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July 10, 2024

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
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**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the PP&L Industrial Customer Alliance ("PPLICA"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a horizontal line.

Adeolu A. Bakare  
MCNEES WALLACE & NURICK LLC

Counsel to the PP&L Industrial Customer Alliance

Attachment

c: Chief Administrative Law Judge Charles E. Rainey, Jr. (via e-mail)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Certificate of Service

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Industries Association*



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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 10<sup>th</sup> day of July, 2024, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :  
For Approval of its Second Distributed Energy : Docket No. P-2024-3049223  
Resources Management Plan :  
through May 31, 2029 :

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**PETITION TO INTERVENE  
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, the PP&L Industrial Customer Alliance ("PPLICA") hereby files this Petition to Intervene in response to the above-captioned filing of PPL Electric Utilities Corporation, Inc. ("PPL" or "Company").

On May 20, 2024, PPL petitioned the Commission for approval of tariff modifications and other authorizations that are needed to implement PPL Electric's Second Distributed Energy Resources ("DER") Management Plan ("Second DER Management Plan" or the "Plan"). The Second DER Management Plan expands on the Company's First DER Management Plan, the First DER Management Plan's Pilot Program ("Pilot Program"), and Rule 12 of its tariff, which were approved at Docket No. P-2019-3010128 and govern the interconnection and operation of new DERs deployed in the Company's service territory.

In support of its Petition to Intervene, PPLICA asserts the following:

## I. PETITION TO INTERVENE

1. PPLICA is an ad hoc group of energy-intensive large commercial and industrial ("Large C&I") customers receiving electric service from PPL primarily under Rate Schedules LP-4 and LP-5, as well as available riders. PPLICA members annually consume approximately 1.03 billion kWh of electricity in their manufacturing and operational processes, and electricity costs comprise a significant element of their respective costs of operation.

2. The PUC's disposition of PPL's Petition in this instance may impact the rates PPLICA members pay for electric service, specifically as it relates to the proposed cost recovery for expenses incurred under the Second DER Management Plan.

3. The names and address of PPLICA's attorneys are:

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4. For purposes of this proceeding, PPLICA includes the companies listed in Appendix A hereto. PPLICA will update Appendix A during the course of this proceeding as needed to reflect changes in its membership.

5. According to 52 Pa. Code Section 5.74(a), a Petition to Intervene may be filed after the established date if good cause is shown. In this instance, PPLICA did not initially intervene this proceeding prior to the July 8 deadline. However, PPLICA understands that this proceeding is already underway, and PPLICA accepts the procedural schedule as is. In other words, PPLICA is not requesting any modifications or accommodations to the procedural schedule to account for

PPLICA's late filed intervention. As such, no party should be unfairly prejudiced or assume any additional burden as a result of the Commission's granting of this Petition, particularly at the early procedural stages of this proceeding. Further, consistent with 52 Pa. Code § 5.72(a), PPLICA has a significant interest in this proceeding that is not represented by any other party of record. *See* 52 Pa. Code § 5.72(a). Accordingly, the Commission should grant PPLICA intervenor status in this proceeding.

6. For these reasons, PPLICA posits that good cause has been shown, as required under 52 Pa. Code Section 5.74(a), and the Commission should grant this Late-Filed Petition to Intervene.

**WHEREFORE**, for the reasons stated above, the PP&L Industrial Customer Alliance respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide the PP&L Industrial Customer Alliance with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the PP&L Industrial Customer Alliance

Dated: July 10, 2024

**APPENDIX A**

**PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Air Products and Chemicals, Inc.

Benton Foundry

Hercules Cement Company

Hydro Extrusions, Inc.

Messer LLC

TIMET North America

Wegmans Food Markets, Inc.

