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File #: 203590

August 27, 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 a Default Service Program and Procurement Plan for the Period June 1, 2025 through May 31, 2029  
Docket No. P-2024-3047290**

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Dear Secretary Chiavetta:

Attached for filing please find the Joint Stipulation for Admission of Evidence on behalf of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/kl  
Attachment

cc: The Honorable F. Joseph Brady (*via email; w/attachment*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing 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).

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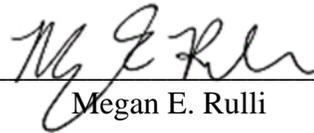
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Date: August 27, 2024

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Megan E. Rulli

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :  
for Approval of a Default Service Program and : Docket No. P-2024-3047290  
Procurement Plan for the Period June 1, 2025 :  
through May 31, 2029 :

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**JOINT STIPULATION FOR ADMISSION OF EVIDENCE**

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**TO ADMINISTRATIVE LAW JUDGE F. JOSEPH BRADY:**

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), and Retail Energy Supply Association (“RESA”), parties in the above-captioned proceeding (hereinafter collectively referred to the “Joint Petitioners” or “Parties”), hereby submit this *Joint Stipulation for Admission of Evidence* in the above-captioned proceeding (the “Evidence Stipulation”). In support of the Evidence Stipulation, the Joint Petitioners represent as follows:

1. On March 12, 2024, PPL Electric filed a Petition requesting Public Utility Commission (“Commission”) approval of its sixth Default Service Program and Procurement Plan (“DSP VI Program”) to establish the terms and conditions under which PPL Electric will acquire and supply Default Service or provider of last resort service, from June 1, 2025 through May 31, 2029. Together with the Petition, PPL Electric filed the direct testimony of four witnesses in support of the DSP VI Program.
2. On March 14, 2024, CAUSE-PA filed a Petition to Intervene in this proceeding.
3. On March 20, 2024, OCA filed an Answer to the Company’s Petition.

4. On March 28, 2024, PPLICA filed a Petition to Intervene in this proceeding.
5. On April 4, 2024, Calpine filed a Petition to Intervene in this proceeding.
6. On April 18, 2024, NRG and RESA filed Petitions to Intervene in this proceeding.
7. On April 19, 2024, OSBA filed a Notice of Intervention, Public Statement, and Verification.
8. Also on April 19, 2024, Shell filed a Petition to Intervene in this proceeding.
9. On April 26, 2024, Administrative Law Judge F. Joseph Brady (the “ALJ”) held a prehearing conference, at which time a procedural schedule was adopted.
10. In accordance with the procedural schedule, OCA, OSBA, CAUSE-PA, and RESA submitted their direct testimony and exhibits on June 4, 2024. PPLICA, NRG, and Shell did not submit direct testimony in this proceeding.
11. On July 1, 2024, PPL Electric, OCA, CAUSE-PA, and RESA submitted written rebuttal testimony and exhibits. No other party submitted rebuttal testimony in this proceeding.
12. On July 15, 2024, OCA and RESA submitted surrebuttal testimony and exhibits. No other party submitted surrebuttal testimony in this proceeding.
13. On July 17, 2024, counsel for the Company advised the ALJ that the Parties agreed to waive cross-examination of all Parties’ witnesses and requested that all witnesses be excused from appearing for the hearings scheduled for July 17 and 18, 2024.<sup>1</sup>
14. Also on July 17, 2024, the ALJ advised the Parties that the evidentiary hearings would be canceled, and that the Parties’ written testimony and exhibits could be admitted into the record by stipulation.

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<sup>1</sup> Counsel for Shell was consulted regarding the waiver of cross-examination but did not respond.

15. The Joint Petitioners request that the ALJ admit the testimony and the exhibits listed below into the record in the above-captioned proceeding:

**I. Testimony and Exhibits of PPL Electric**

16. PPL Electric Statement No. 1 – Direct Testimony of Andrew Castanaro, and PPL Electric Exhibit 1 (Petition and Attachments)<sup>2</sup> and PPL Electric Exhibits AC-1, AC-2, AC-3, AC-4, and AC-5.

17. PPL Electric Statement No. 2 – Direct Testimony of A. Joseph Cavicchi, Appendix A to PPL Electric Statement No. 2, and PPL Electric Exhibits JC-1, JC-2, JC-3, JC-4, JC-5, JC-6, and JC-7.

18. PPL Electric Statement No. 3 – Direct Testimony of Melinda Stumpf and PPL Electric Exhibits MS-1, MS-2, and MS-3.

19. PPL Electric Statement No. 4 – Direct Testimony of Bethany Johnson, PPL Electric Exhibit BLJ-1, and Attachment K to the Petition (Pro Forma Tariff provisions for the Generation Supply Charge-1, the Generation Supply Charge-2, and the Transmission Service Charge).

20. PPL Electric Statement No. 1-R – Rebuttal Testimony of Andrew Castanaro and PPL Electric Exhibits AC1-R and AC2-R.

21. PPL Electric Statement No. 2-R – Rebuttal Testimony of A. Joseph Cavicchi.

22. PPL Electric Statement No. 3-R – Rebuttal Testimony of Melinda Stumpf (PUBLIC AND CONFIDENTIAL versions) and PPL Electric Exhibits MS1-R, MS2-R, MS3-R, MS4-R, MS5-R, MS6-R, MS7-R, MS8-R, and MS9-R.

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<sup>2</sup> Attachment K to the Petition is sponsored by PPL Electric witness Johnson.

**II. Testimony and Exhibits of the OCA**

23. OCA Statement 1 – Direct Testimony of Serhan Ogur and Appendix A to OCA Statement 1.

24. OCA Statement 2 – Direct Testimony of Barbara Alexander (PUBLIC and CONFIDENTIAL versions) and Exhibits BA-1, BA-2, BA-3, and BA-4.

25. OCA Statement 1R – Rebuttal Testimony of Serhan Ogur.

26. OCA Statement 2R – Rebuttal Testimony of Barbara Alexander and Exhibit BA-5.

27. OCA Statement 1SR – Surrebuttal Testimony of Serhan Ogur (PUBLIC and CONFIDENTIAL versions).

28. OCA Statement 2SR – Surrebuttal Testimony of Barbara Alexander and Exhibit BA-1SR.

**III. Testimony and Exhibits of the OSBA**

29. OSBA Statement No. 1 – Direct Testimony of Mark D. Ewen and Exhibit IEC-1.

**IV. Testimony and Exhibits of CAUSE-PA**

30. CAUSE-PA Statement 1 – Direct Testimony of Harry Geller, Appendix A and B to CAUSE-PA Statement 1, CAUSE-PA Exhibit 1, and CAUSE-PA Exhibit 2.

31. CAUSE-PA Statement 1-R – Rebuttal Testimony of Harry S. Geller.

**V. Testimony and Exhibits of RESA**

32. RESA Statement No. 1 – Direct Testimony of Joseph Olikier and RESA Exhibits JO-1, JO-2, JO-3, JO-4, JO-5, JO-6, JO-7, and JO-8.

33. RESA Statement No. 1-R – Rebuttal Testimony of Joseph Olikier.

34. RESA Statement No. 1-SR – Surrebuttal Testimony of Joseph Olikier.

**VI. Motion**

35. The Joint Petitioners request that the above identified testimony and exhibits be moved into the record without a hearing.

36. Consistent with the Protective Order that was entered in this proceeding on May 16, 2024, the Parties request that all filings, statements, and exhibits designated as “CONFIDENTIAL” be placed in non-public folders by the Secretary’s Bureau of the Commission.

37. Verifications for the rebuttal testimony and exhibits of PPL Electric, as well as verifications for the testimony and exhibits of CAUSE-PA, are attached hereto as **Appendix A**, whereas the verifications for the other Parties’ testimony and exhibits were attached to their preserved testimony.

WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request that Administrative Law Judge F. Joseph Brady admit the foregoing testimony and exhibits into the record in this proceeding.

Respectfully submitted,

*Michael W. Hassell*

Date: August 27, 2024

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/s/ Rebecca Lyttle

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Date: August 27, 2024

/s/ Elizabeth R. Marx

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Date: August 27, 2024

Deanne M. O'Dell

Date: August 27, 2024

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# Appendix A

## VERIFICATION

I, Andrew Castanaro, Energy Procurement Manager at PPL Electric Utilities Corporation, hereby state that the facts above set forth 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).

Date: July 18, 2024

DocuSigned by:  
*Andy Castanaro*  
1A17FE9CA6834ZE...  
Andrew Castanaro

## VERIFICATION

I, A. Joseph Cavicchi, Vice President at Analysis Group, hereby state that the facts above set forth 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).

Date: July 18, 2024

DocuSigned by:  
*Joe Cavicchi*  
2245DEE6C694426...  
A. Joseph Cavicchi

## VERIFICATION

I, Melinda Stumpf, Director - Customer Programs at PPL Electric Utilities Corporation, hereby state that the facts above set forth 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).

Date: July 18, 2024

DocuSigned by:  
*Melinda Stumpf*  
B34295FCF42740F...  
Melinda Stumpf

## VERIFICATION

I, Bethany L. Johnson, Senior Director - Regulatory at PPL Services Corporation, hereby state that the facts above set forth 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).

Date: July 18, 2024

DocuSigned by:  
*Bethany L. Johnson*  
158B0C6FA1DC43B...  
Bethany L. Johnson

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

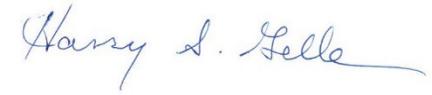
Petition of PPL Electric Utilities Corporation for :  
Approval of a Default Service Program for the : Docket No. P-2024-3047290  
Period of June 1, 2025 through May 31, 2029 :

**VERIFICATION**

I, Harry S. Geller, Esq., verify that the following testimony, exhibits, and appendices were prepared by me or under my direct supervision, and 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:

- **CAUSE-PA Statement 1**  
Direct Testimony of Harry Geller on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania
  - 37 pages of written testimony
  - CAUSE-PA Exhibit 1: Residential Shopping
  - CAUSE-PA Exhibit 2: Confirmed Low Income (Non-CAP) Shopping
  - Appendix A: Resume of Harry S. Geller, Esq.
  - Appendix B: Cited Discovery Responses
  
- **CAUSE-PA Statement 1-R**  
Rebuttal Testimony of Harry S. Geller on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania
  - 18 pages of written testimony

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: August 27, 2024

Harry S. Geller, Esq.