pilot Program will be implemented within the existing Commission-approved budget of \$3 million for residential pilot programs and pursuant to the Commission-approved process for implementing pilot programs, as set forth in Section 9.1.4 of the Company's Phase IV EE&C Plan.

In addition, nothing in PPL Electric's Phase IV EE&C Plan is changing due to the EV Charger Pilot Program. Section 9.1.4 of the Phase IV EE&C Plan expressly outlines the process by which pilot programs will be implemented, stating, "As was done in Phase III, the Company will submit descriptions of any pilot programs or proposed technology additions to the Pa PUC and stakeholders prior to implementation." PPL Electric complied with this process by filing its letter on June 12, 2024, describing the EV

Charger Pilot Program and by providing notice and a pilot program description to stakeholders on June 11, 2024.

Furthermore, the Commission-approved Phase IV EE&C Plan notes how not all pilot programs will require PUC approval. On page 67 of the Phase IV EE&C Plan, where the Company's Deep Energy Retrofits and Net Zero Building pilot programs are addressed, the Plan states, in pertinent part:

The Company will submit, within a reasonable time, a description of the pilot program(s) to the Commission and stakeholders prior to implementation in accordance with Section 9.1.4 of the Phase IV EE&C Plan. If either or both of the pilots require a change to the Phase IV EE&C Plan, the Company will review the change with stakeholders and submit the change to the Commission in a petition to modify the Phase IV EE&C Plan.

Phase IV EE&C Plan, p. 67 (emphasis added). The Commission specifically approved this language as part of its Opinion and Order entered on March 25, 2021, which approved the Joint Petition for Approval of Partial Settlement regarding PPL Electric's Phase IV EE&C Plan filing. See Petition of PPL Elec. Utils. Corp. for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan, Docket No. M-2020-3020824, at (Order entered Mar. 25, 2021).

For these reasons, PPL Electric's EV Charger Pilot Program does not require separate Commission approval as a "minor" EE&C Plan change.

- b. The 1,000-customer pilot participation represents approximately 5% of the estimated annual EV growth rate in the PPL EU territory. 5% is the expected adoption rate for the proposed incentive. In addition, the proposed participation provides the best opportunity to achieve a sample set with high confidence and low precision error.
- c. The ENERGY STAR ("ES") testing yields power consumption for the EVSE in various modes (no vehicle, idle, max output, partial on). Threshold, qualifying values for the Level 2 ES specification were developed through testing that also included models ultimately deemed non-compliant. As such, there is an existing comparison of power to draw upon. The

pilot will provide the number of hours in each mode, which combined with the power comparison will be used to determine annual energy savings. The pilot will determine the load profile of charging, which will show the proportion of savings that are coincident with peak demand.

- d. All customer information and data will be held securely and treated confidentially and, if presented or reported upon, will be anonymized and aggregated to protect all participating customers. These points will be clearly conveyed to customers in documentation, including in the terms and conditions of their data authorization.
- e. Cost breakdown of the \$875,000 total cost, for customer incentives, marketing, platform build, and administration:

Task / Item	Rate	Unit	Quantity	Total
Customer Incentives	\$300	Qualified Charger	1,000	\$300,000
Configuration and Launch	\$50,000	Launch	1	\$50,000
Pilot Partner Onboarding and Support	\$5,325	Month	15	\$79,875
Marketing and Outreach	\$8,350	Month	12	\$100,200
Customer Support and Rebate Processing	\$3,320	Month	16	\$53,120
Data Aggregation Platform	\$3,350	Month	12	\$40,200
Management and Reporting	\$11,875	Month	16	\$190,000
<del>ChooseEV</del> Subscription	\$30,750	Year	2	\$61,500
<b>Total</b>				<b>\$874,895</b>

- f. The initial TRC benefit-cost ratio estimate from the Company's third-party evaluator for the pilot is 0.04. This is expectedly low due to the additional costs associated with a pilot. A scaled program would have an estimated TRC of 0.25. The overall Phase IV EE&C Plan would remain cost-effective with a TRC benefit-cost ratio exceeding 1.0.
- g. The pilot will employ Chargepoint and Wallbox charging equipment due to high data transfer rates and compatibility. The particular models will be determined prior to pilot implementation to ensure the most accessible and compatible equipment is eligible for incentives. These chargers accommodate both charging standards in use for light duty vehicles – SAE J1772 and NACS (SAE J3400).

- h. The customer incentive is based largely on the request for data authorization, as well as the incremental cost of the charging equipment and installation costs. The equipment's retail cost is expected to be \$600 - \$700 without installation. Installation costs for a level two charger, due to the required 240V circuit, can range between \$750 and \$1500.
- i. The term networked is based on the ENERGY STAR electric vehicle charging definition and refers to charging equipment that is connected or online, allowing for remote data access and/or control of the charging state of the vehicle. In this sense, a networked charger is a requirement of the pilot. Please see [https://www.energystar.gov/products/ev\\_chargers](https://www.energystar.gov/products/ev_chargers).
- j. Participating customers will have access to a CSP hosted website where they can order qualifying charging equipment with installation. The total cost of both equipment and installation will be instantly discounted by the selected incentive level.
  - i. The Company has not selected installation vendors. PPL Electric will begin selection during the planning phase of the pilot. The CSP will employ a closed network of at least three qualified installation trade ally(s) that have required certifications and demonstrate their understanding of EV charging installation requirements based on experience and/or training. Customers will have the final choice of installer.
  - ii. There is no difference in rebate amount.
- k. The PPT states that PPL's residential CSP "has the necessary software".
  - i. The software is a proprietary data aggregation platform provided by the Transportation Electrification division of our Residential CSP.
  - ii. The software allows the CSP to establish or update integrations with the smart charger original equipment manufacturer ("OEM") platforms, so that it can enable charging interval data collection from customer installation and activation through the end of the pilot term. The CSP will provide charging energy load

shapes by vehicle type and usage profile as well as on and off-peak usage behavior.

- iii. Yes, as indicated in the cost summary, there is a monthly cost of \$3,350 totaling approximately \$40,200 for the entirety of the pilot.
- I. 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. Data collection will continue for the full twelve months for all participants to create a complete data set that will support future analysis needs, even if this extends past the end of Phase IV. However, the Company plans to report on results using the data collected by the end of Phase IV. PPL Electric expects to have adequate data by that time to derive significant conclusions for the pilot.
    - ii. The Company intends to collect data for a minimum of 12 months. The extension of data collection would incur additional costs outside of the existing Phase; the level of data collected in the pilot period is adequate for a meaningful analysis.
  - m. Yes, the Company intends to claim savings from this pilot.

**VERIFICATION**

I, THOMAS J. McATEER, being the Manager – Energy Efficiency at PPL Electric Utilities Corporation, 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 PPL Electric Utilities Corporation 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.

Date: 07/02/2024



\_\_\_\_\_  
Thomas J. McAteer