

July 8, 2024

Via Electronic Filing

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

Re: Petition of PPL Electric Utilities Corporation for Approval of its Second Distributed
Energy Resources Management Plan
Docket No. P-2024-3049223
Petition to Intervene

Dear Secretary Chiavetta:

Attached for electronic filing, please find the Petition to Intervene by American Home Contractors, Inc., Enphase Energy, Inc., the Solar Energy Industries Association, SolarEdge Technologies, Inc., Sun Directed, Sunnova, Inc., Tesla, Inc. and Trinity Solar, LLC (collectively, the "Joint Solar Parties") in the above-captioned matter.

Copies have been served as shown on the attached Certificate of Service.

Respectfully submitted,



Bernice I. Corman, PA BAR #332915
BICKY CORMAN LAW, PLLC
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Email: bcorman@bickycormanlaw.com
Counsel to Joint Solar Parties

Attachments

cc: Service List
Office of Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties listed below via electronic mail, in accordance with the requirements of 52 Pa. Code § 154 (relating to service by a party):

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The Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA. 17120
crainey@pa.gov

Dated this 8th day of July, 2024

/s/ Bernice I. Corman

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for	:	
Approval of its	:	Docket No. P-2024-3049223
Second Distributed Energy	:	
Resources Management Plan	:	

**PETITION TO INTERVENE OF
AMERICAN HOME CONTRACTORS, INC., ENPHASE ENERGY, INC.,
THE SOLAR ENERGY INDUSTRIES ASSOCIATION,
SOLAREEDGE TECHNOLOGIES, INC., SUN DIRECTED, SUNNOVA, INC.
TESLA, INC., and TRINITY SOLAR, LLC
("JOINT SOLAR PARTIES")**

Pursuant to 52 Pa. Code §§ 5.71-5.75 and the Secretarial Letter filed on May 23, 2024 in the above-captioned proceeding, American Home Contractors (“AHC”), Enphase Energy, Inc. (“Enphase”), the Solar Energy Industries Association (“SEIA”), SolarEdge Technologies, Inc. (“SolarEdge”), Sun Directed, Sunnova, Inc. (“Sunnova”), Tesla, Inc. (“Tesla”), and Trinity Solar, LLC (“Trinity” or “Trinity Solar”) (collectively, the “Joint Solar Parties” or “JSPs”) hereby petition the Pennsylvania Public Utility Commission (“Commission”) for leave to intervene in the above-referenced proceeding. In support of this petition, the JSPs state:

I. Introduction and Background

a. The Proceeding

On May 24, 2019, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) filed a petition for approval of tariff modifications and other authorizations that are needed to implement its Second Distributed Energy Resources (“DER”) Management Plan (“Second DER Management Plan” or the “Plan”). PPL’s proposed Plan is an expansion of the Company’s DER Management Plan Pilot Program (“Pilot”) and Rule 12 of its tariff, approved in Docket No. P-2019-3010128 (“Pilot

Docket”). The 3-Year Pilot, which is still on-going (the Pilot is in Program Year 3) was intended to permit PPL to investigate methods to enhance the integration and management of the growing deployment of DER’s within PPL’s service territory. To reach this objective, the Pilot requires that participants: (1) install PPL-owned DER Management Devices to enable PPL Electric to monitor and actively manage customers inverters and (2) use only those smart inverters PPL approves based on PPL’s findings that the inverters are compatible with PPL’s DER Management Devices.

On December 17, 2020, the Commission approved a settlement reached by all the parties to the Pilot Docket¹ (“Settlement”) which, among other things, required that: (1) new DERs interconnecting with PPL’s distribution system on or after January 1, 2021 use smart inverters meeting the applicable standards set forth in Rule 12 of PPL’s tariff; and (2) PPL implement the Pilot, including reporting on (a) the costs and benefits to distribution system operation and design of monitoring DERs through PPL-owned and -operated devices connected to customers’ inverters, as compared to maintaining distribution system status visibility through other means such as automated meter reading equipment, or advanced distribution management systems (“ADMS”) modeling; and (b) the costs and benefits to distribution system operation of active management of customers’ DERs by PPL’s DER Management Devices, as compared to the benefits available through the use of inverter autonomous grid support functions. Paragraph 62 of the Settlement provided that within 60 days after the end of Program Year 2 of the Pilot, which concluded on March 21, 2024, PPL could file a petition to: (a) extend the program and make changes to it “as the Company may request;” (b) continue installing its DER Management devices on new DERs in its service territory; and/or (c) authorize the Company to expand the reach of the program such that the Company could remotely and actively

¹ Settling Parties in the Pilot Docket were PPL, the Office of Consumer Advocate (“OCA”), the Natural Resources Defense Counsel (“NRDC”), and the Sustainable Energy Fund (“SEF”). Sunrun, Inc. (“Sunrun”) was a party in the docket but not a signatory to the Settlement. Sunrun did not file an objection to the settlement.

manage (i) the DERs that were in the Pilot Program’s control groups, (ii) the DERs that have enrolled and will enroll in the program, and (iii) any new DERs that will interconnect with the Company’s distribution system after the Pilot concludes (in May, 2025).

PPL has proposed to (1) expand its Pilot by receiving approval in its Second DER Management Plan (“Second DER Management Plan” or “Plan”) that would now cover “all customer-owned and third party-owned, inverter-based DER system installations within its territory,”² (2) utilize the Volt/Watt functionality, with customer consent, when the interconnecting DER could create a localized high voltage issue on the distribution system at the time of interconnection which would not be resolved by the Volt/VAR or Constant Power Factor grid support functions; and (3) make the Pilot a permanent program (“Program”).

b. The Petitioners

American Home Contractors, Inc. (“AHC”) is a corporation organized under the laws of Delaware, with corporate headquarters located at 11820 W. Market Place, Fulton, MD 20759, and registered to do business in Pennsylvania. AHC’s mission is to accelerate the world’s transition to sustainable energy through the deployment of sustainable energy products such as solar roof, rooftop solar, and battery energy storage systems.

Enphase Energy, Inc. (“Enphase”) is a corporation organized under the laws of Delaware and registered to do business in Pennsylvania, with corporate headquarters located at 48281 Bayside Parkway, Fremont, CA 94538, and a purpose of advancing a sustainable future for all. Founded in 2006, Enphase is a global energy technology company and a market leading supplier of solar

² Petition, ¶ 12. Specifically, PPL proposes to expand its program to include: (1) actively monitor[ing] and manag[ing] the smart inverter settings on customers’ DERs (a) in the Pilot Program’s control groups, (b) in solar photovoltaic systems interconnected before the Pilot started on January 1, 2021, and (c) on inverter-based DERs interconnected after the Pilot started without DER Management devices installed on them, upon the earlier of those customers submitting a new interconnection application to upgrade their system, or to install a new inverter on their system.

micro-inverters, battery energy storage, electric vehicle supply equipment, and home energy management systems that optimize the use of locally produced solar energy to power homes and provide grid services.

SEIA is a 501(c) non-profit trade association with a business address of 1425 K Street, N.W., Suite 1000, Washington, DC. Founded in 1974, SEIA is the national trade association for the solar and solar + storage industries, whose vision is to represent an industry that will be the single largest source of new energy generation over the next decade, and to grow as the national voice of a larger, more unified and diverse industry. In partnership with its 1,000 member companies, which include manufacturers; residential, community solar, commercial, and utility-scale solar developers; installers; construction firms; investment firms; and service providers, SEIA advocates in administrative and judicial settings and before federal and local agencies for policies that shape fair market rules that promote competition and the growth of reliable, low-cost solar power. SEIA has more than 30 member companies located in Pennsylvania, several of whom are located in PPL territory, with many more national firms also conducting business in the Commonwealth.

SolarEdge is a Delaware corporation, with a business address of 700 E Tasman Drive, Milpitas, CA 95035. SolarEdge is also an inverter manufacturer, whose several models of inverters were also approved by PPL for use in PPL's Program.

Sun Directed is a corporation organized under the laws of Pennsylvania, with corporate headquarters at 2820 E. College Ave., Suite K, State College, PA 16801. Sun Directed employs 11. Sun Directed has been helping Pennsylvania residents and business realize energy independence since 2008 by providing them with reliable energy and finance solutions that reduce their energy expenses, slash their carbon footprints, and provide outage security.

Sunnova, Inc., an American residential and commercial solar energy company headquartered in Houston, TX and registered to do business in Pennsylvania, is an industry-leading adaptive energy services company focused on making clean energy more accessible, reliable and affordable for homeowners and businesses, and powering energy independence. Sunnova has 7,496 systems operating in PPL territory, with an additional 1,687 under construction. Sunnova's terms of service for both leased and financed systems, as well as contracts for service, require consistent and uninterrupted communication with inverters and devices manufactured by certain of the Joint Solar Parties.

Tesla, which is registered to do business in Pennsylvania, is a corporation organized under the laws of Delaware, with corporate headquarters at 1 Tesla Road, Austin, TX. Tesla's mission is to accelerate the world's transition to a sustainable energy economy through the manufacture and deployment of electric vehicles, electric vehicle charging stations, and sustainable energy products, such as rooftop solar, battery energy storage systems, and auxiliary inverters and products. As of July 18, 2023, Tesla had itself installed 537 Powerwall battery energy storage units in PPL territory. An additional 254 Powerwalls have been installed in PPL territory by third-party installers, as of December, 2023.

Trinity Solar, LLC ("Trinity") is incorporated in New Jersey, headquartered at 2211 Allenwood Road, Wall, NJ 07719, and registered to do business in Pennsylvania. To date, Trinity Solar has installed more than 12,000 solar or solar + storage systems in Pennsylvania residences.

II. Legal Standard

52 Pa. Code § 5.72 provides, in part, that a petition to intervene may be filed by a person claiming an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The interest may include an

interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.

A. PPL's Petition directly and substantially impacts the JSPs' interests.

The approval PPL seeks from the Commission in its Petition directly and substantially impacts the JSPs' interests. All the JSPs and/or their members, all of whom are either in the business of installing solar energy and battery storage equipment and/or manufacturing said equipment and/or providing grid services via aggregation of said equipment, or constitute a trade association representing same, will be impacted by PPL's proposed plan to monitor and actively or remotely control customer-owned and third-party owned equipment associated with solar energy systems.

Further, all the JSPs and/or their members, all of whom have and/or had significant solar energy business operations in PPL territory, have or had experience seeking to operate in accordance with PPL's Pilot Program.

Specifically:

- After several years of business, AHC has ceased installing any battery storage solutions for customers, and largely reduced solar deployments, in PPL territory. AHC's main offering is the Tesla Solar Roof, which under the current Pilot requirements is unable to be installed. In a pleading filed in P-2019-3010128, AHC estimated that as of February, 2024, the sales that did not go forward because of PPL's Program would have added a total of 109.71 kW of solar energy in PPL territory, while AHC had seen a 1200% increase nationally, and nearly \$3,000,000.00 in sales from 2022 to 2023 in the rest of Pennsylvania, just for Tesla's Solar Roof. The list of customers AHC has turned away has grown since then.

- Enphase has worked with PPL since the launch of the Pilot to integrate with the latter's IEEE 2030.5 server, and has had numerous of its smart inverter products tested and approved for use in its Program. It has been Enphase's experience that PPL's monitoring devices have interfered with Enphase's systems communications to the cloud, so have affected systems monitoring in Enphase's customers' app and on Enphase's dashboards. Enphase has expended significant resources working with PPL to seek to resolve these communications disruptions.
- SEIA is concerned by the impacts it, its members, and the solar community in general have observed to date with PPL's Pilot, and is concerned these impacts will worsen if PPL's proposed expanded, permanent, Program is approved. SEIA is also concerned that approval of PPL's Program will result in an inconsistent patchwork of interconnection requirements both within Pennsylvania and nationally.
- SolarEdge has expended an enormous amount of resources ensuring its equipment could be integrated with PPL's systems, and continues to provide support to this day. SolarEdge recounts damage to its inverters following PPL's installation of its management devices therein. Additionally, SolarEdge has observed that PPL's selection of direct communications to the inverter prevents fair market competition with third party grid services providers.
- Since 2020, Sun Directed has had to deny providing solutions to commercial leads with single phase service, having found that PPL's Program requirements provide no viable cost-effective options for it to source single-phase inverters for projects for commercial customers.

- Sunnova reports the Pilot Program has demonstrated that PPL monitoring and control devices consistently interfere with necessary device communication. Sunnova has observed that PPL's limits on eligible inverters has constrained and will further constrain its ability to provide its customers with solar + storage solutions.
- It has been Tesla's experience that since the start of PPL's Pilot, in scores of multi-inverter Tesla solar systems installed in PPL territory, customers' communications have been fully or partially knocked offline due to the presence of PPL's DER Management Device. In all instances, the communications modules Tesla installed in its PPL-approved customers' inverters were either already installed, or recommended for use, by the manufacturers of said inverters. Communications problems caused by PPL's Management Device with certain inverter and system combinations resulted in Tesla and its customers receiving numerous "false alarms" that indicated the customer's solar system had stopped producing power, which in turn required numerous site visits and additional labor from Tesla. Due to the significant difficulties Tesla encountered with PPL's Program, in the summer of 2023, Tesla ceased new direct installations of residential solar and battery storage equipment. However, Tesla has dedicated several hundred hours of staff time, for example, seeking to restore customers' disrupted communications. Further, as a result of failed communications hindering Tesla's ability to calculate solar system exports on some system inverters, and after an additional expenditure of staff time, Tesla has forfeited collecting SREC credits, the rights to which it purchased from customers, amounting to thousands if not hundreds of thousands of dollars potentially lost if the hindrances persist over the life of the systems.

- Trinity Solar reports the Pilot's causing "installation delays, additional spending on labor including unnecessary site visits, expenses for additional project management and increased coordination efforts between PPL and [the installers'] team;" and that PPL's limits on eligible smart inverters inflates the prices of inverters, causes delays in supply deliveries, delays on installations due to equipment availability, and increased costs associated with connecting the particular inverters, all of which costs are passed on to customers.

In addition to their concerns that the proposed Plan will drive up the costs of solar projects in PPL territory (based upon the twin problems of projects needing to accommodate installation of PPL's DER monitoring device, as well as being restricted to using PPL-approved equipment) and deprive customers of the benefits of their investments (as numerous customers have experienced communications losses resulting from the incompatibility between their and PPL's communications systems), all the JSPs are concerned that the proposed Plan will tacitly amend the interconnection rules without benefit of a state-wide proceeding; and will chill innovation, and revenue-generating opportunities, as PPL's approved list of inverters inclines towards limiting eligible projects to only single inverter installs.³

All the JSPs also share the concern that PPL's controlling customers' exports could bar customers from participating in aggregation programs, an outcome that could be particularly short-

³ For example, Tesla's Powerwall 3 will not be able to be sold in PPL territory, as it includes an integrated inverter model that is presently not included on, and in the future is unlikely to be included on, PPL's approved inverter list. Today, Tesla's Powerwall 3 comprises the majority of the residential battery energy storage system market. Approval of PPL's proposed Plan will not only deprive Tesla of the opportunity to sell this product in PPL territory, it will likely deprive ratepayers in PPL territory of any future opportunity to purchase a Powerwall.

sighted, given FERC Order No. 2222's direction to Regional Transmission Organizations to allow DERs to participate in wholesale markets through aggregations.⁴

Finally, all the JSPs share the concern that the thousands of pages of PPL data purporting to identify benefits and cost-savings resulting from the Pilot and to be realized as a result of approval of the proposed Plan, may be masking the types of costs and dis-benefits the JSPs witnessed first-hand, precluding the Commission from being able to accurately gauge the "reasonableness" of the proposed Plan.

The JSPs expect information on these topics and more to be elucidated during the course of the proceeding, in discovery and through cross-examination.

B. The JSPs' interests are not represented by any other party.

The JSPs, all of whom are large and small solar and solar-plus-storage system installers and sellers, inverter manufacturers of solar energy equipment, and/or grid services providers, and/or an association representing same; all of whom have substantial prior, and/or continuing business in PPL's territory; and all of whom wish to do more business in PPL territory, but are concerned that approval of PPL's proposed plan will render their doing so infeasible, are not represented by existing participants, nor can they be adequately represented by same.

III. Communications and Correspondence Concerning this Docket

The JSPs respectfully request that communications and correspondence concerning this docket be directed to the following:

Bernice I. Corman
Bicky Corman Law PLLC

⁴ Recently, the Commission issued an Advance notice of Proposed Rulemaking Order in L-2023-3044115, *Distributed Energy Resources Participation in Wholesale Markets*, in order to investigate its role in implementing FERC Order 2222 and to determine whether any amendments or additions are needed to align existing Commission regulations or policy statements therewith.

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Phone: (202) 213-1672
Email: bcorman@bickycormanlaw.com

IV. Conclusion

For the foregoing reasons, the Joint Solar Parties respectfully request that the Commission grant this Petition to intervene with all rights attached thereto.

Respectfully submitted,

American Home Contractors, Inc.
Enphase Energy, Inc.
The Solar Energy Industries Association
SolarEdge Technologies, Inc.
Sun Directed
Sunnova, Inc.
Tesla, Inc.
Trinity Solar, LLC

By their Attorney:



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for	:	
Approval of its	:	Docket No. P-2024-3049223
Second Distributed Energy	:	
Resources Management Plan	:	

VERIFICATION

I, NICOLAS ZAVALA, being the Director of Operations at American Home Contractors (“AHC”), hereby state that the facts set forth in the Joint Solar Parties’ Petition to Intervene pertaining to AHC are true and correct (or 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).

Date: July 8, 2024


Nicolas Zavala

Verification on behalf of Enphase Energy, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for	:	
Approval of its	:	Docket No. P-2024-3049223
Second Distributed Energy	:	
Resources Management Plan	:	

VERIFICATION

I, Marc Monbouquette, being Senior Manager of Policy and Government Affairs for Enphase Energy, Inc., hereby state that the facts set forth in the Joint Solar Parties' Petition to Intervene pertaining to Enphase Energy, Inc. are true and correct (or 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).

DATED: July 8, 2024



Enphase Energy, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for :
Approval of its : Docket No. P-2024-3049223
Second Distributed Energy :
Resources Management Plan :

VERIFICATION

I, Gizelle Wray, being the Vice President and General Counsel of the Solar Energy Industries Association, hereby state that the facts set forth in the Joint Solar Parties' Petition to Intervene pertaining to the Solar Energy Industries Association on its own behalf and on behalf of its members, and to SolarEdge Technologies, Inc. are true and correct (or 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).

DATED: July 8, 2024



Gizelle Wray
Vice President and General Counsel
Solar Energy Industries Association

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation	for	:	
Approval of its	:	:	Docket No. P-2024-3049223
Second Distributed Energy	:	:	
Resources Management Plan	:	:	

VERIFICATION

I, MICHAEL J. SHADOW, being the Chief Executive Officer at Sun Directed, hereby state that the facts set forth in the Joint Solar Parties' Petition to Intervene pertaining to Sun Directed are true and correct (or 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).

DATED: July 8, 2024



Sun Directed

Verification on behalf of Solar Energy Industries Association

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for :
Approval of its : Docket No. P-2024-3049223
Second Distributed Energy :
Resources Management Plan :

VERIFICATION

I, _____ being the

hereby state that the facts set forth in the Joint Solar Parties' Petition to Intervene pertaining to Sunnova, Inc. are true and correct (or 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).

DATED: July 8, 2024


Sunnova, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for	:	
Approval of its	:	Docket No. P-2024-3049223
Second Distributed Energy	:	
Resources Management Plan	:	

VERIFICATION

I, JORDAN GRAHAM, being a Senior Energy Policy Advisor at Tesla, Inc. (“Tesla, Inc.”), hereby state that the facts set forth in the Joint Solar Parties’ Petition to Intervene pertaining to Tesla Directed are true and correct (or 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).



Date: July 8, 2024

Jordan Graham
Tesla, Inc.

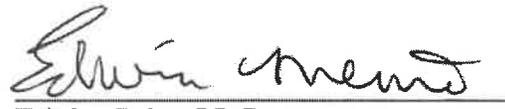
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for	:	
Approval of its	:	Docket No. P-2024-3049223
Second Distributed Energy	:	
Resources Management Plan	:	

VERIFICATION

I, Edwin Merrick being the Corporate Vice President, hereby state that the facts set forth in the Joint Solar Parties' Petition to Intervene pertaining to Trinity Solar, LLC. are true and correct (or 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).

DATED: July 8, 2024


Trinity Solar, LLC.