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File #: 206960

September 6, 2024

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265

**Re: 2026 Total Resource Cost (TRC) Test  
Docket No. M-2024-3048998**

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Dear Secretary Chiavetta:

Enclosed for filing are the Comments of PPL Electric Utilities Corporation on the August 1, 2024 Tentative Order of the Pennsylvania Public Utility Commission in the above-referenced proceeding.

Copies are being served as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DR/dmc  
Enclosures

cc: David Edinger (*via email; w/attachments*)  
Tiffany Tran (*via email; w/attachments*)  
Office of Special Assistants (*via email; w/attachments*)  
Certificate of Service

## CERTIFICATE OF SERVICE

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).

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Date: September 6, 2024



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Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

2026 Total Resource Cost (TRC) Test : Docket No. M-2024-3048998

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**COMMENTS OF  
PPL ELECTRIC UTILITIES CORPORATION**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

On August 1, 2024, the Pennsylvania Public Utility Commission (“Commission”) entered its Tentative Order<sup>1</sup> in the above-captioned proceeding. In the Tentative TRC Order, the Commission issued, for public comment, its proposals for modifying the Total Resource Cost Test (“TRC”) as part of its fifth phase (“Phase V”) of the Energy Efficiency and Conservation (“EE&C”) Program. PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) submits these Comments on various aspects of the Tentative TRC Order for the Commission’s consideration as it prepares the Final TRC Order.

**I. BACKGROUND**

PPL Electric is a public utility and an electric distribution company (“EDC”) as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803. PPL Electric furnishes electric distribution, transmission, and default supply services to approximately 1.5 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

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<sup>1</sup> 2026 Total Resource Cost (TRC) Test, Docket No. M-2024-3048998 (Order entered Aug. 1, 2024) (“Tentative TRC Order”).

Pursuant to Act 129 of 2008, P.L. 1592, 66 Pa. C.S. §§ 2806.1 and 2806.2 (“Act 129”), PPL Electric designed and implemented EE&C Plans in Phases I, II, III, and IV.<sup>2</sup> PPL Electric’s EE&C Plans have included a broad portfolio of energy efficiency and energy education programs and initiatives. PPL Electric’s portfolios of programs were designed to provide customer benefits and to meet the energy reduction goals set forth in Act 129. The EE&C Plans have included a range of energy efficiency programs that included every customer segment in PPL Electric’s service territory.

PPL Electric continues to support Act 129 EE&C Programs and appreciates the opportunity to provide input regarding this matter. As an EDC operating EE&C Plan, PPL Electric believes that its Comments will provide the Commission with a valuable perspective in its evaluation of the TRC Test applicable for Phase V.

## **II. COMMENTS OF PPL ELECTRIC**

PPL Electric offers the following Comments on the Commission’s Tentative TRC Order.

### **A. GENERAL ISSUES**

#### **1. TRC Test Assumptions In Other Matters**

PPL Electric has no comment in response to this section.

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<sup>2</sup> See *Petition of PPL Electric Utilities Corp. for Approval of its Energy Efficiency and Conservation Plan*, Docket No. M-2009-2093216 (Order entered Oct. 26, 2009); *Petition of PPL Electric Utilities Corp. for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order entered Mar. 14, 2013) (approving the initial Phase II EE&C Plan); *Petition of PPL Electric Utilities Corp. for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan*, Docket No. M-2012-2334388 (Order entered July 11, 2013) (approving the Phase II EE&C Plan compliance filing); *Petition of PPL Electric Utilities Corp. for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan*, Docket No. M-2015-2515642 (Order entered Mar. 17, 2016) (approving the Phase III EE&C Plan subject to further modifications to be made in a compliance filing); *Petition of PPL Electric Utilities Corp. for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan*, Docket No. M-2015-2515642 (Tentative Order entered June 9, 2016) (tentatively approving the compliance Phase III EE&C Plan); *Petition of PPL Electric Utilities Corp. for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan*, Docket No. M-2015-2515642 (Secretarial Letter dated June 27, 2016) (stating that PPL Electric’s compliance Phase III EE&C Plan had become final without further action by the Commission); *Petition of PPL Electric Utilities Corp. for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan*, Docket No. M-2020-3020824 (Order entered Mar. 25, 2021) (approving the Phase IV EE&C Plan as modified by the partial settlement).

## **2. Frequency Of Review Of The TRC Test**

PPL Electric recommends the TRC Test be set for the entirety of Phase V and remain unchanged. This will allow for fewer unexpected changes that will impact market participants and ensure consistency in EE&C Plan evaluations. A change in TRC Test during Phase V could require a completely new EE&C Plan.

## **3. Level At Which To Calculate And Report TRC Test Results**

The Commission states that “the Phase V Tentative Implementation Order may include a more integrated EE/DR program design that includes ‘daily load shifting’ rather than an event-based DR program design.” (Tentative TRC Order, p. 10.) PPL Electric recommends that the Commission provide additional examples of qualifying “daily load shifting” measures, programs, or both. This will help the Company better understand how the Commission defines daily load shifts and if there would be any constraints or cost limitations to implement this proposal.

Further, the Company agrees that evaluating cost-effectiveness at the measure level would lead to adverse outcomes and recommends screening at the EE&C Plan level.

Also, the Commission proposes to continue to reserve the right to reject any program with a low TRC ratio. (Tentative TRC Order, p. 11.) PPL Electric recommends that the Commission specifically define “low TRC ratio” and include exemptions for re-evaluation with new measures that can produce a new TRC ratio.

## **4. Discount Rate**

PPL Electric has no comment on this section.

## **5. Effective Useful Life**

The Commission acknowledges that “[i]n previous TRC Test Orders stakeholders have suggested various methodologies whereby costs are reduced proportionately to truncated lifetime benefits.” (Tentative TRC Order, p. 12.) “While certain technologies may have an expected useful

life (EUL) greater than 15 years,” the Commission states that “Act 129 is clear about the 15-year limit” and that “any adjustment to the cost ledger would circumvent the legislative directive.” (Tentative TRC Order, p. 12.)

PPL Electric maintains that there is still no adequate methodology to address the artificially reduced cost-effectiveness of the 15-year EUL limit. (Tentative TRC Order, p. 12.) Therefore, PPL Electric recommends that the Commission reconsider proportionally reducing costs to align with benefits in these cases.

## **6. Low-Income Programs**

PPL Electric supports the proposed modification of avoided costs for low-income programs by incorporating into Phase V avoided cost forecasts of the benefit of EDC’s financial savings from their Act 129 low-income energy efficiency (“EE”) programs. (Tentative TRC Order, p. 13.)

## **7. Basis Of TRC Test Impacts**

PPL Electric has no comment on this section.

## **8. Measures Supported By Both Act 129 Programs And Other Funding Streams**

In the Tentative TRC Order, the Commission states that “[c]onsistent with prior TRC Test Orders, the Commission proposes that EDCs only need to factor in, as reductions to cost, the non-Act 129 incentives that are reasonably quantifiable by the EDC at the time the Act 129 transaction is recorded.” (Tentative TRC Order, p. 14.) As “[e]xamples of reasonably quantifiable non-Act 129 incentives,” the Commission explained that such examples “include energy efficiency rebate programs administered by the Pennsylvania Department of Environmental Protection and grants from the Alternative and Clean Energy Program jointly administered by the Pennsylvania Department of Community and Economic Development and the Pennsylvania Department of Environmental Protection.” (Tentative TRC Order, p. 14.)

PPL Electric recommends that the Commission specifically clarify how the incentives, benefits, or both from the Inflation Reduction Act (“IRA”) and Reducing Industrial Sector Emissions in Pennsylvania (“RISE PA”), among other programs and sources of incentives, will be treated from a TRC Test perspective. The plan for incentive stacking, attribution, and other issues remains unresolved by the Tentative TRC Order and should be addressed.

**B. AVOIDED COSTS OF SUPPLYING ELECTRICITY**

**1. Vintage Of Avoided Cost Forecasts**

PPL Electric has no comment on this section.

**2. Avoided Cost Of Electric Energy**

PPL Electric has no comment on this section.

**3. Nominal Vs. Real Dollars**

PPL Electric has no comment on this section.

**4. Line Losses**

PPL Electric has no comment on this section.

**5. Escalation Rate**

PPL Electric has no comment on this section.

**6. Allocation Of Avoided Capacity Costs Between Summer And Winter Peak**

“For the avoided cost of generation capacity, the Commission proposes a 50/50 allocation between summer and winter demand.” (Tentative TRC Order, p. 21.) The Commission explains that “[t]he same 50/50 allocation would apply to the generation capacity Demand Reduction Induced Price Effects (DRIPE) discussed in Section B.10 of th[e] Tentative Order.” (Tentative TRC Order, p. 21.)

PPL Electric recommends a graded escalation of demand for each program year of Phase V instead of a flat 50/50 split. The Company makes this recommendation because the winter peak is increasing as heating demand shifts from towards electric. This progressive approach also aligns with the 15-year load forecast. Notwithstanding, PPL Electric agrees with the Commission that “if PJM elects to formally bifurcate the capacity market, resulting in separate resource clearing prices for summer capacity resources and winter capacity resources,” then the “proposed 50/50 allocation would be unnecessary.” (Tentative TRC Order, p. 23.)

## **7. Avoided Cost Of Generation Capacity**

The Commission states the following on page 24 of its Tentative TRC Order:

When available, the actual zonal [Base Residual Auction (“BRA”)] clearing prices should be used as the values for the avoided cost of generation capacity. When projecting further into the future than the known values, the Commission proposes the following methodology:

- i. Take a simple average of the five most recent BRA clearing prices for the zone. The Commission’s position is that taking a five-year average is prudent because clearing prices vary from year-to-year, and an average will dampen this volatility. For Phase V EE&C plans, EDC/Rate Districts are expected to have actual BRA clearing price values for the 2026/2027 and 2027/2028 delivery years (Act 129 PY18 and PY19).
- ii. Use the averaged value as the avoided cost of capacity for the first year that BRA clearing pricing prices are not available.
- iii. Escalate using a compound annual growth rate of the BLS index for the power sector to calculate the avoided cost of generation capacity in real dollars for the remainder of the forecast horizon.
- iv. Apply the electric escalation and inflation rates to convert real dollars to nominal dollars.

(Tentative TRC Order, p. 24.)

The recent clearing prices in the 2025/2026 BRA were extremely high (\$269.92/MW-day) based on a combination of factors, including load growth, generation deactivations, and changes to risk modeling. The clearing prices may be as high or even higher in the 2026/2027 BRA to be

held in December as well. Although the five-year average discussed in subpart i. is designed to dampen volatility, PPL Electric questions whether the Commission has fully considered how this level of volatility in the BRA clearing prices will affect the avoided cost of generation capacity, particularly when the 2025/2026 BRA results were released on July 30, 2024, *i.e.*, two days before the Tentative TRC Order was issued on August 1, 2024.

## **8. Avoided Cost Of Transmission And Distribution Capacity**

The Commission has requested comments on the following observations by the Statewide Evaluator (“SWE”):

- The heat maps of deferral value for each EDC/Rate District clearly show that avoided T&D benefits are concentrated in specific locations that are highly loaded and or expected to grow. Other locations have little or no deferral value. Taking a load-weighted average across an EDC/Rate District territory simplifies the accounting but may mute important price signals regarding where load relief would be most beneficial. In the Conclusions and Recommendations section of its report, the SWE describes a low-medium-high value location taxonomy that could preserve some of the locational value. This suggestion would add a spatial component to EE&C program tracking or require EDCs to map participants to distribution circuit after the fact.
- Similarly, the SWE study notes that individual locations tend to be summer-peaking or winter-peaking, but rarely both. A load-weighted average at the EDC/Rate District territory level assigns a mix of summer and winter value to all demand reductions. Like the low-medium-high suggestion above, a seasonal classification scheme would help match EE&C plan measures with system need. A seasonal classification could justify more aggressive marketing or incentives on cooling equipment in summer-peaking areas and focus outreach for electric heating conservation or load shifting measures in winter-peaking areas.
- The SWE also raises the possibility of a non-wires alternative (NWA) demonstration project for the EDCs. We see this as a logical conclusion based on the concentration of deferral value in certain pockets of a territory. The goal of an NWA would be to assess if EE&C resources in combination with other resources can be used to modify the load shapes, bend the growth, and avoid or defer likely upgrades.

On the first point, PPL Electric recommends taking a load-weighted average across the electric distribution company (“EDC”) to simplify accounting and reporting. The additional work required to map participants to distribution circuits is not preferred.

Next, PPL Electric does not recommend seasonal classification, due to perceived customer incentive equity issues across the service territory.

Lastly, PPL Electric recommends that any non-wires alternative (“NWA”) demonstration project be optional for Phase V.

**9. Compliance with Alternative Energy Portfolio Standards Act (AEPS)**

PPL Electric has no comment on this section.

**10. Price Suppression Effects**

PPL Electric has no comment on this section.

**11. End-Use Adjustments**

PPL Electric agrees with the Commission's proposal to make the end-use load shapes in the Avoided Cost Calculator (“ACC”) optional resources for EDCs and evaluation CSPs. (Tentative TRC Order, p. 33.)

**12. Reductions In Arrearages And Collection Costs**

PPL Electric agrees with the Commission’s proposal to incorporate the benefit of EDC’s financial savings from Act 129 low-income EE programs into Phase V avoided cost forecasts. (Tentative TRC Order, p. 34.)

**C. OTHER TRC BENEFITS**

**1. Quantifying Water Impacts**

PPL Electric has no comment on this section.

**2. Monetizing Water Impacts**

PPL Electric has no comment on this section.

### **3. Quantifying Fossil Fuel Impacts**

PPL Electric has no comment on this section.

### **4. Interactive Effects**

PPL Electric has no comment on this section.

### **5. Monetizing Fossil Fuel Impacts**

PPL Electric has no comment on this section.

### **6. O&M Benefits**

PPL Electric has no comment on this section.

### **7. Societal Benefits**

Although the Commission recognizes that “EE&C measures can create societal benefits such as reduced greenhouse gas emissions,” the Commission chooses not to include societal benefits in the TRC Test. (Tentative TRC Order, pp. 35, 44.)

PPL Electric recommends that societal benefits be included because existing literature and research clearly indicate monetizable benefits around health, safety, medical cost, air quality, etc.<sup>3</sup> Further, potential alternative legislation, such as the Regional Greenhouse Gas Initiative (“RGGI”), should not directly impact decisions related to Act 129. As noted by the Commission, the TRC Test “is not a static, one-size-fits-all tool” and “can incorporate different factors and evaluate variables in different ways, as determined by the jurisdictional entity using it.” (Tentative TRC Order, p. 5.)

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<sup>3</sup> See *Making Health Count: Monetizing the Health Benefits of In-Home Services Delivered by Energy Efficiency Programs*, ACEEE, May 5, 2020, <https://www.aceee.org/research-report/h2001>; *Public Health Benefits per kWh of Energy Efficiency and Renewable Energy in the United States: A Technical Report*, Environmental Protection Agency, May 2021, [https://www.epa.gov/sites/default/files/2021-05/documents/bpk\\_report\\_second\\_edition.pdf](https://www.epa.gov/sites/default/files/2021-05/documents/bpk_report_second_edition.pdf).

## **D. TRC COSTS**

### **1. Program Administration And Overhead**

In its Tentative TRC Order, the Commission states that “[t]he shipping cost of the kits would still be treated as a non-incentive program delivery cost.” (Tentative TRC Order, p. 46.)

PPL Electric recommends that the Commission consider delivery costs for kits to be categorized as participant incentive. Kits often contain important educational materials and instructions associated with the shipped products that would normally be conveyed via Implementation Conservation Service Provider (“ICSP”) labor.

### **2. Incremental Costs**

PPL Electric has no comment on this section.

### **3. Act 129 Incentives**

PPL Electric has no comment on this section.

### **4. Incentives From Outside Of Act 129**

As noted in Section II.A.8, *supra*, PPL Electric recommends that the Commission specifically clarify how the incentives, benefits, or both from the IRA and RISE PA, among other programs and sources of incentives, will be treated from a TRC Test perspective. The plan for incentive stacking, attribution, and other issues remains unresolved by the Tentative TRC Order and should be addressed.

## **E. FUEL SWITCHING**

### **1. ENERGY STAR Requirement**

PPL Electric has no comment on this section.

### **2. Increased Fuel Consumption**

PPL Electric has no comment on this section.

**F. NET-TO-GROSS (NTG) ISSUES**

**1. Use Of NTG Research**

PPL Electric has no comment on this section.

**2. Treatment Of Incentives To Free-Riders**

PPL Electric has no comment on this section.

**3. Treatment Of NTG For TRC Benefits**

PPL Electric has no comment on this section.

**G. DEMAND RESPONSE**

**1. DR Testing If DR Is Included In Phase V**

Concerning demand response (“DR”) for Phase V, the Commission sets forth the following in its Tentative TRC Order:

The Commission has not yet determined DR (or EE) targets for a potential Phase V of Act 129. Currently, the Commission expects to release the Phase IV SWE’s DR MPS in early 2025. The results of that analysis will inform the decision relative to a potential Phase V. If it is determined to proceed with a Phase V, the Commission anticipates a Phase V Implementation Tentative Order in spring 2025 and a Final Implementation Order in summer 2025. Additionally, the Commission has made no determination regarding the frequency, duration, or notification time of DR events. The Commission expects the SWE’s DR MPS to include a recommendation on these 54 issues as these parameters have significant impacts on the amount of DR potential in an EDC service territory and the cost to acquire it. This docket will not address issues related to whether DR should be included in or excluded from a potential Phase V. Stakeholders are invited to comment on the proposed cost-effectiveness methodology for DR in this proceeding. Our discussion and proposal herein, as well as any stakeholder comments at this docket, merely presumes for discussion and comment purposes that a potential Phase V will include DR. The Commission proposes guidance on how to calculate the TRC costs and benefits for DR in this Tentative Order if Phase V EE&C plans include DR programming.

(Tentative TRC Order, pp. 53-54.)

Although not addressed in the docket, PPL Electric recommends a coincident peak demand target or dispatchable DR programs, but not both, for Phase V. The Commission previously

mentioned the long-term benefits of demand side management (“DSM”) over DR.<sup>4</sup> PPL Electric also is concerned about the lack of consistency related to coincident peak demand versus dispatchable DR from Phase to Phase of Act 129 EE&C.

**2. Calculations Of TRC Benefits**

PPL Electric has no comment on this section.

**3. Participant Cost Assumption**

PPL Electric has no comment on this section.

**4. Measure Life**

PPL Electric has no comment on this section.

**H. EXHIBITS**

**1. Avoided Cost Calculator (ACC)**

PPL Electric has no comment on this section.

**2. Arrearages**

A link to the *Impact of Act 129 Low-income Programs on Arrearages and Collections Study* is provided on page 59 of the Tentative TRC Order.

PPL Electric supports incorporating the benefits of EDC financial savings as noted in that study. Also, the SWE did not analyze the change in the number of reconnections because the EDCs would not realize any financial savings from reduced reconnections. However, PPL Electric recommends calculating those savings for the Final TRC Order because those customer benefits from the EE&C programs should be considered.

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<sup>4</sup> See *Energy Efficiency and Conservation Program*, Docket No. M-2020-3015228, pp. 61-62 (Order entered June 18, 2020).

### **3. DRIPE**

The Tentative TRC Order provides a link to the *Pennsylvania Demand Reduction Induced Price Effects Study*. (Tentative TRC Order, p. 60.)

PPL Electric supports the inclusion of Demand Reduction Induced Price Effects (“DRIPE”) avoided costs for Phase V. PPL Electric also recommends that the Commission elect to include elements of the Societal Cost Test.

### **4. T&D Study**

The Commission also provides a link to the *Avoided Cost of Transmission and Distribution Capacity Study* in its Tentative TRC Order. (Tentative TRC Order, p. 60.)

The study robust, and the results are similar to Phase IV. PPL Electric agrees with the inclusion of the study, as long as the load weighted EDC values are utilized. The study team does recommend that the Commission, EDCs, and Act 129 stakeholders “consider a more granular perspective on avoided T&D costs within Act 129,” including the consideration of a NWA demonstration project for each EDC. *Avoided Cost of Transmission and Distribution Capacity Study*, p. 95. As stated in Section II.B.8, *supra*, PPL Electric recommends that any NWA demonstration project be optional for Phase V.

### **5. Incremental Cost Database**

PPL Electric has no comment on this section.

## **I. APPENDIX A**

### **1. Table 7: Supporting Algorithms**

Table 7 of Appendix A of the Tentative TRC Order presents the supporting algorithms. PPL Electric notes that the formula for TRC Benefits<sub>gross</sub> is missing capacity benefits, similar to Phase IV. The Company recommends that the formula be corrected in the Final TRC Order.

### III. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that the Commission take these Comments into consideration in preparing its Final TRC Order.

Respectfully submitted,



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