

July 10, 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

Dear Secretary Chiavetta:

Please file this Letter correcting and updating certain content in the June 8, 2024 filings by American Home Contractors, Inc., Enphase Energy, Inc., the Solar Energy Industries Association (“SEIA”), SolarEdge Technologies, Inc. (“SolarEdge”), Sun Directed, Sunnova, Inc., Tesla, Inc. and Trinity Solar, LLC (collectively, the “Joint Solar Parties”) in the above-captioned matter.

First, please find attached Verifications by SolarEdge pertaining to the Joint Solar Parties’ Petition to Intervene, Protest and Answer.

Second, information pertaining to SEIA needs to be updated and corrected. Paragraph 19 in the Joint Solar Parties’ Protest should be updated and corrected as follows:

19. 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~~ **1,200** member companies, which include **equipment** 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~~ **32** member companies located in Pennsylvania, ~~several~~ **8** of whom are located in PPL territory, ~~with many more~~ **and more than 300** national firms also conducting business in the state. SEIA is concerned with the

impacts it, its members, and the solar community in general have observed to date with PPL's Pilot, and is concerned these 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.

Similar language describing SEIA's membership contained on page 7 of the JSPs' Petition to Intervene should be updated and corrected as follows:

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~~ **1,200** member companies, which include **equipment** 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~~ **32** member companies located in Pennsylvania, ~~several~~ **8** of whom are located in PPL territory, ~~with many more~~ **and more than 300** national firms also conducting business in the state.

Thank you.

Respectfully,



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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](mailto:crainey@pa.gov)

Dated this 10<sup>th</sup> 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 :

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**VERIFICATION**

I, \_\_\_\_\_, being the \_\_\_\_\_,  
hereby state that the facts set forth in the Joint Solar Parties' Answer pertaining 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

  
Rachel Prishkoinik  
VP General Counsel  
& Corporate Secretary  
\_\_\_\_\_  
SolarEdge Technologies, Inc.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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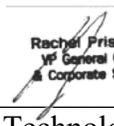
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**VERIFICATION**

I, \_\_\_\_\_, being the \_\_\_\_\_,

hereby state that the facts set forth in the Joint Solar Parties' Petition to Intervene pertaining 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

  
Rachel Frishkoinik  
VP General Counsel  
& Corporate Secretary

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**VERIFICATION**

I, \_\_\_\_\_, being the \_\_\_\_\_,  
hereby state that the facts set forth in the Joint Solar Parties' Protest pertaining 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

  
Rachel Prishkoinik  
VP General Counsel  
& Corporate Secretary

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SolarEdge Technologies, Inc.