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August 2, 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 Prehearing Memorandum 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', with a long horizontal flourish extending to the right.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to the PP&L Industrial Customer Alliance

Attachment

c: Administrative Law Judge John M. Coogan (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).

VIA E-MAIL

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Certificate of Service

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Adeolu A. Bakare

Counsel to the PP&L Industrial Customer Alliance

Dated this 2nd day of August, 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 :

**PREHEARING MEMORANDUM
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Pursuant to the July 25, 2024, Prehearing Conference Order issued by Administrative Law Judge (“ALJ”) John M. Coogan, the PP&L Industrial Customer Alliance (“PPLICA”) hereby submits this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On May 20, 2024, PPL Electric Utilities Corporation, Inc. (“PPL” or “Company”) petitioned the Pennsylvania Public Utility Commission (“PUC” or “Commission”) for approval of tariff modifications and other authorizations needed to implement PPL’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.

On July 10, 2024, PPLICA filed a Petition to Intervene in this proceeding. A description of PPLICA is set forth in Paragraph 1 of PPLICA’s Petition to Intervene.

A Prehearing Conference has been scheduled in this proceeding for August 6, 2024.

II. ANTICIPATED ISSUES AND SUB-ISSUES

PPLICA intends to address the Plan's impact on rates that PPLICA members pay for electric service, specifically as it relates to the proposed cost recovery for expenses incurred under PPL's Plan. PPLICA anticipates pursuing these issues during the course of this proceeding and reserves the right to raise further issues and to respond to all issues raised by other parties.

III. PROPOSED WITNESSES

PPLICA is currently evaluating whether it will sponsor testimony in this proceeding. If PPLICA opts to sponsor testimony, it will immediately inform the ALJ and the parties of any intended witnesses and their areas of testimony. PPLICA also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

PPLICA will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule. PPLICA will also cooperate with the ALJ and the parties to develop appropriate discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ.

V. POSSIBILITY OF SETTLEMENT

PPLICA is willing to participate in discussions with the parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By  _____

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Dated: August 2, 2024