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July 12, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
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 OF THE SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition of the Sustainable Energy Fund of Central Eastern Pennsylvania in the above-captioned docket. Copies of the Petition have been served in accordance with the Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact me.

Very truly yours,

/s/ Judith D. Cassel

Judith D. Cassel
*Counsel for The Sustainable Energy Fund
of Central Eastern Pennsylvania*

JDC/jld
Enclosure
cc: Per Certificate of Service

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 :

**PETITION TO INTERVENE OF
THE SUSTAINABLE ENERGY FUND
OF CENTRAL EASTERN PENNSYLVANIA**

The Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its attorneys, Hawke McKeon & Sniscak LLP, files this Petition to Intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.71, *et seq.* In support of its intervention, SEF avers as follows:

I. BACKGROUND

1. In this proceeding on May 20, 2024, PPL Electric Utilities Corporation (“PPL”) filed for approvals and authorizations (“PPL’s Petition”) necessary to implement its Second Distributed Energy Resources (“DER”) Management Plan (“Second DER Plan”)¹.

2. PPL’s Petition seeks approval to allow PPL to: (1) monitor and control customers’ DERs including output and usage; (2) allow only PPL-approved inverters to be installed by DER customers in the PPL territory; (3) require PPL-approved inverters to be installed on solar photovoltaic systems interconnected prior to the commencement of PPL’s First Distributed Energy Resources Management Plan; and (4) make the Second DER Plan permanent.

¹ Pursuant to a PUC-approved settlement, PPL’s First Distributed Energy Resources Management Plan commenced on January 1, 2021.

3. PPL's Petition, including exhibits is over 7000 pages.

4. SEF is a Pennsylvania corporation established upon the conclusion of PPL's Restructuring Proceeding and pursuant to the terms of the Joint Settlement of that proceeding approved by the Commission's August 27, 1998 Order at Docket No. R-00973954. SEF's mission is to promote and invest in energy efficiency, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers. Inclusive in SEF's mission is to lower barriers to enter the renewable energy space for its clients which include contractors, businesses, and consumers.

5. SEF owns and operates a solar system on its net energy-positive building.

6. SEF's address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania
4250 Independence Drive
Suite 100
Schnecksville, PA 18078

7. The name, address, and telephone number of SEF's attorneys are:

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II. SEF's INTEREST IN THIS PROCEEDING

8. Eligibility to intervene in Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code § 5.72. The Commission's regulations provide that in order to have the ability to intervene, a party must have "a right or interest" sufficient to warrant

intervention, which includes an interest that may be directly affected by the proceeding and which is not being adequately represented by existing participants, and where the petitioner may be bound by the actions of the Commission or where the right or interest is otherwise in the public interest

9. SEF's mission, as noted above, is to promote, invest in, and reduce barriers to energy efficiency, renewable energy and energy education that provides opportunities and benefits for PPL ratepayers. In furtherance of its mission, SEF is engaged in projects that emphasize renewable energy sources, such as solar and wind power development, clean energy technologies, energy conservation and efficiency, as well as energy education.

10. SEF was an active participant in PPL's Second DER Plan at Docket No. P-2019-3010128.

11. SEF's intervention is necessary to insure the development of a complete record on the reasonableness of the continuation of PPL's Second DER Plan. SEF is directly impacted by the outcome of these proceedings as it owns and operates its own solar system on its net energy-positive building. SEF is also affected by the outcome of these proceedings as it facilitates renewable energy projects for contractors, businesses, and consumers in the PPL service territory. SEF has a unique perspective, in keeping with its mission to promote and invest in energy efficiency, renewable energy, and energy education that provide opportunities and benefits for PPL ratepayers, that cannot be represented by any other party to this proceeding, which is in the public interest and which should be considered by the Commission.

12. SEF's late intervention by a few days will not delay or cause prejudice to any current party to this proceeding as SEF will take the proceeding as it stands. To date, the Commission has not established a hearing schedule and PPL has requested an approval date of March 2025.

13. SEF intends to actively participate in this proceeding.

WHEREFORE, the Sustainable Energy Fund of Central Eastern Pennsylvania's intervention has met the intervention standards of 52 Pa. Code § 5.72 and otherwise is in the public interest, SEF requests that the Pennsylvania Public Utility Commission grants its Petition to Intervene in the above-captioned proceeding and grant it full party status.

Respectfully submitted,

/s/ Judith D. Cassel
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*Counsel for The Sustainable Energy Fund of
Central Eastern Pennsylvania*

DATED: July 12, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Chief Administrative Law Judge
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Commonwealth Keystone Building
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crainey@pa.gov

DATE: July 12, 2024

/s/ Judith D. Cassel

VERIFICATION

I, John M. Costlow, President and CEO, on behalf of the Sustainable Energy Fund of Central Eastern Pennsylvania, verify that the facts contained in the foregoing document are true and correct to the best of my knowledge, information and belief. This Verification is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



John M. Costlow
President & CEO
The Sustainable Energy Fund of Central
Eastern Pennsylvania

Dated: July 12, 2024