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File #: 205510

August 2, 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 Second
Distribution Energy Resources Management Plan
Docket No. P-2024-3049223**

Dear Secretary Chiavetta:

Attached for filing is the Prehearing Conference Memorandum of PPL Electric Utilities Corporation in the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/dmc
Attachments

cc: The Honorable John M. Coogan (*via email; w/attachments*)
Certificate of Service

CERTIFICATE OF SERVICE

(Docket No. P-2024-3049223)

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

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Counsel for PPLICA

Date: August 2, 2024


Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM OF
PPL ELECTRIC UTILITIES CORPORATION**

TO ADMINISTRATIVE LAW JUDGE JOHN M. COOGAN:

Pursuant to 52 Pa. Code § 5.222(d) and the Prehearing Order dated July 25, 2024, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) hereby submits this Prehearing Conference Memorandum.

I. BACKGROUND

On May 20, 2024, PPL Electric filed a Petition requesting the Pennsylvania Public Utility Commission’s (“Commission”) 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”), pursuant to Paragraph 62 of the Joint Petition for Settlement of All Issues approved by the Commission at Docket No. P-2019-3010128.

On June 7, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention, Public Statement, and Verification at the above-captioned docket.

On July 1, 2024, the Office of Consumer Advocate (“OCA”) filed an Answer to the Petition.

On July 8, 2024, 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”) filed an Answer, Petition to Intervene, and Protest at the above-captioned docket.

On July 10, 2024, the PP&L Industrial Customer Alliance (“PPLICA”) filed a Petition to Intervene.

On July 12, 2024, the Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”) filed a Petition to Intervene.

On July 24, 2024, a Call-In Telephone Prehearing Conference Notice was issued, scheduling a telephonic prehearing conference for August 6, 2024, at 10:00 AM before Administrative Law Judge John M. Coogan (the “ALJ”).

On July 25, 2024, the ALJ issued a Prehearing Order, which, among other things, directed the parties to file Prehearing Conference Memoranda on or before August 2, 2024.

II. SERVICE OF DOCUMENTS

PPL Electric’s attorneys in this proceeding are Kimberly A. Klock, Esquire, Michael J. Shafer, Esquire, David B. MacGregor, Esquire, Devin T. Ryan, Esquire, and Megan E. Rulli, Esquire. PPL Electric requests that Devin T. Ryan be listed as the recipient for service. Mr. Ryan’s contact information is provided below:

Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
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PPL Electric also requests that Ms. Klock, Mr. Shafer, Mr. MacGregor, and Ms. Rulli be added to any informal e-mail distribution lists in this proceeding. Ms. Klock’s e-mail address is kklock@pplweb.com, Mr. Shafer’s e-mail address is mjshafer@pplweb.com, Mr. MacGregor’s e-

mail address is dmacgregor@postschell.com, and Ms. Rulli's e-mail address is mrulli@postschell.com. In addition, PPL Electric agrees to receive service of documents electronically in this proceeding.

The lead representative on behalf of PPL Electric for purposes of the prehearing conference will be Mr. Ryan.

III. DISCOVERY

In light of the schedule needed to facilitate a Commission ruling by its February 20, 2025 public meeting (see Section IV, *infra*), PPL Electric proposes the following modifications to the Commission's discovery rules:

1. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
2. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
3. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) calendar days of service of written objections.
4. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) calendar days of service of such motions.
5. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
6. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

The Company also is not aware of any outstanding discovery disputes. The Company is willing to work with the parties, through informal discovery, to expedite discovery.

IV. PROCEDURAL SCHEDULE

PPL Electric proposes the following procedural schedule, which is designed to facilitate Commission approval of the Petition by the February 20, 2025 public meeting, as requested in PPL Electric’s Petition:

Other Parties’ Direct Testimony	August 27, 2024
Rebuttal Testimony	September 26, 2024
Surrebuttal Testimony	October 9, 2024
Hearing/Oral Rejoinder Testimony	October 16-17, 2024
Main Briefs	November 7, 2024
Reply Briefs	November 20, 2024
Recommended Decision	December 20, 2024
Exceptions	January 10, 2025
Replies to Exceptions	January 20, 2025
Final Order	February 20, 2025

Commission approval by the February 20, 2025 public meeting is necessary to ensure that the Company has sufficient time to implement the Second DER Management Plan before the current pilot program ends on March 21, 2025.

PPL Electric notes, however, that under Paragraph 62 of the Settlement approved in the DER Management Plan proceeding at Docket No. P-2019-3010128, the Company reserved the right to request that the Commission continue the existing DER Management pilot program until litigation in this proceeding concludes. Therefore, to provide the parties, the ALJ, and the Commission more time for the instant litigation, PPL Electric would be willing to explore an extension of the current pilot program until 30 days after the Commission’s Final Order in this

proceeding.

V. PUBLIC INPUT HEARINGS

PPL Electric is not aware of any substantial consumer interest concerning this proceeding that would warrant public input hearings.

VI. WITNESSES AND ISSUES

The Company’s list of intended witnesses and issues to be addressed is provided below. PPL Electric reserves the right to call additional witnesses or substitute witnesses, as necessary, to address issues that may arise during the course of this proceeding.

Statement Number	Witness	Subject Matter
1	Salim Salet Vice President – TD&S Engineering & Construction PPL Services Corporation 827 Hausman Road Allentown, PA 18104	<ol style="list-style-type: none"> 1. Overview and history of the Company’s First DER Management Plan; 2. Overview of the Company’s proposal to implement the Second DER Management Plan; 3. Describe the Company’s requested tariff modifications; 4. Outline the requested Commission approvals; and 5. Explain how the Second DER Management Plan will leverage the Company’s investments, existing technologies, and innovation.
2	Aliesha Dombrowski-Diamond Supervisor – Distribution Operations Engineering & Energy Resource Management PPL Electric Utilities Corporation 1639 Church Road Allentown, PA 18104	<ol style="list-style-type: none"> 1. Overview the technologies that facilitate PPL Electric’s management of DERs; 2. Overview the Company’s DER management devices; 3. Describe the Company’s field operations and experiences installing DER management devices; 4. Outline the smart inverter testing and certification process; and 5. Address the Company’s capability to adapt to future changes in DER systems and inverter technology.

3	Cody M. Davis Senior Manager of Distribution and Grid Modernization Electric Power Engineers, LLC 1904 S. First Street Champaign, IL 61820	<ol style="list-style-type: none"> 1. Overview of the Pilot Program; 2. Detail the use cases listed in the Second Revised Pilot Implementation Plan; and 3. Detail other use cases the Company analyzed during the Pilot Program.
4	Reigh A. Walling Proprietor Walling Energy Systems Consulting, LLC 438 Vischer Ferry Road Clifton Park, NY 12065	<ol style="list-style-type: none"> 1. Development, standards, and requirements of IEEE 1547-2018; 2. Operational challenges created by DER on electric distribution systems; 3. Operational benefits of utility monitoring and management of DERs; and 4. Potential future consequences of integration of DERs without adequate utility visibility and management.
5	Jay Johnson Chief Technology Officer DER Security Corp 1 Wells Road Scotts Valley, CA 95066	<ol style="list-style-type: none"> 1. Development of UL 1741 Supplement SB; and 2. Describe how the Second DER Management Plan builds upon the standard's purpose and requirements for smart inverters.
6	Dr. Elizabeth Cook Owner, EMC ² Collective Power, LLC 169 Irwin Avenue Pittsburgh, PA 15202	<ol style="list-style-type: none"> 1. Overview the status of solar development in Pennsylvania; 2. Electric utilities' experiences with DERs; and 3. Demonstrate the need for the Second DER Management Plan to facilitate solar development in Pennsylvania.
7	Lee Krevat CEO Krevat Energy Innovations LLC 3530 NW 2 nd Ave Camas, WA 98607	<ol style="list-style-type: none"> 1. Describe how utility monitoring and management of DERs can encourage renewable energy development and combat climate change; and 2. Describe the timeliness of the Second DER Management Plan to avoid problems seen in other jurisdictions without utility monitoring and management, and to leverage the opportunities presented by monitored and managed DERs.

8	Dr. Karen Miu Professor of Electrical and Computer Engineering Drexel University 3141 Chestnut Street Philadelphia, PA 19104	<ol style="list-style-type: none"> 1. Address the need for the Company to continue monitoring and managing DERs under the Second DER Management Plan; 2. Describe issues faced by PPL Electric before its ability to monitor and manage DERs; and 3. Describe the distribution system's more recent performance with the ability to monitor and manage DERs.
9	Kevin Underwood Principal Cybersecurity Architect PPL Services Corporation 645 Hamilton Street, Suite 300 Allentown, PA 18101	<ol style="list-style-type: none"> 1. Address the cybersecurity architecture related to the Second DER Management Plan.

VII. PROTECTION OF CONFIDENTIAL INFORMATION

If necessary, PPL Electric will timely submit an appropriate Motion for Protective Order.

VIII. SETTLEMENT

As of filing this Prehearing Conference Memorandum, no formal settlement discussions have been held. However, PPL Electric remains willing to discuss settlement with the other parties to resolve all or some of the issues in this proceeding.

Respectfully submitted,



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Dated: August 2, 2024

Attorneys for PPL Electric Utilities Corp.