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August 5, 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;
PREHEARING CONFERENCE MEMORANDUM OF THE SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of The Sustainable Energy Fund of Central Eastern Pennsylvania.

Thank you for your attention to this matter. If you have any questions, please contact me.

Sincerely,

/s/ Judith D. Cassel

Judith D. Cassel
Micah R. Bucy

Counsel for The Sustainable Energy Fund of Central Eastern Pennsylvania

JDC/das
Enclosure

cc: Administrative Law Judge John M. Coogan (jcoogan@pa.gov)
Per Certificate of Service

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 :

**THE SUSTAINABLE ENERGY FUND OF
CENTRAL EASTERN PENNSYLVANIA'S
PREHEARING CONFERENCE MEMORANDUM**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE JOHN M. COOGAN:

Pursuant to Your Honor's July 25, 2024 Prehearing Conference Order and 52 Pa. Code § 5.222(d), The Sustainable Energy Fund of Central Eastern Pennsylvania ("SEF") submits this Prehearing Conference Memorandum.

I. HISTORY OF 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 proposes to expand on the Company's First DER Management Plan's Pilot Program ("Pilot Program"), and Rule 12 of its tariff, which were approved pursuant to the Joint Petition for Settlement of All Issues in Docket No. P-2019-3010128. Office of Small Business Advocate ("OSBA") and the Office of Consumer Advocate ("OCA") filed Answers.

American Home Contractors, Inc. Enphase Energy, Inc., the Solar Energy Industries Association, SolarEdge Technologies, Inc., Sun Directed, Sunnova, Ind., Tesla, Inc., and Trinity

Solar, LLC (“Joint Solar Parties”) filed an Answer, Petition to Intervene, and Protest to the above-captioned docket.

PP&L Industrial Customer Alliance (“PPLICA”) and SEF filed Petitions to Intervene which are still pending in this proceeding.

II. PREHEARING CONFERENCE

Judith Cassel and Micah Bucy will be the attorneys representing The Sustainable Energy Fund of Central Eastern Pennsylvania in this proceeding.

III. ISSUES

SEF intends to address the barriers to entry for contractors, businesses, and consumers for participation into this program and whether these barriers increase costs and limited solar development in Pennsylvania. SEF is also concerned that extending the Pilot Program in advance of its completion deprives parties of all information necessary to make informed decisions about such an extension including but not limited to whether the Pilot Program met its commitments under the Settlement, whether the costs outweigh the benefits, and who will bear the costs incurred. As an owner/operator of a solar system, SEF intends to address issues related to net energy usage and surplus supply to the grid. SEF is also concerned with the risk of cyber attacks on residential energy systems.

IV. SERVICE

SEF consents to electronic service and proposes the parties agree to accept service of all documents by email by 4:30 PM as satisfying in-hand delivery. Service of documents in this proceeding shall be accepted on behalf of SEF by the following counsel:

Judith Cassel, PA Attorney ID. No. 209393
Micah Bucy, PA Attorney ID. No. 320196
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V. WITNESSES

SEF is currently evaluating who will sponsor testimony on SEF's behalf. SEF will inform parties of any witnesses SEF elects to sponsor and their areas of testimony. SEF will participate in all discovery, cross-examinations, and briefing.

VI. PROPOSED LITIGATION AND PROCEDURAL SCHEDULE

SEF will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural and discovery schedule.

VII. SETTLEMENT

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

Respectfully submitted,

/s/ Judith D. Cassel

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*Counsel for The Sustainable Energy Fund of Central
Eastern Pennsylvania*

DATED: August 5, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this day served, via email, 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).

By Email:

The Honorable Charles E. Rainey Jr.
Chief Administrative Law Judge
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DATE: August 5, 2024

/s/ Judith D. Cassel