

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Docket No. P-2024-3047290

PPL Electric Utilities Corporation

Statement No. 1-R

Rebuttal Testimony of Andrew Castanaro

Topics Addressed: Fixed Price Full Requirements Contracts
 Long Term Block Product
 Solar Alternative Energy Credit Procurement
 Time of Use Program

Date: July 1, 2024

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Andrew Castanaro. My business address is 827 Hausman Road, Allentown,
4 Pennsylvania 18104.

5
6 **Q. Have you previously filed testimony in this case?**

7 A. Yes. I submitted Direct Testimony, PPL Electric Statement No. 1, on March 12, 2024.

8
9 **Q. What is the purpose of your rebuttal testimony?**

10 A: The purpose of my rebuttal testimony on behalf of PPL Electric Utilities Corporation
11 (“PPL Electric” or the “Company”) is to respond to certain issues and concerns raised in
12 the written direct testimony submitted by other parties. Specifically, my rebuttal
13 testimony will address the following:

- 14 ○ Comments by Office of Consumer Advocate (“OCA”) witness Serhan Ogur and
15 Office of Small Business Advocate (“OSBA”) witness Mark Ewen regarding the
16 Company’s proposed change to the procurement dates for its fixed-price, full-
17 requirements, load-following (“FPFR”) products from the current months of April
18 and October to the months of February and July.
- 19 ○ Comments by Mr. Ewen regarding the proposal to procure 24-month FPFR
20 products and eliminate 6-month FPFR products.
- 21 ○ Objections from Retail Energy Supply Association (“RESA”) witness Joseph
22 Oliker to the change from 6-month and 12-month FPFR products to 12-month and
23 24-month FPFR products.

- 1 ○ Objections by Mr. Olikier to the Company’s proposal to acquire a portion of its
- 2 required Tier 1 Solar Alternative Energy Credits (“AECs”) through a long-term
- 3 contract.
- 4 ○ Objections of Mr. Ogur to the Company’s proposal to acquire a 10-year block
- 5 supply that also requires the supplier to provide capacity.
- 6 ○ Objections of Mr. Ogur to the elimination of differences in the on-peak hours
- 7 between summer and winter Time of Use (“TOU”) rates, and his proposal to
- 8 require all TOU capacity costs to be recovered in summer on-peak rates.
- 9 ○ Proposal of OCA witness Barbara Alexander that the Company develop one or
- 10 more pilot programs to reduce on-peak usage with demand response features.

11

12 **Q. Are you sponsoring any exhibits as part of your rebuttal?**

13 A. Yes, I am sponsoring PPL Electric Exhibits AC1-R through AC3-R.

14

15 **II. FIXED-PRICE FULL-REQUIREMENTS CONTRACTS TERMS**

16 **Q. Have any parties commented on the Company’s proposal to shift the procurement**

17 **dates for FPFR products from semi-annually, April and October to February and**

18 **July?**

19 A. Yes. OCA witness Ogur expressed doubts that, in the long-term, auction prices in

20 February and July will continue to be lower than in April and October. But he is not

21 opposed to the change, as he does not believe in the long term the prices will be higher.

22 Further he recognizes that a longer lead time would allow for considering and

1 implementing contingency plans in the event a bid fails or the Pennsylvania Public Utility
2 Commission (“PUC” or “Commission”) rejects a bid.

3 OSBA witness Ewen expresses concern that a longer time between procurement
4 and delivery may raise bid prices due to perceived increased risk.

5
6 **Q. Please respond to Mr. Ogur’s and Mr. Ewen’s concerns.**

7 A. The analysis performed by the Company in support of the additional lead time was based
8 on historic prices, and the results indicated that February and July produced the lowest
9 prices. As I noted in my direct testimony, historic prices are not always indicative of
10 future prices, but the Company believes its proposal provides an opportunity to achieve
11 savings for customers. Further, as Mr. Ogur notes, the slightly longer lead time provides
12 additional time to develop and implement a contingency plan in the event a bid is
13 unsuccessful.

14 In response to Mr. Ewen’s concern that a longer lead time may raise bid prices, I
15 note that PECO currently has the longest lead time from auction to delivery of the
16 Pennsylvania EDCs, and longer than the lead time proposed by PPL Electric. There is no
17 indication from PECO’s default service rates that the longer lead time has increased bid
18 prices.¹ Finally, the Company consulted with its expert witness, Joseph A. Cavicchi, on
19 the impact of a longer lead time. For reasons explained in Mr. Cavicchi’s rebuttal

¹ See Exhibit AC1-R. While Mr. Ewen’s concerns were regarding Small C&I, the Company found similar results for the Residential PTC. See www.papowerswitch.com for historic price comparisons.

1 testimony, he does not have any concerns about adverse effects upon bid prices with the
2 proposed small increase in lead time.

3
4 **Q. Have any parties expressed concern or opposition to the Company's proposal to**
5 **transition from FPFR contracts with 6- and 12-month terms to FPFR contracts with**
6 **12- and 24-month terms?**

7 A. Yes. OSBA witness Ewen states that he continues to evaluate the move to using 12- and
8 24-month contract terms for Small Commercial and Industrial ("Small C&I") customers.
9 Mr. Ewen stated that he wanted to review the rate of shopping by Small C&I customers
10 because, in his opinion, when shopping rates vary over time, there is more risk to
11 wholesale suppliers bidding on longer term supply procurements.

12 RESA witness Oliker opposes the elimination of 6-month FPFR contracts and the
13 adoption of 24-month contracts. He asserts that PPL Electric's witness Mr. Cavicchi
14 recognizes that it would be more difficult for EGSs to compete with default service rates
15 if they are established over a long term.

16
17 **Q. In response to Mr. Ewen's concern, has the Company undertaken an analysis of**
18 **rates of shopping by Small C&I customers?**

19 A. Yes. PPL Electric Exhibit AC2-R presents data on the number and percentage of Small
20 C&I customers who have shopped since January of 2018. As that data shows, the
21 percentage of Small C&I customers who are shopping has remained relatively steady
22 around 50% and make up approximately 80% of the total load. The fact that Small C&I
23 rates have historically stayed stable should be responsive to Mr. Ewen's concern that PPL

1 Electric's proposal to obtain 24-month FPFR products could present greater risk to
2 wholesale bidders if shopping rates vary substantially.

3
4 **Q. Please respond to Mr. Oliker's opposition to PPL Electric's proposed change to the**
5 **FPFR product mix.**

6 A. The Company has observed increased volatility in the energy markets and, in turn,
7 increased volatility in its Price to Compare ("PTC") under the product mix in DSP V.
8 Therefore, the Company is proposing to transition to a 12- and 24-month product for
9 FPFR to achieve more price stability for customers. The 12- and 24-month product mix is
10 a straightforward procurement strategy and is similar to other Pennsylvania peer EDC
11 Default Service Plans. This procurement approach will still maintain a change in the PTC
12 every 6 months, which is responsive to market changes, but will mitigate some volatility
13 to prices.

14
15 **III. SOLAR AEC PROCUREMENT**

16 **Q. Please summarize the Company proposal to procure AECs for default service load.**

17 A. Under the proposed DSP VI Program, AECs will be reincorporated into supplier
18 obligations for the Full Requirements contracts. The Company will also procure up to
19 30,000 solar AECs through 20-year Long-Term PA Solar AEC contracts using a
20 staggered approach of two auctions, each procuring 15,000 AECs. The Company will
21 hold annual auctions in July to satisfy any remaining requirement for the Long-Term
22 Block product not satisfied by the Long-Term PA Solar AECs.

23

1 **Q. Do any parties oppose PPL Electric’s proposals to procure AECs?**

2 A. The only party to express opposition is RESA, which opposes the Company’s proposed
3 long-term (20-year) contract to procure 30,000 Tier 1 Solar AECs, which will be used
4 solely to meet the AEC requirements of Residential Default Service customers. OCA
5 witness Mr. Ogur specifically supports the Company’s proposed long-term procurement
6 of Solar AECs (OCA St. 1, p. 22). OSBA witness Mr. Ewen indicates he has no
7 opposition to the proposed procurement of AECs for Small C&I customers, which, after a
8 transition period, will be obtained through the FPFR contracts.

9

10 **Q. What is Mr. Oliker’s objection to the Company’s proposed long-term procurement**
11 **of 30,000 Solar AECs?**

12 A. Mr. Oliker asserts that the long-term procurement of these Solar AECs may not
13 accurately reflect the actual market price over the term of the contract, but still will be
14 used to develop the Default Service rates.

15

16 **Q. What proportion of annual Residential Default Service costs are Solar AEC costs?**

17 A. I am advised by counsel that under the Alternative Energy Portfolio Standards (“AEPS”)
18 Act, Pennsylvania requires that 0.5% of electricity purchased by consumers comes from
19 in-state solar resources as part of its Tier 1 renewable energy goal. For the latest 2023-
20 2024 compliance year, solar AEC costs were approximately 3% of the total cost of AECs
21 and approximately 0.2% of the total Default Service cost.

22

1 **Q. Is the Company's proposal to acquire 30,000 Solar AEC credits intended to acquire**
2 **all of the Tier 1 AECs needed for Default Service?**

3 A. No. The total of 30,000 Solar AECs represents only a small portion of expected annual
4 Tier 1 AEC credits that will be needed to meet Residential Default Service requirements.
5 As explained in my Direct Testimony, 30,000 Solar AECs represent less than 30% of the
6 Tier 1 AECs needed for the 150 MW of block energy that the Company proposes to
7 procure. The remaining 70+% of Tier 1 AECs and all Tier 2 AECs to meet the AEC
8 requirements of the block supply will be acquired through separate annual auctions.
9 Further, all of the AECs, including Tier 1 AECs, needed to meet load provided pursuant
10 to the FPFR contracts will be acquired pursuant to the FPFR contracts. Roughly 85% of
11 all residential load will be met through supply procured pursuant to the FPFR contracts.
12 Based upon the foregoing, the resulting costs from the long-term Solar procurement will
13 not substantially effect the total annual Default Service rate for Residential customers.
14 Nevertheless, this proposal further supports the Company's goal of providing price
15 stability and Mr. Oliker's concern about the impact of this contract on the overall Default
16 Service rate is misplaced.

17
18 **Q. Are there other benefits to the procurement of these AECS pursuant to a long-term**
19 **contract?**

20 A. Yes. As explained in my direct testimony, this contract will support the growth of Solar
21 facilities in Pennsylvania, as 30,000 AECs will support 20 MW of solar generation.
22

1 **IV. LONG TERM BLOCK PRODUCT**

2 **Q. Please summarize the Company’s proposed long-term block product.**

3 A. As explained in greater detail in my direct testimony, PPL Electric is proposing to replace
4 the current 100 MWs of block energy contracts that expire in 2026 with a 10-year Long-
5 Term Block contract for 150 MW, or approximately 15% of the Residential Customer
6 Default Service load. The 150 MW will be procured in three 50 MW tranches, each with
7 a term of 10 years. The contracts will only be used to meet Residential Default Service
8 requirements. The proposed Long-Term Block contract provides that the supplier must
9 provide capacity, referred to as “Bilateral Transferred Capacity” that matches the block
10 supply. The Long-Term Block capacity is required to clear the PJM’s Reliability Pricing
11 Model (“RPM”) capacity auction for the delivery year and must be associated with a
12 generating unit in the PJM Mid-Atlantic Area Council region (“MAAC”).

13
14 **Q. Does any party oppose the Company’s proposed Long-Term Block Product?**

15 A. Yes. OCA Witness Ogur opposes the Bilateral Transferred Capacity component of the
16 Long-Term Block Product. As an alternative to eliminating the Bilateral Transferred
17 Capacity procurement in its entirety, Mr. Ogur states that any capacity procurement
18 should be done by a separate procurement.

19
20 **Q. What are Mr. Ogur’s reasons for opposing any procurement of Bilateral**
21 **Transferred Capacity?**

22 A. Mr. Ogur lists several reasons for his opposition:

- 23
- Uncertainty regarding forward capacity prices out 10 years;

- 1 • Lack of a recognized index pricing for forward capacity in PJM;
- 2 • Volatility in Base Residual Auction clearing prices since the start of PJM's annual
- 3 RPM capacity procurement;
- 4 • Concern that the bid process would lock in capacity price that is above the prevailing
- 5 market price, particularly if the winning bids are at or near the highest
- 6 administratively permitted price permitted under PJM's capacity pricing rules;
- 7 • The long-term capacity procurement may not necessarily lead to new capacity
- 8 resources being developed;
- 9 • No need to bundle capacity procurement with block supply procurement, which may
- 10 allow block supply to be procured in the event there is not an interest in the capacity
- 11 portion of the product; and
- 12 • PJM will continue to procure the same targeted amount of capacity each year,
- 13 regardless of whether PPL Electric enters into a contract for long-term capacity.

14

15 **Q. Please respond to Mr. Ogur's concerns.**

16 A. I recognize that Mr. Ogur's objective is to remove the Bilateral Transferred Capacity
17 component from the Long-Term Block product for concerns that customers are
18 potentially getting locked into higher than market capacity prices. However, the
19 Company does not agree with his proposal to eliminate the capacity component from the
20 Long-Term Block product.

21 First, while the Company realizes there is uncertainty in forward capacity prices,
22 including Bilateral Transferred Capacity procured for a longer term provides more price
23 stability. In addition, including capacity and requiring it to come from a unit that can

1 provide RPM capacity may encourage new capacity construction. Even if the proposed
2 contract does not result in construction of new capacity, it may help contribute to
3 retaining a unit in the relevant RPM area for the entire 10-year period. This would
4 contribute to resource adequacy in PJM, which as I noted in my direct testimony is a
5 substantial concern of PPL Electric. This is especially true given the drastic increase in
6 PJM's latest load forecast² and the amount of generation resources retiring outpacing
7 replacement capacity as noted in the Energy Transition in PJM: Resource Retirements,
8 Replacements & Risks study.³ In addition, I note that before proposing the Long-Term
9 Block product, the Company issued a Request for Interest ("RFI") inquiry to wholesales
10 suppliers, to identify interests in providing block products to PPL Electric. The Company
11 received feedback from several respondents to its RFI that were interested in including
12 capacity in the Long-Term Block product.

13 The Company proposes to procure energy and capacity together because if they
14 are procured together, it enables a generation owner to directly participate and offer
15 energy and capacity while not precluding a marketer from separately buying or hedging
16 energy and capacity and bundling them for the Company. There are also increased
17 administrative costs associated with auctions for separate products which the Company is
18 seeking to avoid.

² See, e.g., *PJM Load Forecast Report*, PJM INTERCONNECTION LLC (Jan. 2024), <https://www.pjm.com/-/media/library/reports-notices/load-forecast/2024-load-report.ashx>.

³ See, e.g., *Energy Transition in PJM: Resource Retirements, Replacements & Risks*, PJM INTERCONNECTION LLC (Feb. 24, 2023), [energy-transition-in-pjm-resource-retirements-replacements-and-risks.ashx](https://www.pjm.com/-/media/library/reports-notices/energy-transition-in-pjm-resource-retirements-replacements-and-risks.ashx).

1 **Q. At page 30 of his testimony, Mr. Ogur asserts that he could not support the Bilateral**
2 **Transferred Capacity component of the product without “adequate customer**
3 **protections” built into the procurement. Has Mr. Ogur identified what those**
4 **“adequate customer protections” would be?**

5 A. Mr. Ogur did not identify such protection in his direct testimony. However, in response
6 to discovery, Mr. Ogur identifies three possible solutions that could be built into the
7 procurement as either standalone protection or a combination of the following:

- 8 • Forward capacity index prices from an electricity industry index pricing source (e.g.,
9 Intercontinental Exchange, Chicago Mercantile Exchange, OTC Global Holdings, or
10 a similar publication or service) for the relevant contract term and capacity resource
11 location, which would be used as a benchmark against which to evaluate the offers.
- 12 • Capacity price projections for the relevant contract term and capacity resource
13 location, conducted by PPL Electric internally, a consultant to PPL Electric, PPL
14 Electric’s procurement manager or independent evaluator for the LTP Product, or a
15 reputable third party, which would be used as a benchmark against which to evaluate
16 the offers.
- 17 • Procurement competitiveness metrics (e.g., number of independent bids, price
18 dispersion among the bids) proposed by PPL Electric and approved by the
19 Commission, which would be used as a guideline in evaluating and deciding whether
20 to accept one or more of the submitted offers.⁴

21

⁴ PPL Electric Exhibit AC3-R (Office of Consumer Advocate Responses to PPL Set I Interrogatories, PPL-I-1).

1 **Q. Based upon the foregoing, does the Company propose any changes to its proposed**
2 **Long-Term Block Product?**

3 A. The Company is not proposing any changes to its proposed Long-Term Block product.
4 The product was designed to meet the Company’s objective of price stability for its
5 customers. Regarding the recommended protections Mr. Ogur identified, I am unaware of
6 any published quotes for PJM capacity prices and do not believe they are viable options.
7 However, regarding the competitiveness metrics, third party auction manager NERA can
8 commit to prepare a market information report using the best available information prior
9 to the procurement event and will also consider the degree of competition in the Request
10 for Proposal (“RFP”).

11
12 **V. TIME-OF-USE**

13 **Q. Please summarize the terms of the Company’s TOU proposal.**

14 A. As I explained in my direct testimony, the proposed Default Service TOU is substantially
15 the same as the current TOU. The only change is to eliminate the different on-peak and
16 off-peak hours in the Summer (June 1 through November 30) and Winter (December 1
17 through May 31) periods. As a result, on-peak hours throughout the year will be 4 p.m.
18 to 7 p.m. There will still be different summer and winter rates, because the rates will
19 continue to be recomputed effective each June 1 and December 1. The on-peak rate in
20 each period will continue to be computed based upon the generation portion of the then-
21 effective PTC, multiplied by a factor reflecting the most recent rolling five year average
22 of on peak and off peak spot prices at the PPL Residual Aggregation Point, and the off-

1 peak rate will continue to be based upon the generation portion of the PTC multiplied by
2 90%.

3
4 **Q. Does any party oppose the Company's TOU proposal?**

5 A. Yes. OCA opposes the Company proposal to have the same on-peak and off-peak hours
6 throughout the year. OCA further proposes that the rate formula be changed so that all
7 capacity costs would be reflected in Summer on-peak rates.

8
9 **Q. Before responding to OCA's proposal, would you please provide background on the
10 development of PPL Electric's TOU mechanism?**

11 A. Yes. PPL Electric's TOU mechanism has had a checkered history. PPL Electric has
12 proposed a number of TOU Programs starting in 2010 through the present Petition.
13 During the "Competitive Bridge Plan" in 2010, the TOU Program implemented had an
14 on-peak rate that was higher than the then-effective PTC, and an off-peak rate that was
15 below the PTC. The plan was approved by the Commission, but with the stipulation that
16 PPL Electric could not recover lost or decreased revenues due to shifted demand. As a
17 result of the Company being unable to fully recover the Program's costs, PPL Electric
18 issued a new plan in 2011 that disconnected the TOU rates from the PTC, basing the rates
19 entirely on the spot market, and ensured all reconciliation costs were recovered from
20 participating TOU Program customers. The TOU Program was approved but resulted in
21 on-peak and off-peak rates that were below the then-effective PTC, causing an influx of
22 customers to the Program. In the subsequent rate period, spot market prices increased,
23 and reconciliation costs were much higher than projected due to the influx of customers,

1 resulting in on-peak and off-peak rates that were above the then-effective PTC. At this
2 point, the Commission issued an Order directing the Company to freeze the then-current
3 TOU rates and develop a new TOU Program to address the issues experienced with the
4 Program.

5 In 2012, the Company filed a new TOU Program as a part of its next Default
6 Service Plan. The Commission approved the Default Service Plan but rejected the TOU
7 Program. In its Order, the Commission encouraged the Company to utilize Electric
8 Generation Suppliers (“EGSs”) to meet its TOU rate requirements. As a result, in August
9 2013, PPL Electric proposed a pilot TOU Program that sought to utilize Retail EGSs to
10 meet its TOU rate requirements. This Petition was approved by the Commission in
11 September 2014 and implemented in December 2014.

12 The Dauphin County Industrial Authority (“DCIDA”) appealed the September
13 2014 Commission Order, and the Commonwealth Court of Pennsylvania
14 (“Commonwealth Court”) reversed and remanded the Commission Order. The
15 Commonwealth Court concluded that 66 Pa.C.S. § 2807(f)(5) provides that there can be
16 only one default service provider, that PPL Electric, as the default service provider, is
17 required to offer TOU rates, and that PPL Electric cannot satisfy this obligation through
18 EGSs. In December 2016, the Commission issued a Secretarial Letter seeking comments
19 regarding the Commission’s intent to initiate a proceeding to comply with the
20 Commonwealth Court’s DCIDA Order. On April 6, 2017, the Commission issued a
21 Secretarial Letter providing guidance on how PPL Electric should design its TOU
22 Program and directing PPL Electric to submit a new TOU proposal no later than June 1,
23 2017. Among other things, the guidelines provided that PPL Electric undertake an

1 auction to have wholesale suppliers provide a summer season and a winter season TOU
2 product, which would be a load-following, full-requirements product for the entire TOU
3 supply. The on-peak rate was to be a multiplier of the off-peak rate. Wholesale suppliers
4 would bid the off-peak rate for each season, and the winning bidder would be the lowest
5 off-peak price. The guidelines further provided that PPL Electric develop a contingency
6 program if wholesale suppliers failed to participate in the auction. That contingency was
7 to apply on-peak and off-peak multipliers to its PTC. Following the Commission's
8 Secretarial Letter, PPL Electric submitted a new TOU proposal. Subsequently, parties to
9 that TOU proceeding, including OCA, reached a settlement on the design of the TOU that
10 continues substantially in effect today.

11
12 **Q. Did wholesales suppliers bid on the TOU product?**

13 A. No. As a result, the contingency plan, which established the TOU on-peak and off-peak
14 prices based off of the PTC, was implemented. In PPL Electric's DSP V proceeding, the
15 auction process was eliminated, and the process of pricing the TOU off of PTC
16 generation rates was adopted. This approach ensures that off-peak TOU prices, in both
17 the summer and winter periods, are below the PTC, while on-peak prices are above the
18 PTC.

19
20 **Q. What are some of the lessons learned from this TOU history?**

21 A. First, it is important that the TOU operates in relationship to the PTC. Otherwise,
22 customers may "game the system" by swinging on and off TOU if on-peak rates are
23 below the PTC, or by swinging off TOU if off-peak rates are above the PTC. This is

1 exacerbated by the fact that customers may enter or leave TOU service at any time.
2 Second, customers entering or leaving TOU to take temporary advantage of price
3 distortions compared to the PTC can create under or over collections that are ultimately
4 borne, at least in part, by other default service customers. Third, TOU is a default service
5 option when provided by PPL Electric. Fourth, wholesale suppliers did not show an
6 interest in providing a TOU-specific product.

7
8 **Q. What would be the effect of OCA’s proposal on TOU rates?**

9 A. In response to discovery, OCA was unable to provide a revised formula to demonstrate
10 Mr. Ogur’s proposal to assign all capacity costs to the summer season, citing the TOU
11 rate formula in the Company’s tariff contains insufficient detail. OCA instead provided
12 Duquesne Light Company’s (“DLC”) TOU rate multipliers as a demonstration of how
13 capacity costs could be assigned to a specific season.⁵ However, the exhibit provided
14 demonstrates how On-Peak and Off-Peak multipliers for an Electric Vehicle (“EV”) TOU
15 rate are calculated for the entire year and does not indicate a shift to a particular season.
16 In addition, I am not aware of any other peer EDC in the PJM footprint that utilizes this
17 approach of recovering capacity costs.

18 Mr. Ogur is correct in that PJM’s capacity costs are based on PJM’s 5 coincident
19 peak (“5CP”) days, which are limited to the period from June 1 through September 30.
20 However, unlike PJM, PPL Electric can be a winter or summer peaking utility depending
21 on the year. Given that the Company can be winter or summer peaking it allocates

⁵ PPL Electric Exhibit AC3-R (Office of Consumer Advocate Responses to PPL Set I Interrogatories, Exhibit DBO-4).

1 capacity costs by 5CP days over the entire year. The Company developed this method as
2 an equitable way to recover capacity costs across all customers, which is the same as the
3 allocation methodology used for transmission costs. In addition, the Company would
4 need to change their methodology for calculating Installed Capacity (“ICAP”) tags for
5 customers, which are used to determine the allocation of capacity costs, and would need
6 to be submitted to and approved by FERC. This administrative change would also be
7 open to public comment and likely be scrutinized.

8
9 **Q. Do you agree with OCA’s proposal to shift all recovery of TOU capacity costs to the**
10 **on-peak summer period?**

11 A. No. As I mentioned, PPL Electric can be a winter or summer peaking utility and has
12 already developed the most equitable way to allocate costs across all customers
13 regardless of when the customer contributes to the zonal peak. In addition, to adopt
14 OCA’s proposal would require the Company to change the methodology for how ICAP
15 tags are calculated for customers, which would require FERC approval.

16
17 **Q. Why did the Company propose to use the same on-peak and off-peak hours**
18 **throughout the year?**

19 A. The Company analyzed a variety of on-peak and off-peak hours, and the analysis
20 indicated that having on-peak hours between 3:00 PM and 7:00 PM annually provided
21 slight savings by shifting usage to those hours. In addition, using the same hours
22 throughout the year would provide a simplified structure for customers.

1 **Q. OCA witness Alexander also offers testimony on TOU. What are Ms. Alexander's**
2 **views on an "ideal" TOU?**

3 A. Ms. Alexander expresses the view that an ideal TOU should attract significant numbers
4 of customers, result in lower peak usage compared to a customer's prior usage profile,
5 and document value by linking the results of the rate option to the lower price for
6 capacity or energy for all customers.

7
8 **Q. Please comment on Ms. Alexander's thoughts.**

9 A. As Ms. Alexander notes in her direct testimony, the Company has an obligation to offer a
10 TOU rate program.⁶ However, the TOU rate program is a default service product and like
11 other Default Service rates, its goal is not to aggressively attract a significant number of
12 customers. Rather the competitive market should drive adoption of TOU products.

13
14 **Q. Does Ms. Alexander offer any other proposal to develop alternative rate options to**
15 **TOU?**

16 A. Yes, Ms. Alexander proposes that the Company be directed to develop one or more pilot
17 programs to reduce peak usage with demand response features.

18
19 **Q. Does the Company currently offer programs with demand response features?**

20 A. Yes. Under its Phase IV Act 129 Energy Efficiency and Conservation ("EE&C") Plan,
21 PPL Electric offers energy efficiency measures to customers that provide peak demand

⁶ OCA Statement No. 2, page 20, lines 4-6

1 reductions, such as incentives for smart thermostats, and the peak demand reductions
2 associated with those measures are counted toward the Commission-established peak
3 demand reduction target for the Company. However, PPL Electric does not have a
4 dispatchable demand response (“DDR”) program because in its *Phase IV Implementation*
5 *Order*, the Commission specifically excluded DDR from counting toward the peak
6 demand reduction targets established for Phase IV of Act 129 EE&C. *See Energy*
7 *Efficiency and Conservation Program*, Docket No. M-2020-3015228, pp. 68, 84 (Order
8 entered on June 18, 2020). Therefore, EDCs can only achieve their demand reduction
9 targets with the peak demand reductions associated with energy efficiency measures. *See*
10 *id.* To the extent that the OCA would like DDR to be a part of Phase V of Act 129
11 EE&C, it can make such a proposal in its Comments on the forthcoming Tentative
12 Implementation Order for Phase V.

13
14 **Q. Does Ms. Alexander explain how the costs of her proposed pilot programs, including**
15 **in particular programs that offer bill credits or rebates, would be recovered?**

16 A. Ms. Alexander does not explain how the costs of such programs are recovered. However,
17 as I note above, EDCs can only achieve their demand reduction targets in Phase IV of
18 Act 129 EE&C through the peak demand reductions associated with energy efficiency
19 measures. *Id.*, pp. 68, 84. Thus, the costs of operating a voluntary DDR program would
20 not be recoverable under the Company’s Act 129 Compliance Rider.

21
22 **Q. Do you consider a program designed to reduce peak usage with demand response**
23 **features a “pilot”?**

1 A. No. Demand response is nothing new or novel at the state or federal level. Demand
2 response was a part of Phase I of Act 129 EE&C, and many companies (not only utilities)
3 have been providing demand response programs for customers for several years.
4 Therefore, I do not see why a program based around peak demand response would be a
5 “pilot program.”

6

7 **Q. Does this conclude your rebuttal testimony?**

8 A. Yes.

PPL Electric Exhibit AC1-R

PA EDCs	Duquesne		MetEd	PECO	Penelec	Penn Power	PPL	West Penn
PTC Rate Effective Date	GS Small (GS)	GS Medium (GM <25kW)	General Secondary (GS-S and GS-M)	General Service	General Secondary (GS-S and GS-M)	General Secondary and General Secondary Medium (GS and GM)	Small Gen Service	General Service and General Service Small (GS-S and GS-M)
June 1, 2024	9.7	10.0	10.6	8.4	10.2	11.8	9.2	9.2
March 1, 2024	N/A	N/A	N/A	8.5	N/A	N/A	N/A	N/A
December 1, 2023	10.1	10.4	11.9	8.8	11.6	13.1	11.4	11.0
September 1, 2023	N/A	N/A	N/A	9.7	N/A	N/A	N/A	N/A
June 1, 2023	11	11.4	10.7	9.6	11.0	12.9	11.7	11.0
March 1, 2023	N/A	N/A	8.7	9.3	9.2	10.8	N/A	7.5
December 1, 2022	10.2	10.3	12.6	9.6	10.7	12.0	14.8	10.5
September 1, 2022	N/A	N/A	11.5	8.0	10.9	13.1	N/A	9.4
June 1, 2022	7.9	8.1	10.6	7.7	11.1	12.5	11.7	10.1
March 1, 2022	N/A	N/A	7.5	6.8	8.0	10.0	N/A	6.5
January 1, 2022	6.7	7	8.7	6.2	8.6	10.1	9.7	7.6

*Sourced from papowerswitch.com

PPL Electric Exhibit AC2-R

Year_Mo	Total_SCI	Shopping_SCI	Shopping%
2018-01	182,872	97,249	53.18%
2018-02	182,226	97,157	53.32%
2018-03	182,309	96,958	53.18%
2018-04	182,442	97,028	53.18%
2018-05	182,515	96,899	53.09%
2018-06	182,599	96,702	52.96%
2018-07	182,505	96,481	52.86%
2018-08	182,725	96,259	52.68%
2018-09	182,753	95,782	52.41%
2018-10	183,095	95,408	52.11%
2018-11	183,045	95,307	52.07%
2018-12	182,806	94,732	51.82%
2019-01	183,092	95,235	52.01%
2019-02	182,801	95,319	52.14%
2019-03	183,099	95,420	52.11%
2019-04	183,138	95,201	51.98%
2019-05	183,201	94,663	51.67%
2019-06	183,262	94,488	51.56%
2019-07	183,464	94,256	51.38%
2019-08	183,544	93,933	51.18%
2019-09	183,410	93,742	51.11%
2019-10	183,662	93,485	50.90%
2019-11	183,708	93,143	50.70%
2019-12	183,648	92,563	50.40%
2020-01	184,088	92,465	50.23%
2020-02	183,533	92,553	50.43%
2020-03	183,574	92,492	50.38%
2020-04	183,611	92,398	50.32%
2020-05	183,956	92,224	50.13%
2020-06	183,945	92,164	50.10%
2020-07	184,231	92,040	49.96%
2020-08	184,368	91,701	49.74%
2020-09	184,523	91,428	49.55%
2020-10	184,859	91,136	49.30%
2020-11	184,765	90,894	49.19%
2020-12	184,854	90,608	49.02%
2021-01	184,987	90,104	48.71%
2021-02	184,831	87,608	47.40%
2021-03	185,273	87,381	47.16%
2021-04	185,434	87,857	47.38%
2021-05	185,766	87,908	47.32%
2021-06	185,967	87,965	47.30%
2021-07	186,266	87,644	47.05%

2021-08	186,327	87,447	46.93%
2021-09	186,149	86,987	46.73%
2021-10	186,275	86,508	46.44%
2021-11	186,511	86,379	46.31%
2021-12	186,697	86,349	46.25%
2022-01	186,779	86,699	46.42%
2022-02	186,472	86,520	46.40%
2022-03	186,761	86,268	46.19%
2022-04	187,167	85,828	45.86%
2022-05	187,508	85,045	45.36%
2022-06	187,616	87,226	46.49%
2022-07	187,488	87,232	46.53%
2022-08	187,716	86,882	46.28%
2022-09	187,750	86,335	45.98%
2022-10	187,842	85,866	45.71%
2022-11	187,790	85,970	45.78%
2022-12	187,897	87,009	46.31%
2023-01	188,375	87,781	46.60%
2023-02	189,181	89,143	47.12%
2023-03	189,061	90,780	48.02%
2023-04	188,836	91,891	48.66%
2023-05	189,084	92,812	49.09%
2023-06	189,115	93,346	49.36%
2023-07	188,964	93,582	49.52%
2023-08	189,181	93,991	49.68%
2023-09	188,985	94,311	49.90%
2023-10	189,143	94,393	49.91%
2023-11	189,082	94,579	50.02%
2023-12	188,921	94,682	50.12%
2024-01	188,981	94,734	50.13%
2024-02	188,644	94,885	50.30%
2024-03	188,659	95,075	50.40%
2024-04	189,090	95,596	50.56%
2024-05	188,969	95,666	50.63%

PPL Electric Exhibit AC3-R

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
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June 17, 2024

Via Electronic Mail Only

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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

Dear Counsel:

Enclosed you will find the Office of Consumer Advocate's Response to PPL Electric Utilities Corporation's Interrogatories, Sets 1 and 2, in this matter.

Copies of the response have been served on PPL Electric Utilities Corporation. The OCA can make available copies of the response to other parties, upon request.

Sincerely,

A handwritten signature in cursive script that reads "Christy M. Appleby".

Christy M. Appleby
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
cappleby@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service Only)
Certificate of Service

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Response to PPL Electric Utilities Corporation's Interrogatories, Sets 1 and 2, upon PPL Electric Utilities Corporation in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission's electronic filing system.

Dated this 17th day of June, 2024.

SERVICE BY E-MAIL ONLY

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Dated: June 17, 2024

**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**

**Office of Consumer Advocate Responses
To PPL Set I Interrogatories**

PPL-I-1: Reference OCA Statement No. 1, page 20, lines 8-11. Please identify and describe the “adequate customer protections” that Mr. Ogur believes would need to be built into the procurement process for the LTP Product to address his first concern.

Response to PPL-I-1

Adequate customer protections that could be built into the procurement process for the LTP Product to address Dr. Ogur’s concern could be one or a combination of the following:

- Forward capacity index prices from an electricity industry index pricing source (e.g., Intercontinental Exchange, Chicago Mercantile Exchange, OTC Global Holdings, or a similar publication or service) for the relevant contract term and capacity resource location, which would be used as a benchmark against which to evaluate the offers.
- Capacity price projections for the relevant contract term and capacity resource location, conducted by PPL Electric internally, a consultant to PPL Electric, PPL Electric’s procurement manager or independent evaluator for the LTP Product, or a reputable third party, which would be used as a benchmark against which to evaluate the offers.
- Procurement competitiveness metrics (e.g., number of independent bids, price dispersion among the bids) proposed by PPL Electric and approved by the Pennsylvania Public Utility Commission, which would be used as a guideline in evaluating and deciding whether to accept one or more of the submitted offers.

Dr. Ogur would not necessarily limit the set of adequate customer protections to the above and he is open to other customer protections that would address his concern. The goal of building adequate customer protections into the procurement process for the LTP Product is to avoid making a purchase in an illiquid market or product and paying a price which materially exceeds the intrinsic value of the product being procured.

RESPONDENT: DR. SERHAN OGUR

DATE: JUNE 17, 2024

**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**

**Office of Consumer Advocate Responses
To PPL Set I Interrogatories**

PPL-I-2: Reference OCA Statement No. 1, page 26, lines 19-23.

A. Are capacity costs paid by PPL Electric only in summer months?

B. Are Time of Use customers required to remain on the TOU rate for 12 consecutive months?

C. PPL Electric's current Time of Use rate formula is provided on tariff pages 19Z.5B and 19Z.5C. Please revise the formula to demonstrate how rates would be computed under Mr. Ogur's proposal to assign all capacity costs to the summer season.

Response to PPL-I-2

- (a) PJM capacity costs are paid by PPL Electric and/or by PPL Electric's fixed-price full-requirements contract suppliers, as the default service customers' load-serving entity ("LSE") in PJM, weekly or monthly over the course of a PJM Delivery Year. However, this is merely a billing convenience or convention in PJM's settlements and billing system. As explained by Dr. Ogur in his Direct Testimony (page 26, lines 16-23), PPL Electric allocates PJM capacity cost responsibility to the suppliers of individual customers based on the "Five PJM Coincident Peaks" ("5CP") construct; the 5CP days are limited to the period from June 1 through September 30; and thus, capacity costs are incurred based exclusively on usage during certain summer period hours. For example, a customer that has zero usage during the 5CPs in a given summer gets assigned zero PJM capacity responsibility for the subsequent PJM Delivery Year by PPL Electric.
- (b) Dr. Ogur's understanding, based on Page No. 19Z.5D of PPL Electric's General Tariff, is that a customer is not obligated to remain on the TOU rate program for 12 consecutive months.
- (c) The Time of Use rate formula on Page Nos. 19Z.5B and 19Z.5C does not contain sufficient detail for Dr. Ogur to revise it in a way which would demonstrate how rates would be computed under Dr. Ogur's proposal to assign all capacity costs to the summer season. Assigning all capacity costs to the summer season would be accomplished by revising the way in which "GS_M" (Seasonal Multiplier based on historic data) is computed. The PPL Electric tariff pages to which this interrogatory refers do not provide the formula according to which the GS_M Seasonal Multiplier is computed.

To illustratively demonstrate how his proposal could be operationalized in ratemaking, Dr. Ogur provides the computation of Duquesne Light Company's ("DLC's") Time-of-Use rate multipliers in PPL-I-2 Attachment 2(c), which demonstrates how capacity costs could be assigned to a specific season and or a Time-of-Use period. Dr. Ogur notes that under his proposal, PPL Electric would assign capacity costs exclusively to the summer on-peak period (whereas in the attachment DLC assigns capacity costs exclusively to the year-round on-peak period).

PPL-I-2 Attachment 2(c) was filed as Exhibit DBO-4 by DLC in Docket No. P-2020-3019522.

**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**

**Office of Consumer Advocate Responses
To PPL Set I Interrogatories**

RESPONDENT: DR. SERHAN OGUR

DATE: JUNE 17, 2024

Duquesne Light Company
Default Service Supply Plan - June 1, 2021 to May 31, 2025
Derivation of EV-TOU Supply Rate Factors: Residential and Lighting

Exhibit DBO-4

Capacity

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
1	Capacity Obligation (MW-day)				
2	2016	482,908	0	0	482,908
3	2017	486,145	0	0	486,145
4	2018	509,705	0	0	509,705
5	2019	529,330	0	0	529,330
5	2021/2022 Capacity Price (\$/MW-day) (1)	\$140.45	\$140.45	\$140.45	\$140.45
6	Load (MWH)				
7	2016	1,799,054	1,655,579	1,086,034	4,540,667
8	2017	1,655,668	1,538,216	1,018,012	4,211,896
9	2018	1,813,747	1,664,685	1,122,010	4,600,442
10	2019	1,739,120	1,598,905	1,071,000	4,409,025
10	2021/2022 Capacity Price (\$/MWH)				
11	2016	\$37.70	\$0.00	\$0.00	\$14.94
12	2017	\$41.24	\$0.00	\$0.00	\$16.21
13	2018	\$39.47	\$0.00	\$0.00	\$15.56
13	2019	\$42.75	\$0.00	\$0.00	\$16.86

Energy

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
14	Load-Weighted LMP (\$/MWH)				
15	2016	\$36.85	\$28.74	\$20.25	\$29.92
16	2017	\$37.62	\$30.29	\$22.83	\$31.37
17	2018	\$50.62	\$40.27	\$27.53	\$41.24
17	2019	\$33.94	\$27.38	\$20.73	\$28.36

Capacity + Energy

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
18	\$/MWH				
19	2016	\$74.55	\$28.74	\$20.25	\$44.86
20	2017	\$78.87	\$30.29	\$22.83	\$47.58
21	2018	\$90.09	\$40.27	\$27.53	\$56.80
21	2019	\$76.69	\$27.38	\$20.73	\$45.22

Rate Factor

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>
22	2021/2022 Rate Factor			
23	2016	1.66	0.64	0.45
24	2017	1.66	0.64	0.48
25	2018	1.59	0.71	0.48
26	2019	1.70	0.61	0.46
26	Average	1.65	0.65	0.47

1/ As of First Incremental Auction for 2021/2022.

Duquesne Light Company
Default Service Supply Plan - June 1, 2021 to May 31, 2025
Derivation of EV-TOU Supply Rate Factors: Small Commercial and Industrial

Exhibit DBO-4

Capacity

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
1	Capacity Obligation (MW-day)				
2	2016	63,939	0	0	63,939
3	2017	61,869	0	0	61,869
4	2018	66,970	0	0	66,970
5	2019	79,692	0	0	79,692
5	2021/2022 Capacity Price (\$/MW-day) (1)	\$140.45	\$140.45	\$140.45	\$140.45
6	Load (MWH)				
7	2016	288,076	288,300	154,812	731,188
8	2017	266,691	269,117	144,516	680,324
9	2018	297,433	302,067	169,558	769,058
10	2019	337,023	343,637	206,776	887,436
10	2021/2022 Capacity Price (\$/MWH)				
11	2016	\$31.17	\$0.00	\$0.00	\$12.28
12	2017	\$32.58	\$0.00	\$0.00	\$12.77
13	2018	\$31.62	\$0.00	\$0.00	\$12.23
13	2019	\$33.21	\$0.00	\$0.00	\$12.61

Energy

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
14	Load-Weighted LMP (\$/MWH)				
15	2016	\$35.73	\$29.03	\$20.11	\$29.78
16	2017	\$36.51	\$30.42	\$22.61	\$31.15
17	2018	\$48.89	\$39.84	\$26.90	\$40.49
17	2019	\$33.11	\$27.46	\$20.55	\$28.00

Capacity + Energy

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
18	\$/MWH				
19	2016	\$66.91	\$29.03	\$20.11	\$42.07
20	2017	\$69.10	\$30.42	\$22.61	\$43.92
21	2018	\$80.52	\$39.84	\$26.90	\$52.72
21	2019	\$66.32	\$27.46	\$20.55	\$40.61

Rate Factor

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>
22	2021/2022 Rate Factor			
23	2016	1.59	0.69	0.48
24	2017	1.57	0.69	0.51
25	2018	1.53	0.76	0.51
26	2019	1.63	0.68	0.51
26	Average	1.58	0.70	0.50

1/ As of First Incremental Auction for 2021/2022.

Duquesne Light Company
Default Service Supply Plan - June 1, 2021 to May 31, 2025
Derivation of EV-TOU Supply Rate Factors: Medium Commercial and Industrial

Exhibit DBO-4

Capacity

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
1	Capacity Obligation (MW-day)				
2	2016	220,376	0	0	220,376
3	2017	224,631	0	0	224,631
4	2018	219,660	0	0	219,660
5	2019	205,735	0	0	205,735
5	2021/2022 Capacity Price (\$/MW-day) (1)	\$140.45	\$140.45	\$140.45	\$140.45
6	Load (MWH)				
7	2016	1,001,696	1,076,681	623,894	2,702,271
8	2017	994,889	1,078,109	620,596	2,693,593
9	2018	998,778	1,080,512	623,816	2,703,106
10	2019	762,437	815,715	467,805	2,045,958
10	2021/2022 Capacity Price (\$/MWH)				
11	2016	\$30.90	\$0.00	\$0.00	\$11.45
12	2017	\$31.71	\$0.00	\$0.00	\$11.71
13	2018	\$30.89	\$0.00	\$0.00	\$11.41
13	2019	\$37.90	\$0.00	\$0.00	\$14.12

Energy

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
14	Load-Weighted LMP (\$/MWH)				
15	2016	\$35.61	\$28.94	\$20.00	\$29.35
16	2017	\$36.54	\$30.29	\$22.42	\$30.78
17	2018	\$48.98	\$40.08	\$26.93	\$40.33
17	2019	\$32.32	\$27.83	\$20.93	\$27.93

Capacity + Energy

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>	<u>Total</u>
18	\$/MWH				
19	2016	\$66.51	\$28.94	\$20.00	\$40.80
20	2017	\$68.25	\$30.29	\$22.42	\$42.50
21	2018	\$79.87	\$40.08	\$26.93	\$51.75
21	2019	\$70.22	\$27.83	\$20.93	\$42.05

Rate Factor

		<u>On Peak</u>	<u>Shoulder</u>	<u>Off Peak</u>
22	2021/2022 Rate Factor			
23	2016	1.63	0.71	0.49
24	2017	1.61	0.71	0.53
25	2018	1.54	0.77	0.52
26	2019	1.67	0.66	0.50
26	Average	1.61	0.71	0.51

1/ As of First Incremental Auction for 2021/2022.

**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**

**Office of Consumer Advocate Responses
To PPL Set II Interrogatories**

PPL-II-1: Reference OCA Statement No. 2, page 20, line 12. Please identify what number would represent a “significant number of customers.” Please identify every Pennsylvania EDC whose TOU program serves a “significant number of customers” as defined by Ms. Alexander.

RESPONSE: A “significant” number would reflect sufficient residential and/or commercial customers that would provide a statistically valid representation of the demographics and usage characteristics of the customer class to determine the impact on distribution and default service load shape and determine potential benefits. Ms. Alexander is not aware of any Pennsylvania EDC in which the TOU default service rate option meets these criteria due to the low level of enrollment and inability to predict potential costs and benefits for default or distribution service. Ms. Alexander’s recommendations reflect PPL’s own evaluation of its TOU pilot to date and those of other TOU pilots at PECO Energy and Duquesne Light in pending DSP proceedings.

RESPONDENT: BARBARA ALEXANDER

DATE: JUNE 17, 2024

**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**

**Office of Consumer Advocate Responses
To PPL Set II Interrogatories**

PPL-II-2: Reference OCA Statement No. 2, page 20, line 18 through page 21, line 14. Please identify specifically how the costs of such alternative programs will be fully recovered, including but not limited to the costs of any incentive payments, rebates or bill credits, and the costs to implement any pilot.

RESPONSE: Ms. Alexander has not designed or determined the costs of any such pilot but recommends that PPL estimate costs once it has decided the pilot design. Ms. Alexander presumes that the costs for any such future pilot would reflect the same cost recovery principles as the current TOU rate option. Ms. Alexander also would recommend that PPL explore the potential monetization of any efficiency or demand response benefits delivered by a full scale program in the wholesale market, similar to that done by the Maryland distribution utilities for their peak rewards programs.

RESPONDENT: BARBARA ALEXANDER
DATE: JUNE 17, 2024

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

VERIFICATION

I, Serhan Ogur, hereby state that the facts above set forth in my Response to PPL Electric Utilities Corporation's Interrogatories, Set I, are true and correct (or 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).

DATED: June 14, 2024

Signature:



Serhan Ogur

Address:

Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, MD 21044-2690

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities :
Corporation for Approval of its Default : Docket No. P-2024-3046008
Service Program for the Period of June 1, :
2025, through May 31, 2029 :

VERIFICATION

I, Barbara R. Alexander, hereby state that the facts above set forth in my Response to PPL Electric Utilities Corporation's Interrogatories, Set I, are true and correct (or 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).

DATED: June 14, 2024

Signature: *Barbara Alexander*
Barbara R. Alexander

Address: Barbara Alexander Consulting LLC
44 Beech St.
Hallowell, ME 04347

1 **Q: Please state your full name and business address.**

2 A: My name is A. Joseph Cavicchi. My business address is 111 Huntington Avenue, Boston,
3 MA 02199.

4
5 **Q: Have you previously submitted testimony in this proceeding?**

6 A: Yes. I submitted direct testimony on March 12, 2024.¹

7
8 **Q: What is the purpose of your rebuttal testimony in this proceeding?**

9 A: My rebuttal testimony responds to a portion of the Direct Testimony of the Retail Energy
10 Supply Association (“RESA”) Witness Joseph Oliker. He appears to oppose PPL Electric
11 Utilities Corporation’s (“PPL Electric” or “Company”) proposal to eliminate 6-month
12 Fixed-Price, Pull-Requirements contracts from its product mix. He asserts that PPL
13 Electric’s proposed DSP VI² product mixture was designed to mirror the product mixtures
14 offered in the competitive market. Specifically, Mr. Oliker asserts that the comparison in
15 my direct testimony of, “[...] the default service rate to suppliers’ pricing offers [...],”
16 suggests that PPL is, “[...] designing a product PPL thinks customers want based on
17 competitive offers in the market.”³ On this point, Mr. Oliker concludes that, “[...] RESA
18 does not support the view that PPL should be attempting to design a default service product
19 based on what it thinks customers want based on what is being offered by EGSs [electric

¹ Pennsylvania Public Utility Commission, Docket No. P-2024-3047290, PPL Electric Utilities Corporation, Statement No. 2, Direct Testimony A. Joseph Cavicchi, March 12, 2024 (hereinafter “Cavicchi Direct Testimony”).

² *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*, Filed on March 12, 2024 (hereinafter “Petition”).

³ Pennsylvania Public Utility Commission, Docket No. P-2024-3047290, The Retail Energy Supply Association, Direct Testimony of Joseph Oliker, June 3, 2024, at 52 (hereinafter “Oliker Direct Testimony”).

1 generation suppliers].”⁴ My rebuttal testimony also responds to the comments by Office
2 of Consumer Advocate (“OCA”) witness Serhan Ogur⁵ and Office of Small Business
3 Advocate (“OSBA”) witness Mark Ewen⁶ regarding the Company’s proposed change to
4 the procurement dates for its fixed-price, full-requirements, load-following (“FPFR”) products from the current months of April and October to the months of February and July.
5
6

7 **Q: How do you respond to Mr. Oliker’s assertion?**

8 A: Mr. Oliker mis-represents my testimony. I do not state that PPL Electric is trying to design
9 its product mixture based on the retail competitive market offerings of electric generation
10 suppliers (“EGSs”). In shifting from 6-month products toward the incorporation of 24-
11 month products, PPL Electric’s proposed mixture seeks to reduce default price volatility
12 for consumers. As stated in my direct testimony, “[...] DSP VI continues to strike a balance
13 by providing reasonably frequent price adjustment without exposing customers to
14 unacceptable price volatility, while facilitating retail customers seeking service from
15 Electric Generation Suppliers (“EGSs”).”⁷ In that regard, I note that PPL Electric proposes
16 to continue to recalculate default service rates for Residential and Small Commercial and
17 Industrial customers every six months. PPL Electric has recalculated its default service
18 rates every six months since June 1, 2015, which was the beginning of its DSP III Program.

⁴ Oliker Direct Testimony at 53.

⁵ Pennsylvania Public Utility Commission, Docket No. P-2024-3047290, Pennsylvania Office of Consumer Advocate, Direct Testimony of Serhan Ogur, June 3, 2024, at 14-15 (hereinafter “Ogur Direct Testimony”).

⁶ Pennsylvania Public Utility Commission, Docket No. P-2024-3047290, Pennsylvania Office of Small Business Advocate, Direct Testimony of Mark D. Ewen, June 3, 2024, at 8 (hereinafter “Ewen Direct Testimony”).

⁷ Cavicchi Direct Testimony at 6.

1 Furthermore, as I explain in my direct testimony, every six-month solicitation will procure
2 at least 30% of the power supply under fixed-price, full requirements contracts.⁸

3 Moreover, in Exhibit JC-7 of my direct testimony, I simply compared the contract
4 term *lengths* of the EGS product offerings, not the pricing offers as Mr. Oliker asserts. I
5 find that PPL's DSP VI "proposed product mixture will continue to provide an opportunity
6 for EGSs to make competitive offers to default service providers."⁹ I did not suggest that
7 the product mix was designed or intended to be based on what is being offered by EGSs.
8 EGSs will continue to have the ability to structure their prices and term lengths to meet
9 market demands.

10
11 **Q. How do you respond to Mr. Ogur and Mr. Ewen's concerns regarding the change in**
12 **procurement dates for the FPFR products?**

13 A. I do not share Mr. Ogur and Mr. Ewen's concerns.¹⁰ Based on my experience, one of the
14 most important considerations that sellers take into account when making offers to supply
15 FPFR products is assessing their ability to hedge their sales in futures/forwards markets.
16 If the FPFR contract delivery commencement date and term falls within the time span
17 where futures/forward markets record ongoing market participants' trades and open
18 interests, then sellers can mitigate risk, even if the contract start date is a few months in the
19 future. For example, ICE's PJM Western Hub on- and off-peak futures products are an
20 example of a well-known financial hedging instrument that shows trades and open interests

⁸ Cavicchi Direct Testimony at 11.

⁹ Cavicchi Direct Testimony at 29.

¹⁰ Ogur Direct Testimony at 14-15; Ewen Direct Testimony at 8.

1 well into the future, well beyond the lead time plus the term of the contract.¹¹ These
2 products provide sellers a means to hedge and mitigate risk associated with the time span
3 between procurement, delivery start date, and the term of the contract. Moreover, in my
4 experience it would be difficult to isolate the impact on FPCR prices of a couple of months
5 change in the lead time between procurement date and delivery commencement.

6
7 **Q: Does this conclude your Rebuttal Testimony?**

8 **A:** Yes.

¹¹ See the ICE Futures Daily Market Report for the following contracts: PJC-PJM Western Hub Day-Ahead Peak Fixed Price Future and PJD-PJM Western Hub Day-Ahead Off-Peak Fixed Price Future. ICE, Report Center, End of Day Report, ICE Futures U.S. – Energy Div, available at: <https://www.theice.com/marketdata/reports/142>.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Docket No. P-2024-3047290

PPL Electric Utilities Corporation

Statement No. 3-R

Rebuttal Testimony of Melinda Stumpf

Topic Addressed: Communications to Shopping Customers
 Standard Offer Program
 Low-Income Issues

Date: July 1, 2024

1 **I. INTRODUCTION**

2 **Q. What is your name and business address?**

3 A. My name is Melinda Stumpf. My business address is PPL Electric Utilities Corporation,
4 827 Hausman Road, Allentown, PA 18104.

5
6 **Q. Did you previously submit testimony in this proceeding on behalf of PPL Electric
7 Utilities Corporation (“PPL Electric” or the “Company”)?**

8 A. Yes. I submitted my direct testimony, PPL Electric Statement No. 1, on March 12, 2024.

9
10 **Q. Please describe the purpose of your rebuttal testimony in this proceeding.**

11 A. My rebuttal testimony responds to certain issues and concerns raised in the direct
12 testimony submitted by other parties concerning PPL Electric’s proposed Default Service
13 Program and Procurement Plan (“DSP VI Program”). Specifically, my rebuttal testimony
14 will address the following:

15 (1) The portions of the direct testimony of Retail Energy Supply Association (“RESA)
16 witness Joseph Olikier objecting to PPL Electric’s communications to shopping
17 customers;

18 (2) The objections of RESA witness Olikier to the Company’s proposed changes to the
19 Company’s Standard Offer Program (“SOP”);

20 (3) The recommendations of Office of Consumer Advocate (“OCA”) witness Barbara
21 Alexander regarding the SOP and bill presentation; and

22 (4) The recommendations of Coalition for Affordable Utility Services and Energy
23 Efficiency in Pennsylvania (“CAUSE-PA”) witness Harry Geller regarding the SOP and

1 protections for low income customers participating in the Company’s Time of Use
2 (“TOU”) rate.

3
4 **Q. Are you sponsoring any exhibits with your rebuttal testimony?**

5 A. Yes. I am sponsoring the following exhibits: PPL Electric Exhibits MS1-R through
6 MS9-R.

7
8 **II. RESA WITNESS OLIKER**

9 **A. PPL Electric’s Communications with Shopping Customers**

10 **Q. Do you have any overall observations about Mr. Oliker’s testimony about PPL
11 Electric’s communications with shopping customers?**

12 A. Yes. Overall, I believe that the credibility of Mr. Oliker’s direct testimony on this topic
13 is questionable at best. In his direct testimony, Mr. Oliker makes sweeping allegations
14 about the Company’s communications with customers about shopping. However, he fails
15 to back up his claims with reliable evidence. He begins his testimony with admitting that
16 his “testimony” is “informed by anecdotal information from members” of RESA “as well
17 as their learned experience about how competitive markets operate in Pennsylvania and
18 across the country.”¹ Mr. Oliker doubled down on this claim that his testimony is based,
19 at least in part, on this “anecdotal information,” stating:

20 Mr. Oliker does not have “written” anecdotal information nor has
21 he kept a list of “oral” anecdotal information.” Mr. Oliker’s
22 testimony is based on his 15+ years of experience in the energy
23 industry, as well as his specific experience working for IGS

¹ RESA Statement No. 1, p. 2.

1 Energy and working collaboratively with RESA members to
2 address issues that impact the competitive retail markets across the
3 country. All of this forms the basis for Mr. Oliker's written
4 testimony in this proceeding.²

5 Further, when pressed for basic information and documents related to his claims,
6 Mr. Oliker and RESA could not or refused to produce them. As a prime example, despite
7 Mr. Oliker's claims that PPL Electric's communications are "unnecessary" and
8 "duplicative" with EGSs' notices and could confuse customers,³ Mr. Oliker did not
9 review the notices of any EGSs, including his employer, IGS Energy, before submitting
10 his direct testimony. He only "reviewed the Commission's regulations about the required
11 elements to be included in contract notice expiration[,] and that informed the basis of his
12 testimony."⁴ Additionally, Mr. Oliker "is not personally aware whether any EGSs have
13 failed to send the required notices to customers."⁵ Also, when RESA was asked to
14 produce representative copies of the notices sent by RESA's EGS members, Mr. Oliker
15 asserted on behalf of RESA that "RESA does not maintain copies of members'
16 communications with customers."⁶ Mr. Oliker is not an employee of RESA, and it is
17 unclear to me how he would have actual knowledge about what records RESA has or
18 does not have in its possession.

19 From my perspective, Mr. Oliker cannot claim that PPL Electric's
20 communications are "unnecessary" and "duplicative" and would confuse customers
21 unless he has actual knowledge: (1) about EGSs' notices and their contents; and (2) that

² PPL Electric Exhibit MS1-R.

³ RESA Statement No. 1, pp. 27-28, 36-37.

⁴ PPL Electric Exhibit MS2-R.

⁵ PPL Electric Exhibit MS3-R.

⁶ PPL Electric Exhibit MS4-R.

1 EGSs comply with the regulation and send those notices to customers.⁷ Because he has
2 failed to establish both of those points, I do not see how he can credibly testify about
3 comparisons between PPL Electric’s communications and EGSs’ notices. Indeed, we are
4 left with an evidentiary record that only has one half of the equation—i.e., copies of PPL
5 Electric’s communications—and not the other half—i.e., copies of EGSs’ notices.

6
7 **Q. Before addressing RESA witness Oliker’s specific recommendations and allegations**
8 **about PPL Electric’s communications with shopping customers, could you please**
9 **describe the communications that PPL Electric sends to customers about shopping**
10 **for competitive electric generation supply service?**

11 A. PPL Electric sends a variety of communications to customers to educate them on their
12 options regarding shopping for retail energy supply. At times, the Company’s
13 communications provide customers with their current shopping rate as compared to the
14 Price to Compare (“PTC”). In the communications, customers are informed of their
15 options to contact their current supplier, shop for a new supplier, or return to default
16 service. The Company further refers customers to its Shop Smart website which contains
17 additional information on how to navigate the competitive electric supply market,
18 including references to the PA Power Switch website. The communications are not anti-
19 shopping. They are meant to be informative and to empower customers to make the best
20 decision for their particular situation when choosing a supply option. Well-informed and
21 engaged consumers should be the goal of EGSs and EDCs alike.

⁷ RESA Statement No. 1, pp. 27-28, 36-37.

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A. Are there compelling reasons why PPL Electric sends these communications to customers?

A. Yes. No one can reasonably dispute that a thriving, competitive retail electric market benefits from a well-informed customer base.⁸ To that end, PPL Electric strives to ensure that customers, both shopping and non-shopping, receive competitively-neutral communications about their current rates for electric service and their potential options should they want to switch from default service to a supplier, from their supplier back to default service, or from one supplier to another supplier.

In fact, customers should always be well-educated and informed about their electric service rates. These concerns are heightened with the SOP, which was designed as a means to foster customers’ engagement with the competitive market. As explained in my direct testimony, most customers who remain with their SOP supplier upon the conclusion of their SOP contract end up paying significantly more than the currently-effective PTC. PPL Electric is concerned that this is occurring simply because the customers are unaware that their contract is expiring. The practical impact to these

⁸ See, e.g., Rebecca Hollander-Blumoff & Matthew T. Bodie, *The Market as Negotiation*, 96 Notre Dame L. Rev. 1257, 1266-1267 (“In economic theory, markets operate to provide maximal efficiency in the distribution of goods, services, and property rights. The suppliers in the market will meet up and trade with the buyers on the market at the price that works best for both parties - the equilibrium price. This price will reflect the value that best matches buyers and sellers for that particular good at that particular time. For this equilibrium to occur dependably for every transaction, a number of conditions must be met. Those conditions are generally characterized within economics as: both parties are rational actors; both parties have perfect information; neither party has significant market power; there are no significant and unaccounted-for externalities imposed on third parties; and there are no transaction costs. If these conditions are met, this perfectly competitive market will reach an equilibrium point of Pareto efficiency - that is, a point at which there is no alternative state of affairs that would make both parties better off. This, in turn, will lead to overall societal efficiency.”).

1 customers is that whatever savings they realized while on the SOP quickly evaporate in
2 the months following the end of the SOP contract because they are paying prices
3 significantly higher than the PTC. From my perspective, experiences such as these result
4 in customers having a poor experience with shopping, which ultimately harms the
5 competitive market for electric generation supply service.

6 As such, EDCs, EGSs, the Commission, and all other interested stakeholders
7 should encourage efforts to provide accurate information to customers about how they
8 may be able to lower their electric service bills.

9
10 **Q. Does the Company have data showing that there is a substantial need to improve**
11 **customer education about shopping and the prices they pay for electric service?**

12 A. Yes. In the second quarter of 2021, PPL Electric commissioned a third party, Bellomy
13 Market Intelligence, to conduct a mixed-mode survey⁹ of customers paying more than the
14 PTC. The survey's purpose was to get a better understanding of the customers' reasons
15 for paying a higher rate for electric generation supply service. The survey involved 2,975
16 total respondents. The results of that survey showed the following:

17 a. More than three-quarters (75.74%) of respondents were unaware or did not
18 know if they were paying more than the PTC.

19 b. Of those respondents aware that they were paying more than PTC, nearly one-
20 third said they were not willing to pay more.

⁹ Two modes were used to communicate with the respondents for the survey: online and telephone.

- 1 c. Of those respondents aware that they were paying more than PTC,
2 approximately 16% said that they pay more for “clean/green energy.”
- 3 d. Over 60% of respondents were unfamiliar with the length of their contracts or
4 contract terms/expiration dates.
- 5 e. Approximately 56% of respondents stated that they never heard or did not
6 know how frequently they heard from their EGSs.
- 7 f. Approximately one-third of respondents said that they did not know how often
8 they shop for electric generation supply service.¹⁰

9 As such, significant improvement must be made in educating and informing customers
10 about shopping in the competitive market for electric generation supply service.

11

12 **Q. Mr. Oliker makes certain recommendations regarding PPL Electric’s**
13 **communications with customers about shopping. Could you please summarize**
14 **them?**

15 A. Mr. Oliker recommends that the Commission “Prohibit PPL from Communicating with
16 Shopping Customers about their Specific EGS Contract Terms, Including Pricing.”
17 (RESA St. No. 1 at 6.) In particular, Mr. Oliker states how RESA “recommends that the
18 PUC make it clear to PPL that any communications with supply customers of EGSs
19 regarding their contracts, terms and conditions, and prices must be sanctioned by the
20 Commission.” (RESA St. No. 1 at 21.) Also, Mr. Oliker argues that “PPL should be
21 directed to refrain from independently communicating with shopping customers about

¹⁰ The results of this survey were shared with the Commission’s Office of Competitive Market Oversight (“OCMO”) in the summer of 2021.

1 their EGS contracts, whether they are part of the SOP or have made their own decisions
2 to select an EGS without any involvement from PPL.” (RESA St. No. 1 at 21.)
3 However, “[t]o the extent that the PUC believes more consumer education is necessary
4 and that PPL (and other EDCs) have some role in that process, RESA believes that issue
5 should be taken up on a statewide basis to ensure that feedback from all stakeholders can
6 be considered, including the need for Commission oversight of the content of the
7 messages and their frequency.” (RESA St. No. 1 at 22.)
8

9 **Q. Do you agree with Mr. Oliker’s recommendation that PPL Electric be prohibited**
10 **from communicating with shopping customers about their EGS contracts, including**
11 **pricing?**

12 A. No. At the outset, I am advised by counsel that Mr. Oliker’s proposal for the
13 Commission to prohibit PPL Electric’s communications with customers would violate
14 PPL Electric’s free speech rights under the U.S. and Pennsylvania Constitutions and that
15 the legal issues with that proposal will be addressed in PPL Electric’s briefs.

16 In addition, PPL Electric’s communications are reasonable and appropriate. None
17 of the Company’s communications cited by Mr. Oliker present any false, deceptive, or
18 misleading information to customers. There is no promotion of one shopping choice over
19 another. Rather, all options are presented factually and equally so that the customer can
20 make an informed choice. I cannot understand any legitimate reason as to why Mr.
21 Oliker would want to prevent the sharing of factual information that promotes a well-
22 functioning market.

1 In addition, RESA’s claims that PPL Electric’s communications are “misleading”
2 is baseless. In discovery, Mr. Oliker stated the following on behalf of RESA when asked
3 whether any of the information in PPL Electric’s communications is factually incorrect:

4 RESA views the information in the referenced PPL communications as
5 misleading and therefore incorrect. For instance, the information
6 emphasizes a supply price that a customer is paying at a particular point in
7 time, which may result in the customer making an apples-to-oranges
8 comparison and reaching a decision that fails to consider other relevant
9 factors. In focusing on the price that the customer is **currently** paying, as
10 compared to PPL’s **current** price for default service, the communications
11 do not take into consideration the value to the customer of a fixed price
12 over time. Likewise, this comparison is a snapshot at a moment in time
13 that does not capture savings from previous or future time periods.
14 Further, the communications do not account for the value of products and
15 services for which the customer may be paying, such as green power or
16 support for charities or other items that are important to the customer.
17 Since the comparisons are incomplete at best, they are misleading and
18 incorrect. As a result, it is RESA’s position that PPL’s communications
19 with supply customers of EGSs regarding the terms and conditions of their
20 supply contracts violate prior Commission orders, inappropriately promote
21 default service and constitute anti-competitive conduct.¹¹
22

23 However, under Mr. Oliker’s view, RESA’s own Energy Market Savings Reports
24 would apparently be “misleading.” In those reports, RESA purports to show the
25 “savings” that customers can achieve through shopping.¹² In calculating those savings,
26 RESA singles out the lowest offer below the PTC for each major EDC service territory to
27 calculate the potential market savings for a single month (here, May 2024).¹³ Certainly,
28 RESA would not consider its own Energy Market Savings Reports, which “emphasize a
29 supply price that a customer is paying at a particular point in time” and provide “a
30 snapshot at a moment in time that does not capture savings from previous or future time

¹¹ PPL Electric Exhibit MS5-R.

¹² PPL Electric Exhibit MS6-R.

¹³ PPL Electric Exhibit MS6-R.

1 periods,”¹⁴ to be misleading. Yet, Mr. Oliker alleges that PPL Electric’s communications
2 are misleading for purportedly doing the same. Thus, Mr. Oliker’s position should be
3 rejected outright.

4
5 **Q. Is PPL Electric’s proposal to reach out to customers about their SOP contracts “a**
6 **marketing opportunity to ‘win back’ customers,” as alleged by Mr. Oliker (RESA**
7 **St. No. 1 at 23-24)?**

8 A. No. The Company has no incentive to “win back” customers. PPL Electric does not
9 mark up or make any profit on providing default service, as Mr. Oliker himself
10 acknowledged in discovery.¹⁵ The Company’s interest is that it does not want to be
11 blamed for the actions of a supplier with which it has no connection. As explained in my
12 direct testimony, many customers do not know who their SOP supplier is. Rather, they
13 think it is PPL Electric because it is PPL Electric’s SOP, and they enter the program by
14 calling or visiting the Company’s website. In the situation when the SOP supplier raises
15 the customer’s generation rate after the expiration of the SOP contract, it is often PPL
16 Electric that is blamed for the price increase. PPL Electric does not want to win back any
17 customers; it is only seeking to protect customers from making ill-informed choices.

18 I would also note the inconsistency in Mr. Oliker’s positions. He is adamant that
19 PPL Electric should not communicate with customers regarding their supply contract and
20 that EDCs have no role in the relationship between an EGS and its customer. However,
21 Mr. Oliker still supports the SOP, which by its very nature inserts the EDC into the

¹⁴ PPL Electric Exhibit MS5-R.

¹⁵ PPL Electric Exhibit MS7-R.

1 EGS's relationship with the customer. If Mr. Olikier really believed that EDCs have no
2 role in the competitive generation supply space, then he should support eliminating the
3 SOP.

4
5 **Q. Please respond to Mr. Olikier's claim about the communications included with your**
6 **direct testimony as PPL Electric Exhibits MS-1 and MS-2, particularly his claim**
7 **that PPL Electric Exhibit MS-2 "is a very small excerpt of the communications that**
8 **have been sent and is far from representing the entire message" (RESA St. No. 1 at**
9 **24)?**

10 A. Exhibits MS-1 and MS-2 are examples of communications that PPL Electric has sent and
11 contain the entirety of those specific communications. PPL Electric has provided other
12 communications, which were provided in discovery in response to RESA Set I, No. 5.
13 Copies of those communications provided in discovery are attached to my rebuttal
14 testimony as PPL Electric Exhibit MS8-R.¹⁶ The format of these communications may
15 be different, but the core message remains the same. The goal for all of the Company's
16 communications around shopping is to provide factual information to educate customers.

17
18 **Q. Have the Company's communications "promote[d] default service" and "presented**
19 **PPL's default service as a competitive option," as alleged by Mr. Olikier (RESA St.**
20 **No. 1 at 26-27)?**

¹⁶ Please note that PPL Electric Exhibit MS8-R contains a confidential attachment, RESA I-5 Attachment 3, which is only provided in the Proprietary version of my rebuttal testimony. In addition, PPL Electric's response to RESA Set I, No. 5, as served, included a live spreadsheet attached as RESA I-5 Attachment 2. Because RESA I-5 Attachment 2 does not contain any communications with shopping customers, it is omitted from Exhibit MS8-R.

1 A. No. PPL Electric specifically mentions in all of its shopping communications that a
2 customer can shop with a competitive supplier for a better rate. Although the Company’s
3 communications list that default service is one of the options that customers can choose
4 (which is factually correct), the communications never suggest that default service is
5 superior to or more advantageous than a competitive supplier option. Moreover, there
6 would be no financial gain for PPL Electric to promote default service. As noted
7 previously, and as acknowledged by Mr. Oliker, PPL Electric does not profit from default
8 service. Thus, there is no reason for the Company to promote default service or try to
9 “win-back” customers, as alleged by Mr. Oliker.

10

11 **Q. Mr. Oliker asserts that “previous consumer education efforts” by EDCs were**
12 **“highly controlled by the Commission.” (RESA St. No. 1 at 30.) Do you agree with**
13 **this characterization?**

14 A. No. The reference to the *Immediate Work Plan Order* is not relevant to PPL Electric’s
15 current communications. Mr. Oliker is referencing an order from 2012 at the early stages
16 of allowing customers to shop for electric supply. The Commission was giving a specific
17 directive to EDCs on how to communicate with customers; however, there was no
18 suggestion that it would be the only communication on shopping for the remainder of
19 time. Suggesting that a round of communications 12 years ago is sufficient to educate
20 customers should not prohibit current education efforts. Additionally, PPL Electric was
21 encouraged to continue communicating with its customers about shopping in the DSP V
22 proceeding, when then-Chairman Brown Dutrieuille issued a Statement accompanying
23 the Commission’s Order “encourag[ing] PPL to continue to educate customers about the

1 shopping options available to them at the end of the SOP.”¹⁷. That is precisely what PPL
2 Electric has been doing. Finally, the Company communicates regularly with its
3 customers about a variety of topics without specific Commission approval.
4

5 **Q. Mr. Oliker claims that PPL Electric’s communications with customers about**
6 **shopping have been “harmful to the retail competitive market” for various reasons.**
7 **(RESA St. No. 1 at 35-37.) Before addressing each of his alleged reasons, have the**
8 **Company’s communications with shopping customers adversely affected the number**
9 **of customers shopping in PPL Electric’s service territory?**

10 A. No. In his direct testimony, RESA witness Oliker references and relies on the
11 Commission’s “PaPUC Retail Electricity Choice Activity Report 2022 dated October
12 2023,” asserting that “[o]n a statewide basis, only 26.4% of the total residential load is
13 being served by competitive suppliers.” (RESA St. No. 1 at 14.) “While [he] agree[s]
14 with the prior Commission statement that shopping alone is not indicative of the status of
15 competition,” Mr. Oliker claims that “the current numbers, and the trends over the years
16 since the Commission’s Retail Markets Investigation support the view that the market has
17 become stagnant.” (RESA St. No. 1 at 14.)

18 Interestingly, Mr. Oliker omits how that same report shows that more residential
19 and non-residential customers, on a percentage-wise basis, are shopping in PPL Electric’s
20 service territory than any other EDC’s service territory. (See RESA Exh. JO-2 at 4.)
21 Specifically, Table 2 of that report states that 35% of PPL Electric’s residential customer

¹⁷ Chairman Brown Dutrieuille’s Statement, Docket No. P-2020-3019356, p. 2 (Dec. 17, 2020).

1 accounts and 46% of its non-residential customer accounts were shopping as of 2022.
2 (*Id.*) On the residential side, the next closest EDCs were Duquesne Light Company
3 (“Duquesne Light”) and PECO Energy Company (“PECO”), both with 21% of their
4 residential customer accounts shopping as of 2022. (*Id.*) As for non-residential, the next
5 closest EDC was Pennsylvania Power Company with 44% of its non-residential customer
6 accounts shopping as of 2022. (*Id.*) Given that PPL Electric has been sending these types
7 of communications to customers since 2021, it is difficult to see how the data supports Mr.
8 Oliker’s claim that the Company’s communications have been “harmful to the retail
9 competitive market.” (RESA St. No. 1 at 35.)

10 Furthermore, the goal of restructuring was not to have a competitive market for the
11 sake of having a competitive market or to offer innovative products disconnected from
12 electric service. The goal was to have a competitive market to drive down electricity
13 supply prices. For example, I am advised by counsel that Section 2802(4)-(5) of the
14 Public Utility Code declares the following policies as reasons why the General Assembly
15 passed the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S.
16 § 2801, *et seq.* (“Act”):

17 (4) Rates for electricity in this Commonwealth are on average higher than
18 the national average, and significant differences exist among the rates of
19 Pennsylvania electric utilities.

20
21 (5) Competitive market forces are more effective than economic
22 regulation in controlling the cost of generating electricity.

23 66 Pa. C.S. § 2802(4)-(5). The General Assembly also required default service to be
24 procured at “[t]he least cost to customers over time.” 66 Pa. C.S. § 2807(e)(3.4)(ii).

25 Notwithstanding, it appears that Mr. Oliker supports a competitive market where
26 customers have less information about their electric supply prices, where the PTC is

1 higher so that EGSs can in turn offer higher rates to customers, or both. Therefore,
2 although I am not an attorney, I believe a foundational principle of restructuring was to
3 reduce customers' electric supply rates, and Mr. Oliker's position runs contrary to that
4 foundational principle.

5
6 **Q. Mr. Oliker contends that the Company's communications "inappropriately insert**
7 **PPL as the EDC into the private EGS-customer contractual relationship." (RESA**
8 **St. No. 1 at 36.) Do you agree?**

9 A. No. As I discussed earlier, the surveys that PPL Electric has conducted have indicated
10 that customers are still not well educated on electric retail shopping. In my experience
11 customers still look to PPL Electric for answers about how to navigate the competitive
12 market. The Company is not inserting itself into the contractual relationship; rather, it is
13 providing factual information to help customers to make an informed decision, as shown
14 by the communications attached to my direct testimony as PPL Electric Exhibits MS-1
15 and MS-2.

16

1 **Q. Mr. Oliker also claims that PPL Electric’s “communications are misleading in that**
2 **they focus on a supply price that a customer is paying at a particular point in time,**
3 **which may cause the customer to take actions that result in the customer paying**
4 **more for supply at a later point in time.” (RESA St. No. 1 at 36.) Please respond.**

5 A. I do not agree with this suggestion. PPL Electric’s communications encourage customers
6 to check their generation supply price often. PPL Electric’s education efforts do not
7 suggest that prices are static; rather, they encourage customers to check their rate often.

8
9 **Q. Mr. Oliker avers that “PPL’s focus on price – to the exclusion of all other issues –**
10 **overlooks the other benefits of shopping,” such as “the long-term nature of a**
11 **contract and the associated price stability” or “other value-added services that are**
12 **important to the customer.” (RESA St. No. 1 at 36-37.) Please respond.**

13 A. Many customers are focused on price, and PPL Electric provides them information to
14 make a decision that fits their needs. However, if a customer is choosing to pay more for
15 price stability or value added services, then that is entirely their choice. It is also true that
16 if a customer is paying for price stability or value added services then they are doing that
17 knowingly and understand that they may be paying a premium to obtain a benefit that is
18 valuable to them. Customers making an informed choice to pay more for retail supply
19 are not going to be persuaded by PPL Electric’s communications because they have
20 already considered their options and are comfortable with their decision. The Company’s
21 communications are directed at those customers who have not chosen to pay more but are
22 doing so unknowingly. Transparency and full access to information are among the

1 hallmarks of a competitive market. Thus, Mr. Oliker’s proposal to restrict information to
2 customers should not be adopted.

3
4 **Q. Mr. Oliker also argues that PPL Electric’s communications “promote default
5 service by encouraging customers to cancel their contracts with EGSs.” (RESA St.
6 No. 1 at 37.) Is that correct?**

7 A. No. PPL Electric’s communications inform customers of all of their options, including
8 staying with their current supplier, shopping for a new supplier, or switching to default
9 service. As mentioned previously, there is no incentive for the Company to promote
10 default service. PPL Electric’s only goal with the communications is to help educate
11 customers so that they can make well-informed decisions.

12
13 **Q. Mr. Oliker states that “the PPL communications offer advice to EGS’s supply
14 customers regarding the terms of their electric supply contracts, including prices”
15 and that by “suggesting actions that customers should take concerning the supply
16 contracts, PPL is portraying itself as an expert and a trusted source on the purchase
17 of electricity.” (RESA St. No. 1 at 37.) Please respond.**

18 A. The Company does offer education on shopping as a trusted source of information. As a
19 regulated public utility with a statutory duty to provide safe, reliable, adequate, and
20 reasonable service, PPL Electric believes that it must, as part of its “service” that is
21 broadly defined by Section 102 of the Public Utility Code,¹⁸ educate its customers about

¹⁸ See 66 Pa. C.S. § 102.

1 their bills. As such, customer education is a part of the Company's core functions as an
2 electric utility. Given that PPL Electric has no financial interest in whether customers
3 shop, it is an ideal position to provide fact based neutral information to customers. The
4 Company's surveys of customers have consistently shown that there is still a great deal of
5 confusion around shopping for retail generation supply. Finally, I would note that the
6 Office of Consumer Advocate, Office of Small Business Advocate, and the Public Utility
7 Law Project are all aware and supportive of PPL Electric's efforts around shopping
8 education.

9
10 **Q. Mr. Oliker also contends that "given the Commission's requirements for EGSs to**
11 **provide detailed notices to their supply customers about the prices and their options**
12 **upon the expiration of contracts, the PPL communications have the potential to**
13 **overload or confuse customers, particularly when the Commission is also sending**
14 **out notices regarding these matters." (RESA St. No. 1 at 37.) Do you agree?**

15 **A.** No. PPL Electric has discovered that there are a significant amount of customers who are
16 unaware that they are paying prices above the PTC, and who want to pay the lowest price
17 possible for their electric service. In this scenario, the minimum mandated
18 communications are not enough because customers are unaware that there are other
19 options to achieve their desired result. Therefore, PPL Electric should play a role in
20 educating customers about their options. In fact, as noted by CAUSE-PA witness Geller,
21 there is a "direct correlation between PPL's educational efforts and the ability for
22 residential consumers to save in some months," which shows "targeted education and

1 outreach are critically important components to help ensure residential consumers can
2 achieve savings in the competitive market.”¹⁹

3
4 **Q. Mr. Oliker states that “PPL would be well-advised to focus on its core distribution**
5 **functions, including the timely issuance of bills that include EGS charges, rather**
6 **than devoting resources to an area that lies outside [its] statutory duties as an**
7 **EDC.” (RESA St. No. 1 at 38.) Please respond.**

8 A. PPL Electric believes that one of its core functions is to provide quality customer service.
9 The Company feels obligated to help customers when it sees that they are confused and
10 paying more than they need to for electric service. I would also note that educating
11 customers about their shopping options does not prevent the Company from meeting its
12 duties to provide “core distribution functions.” In fact, as noted above, the Company
13 considers customer education to be a part of its core functions.

14
15 **Q. You noted previously how Mr. Oliker recommends that “[t]o the extent that the**
16 **PUC believes more consumer education is necessary and that PPL (and other EDCs)**
17 **have some role in that process, RESA believes that issue should be taken up on a**
18 **statewide basis to ensure that feedback from all stakeholders can be considered,**
19 **including the need for Commission oversight of the content of the messages and**
20 **their frequency.” (RESA St. No. 1 at 22.) As part of that statewide proceeding, Mr.**
21 **Oliker recommends that the Commission evaluate the continued used of “Price to**

¹⁹ CAUSE-PA St. 1, p. 11.

1 **Compare” and that the Commission should replace that term with “Default Service**
2 **Rate.” Do you agree with these recommendations?**

3 A. No. First, I am advised by counsel that an individual company’s default service
4 proceeding is not an appropriate forum to propose that the Commission open a statewide
5 investigation concerning default service messaging. Not all parties that potentially would
6 have opinions on whether such an investigation is necessary are present in this case. The
7 Commission has processes for making such a request that will provide all interested
8 parties an opportunity to comment on whether such an investigation should be
9 undertaken, and the scope of any such investigation.

10 Second, despite Mr. Oliker’s suggestion it is PPL Electric’s experience that
11 customers primarily care about price when shopping for generation supply. The term
12 “Price to Compare” is an easily understood term for customers that they can use the
13 EDCs default service rate as a neutral benchmark to compare supplier offers against. It
14 also does not mean that customers will only compare on price. An EGS may be offering
15 a value added product and customers can use the PTC to determine if they are receiving
16 enough value in return for paying a premium above the PTC. Eliminating the usage of
17 the term “Price to Compare” would only serve to confuse customers.

18 Lastly, if there were to be a statewide investigation, the lead topic should be the
19 serious problem of many, many customers paying substantially more than the PTC.

20

1 **Q. Do you have any final observations about PPL Electric’s communications and**
2 **RESA’s opposition to those communications?**

3 A. I find RESA’s position inherently contradictory. On one hand, RESA believes that
4 customers are very knowledgeable about their electric generation supply service, such
5 that they made deliberate, well-informed decisions when choosing a particular electric
6 generation supply service offer that could have a higher rate than the default service rate.
7 On the other hand, RESA claims that PPL Electric’s communications, which indisputably
8 present factually accurate information, will confuse those same knowledgeable customers
9 and cause them to revert back to default service or choose another supplier, apparently
10 forgetting about all the reasons why they signed up for their current supplier’s rate in the
11 first place. The bottom line is that both the competitive market and retail electric service
12 customers benefit the most with a well-educated customer base, and, as I explained
13 previously, such consumer education is lacking. Thus, the Commission should reject
14 RESA’s continued efforts to stifle competitively neutral and factually accurate customer
15 education, including RESA’s proposals in this proceeding.

16

17 **B. PPL Electric’s Proposed Changes to the SOP**

18 **Q. Please summarize Mr. Oliker’s recommendations regarding the Company’s**
19 **proposed changes to the SOP.**

20 A. In pages 40 to 49 of his direct testimony, Mr. Oliker makes the following
21 recommendations:

1 (1) Reject the Company’s proposal to return SOP customers automatically to default
2 service upon expiration of SOP contract unless the customer takes affirmative action to
3 remain enrolled with the EGS;

4 (2) Reject the Company’s alternative proposal to communicate about the end of the SOP
5 contract with customers prior to entering into an SOP contract;

6 (3) Reject the Company’s alternative proposal to require EGSs to communicate with
7 customers after the expiration of the SOP contract on a monthly basis until the customer
8 takes affirmative action regarding their supplier contract; and

9 (4) Reject the Company’s proposed increase to the SOP referral fee charged to EGSs
10 participating in the SOP.

11
12 **Q. As an alternative to the Company’s proposed reforms to the SOP, Mr. Oliker**
13 **recommends amending the SOP to require EGSs to provide an initial price equal to**
14 **the default service rate and cease marketing the SOP as a “guaranteed savings”**
15 **program. (RESA St. No. 1 at 41.) Do you agree with this recommendation?**

16 A. No. The SOP was originally designed as a program to acclimate customers to shopping
17 for generation supply. It was never intended to be a marketing tool for EGSs. Part of
18 getting customers comfortable with shopping is showing them the potential benefits of
19 purchasing generation from an EGS. That is how the SOP arrived at providing a 7%
20 discount off the then current PTC. Mr. Oliker’s proposal that the SOP simply provide the
21 PTC rate would be harmful for customers. Customers would receive no benefit for the
22 year that they are in the SOP program and potentially be paying more if the PTC price
23 falls during the SOP term. More concerning is that this exposes customers to having their

1 contract price increase at the end of the SOP term after not receiving any discount during
2 the term. This has the potential to be a very negative shopping experience for customers
3 and could sour these customers to the entire shopping experience. Additionally, Mr.
4 Oliker's alternative recommendation calls into question the continued existence of the
5 SOP. If SOP customers are not provided a discount off of the PTC, then there would be
6 no incentive for them to participate.

7
8 **Q. On page 40 of his direct testimony, Mr. Oliker asserts that the Commission has**
9 **already rejected the proposal for an automatic return to default service upon**
10 **expiration of the SOP contract, finding that it is “a restriction on competition’ and**
11 **inconsistent with the Commission’s order and regulations.” Do you have any**
12 **response to this assertion?**

13 A. The Company does not view its SOP proposal as a restriction on competition. The SOP
14 is not mandated by statute or regulation. Rather, it is a creation of the PUC, and the PUC
15 has created the program parameters. Under no other context would the PUC mandating
16 that suppliers offer a 7% discount off of the PTC be allowed as it is clearly a restriction
17 on competition. However, under the special SOP rules, which is voluntary for EGSs to
18 participate in, the PUC mandates the price and contractual terms that the EGS can offer.
19 The PUC is free to alter the terms of the SOP to achieve its desired goals of promoting
20 shopping. As the Company has demonstrated, many customers are having a negative
21 shopping experience with the SOP as it is currently designed, which is counter to the
22 Commission's original intent of introducing customers to shopping with a positive

1 experience. It is well within the PUC's authority to grant PPL Electric's proposal to
2 achieve the original intent of the SOP.

3 Also, the SOP is unlike the shopping that occurs generally in the competitive
4 market for electric generation supply service. The SOP is a PUC-regulated and approved
5 program that provides guaranteed, non-market-based savings against the PTC.
6 Therefore, I believe that customers signing up for the SOP do so to save money on their
7 electric bills by having a lower rate than the PTC. As such, it makes more sense for
8 customers to be returned to default service at the end of the SOP contract if they do not
9 affirmatively choose to remain with the EGS. Otherwise, these customers, who signed up
10 expecting to have a lower rate than the PTC, will continue having negative experiences
11 when they are rolled over to the EGSs' higher rates after the SOP contract ends.

12
13 **Q. On page 41 of his direct testimony, Mr. Olikier claims that if adopted, returning**
14 **customers to default service at the expiration of the SOP contract will result in**
15 **EGSs not participating in the SOP. What evidence has he offered to support his**
16 **claim?**

17 A. He has not offered any evidence and it is pure speculation at this point. I would also note
18 that even under the current SOP rules, there is no guarantee that suppliers will participate.
19 As noted in my direct testimony, there was a six-month period from June to November
20 2022 when PPL Electric's SOP was not offered because of lack of supplier participation.

21

1 **Q. Do you have any further observations with respect to this claim?**

2 A. It appears that what Mr. Oliker is suggesting is that if EGSs do not have the opportunity
3 to charge some percentage of customers prices above the PTC after the expiration of the
4 SOP contract they would not want to participate. Mr. Oliker is agreeing with the
5 argument that PPL Electric is making. EGSs will only participate in the SOP if there is
6 the opportunity to recoup the cost of the 7% discount by increasing their rates when the
7 SOP contract expires. This is why all parties and the Commission should support the
8 Company's customer education efforts discussed earlier in my testimony.

9

10 **Q. On page 45 of his direct testimony, Mr. Oliker equates PPL Electric's proposal to**
11 **return customers to default service at the expiration of the SOP contract to**
12 **slamming, claiming this change would amount to the unauthorized switch of a**
13 **customer's service and that it "further robs customers of the ability to freely shop**
14 **for competitive service." Is Mr. Oliker making a reasonable comparison?**

15 A. No. The customer would be advised at the outset on how the SOP contract will work,
16 including notification that the customer will revert to default service if they take no
17 affirmative action at the expiration of the SOP term. If the customer does not like this
18 condition, they are free to decline the SOP offer. This is the very definition of informed
19 consent and cannot be considered slamming at all.

20

21 **Q. Mr. Oliker also argues that the Company's proposed communications to SOP**
22 **customers leading up to the end of their SOP contract should be rejected, claiming**
23 **that PPL Electric has already "demonstrated use of its platform to improperly**

1 **message information about the competitive market.” (RESA St. No. 1 at 45.) Do**
2 **you agree?**

3 A. No. As I explained previously, PPL Electric’s communications provide true and factual
4 information intended to educate and inform customers.

5
6 **Q. On pages 47 to 48 of his direct testimony, Mr. Oliker claims that existing**
7 **Commission regulations requiring EGSs to provide notice of a subsequent change in**
8 **supplier pricing negate the need for PPL Electric’s proposal to require EGSs to**
9 **send monthly post-SOP notices to customers who take no affirmative action. Please**
10 **respond.**

11 A. PPL Electric’s data shows otherwise in that many customers are paying prices well above
12 the PTC several months after the SOP contract has expired. The SOP is a unique product
13 in which the EDC does the initial marketing. In many cases, the customer does not
14 choose or even know who their SOP supplier is. Given the unique characteristics of the
15 SOP, the additional post-term notifications are warranted.

16
17 **Q. Mr. Oliker also claims that PPL Electric “failed to consider the costs to EGSs of this**
18 **additional notice requirement.” (RESA St. No. 1 at 48.) Do you agree ?**

19 A. Initially, I note that PPL Electric is proposing the additional notification as an alternative
20 to its main proposal, which is to return customers to default service at the end of their
21 SOP contracts. If the Company’s primary proposal is accepted, the EGSs will not incur
22 any costs for additional post-contract notices. Second, EGS participation in the SOP is

1 entirely voluntary. If compliance with SOP terms is too expensive, EGSs have the option
2 to not participate.

3
4 **Q. Noting his opposition to PPL Electric’s proposed increase in the Company’s SOP**
5 **referral fee, Mr. Oliker claims that “PPL has offered no analysis or information or**
6 **information to support this cost increase” other than to compensate its SOP vendor**
7 **more appropriately. (RESA St. No. 1 at 49.) Do you agree with this assertion?**

8 A. No. PPL Electric consulted with its SOP vendor and was informed that market price for
9 SOP call handling is \$33. I would note that the \$28 referral fee has been in place for over
10 10 years, and it should not come as a surprise to Mr. Oliker that the cost to provide SOP
11 referral service is more than it was at program inception.

12
13 **Q. On page 50 of his direct testimony, Mr. Oliker asserts that “taken together, all of**
14 **PPL’s proposals regarding SOP in this proceeding are essentially acting as a death**
15 **by a thousand cuts for the SOP program.” Do you agree with this characterization?**

16 A. Absolutely not. Rather, PPL Electric is making modest proposals in an effort to improve
17 the customer experience.

18
19 **III. OCA WITNESS ALEXANDER**

20 **Q. Please summarize Ms. Alexander’s recommendations regarding the Company’s**
21 **SOP and bill presentation.**

22 A. On pages 3 to 4 of her direct testimony, Ms. Alexander makes the following
23 recommendations:

1 (1) That the Company should terminate its Standard Offer Program (“SOP”);

2 (2) Alternatively, if the SOP is not eliminated, she agrees with PPL’s proposal to return
3 SOP customers to default service upon expiration of SOP contract unless the customer
4 takes affirmative action to remain enrolled with the EGS;

5 (3) That PPL Electric revise its bill presentation to show a dollars and cents calculations
6 of the customer’s supplier charges with a dollars and cents calculation of what the
7 customer would pay under the Company’s PTC;

8
9 **Q. Both OCA witness Alexander and CAUSE-PA witness Geller recommend that the**
10 **Company’s SOP be terminated. (OCA St. No. 2 at 3; CAUSE-PA St. 1 at 39.)**
11 **Please respond to these recommendations.**

12 A. PPL Electric is not opposed to and would support the elimination of the SOP. However,
13 if the SOP is to remain, the Company’s proposed modifications should be adopted to
14 improve the customer experience.

15
16 **Q. Do you agree with Ms. Alexander’s proposal that the Company revise its bill**
17 **presentation for shopping customers to reflect a dollars and cents comparison**
18 **between supplier charges and the Price to Compare (OCA St. No. 2, pp. 15-16)?**

19 A. PPL Electric generally supports changes that help customers better understand their bill.
20 However, the Company has some concerns with this proposal. First, unless the customer
21 bill is rate ready, PPL Electric does not know the supplier’s rate. Second, some suppliers
22 charge a monthly fee in addition to the per kWh fee. Lastly, some suppliers have tiered
23 pricing depending on the customer's usage. Conceptually, PPL Electric agrees with Ms.

1 Alexander's suggestion but is concerned that it does not have enough information on
2 supplier billing to implement the suggestion effectively.

3
4 **Q. On page 10 of her direct testimony, Ms. Alexander asserts that she has "concerns"**
5 **about PPL Electric's implementation of its SOP because the third party**
6 **administrator of its SOP "has not been audited or evaluated in terms of compliance**
7 **in any recent reasonable period." Do you agree with this assertion?**

8 A. No. While there has not been a formal evaluation of the third-party administrator's
9 performance, the Company does monitor the performance of the SOP as a whole. If PPL
10 Electric became aware of an issue with the third-party administrator, the Company would
11 address it as appropriate.

12
13 **IV. CAUSE-PA WITNESS GELLER**

14 **Q. Please summarize Mr. Geller's recommendations regarding the Company's SOP**
15 **and CAP shopping rules.**

16 A. On pages 39 to 40 of Mr. Geller's direct testimony, he makes the following
17 recommendations:

18 (1) To reject the Company's proposal to continue operating the SOP;

19 (2) In the alternative, approve PPL Electric's proposals to return customers to default
20 service at expiration of SOP contract if they do not make an affirmative decision to stay
21 with their current supplier or to select a new supplier at the end of the 12-month SOP
22 contract;

1 (3) Approve PPL Electric’s proposal to perform targeted outreach to SOP customers
2 about their shopping decision throughout the 12-month SOP contract, especially in the
3 month leading up to the expiration of their contract;

4 (3) Require PPL Electric to host an annual SOP Stakeholder meeting to assess relevant
5 data and determine whether PPL Electric’s flexible SOP guidelines for its customer
6 service representatives are successful;

7 (4) Approve PPL Electric’s proposal to institute a rule that permits CAP applicants to
8 automatically return to default service upon enrollment; and

9 (5) Amend PPL Electric’s CAP rules to bar suppliers from charging any early termination
10 or cancellation fees to CAP customers who return to default service upon entry into CAP.

11
12 **Q. On page 30 of his direct testimony, Mr. Geller recommends that PPL Electric no**
13 **longer solicit confirmed low income customers for enrollment into the SOP. Do you**
14 **agree with this recommendation?**

15 A. Yes, and the Company can add this restriction to the SOP rules if directed.

16
17 **Q. On page 39 of his direct testimony, Mr. Geller recommends that PPL Electric hold**
18 **an annual SOP Stakeholder meeting to assess the SOP. Do you have any comments**
19 **regarding this recommendation?**

20 A. CAUSE-PA withdrew this recommendation in discovery.²⁰

21

²⁰ PPL Electric Exhibit MS9-R.

1 **Q. On page 24 of his direct testimony, Mr. Geller asserts that further reforms to the**
2 **TOU rate are needed to protect confirmed low income customers, and recommends**
3 **that PPL Electric provide confirmed low income (“CLI”) customers with**
4 **information about the availability of the Company’s universal service programs if**
5 **they seek to enroll in the TOU rate. Do you agree with this recommendation?**

6 A. Yes, this is something that the Company can implement.

7

8 **Q. Mr. Geller further recommends that PPL Electric conduct targeted universal**
9 **service program outreach to CLI customers participating in the TOU rate.**
10 **(CAUSE-PA St. No. 1 at 38.) Do you agree with this recommendation?**

11 A. Yes, but only if the number of CLI customers participating in TOU remains low. If
12 participation increases, it may not be feasible to perform the targeted outreach suggested
13 by Mr. Geller.

14

15 **Q. Does this conclude your rebuttal testimony?**

16 A. Yes.

PPL Electric Exhibit MS1-R

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-1 Re: RESA St. No. 1, p. 2. Mr. Olikier states that “[m]y testimony about problems faced by competitive electric generation suppliers (‘EGSs’) as a result of the current market structure, the design of the default service plan and the proposals of PPL Electric . . . that [he] discuss[es] below is informed by anecdotal information from members as well as their learned experience about how competitive markets operate in Pennsylvania and across the country.”

- a) Please provide copies of all written “anecdotal information from members” referenced by Mr. Olikier.
- b) Please summarize all oral “anecdotal information from members” referenced by Mr. Olikier.
- c) Are there any portions of Mr. Olikier’s testimony that are based on the referenced “anecdotal information from members” and about which he has no personal knowledge? If so, please identify such portions of his direct testimony.

Response: Mr. Olikier does not have “written” anecdotal information nor has he kept a list of “oral” anecdotal information.” Mr. Olikier’s testimony is based on his 15+ years of experience in the energy industry, as well as his specific experience working for IGS Energy and working collaboratively with RESA members to address issues that impact the competitive retail markets across the country. All of this forms the basis for Mr. Olikier’s written testimony in this proceeding.

Response provided by: Joseph Olikier on behalf of RESA

Date response provided: June 18, 2024

PPL Electric Exhibit MS2-R

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-2 Re: RESA St. No. 1, p. 3. Please provide copies of all “notices to be provided to customers upon pending expiration of the contract or notice of material changes” that Mr. Oliker reviewed prior to submitting his direct testimony.

Response: Mr. Oliker reviewed the Commission’s regulations about the required elements to be included in contract notice expiration and that informed the basis of his testimony.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

PPL Electric Exhibit MS3-R

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-9 Re: RESA St. No. 1, p. 23. Mr. Oliker states, “RESA is not convinced that any further communications should be made to customers and believes that the concerns that PPL has expressed about customer confusion have been and would continue to be further exacerbated by having yet another entity chiming in with notifications about expiring contracts.”

Is Mr. Oliker aware of any EGSs that have failed to send the required customers to customers? If so, please identify the EGS(s) and provide all Documents relied upon by Mr. Oliker in reaching that conclusion and in responding to this interrogatory.

Response:

Mr. Oliker is not personally aware whether any EGSs have failed to send the required notices to customers. However, to the extent that this has occurred, that is an enforcement issue for handling by the Commission’s Bureau of Investigation and Enforcement in conjunction with the Bureau of Consumer Services. It is not a reason for PPL to issue its own notices that have no basis in the Commission’s regulations.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

PPL Electric Exhibit MS4-R

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-11 Re: RESA St. No. 1, pp. 22-23. For each member of RESA, please provide a representative copy of the “Initial Notice” sent by that EGS to a non-SOP “customer between 45 and 60 days before the expiration date of the contract.”

Response: As stated in Mr. Olikier’s testimony, RESA does not maintain copies of members’ documents. As stated in Mr. Olikier’s response to Request PPL-II-2, Mr. Olikier reviewed the Commission’s regulations about the required elements to be included in contract notice expiration and that informed the basis of his testimony.

Response provided by Joseph Olikier on behalf of RESA

Date response provided: June 18, 2024

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-2 Re: RESA St. No. 1, p. 23. For each member of RESA, please provide a representative copy of the “Options Notice” sent by that EGS to a non-SOP “customer at least 30 days prior to the expiration of the fixed duration contract.”

Response: As stated in Mr. Oliker’s testimony, RESA does not maintain copies of members’ documents. As stated in Mr. Oliker’s response to Request PPL-II-2, Mr. Oliker reviewed the Commission’s regulations about the required elements to be included in contract notice expiration and that informed the basis of his testimony.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-13 Re: RESA St. No. 1, pp. 22-23. For each member of RESA, please provide a representative copy of the “Initial Notice” sent by that EGS to an SOP “customer between 45 and 60 days before the expiration date of the contract.”

Response: As stated in Mr. Oliker’s testimony, RESA does not maintain copies of members’ documents. As stated in Mr. Oliker’s response to Request PPL-II-2, Mr. Oliker reviewed the Commission’s regulations about the required elements to be included in contract notice expiration and that informed the basis of his testimony.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-14 Re: RESA St. No. 1, p. 23. For each member of RESA, please provide a representative copy of the “Options Notice” sent by that EGS to an SOP “customer at least 30 days prior to the expiration of the fixed duration contract.”

Response: As stated in Mr. Oliker’s testimony, RESA does not maintain copies of members’ documents. As stated in Mr. Oliker’s response to Request PPL-II-2, Mr. Oliker reviewed the Commission’s regulations about the required elements to be included in contract notice expiration and that informed the basis of his testimony.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-15 Re: RESA St. No. 1, pp. 24-28. Please provide a sample copy of every communication that each of RESA’s members sent from January 1, 2021, through the date of the response to this request, to supply customers of EGSs who were or are participating in PPL Electric’s Standard Offer Program that contained information regarding their contracts with EGSs, the impending expiration of those contracts, or the options available to the customers upon the expiration of those contracts.

Response: As stated in Mr. Oliker’s testimony, RESA does not maintain copies of members’ communications with customers. As stated in Mr. Oliker’s response to Request PPL-II-2, Mr. Oliker reviewed the Commission’s regulations about the required elements to be included in contract notice expiration and that informed the basis of his testimony.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-16 Re: RESA St. No. 1, pp. 24-28. Regarding the communications provided in response to the prior interrogatory, please provide the following:

- a) Date of each communication;
- b) Number of customers to whom the communication was sent;
- c) Criteria used by the EGS in selecting the customers to whom the communication was sent; and
- d) Method by which the communication was sent, including regular mail, electronic mail, and/or text message.

Response: Not applicable.

Response provided by: Joseph Olikier on behalf of RESA

Date response provided: June 18, 2024

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-17 Re: RESA St. No. 1, pp. 24-28. Please provide a sample copy of every communication that each of RESA’s members sent from January 1, 2021, through the date of the response to this request, to supply customers of EGSs who were not at that time participating in PPL Electric’s Standard Offer Program that contained information regarding their contracts with EGSs, the impending expiration of those contracts, or the options available to the customers upon the expiration of those contracts.

Response: As stated in Mr. Oliker’s testimony, RESA does not maintain copies of members’ documents. As stated in Mr. Oliker’s response to Request PPL-II-2, Mr. Oliker reviewed the Commission’s regulations about the required elements to be included in contract notice expiration and that informed the basis of his testimony.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-18 Re: RESA St. No. 1, pp. 24-28. Regarding the communications provided in response to the prior interrogatory, please provide the following:

- a) Date of each communication;
- b) Number of customers to whom the communication was sent;
- c) Criteria used by the EGS in selecting the customers to whom the communication was sent; and
- d) Method by which the communication was sent, including regular mail, electronic mail, and/or text message.

Response: Not applicable.

Response provided by: Joseph Olikier on behalf of RESA

Date response provided: June 18, 2024

PPL Electric Exhibit MS5-R

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-19 Re: RESA St. No. 1, pp. 24-28. Does RESA assert that any of the information set forth in the referenced communications sent by PPL Electric is factually incorrect?

If so, please identify every alleged factually incorrect statement in those communications and explain why it is factually incorrect.

Response:

RESA views the information in the referenced PPL communications as misleading and therefore incorrect. For instance, the information emphasizes a supply price that a customer is paying at a particular point in time, which may result in the customer making an apples-to-oranges comparison and reaching a decision that fails to consider other relevant factors. In focusing on the price that the customer is **currently** paying, as compared to PPL’s **current** price for default service, the communications do not take into consideration the value to the customer of a fixed price over time. Likewise, this comparison is a snapshot at a moment in time that does not capture savings from previous or future time periods. Further, the communications do not account for the value of products and services for which the customer may be paying, such as green power or support for charities or other items that are important to the customer. Since the comparisons are incomplete at best, they are misleading and incorrect. As a result, it is RESA’s position that PPL’s communications with supply customers of EGSs regarding the terms and conditions of their supply contracts violate prior Commission orders, inappropriately promote default service and constitute anti-competitive conduct.

Response provided by Joseph Olikier on behalf of RESA

Date response provided: June 18, 2024

PPL Electric Exhibit MS6-R

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-8 Re: RESA St. No. 1, p. 20. Mr. Oliker states, “This list is merely a preview of the host of other innovations that have been shown to be available in other states or countries where suppliers have been able to compete without these barriers and which have benefitted customers by resulting in enhanced services, and in some cases, lower prices than they otherwise would have experienced.”

- a) What other states and countries is Mr. Oliker referencing?
- b) What “other innovations” is Mr. Oliker referencing?
- c) Please provide all Documents upon which Mr. Oliker relied to conclude that these “innovations” have “benefitted customers by resulting in enhanced services.”
- d) Please provide all Documents upon which Mr. Oliker relied to conclude that these “innovations” have “benefitted customers by resulting . . . in some cases, lower prices than they otherwise would have experienced.”

Response:

- a) Jurisdictions referenced by Mr. Oliker include Georgia (natural gas) Texas, Canada.
- b) Innovations are developed by companies that are seeking to deliver products and services that customers demand. Without a healthy and competitive market, innovative developments are not encouraged or incentivized.
- c) Mr. Oliker has no such documents. However, it is common sense that when customers receive enhanced services based on their own individual needs as a result of innovations developed by a business that was willing to listen to them and to risk their own dollars to meet those needs, customers benefit.
- d) According to Market Savings Reports produced by RESA, which are attached as PPL-II-8, Attachment A, these documents show the various benefits delivered to customers, including the lower prices that are available to them in the competitive market.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

**RESA's Response to PPL-II-8
Attachment A**

All Offers								Fixed Price Offers					Variable Price Offers			Green Offers			
May-24	Price to Compare "PTC" (\$/kWh)	Lowest Offer (\$/kWh)	Customer Savings (\$/kWh)	Potential Market Savings for the Month (Total \$)	# of Offers	Offers Below PTC	Recorded Date	# of Offers	Offers Below PTC	Longest Term (bill cycles)	Lowest Offer (\$/kWh) (2)	Lowest Offer (\$/kWh) (bill cycles)	# of Offers	Offers Below PTC	Lowest Offer (\$/kWh)	# of Offers	Offers Below PTC	Lowest Offer (\$/kWh)	
MARKETS																			
Connecticut																			
				\$46,182,201															
Eversource - CL&P	\$0.14714	\$0.08870	\$0.05844	\$35,299,572	28	28	5/8/24	28	28	40	\$0.13970	7	\$0.08870	N/A	N/A	N/A	0	0	N/A
United Illuminating	\$0.17063	\$0.08890	\$0.08173	\$10,882,628	28	28	5/8/24	28	28	40	\$0.13970	7	\$0.08890	N/A	N/A	N/A	0	0	N/A
D.C.																			
				\$536,513															
Pepco DC	\$0.10329	\$0.09900	\$0.00429	\$536,513	18	1	5/8/24	9	1	36	\$0.13500	6	\$0.09900	0	0	N/A	9	0	\$0.11000
Illinois																			
				\$38,891,829															
Ameren I - CIPS	\$0.08251	\$0.07499	\$0.00752		18	2	5/8/24	14	0	36	\$0.10390	18	\$0.09900	1	1	\$0.07499	3	1	\$0.07900
Ameren II - CILCO	\$0.08354	\$0.07499	\$0.00855	\$3,855,351	13	2	5/8/24	11	0	36	\$0.10390	18	\$0.09900	1	1	\$0.07499	1	1	\$0.07900
Ameren III - IP	\$0.08171	\$0.07900	\$0.00271		17	1	5/8/24	14	0	36	\$0.10390	18	\$0.09900	0	0	N/A	3	1	\$0.07900
ComEd	\$0.07936	\$0.05740	\$0.02196	\$35,036,478	40	13	5/8/24	29	9	60	\$0.07290	12	\$0.05740	0	0	N/A	11	4	\$0.05990
Maryland																			
				\$29,256,327															
BGE	\$0.11154	\$0.08890	\$0.02264	\$15,566,674	74	33	5/8/24	38	21	60	\$0.11990	12	\$0.09250	6	4	\$0.08990	30	8	\$0.08890
Delmarva MD	\$0.11328	\$0.08900	\$0.02428	\$2,886,600	57	18	5/8/24	34	10	60	\$0.10990	7	\$0.08900	4	3	\$0.08990	19	5	\$0.09900
Potomac Edison	\$0.09328	\$0.07900	\$0.01428	\$2,358,429	50	18	5/8/24	28	10	24	\$0.09790	7	\$0.07900	4	3	\$0.07990	18	5	\$0.07900
Pepco MD	\$0.11585	\$0.08990	\$0.02595	\$8,444,624	62	35	5/8/24	33	22	60	\$0.10290	12	\$0.09490	5	3	\$0.08990	24	10	\$0.08990
Massachusetts (1)																			
				\$65,065,760															
NSTAR BECO	\$0.17216	\$0.10290	\$0.06926		48	46	5/9/24	24	24	36	\$0.13790	6	\$0.10290	N/A	N/A	N/A	24	22	\$0.10300
NSTAR CAMB	\$0.17216	\$0.10290	\$0.06926	\$26,602,382	48	46	5/9/24	24	24	36	\$0.13790	6	\$0.10290	N/A	N/A	N/A	24	22	\$0.10300
NSTAR COMM	\$0.17216	\$0.10310	\$0.06906		46	44	5/9/24	22	22	36	\$0.13790	6	\$0.10310	N/A	N/A	N/A	24	22	\$0.10330
Unitil - FGE	\$0.19338	\$0.10960	\$0.08378	\$677,397	17	16	5/9/24	10	10	36	\$0.14900	6	\$0.10960	N/A	N/A	N/A	7	6	\$0.13730
NGRID - MECO	\$0.18213	\$0.10290	\$0.07923	\$33,680,595	48	46	5/9/24	22	22	36	\$0.13970	6	\$0.10500	N/A	N/A	N/A	26	24	\$0.10290
NGRID - Nantucket	\$0.18213	\$0.11820	\$0.06393	\$447,213	9	9	5/9/24	4	4	36	\$0.15900	6	\$0.11820	N/A	N/A	N/A	5	5	\$0.13820
Eversource - WMECO	\$0.15810	\$0.09980	\$0.05830	\$3,658,172	38	36	5/9/24	22	22	36	\$0.12970	6	\$0.09980	N/A	N/A	N/A	16	14	\$0.09990
Ohio																			
				\$181,763,118															
AEP Columbus Southern	\$0.11318	\$0.04490	\$0.06828	\$60,698,852	147	139	5/8/24	90	87	36	\$0.06980	3	\$0.04790	5	4	\$0.04890	52	48	\$0.04490
AEP Ohio Power	\$0.11318	\$0.04490	\$0.06828		147	139	5/8/24	90	87	36	\$0.06980	3	\$0.04790	5	4	\$0.04890	52	48	\$0.04490
Cleveland Electric Illuminating	\$0.11082	\$0.04490	\$0.06592	\$25,436,909	112	107	5/8/24	65	63	36	\$0.06800	3	\$0.04490	3	2	\$0.04790	44	42	\$0.04590
AES Ohio	\$0.10807	\$0.04590	\$0.06217	\$20,752,149	98	93	5/8/24	60	58	36	\$0.07390	3	\$0.04790	3	2	\$0.05090	35	33	\$0.04590
Duke	\$0.09821	\$0.04590	\$0.05231	\$23,514,967	113	99	5/8/24	65	62	36	\$0.07650	3	\$0.04590	4	3	\$0.04990	44	34	\$0.05000
Ohio Edison	\$0.10914	\$0.04490	\$0.06424	\$40,813,521	113	107	5/8/24	66	64	36	\$0.06800	3	\$0.04490	3	2	\$0.04790	44	41	\$0.04590
Toledo Edison	\$0.11004	\$0.04490	\$0.06514	\$10,546,721	112	106	5/8/24	65	63	36	\$0.06800	3	\$0.04490	3	2	\$0.04790	44	41	\$0.04590
Pennsylvania																			
				\$136,437,843															
Duquesne	\$0.10455	\$0.06380	\$0.04075	\$9,829,042	113	70	5/8/24	66	46	60	\$0.11990	3	\$0.06390	5	4	\$0.09890	42	20	\$0.06380
MetEd	\$0.11306	\$0.06200	\$0.05106	\$19,910,238	110	94	5/8/24	65	60	60	\$0.09990	3	\$0.06290	4	4	\$0.10090	41	30	\$0.06200
PECO	\$0.09425	\$0.05000	\$0.04425	\$30,744,360	127	94	5/8/24	71	60	60	\$0.07990	3	\$0.05090	5	4	\$0.08290	51	30	\$0.05000
Penetec PA	\$0.10607	\$0.06890	\$0.03717	\$10,873,139	113	79	5/8/24	64	53	60	\$0.09490	3	\$0.06890	4	3	\$0.08990	45	23	\$0.06990
Penn Power	\$0.11231	\$0.07490	\$0.03741	\$3,819,681	97	77	5/8/24	54	48	48	\$0.00000	3	\$0.07490	4	3	\$0.10190	39	26	\$0.07590
PPL	\$0.11028	\$0.05450	\$0.05578	\$46,985,611	136	93	5/8/24	75	59	60	\$0.10490	3	\$0.06990	7	6	\$0.10000	54	28	\$0.05450
West Penn Power	\$0.10001	\$0.06190	\$0.03811	\$14,275,772	102	87	5/8/24	58	56	60	\$0.07990	3	\$0.06190	5	5	\$0.08200	39	26	\$0.06190

FOOTNOTE

- 1) Massachusetts Lowest Offer Price includes Community Choice as it's our understanding that anyone can sign up for Community Choice
- 2) Longest Term Lowest Offer does include Green offers with fixed rate terms since the intent is to show the longest term of a non-variable rate.

State	REP	Description
Connecticut	XOOM Energy Connecticut, LLC	Airline reward miles available.
	XOOM Energy Connecticut, LLC	Supplier will make a charitable donation based on customer usage.
D.C.	Major Energy Electric Services	You can be qualified to a \$100 total rebate over the course of service.
	Think Energy	Gift Card available. Contact for details.
	WGL Energy Services	\$50 in Reward Dollars every month that you can use to save in over 500,000 ways.
Illinois	AEP Energy	Receive up to \$60 in Reward Dollars for the AEP Energy Reward Store, an online marketplace filled with a variety of energy-saving products for your home.
	Ambit Northeast	Get 50% off your energy charges on bill cycles beginning November 1st through the end of February.
	EcoPlus Power	Free Subscription to Norton LifeLock Personal Identity Theft Protection and an Amazon Gift Card Loyalty Program every 6 Months.
	Illinois Gas & Electric	\$50 in Reward Dollars every month once your account's active.
	Spark Energy	You can be qualified to a \$100 total rebate.
	Think Energy	Receive a \$100 gift card.
Maryland	AEP Energy, Inc.	Includes access to AEP Energy Reward Store, a one-stop online marketplace filled with a variety of energy-saving products for your home and is exclusively for AEP Energy customers. You can earn Reward Dollars to use in the Reward Store by enrolling in this price plan.
	Agway Energy Services LLC	Includes our EnergyGuard repair program. This valuable coverage provides Peace of Mind repair protection on your central a/c unit and the interior electric lines in your home.
	Ambit Northeast, LLC	Get 50% off your energy charges on bill cycles beginning November 1st through the end of February.
	American Power & Gas of MD LLC	25% Rebate on average monthly supply charges after 12 months.
	Energy Harbor	Ask about how to get \$50 in gift cards when you sign up.
	Energy Services Providers, Inc. d/b/a Maryland Gas and Electric	\$50 in Reward Dollars every month once your account's active.
	RPA Energy Inc	As a customer you automatically qualify for our Power Perks Rewards Program.
	Shibley Choice LLC d/b/a Shibley Energy	Earn 3% Rewards with Shibley Energy's Reward Program.
	Spring Energy RRH LLC d/b/a Spring Power & Gas	Customers receive \$25 in Spring Rewards Dollars each month.
	Spring Energy RRH LLC d/b/a Spring Power & Gas	Includes HVAC coverage up to \$750 per year or Surge Protection up to \$1500 per year.
	Tomorrow Energy Corporation fka Sperian Energy Corporation	4 trees will be planted in partnership with the Arbor Day foundation over your 12-month term.
	WGL Energy Services, Inc.	\$50 in Reward Dollars every month that you can use to save in over 500,000 ways.
	XOOM Energy Maryland, LLC	Cash Back program, you earn a 5% rebate for your everyday energy usage.
	XOOM Energy Maryland, LLC	Enroll on RescueLock 12 and 5% of your monthly energy charges will be donated to PetSmart Charities.
	Massachusetts	Alpha Gas and Electric
CleanChoice Energy		\$50 Gift Card, Rewards Programs, Sponsored Promotions.
Discount Power		Rewards Program to saving on shopping, dining, travel, movies, and more.
SmartEnergy		\$100 Visa after 6 months.
Verde Energy USA		Receive a digital \$50 Home Depot gift card after 90 days of active service and the second \$50 after 9 months of active service.
Ohio	AEP Energy Inc	Enroll in this plan and receive up to \$180 Reward Dollars over course of the plan to use in Energy Reward Store.
	American Power & Gas of Ohio LLC	Our 25% rebate is available to all of our customers.
	Atlantic Energy MD LLC	3% Cash Back
	Atlantic Energy MD LLC	Free Smart Home Products (color changing bulbs, security cameras with two-way talk, smart plugs, and more).
	Discount Power Inc	Save on shopping, dining, travel, movies, and so much more.
	EcoPlus Power LLC	Complimentary Norton LifeLock Personal Identity Theft Protection Subscription (Valued over \$300 annually).
	Kiwi Energy	Receive up to \$25 in Rewards Dollars monthly.
	Major Energy Electric Services LLC	\$100 Rebate offer available.
	NRG Home	1% cash back annually
	Ohio Gas & Electric	\$50 in Reward Dollars every month once your account's active.
	ResCom Energy LLC	Sign up and enjoy monthly ResCom Rewards to shop at your favorite stores through rescocomenergyrewards.com.
	Santanna Energy Services	Earn Rewards Points for discounts and coupons on top brands dining and groceries.
	Shibley Choice LLC	Earn 3% REWARDS with Shibley Energy's Rewards Program.
	Think Energy LLC	Sign up and receive a \$100 gift card.
	XOOM Energy Ohio LLC	Enroll on RescueLock 12 and 5% of your monthly energy charges will be donated to PetSmart Charities.
Pennsylvania	AEP Energy	Receive up to \$180 Reward Dollars to use in AEP Energy Reward Store, our one-stop online marketplace filled with a variety of energy-saving products for your home.
	Alpha Gas and Electric LLC	Free month of energy supply after a year of service.
	American Power & Gas of Pennsylvania LLC	Our famous 25% rebate is available to all of our customers.
	City Power & Gas PA	\$25 in Reward Dollars every month and an annual 2% Cashback Reward.
	IDT Energy, Inc.	Earn REWARD points for every kWh used and redeem them for gift cards and more.
	Major Energy	For the \$100 rebate, redeem the first \$50 after one month of service and the second \$50 after 6 months of service from Major.
	nTherm LLC	20% rebate on the average months energy supply cost after 12 consecutive months with nTherm.
	Pennsylvania Gas & Electric	\$50 in Reward Dollars every month once your account's active.
	SFE Energy Pennsylvania, Inc.	Will plant 1 tree on your behalf.
	Shibley Energy	Earn 3% REWARDS with Shibley Energy's Rewards Program.
	SmartEnergy	6 Month Fixed Rate with \$100 Visa after 6 months
	Spring Power & Gas	Receive \$25 in Spring Rewards Dollars each month.
	Think Energy	Conditional Cash rebate of up to \$25 per year of service at the end of your contract term if you paid more for electricity with Think Energy.
Verde Energy USA, Inc.	\$100 in digital Home Depot Gift Cards, by enrolling in a 100% renewable energy credits supply plan with a fixed rate for 12 months.	
WGL Energy Services	\$50 in Reward Dollars every month that you can use to save in over 500,000 ways.	

State	Utility	Rate Schedule	Number of Residential Customers	Utility Load Profile Assigned	Monthly kWh by Profile	Total Monthly kWh	Sources	Notes	
Connecticut	Eversource - CL&P	Residential - Rate 1		RNSH: Residential Non-Space Heat (01)		604,031,011	Rate Schedule: Utility Tariff Offers taken from Connecticut Rate Board: www.energizect.com CL&P Energy Usage: https://www.eversource.com/content/residential/about/doing-business-with-us/energy-suppliers/connecticut-wholesale-supply UI Energy Usage: https://www.uinet.com/web/uinet/suppliers_and_partners/power_procurement/active_rfps/ui_filings_for_ct_dpuc_docket_no_06-10-22	<ol style="list-style-type: none"> # of Fixed and Green Offers excludes offers not available until the following month Green Offers, defined as those with green provisions exceeding the state minimum, are not included in Fixed offer analysis Offers containing enrollment fees are not included in this analysis Offers containing monthly service fees are not included in this analysis. A few offers might have hidden monthly pass through fees for capacity. Total Monthly kWh = Number of Residential Customers x Monthly kWh by Profile Number of Residential Customers and Monthly kWh by are using values for the same corresponding month from the previous year 	
	United Illuminating	Residential - Rate R		R: Residential		133,161,559			
D.C. (1)	Pepco	Residential - Schedule R		RDNS: Residential Non-Space Heating (DC)		124,969,000	Rate Schedule: Utility Tariff Offers taken from D.C. Power Connect: http://search.dcpowerconnect.com/search-offers Pepco's Number of Residential Accounts and Energy Usage: https://dcpoc.org/Utility-Information/Electric/Historical-and-Analytical-Information-for-Electric.aspx	<ol style="list-style-type: none"> Green Offers, defined as those with green provisions exceeding the state minimum, are not included in Fixed and Variable offer analysis Number of Residential Customers and Monthly kWh are using values for the same corresponding month from the previous year 	
Illinois	Ameren_IL Zone I	BGS-1 - Residential Service		RESDDL: High summer use; Low winter use		615,765,044	Rate Schedule: Utility Tariff Offers taken from Plug In Illinois website: www.pluginillinois.org	<ol style="list-style-type: none"> Green Offers, defined as those with green provisions exceeding the state minimum, are not included in Fixed and Variable offer analysis Offers were not considered green in cases where green is mentioned in the offer description but there are no details of what percentage is green Offers containing Monthly fees assessed by the retail suppliers, as well as offers showing "Custom Price" as the rate, with no actual value, are not included as part of the analysis Monthly kWh values reflect the values for the same corresponding month from the previous year since current month values are not yet available 	
	Ameren_IL Zone II	BGS-1 - Residential Service		RESDDL: High summer use; Low winter use					
	Ameren_IL Zone III	BGS-1 - Residential Service		RESDDL: High summer use; Low winter use					
	ComEd	Residential		23: Residential Single Family Without Electric Space Heat		1,595,468,038	Source for Number of Residential Customers and Total Monthly kWh: https://www.icc.illinois.gov/Electricity/SwitchingStatistics.aspx		
Maryland	BGE	Schedule R	1,206,825	R: Residential Service	570	687,573,941	Rate Schedule: Utility Tariff	<ol style="list-style-type: none"> Green Offers, defined as those with green provisions exceeding the state minimum, are not included in Fixed and Variable offer analysis Total Monthly kWh = Number of Residential Customers x Monthly kWh by Profile Offers classified by PSC as Variable with Term listed as 'Varies' or 0 Months are assumed to have a term of 1 month as the utility still describes the term as monthly or month to month 	
	Delmarva MD	Service Classification - R	184,635	MDDRS: Maryland Residential Service	644	118,884,076	Offers taken from Maryland PSC: https://www.mdelectricchoice.com/shop		
	Potomac Edison	Schedule R	252,862	RSNH: Residential Service - No Electric Heat	653	165,156,071	Source for Number of Residential Customers: http://www.psc.state.md.us/electricity/electric-choice-monthly-enrollment-reports/#		
	Pepco MD	Schedule R	548,038	RMNS: Residential Non-Space Heating (MD)	594	325,396,466			
Massachusetts	NSTAR BECO	Rate A1		R1: Rate R1 Residential		384,464,530	Rate Schedule: Utility Tariff	<ol style="list-style-type: none"> Green Offers, defined as those with green provisions exceeding the state minimum, are not included in Fixed and Variable offer analysis Offer do include Community Choice that are listed on the energyswitchma.gov website Energyswitchma.gov website does not publish any variable offers Available Number of Residential Customers and Total Monthly kWh for NSTAR not broken out by utility within the state so state totals for all of NSTAR used 	
	NSTAR CAMB	Rate A1		R1: Rate R1 Residential					Offers taken from Energy Switch MA: http://energyswitchma.gov
	NSTAR COMM	Rate A1		R1: Rate R1 Residential					Source for Number of Residential Customers and Total Monthly kWh: https://www.mass.gov/service-details/electric-customer-migration-data
	FGE	Residential - RD-1		RD1: Residential RD1		8,085,427			

Energy Market Savings Report



Pennsylvania

By shopping for the best deal for electricity, Pennsylvania consumers could have saved more than **\$136.4 million** in May and benefited from a wide range of value-added products and services by switching to competitive suppliers.

Savings Over

Duquesne:	\$9,829,042
MetEd:	\$19,910,238
PECO:	\$30,744,360
Penelec PA:	\$10,873,139
Penn Power:	\$3,819,681
PPL:	\$46,985,611
West Penn Power:	\$14,275,772
May Potential Market Savings:	\$136,437,843

May



PRICE PLANS

25% rebate is available to all of customers



ECO-FRIENDLY

One tree planted on your behalf



VALUE ADDED PRODUCTS

\$50 in Reward Dollars every month

PPL Electric Exhibit MS7-R

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of PPL Electric Utilities Corporation (“PPL”), Set II in
Docket No. P-2024-3047290**

Request: PPL-II-10 Re: RESA St. No. 1, p. 23. Mr. Oliker states that “PPL’s proposal presents it with a marketing opportunity to ‘win back’ customers.”

Does Mr. Oliker believe that PPL Electric profits from customers being default service customers versus shopping customers? If so, please explain in detail why Mr. Oliker believes that and provide all Documents relied upon by Mr. Oliker in reaching that conclusion.

Response:

Mr. Oliker does not believe that PPL profits from customers being default service customers versus shopping customers.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: June 18, 2024

PPL Electric Exhibit MS8-R

Megan E. Rulli

mrulli@postschell.com
717-612-6012 Direct
717-731-1985 Direct Fax
File #: 203590

June 3, 2024

VIA EMAIL

Deanne M. O'Dell, Esquire
Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

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

Dear Counsel:

Please be advised that the Responses on behalf of PPL Electric Utilities Corporation to the discovery requests of the Retail Energy Supply Association's ("RESA"), Set I, have been uploaded to the OneDrive site designated to house discovery responses as follows:

- **RESA Set I** – Nos. 1 to 3, 5 to 7, 11, 12, 16 to 19, 22, and 25 (Non-Confidential)
- **RESA Set I** – No. 8, No. I-5 Attachment 3, No. 22 Attachment 1 (**Confidential**)

Access to any **CONFIDENTIAL** or **HIGHLY CONFIDENTIAL** materials will only be provided to the parties pursuant to a Stipulated Protective Agreement or a Protective Order entered in the above-referenced proceeding.

Copies of this correspondence are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/kl

Attachments

cc: Rosemary Chiavetta, Secretary (*letter and Certificate of Service only*)
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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Counsel for Intervenor NRG Energy, Inc.

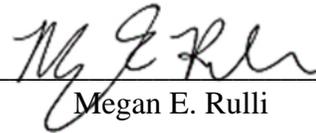
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Date: June 3, 2024

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Megan E. Rulli

PPL Electric Utilities Corporation
Response to the Set I Interrogatories of
the Retail Energy Supply Association (RESA)
Dated May 20, 2024
Docket No. P-2024-3047290

- RESA I-5 Reference Petition at ¶ 105 and PPL St. No. 3 where PPL describes proposed modifications to the SOP, including an authorization from the Commission to communicate with customers regarding the impending expiration of their contracts.
- a. Please provide copies of discovery responses PPL furnished to RESA (and NRG Energy, Inc.) in *Petition for Declaratory Order of the Retail Energy Supply Association.*, Docket No. P-2022-3036985 (Petition filed November 30, 2022), including communications with SOP customers and non-SOP shopping customers.
- b. Please supplement these responses to provide any additional communications that have been sent to SOP and non-SOP shopping customers since service of the discovery responses referred to in a, including the dates, whether SOP and/or non-SOP customers received them, and the criteria PPL used to select the customers to whom communications were sent.
-
- PPL
Response a. See RESA I-5 Attachments 1 and 2, as well as CONFIDENTIAL Attachment 3.
- b. See RESA I-5 Attachment 4.

RESA I-5 Attachment 1

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-1

Please admit that PPL sent the communications, which are attached to the Petition for Declaratory Order as Appendices A, B and C, to supply customers of electric generation suppliers (“EGSs”). If you do not admit, please explain.

RESPONSE: Admit Deny

EXPLANATION (if applicable):

PPL
Response

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-2

Please refer to PPL's Answer to the Petition for Declaratory Order, ¶ 38, referencing a survey that PPL commissioned in the second quarter of 2021. Please provide the survey that was used by Bellomy Market Intelligence, the costs incurred by PPL to have the survey conducted and the results of the survey.

PPL
Response

The Bellomy Market Intelligence Survey ("Survey") is attached hereto as CONFIDENTIAL Attachment RESA & NRG 1-2-1 . The results of the Survey speak for themselves. The total cost for the Survey was \$80,010.

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-3

Please provide any surveys that PPL has conducted or commissioned since the second quarter of 2021 containing questions about retail electric suppliers, generation service, the competitive market, and default service, including information as to the entity or entities that conducted the surveys, the costs incurred by PPL to have the survey(s) conducted and the results of the survey(s).

PPL
Response

PPL Electric has not conducted or commissioned any additional surveys containing questions about retail electric suppliers, generation service, the competitive market, and default service since the second quarter of 2021.

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-3

Please provide any surveys that PPL has conducted or commissioned since the second quarter of 2021 containing questions about retail electric suppliers, generation service, the competitive market, and default service, including information as to the entity or entities that conducted the surveys, the costs incurred by PPL to have the survey(s) conducted and the results of the survey(s).

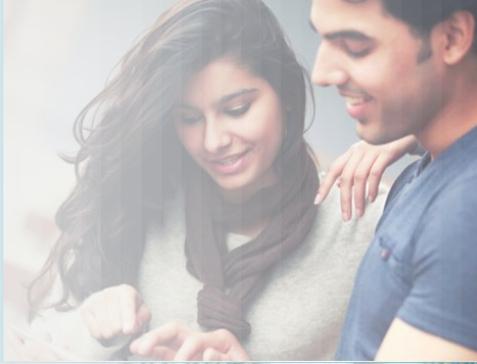
PPL
Supplemental
Response

The Company's Quarterly Customer Satisfaction (CSAT) survey program is conducted by an independent research firm, InMoment, on a quarterly basis to measure and track overall satisfaction and other key components that impact performance. The program is used to improve operational effectiveness, support customer experience, and measure and track marketing and communications initiatives among both business (small and mid-size) and residential customers. Beginning April 2021, several questions were added to, *inter alia*, help assess customer satisfaction with PPL as a provider of electric delivery service, understand the impact of different prices offered for generation on satisfaction levels with the Company, and understanding the different scam activity customers may have been experiencing. No questions were added to assess supplier satisfaction or satisfaction with shopping.

RESA & NRG I-3 Attachment 1 through Attachment 3 are slides prepared by InMoment, showing the annual data for 2021, 2022, and 2023 and the quarterly trended performance for the newly added questions asked of both business and residential customers. The questions the results are referencing can be found at the bottom of each slide.

PPL
Response

PPL Electric has not conducted or commissioned any additional surveys containing questions about retail electric suppliers, generation service, the competitive market, and default service since the second quarter of 2021.



PPL Electric Utilities 2021 Customer Satisfaction Research Residential Customers

Quarter 4 - Detailed Results

The PPL CSAT Residential program is conducted on a quarterly basis to measure and track overall satisfaction and other key components that impact performance. The program is used to improve operational effectiveness, and support customer experience initiatives.

Several changes were made to the survey in 2021

- Overall attributes are now asked on the same grid
- Key diagnostic measures under each overall were moved, updated and changed from a 5-point to a 7-point scale
- Additional advertising messages were added
- Communication channels were updated and expanded
- JD Power Brand Health attributes were added
- New scam question added

Any trending that is potentially impacted by these changes are noted on the slide



Respondents are the decision makers for electric service or pay the electric bill for their household



Online Survey

All residential surveys were conducted online in Q4'21



October 19, 2021 – November 8, 2021



A total of 1089 residential surveys were completed in Q4'21. The breakdown was as follows:

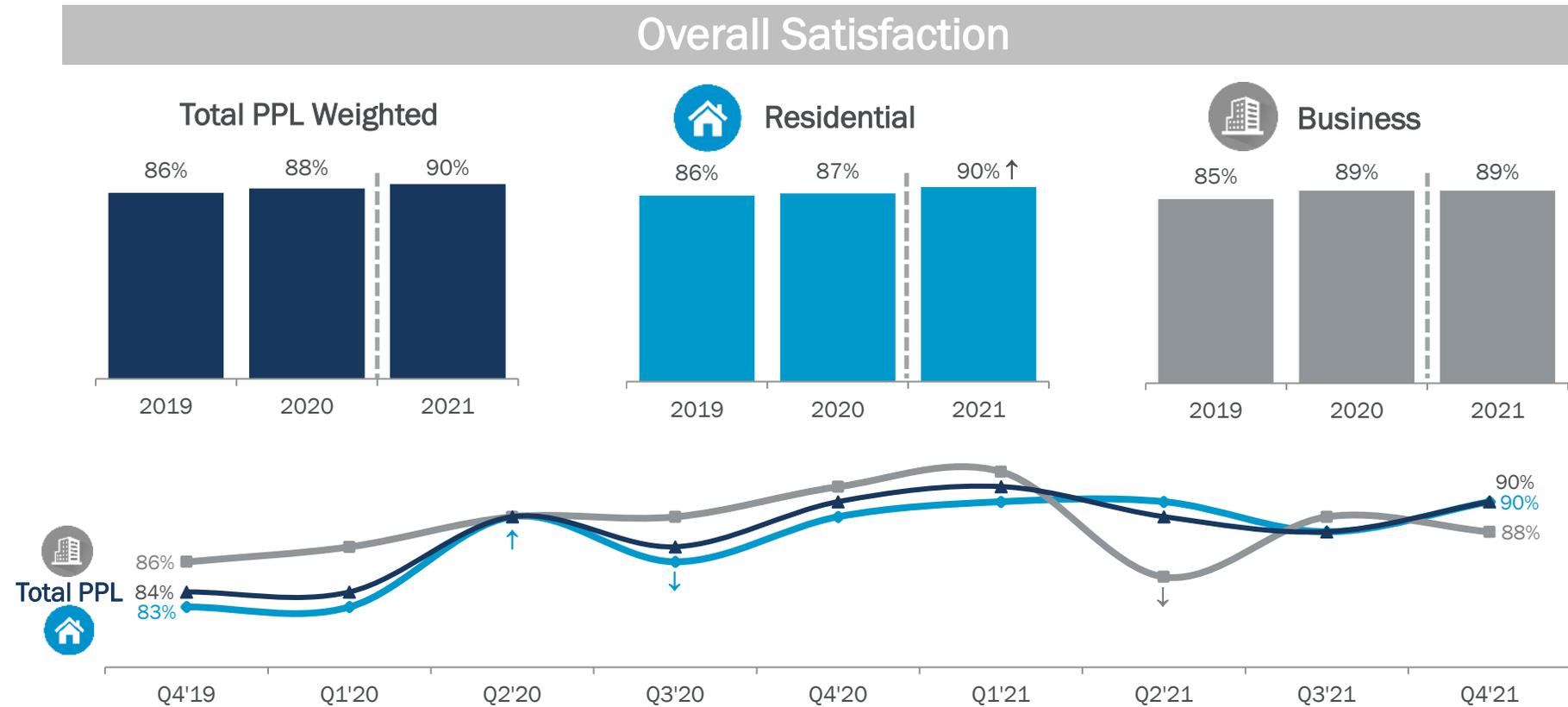
Central	Harrisburg	Lancaster	Lehigh	Northeast	Susquehanna
183	202	179	197	158	170



- Data weighted by region and age
- Significance testing conducted at a 95% confidence level

Overall Satisfaction

- Residential customer satisfaction was high consistently throughout the year, exceeding 2020 satisfaction levels.
- There was more fluctuation with business customer satisfaction – especially in Q2 – but overall it is on par with last year.



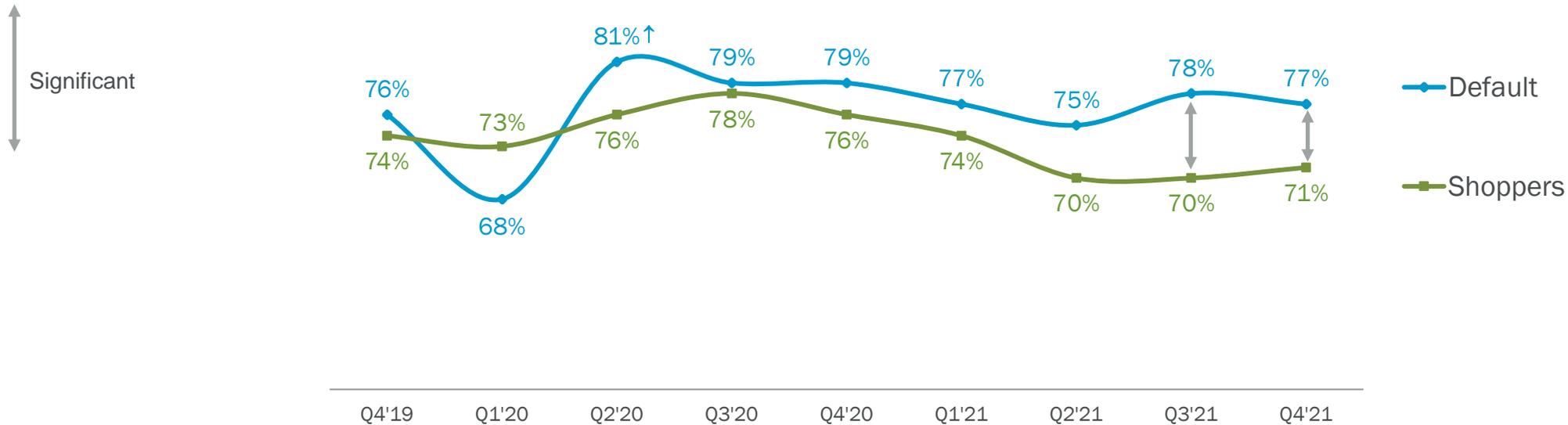
Top 3 Box on a 10-pt scale shown for Overall Metrics

↑↓ Indicates a significant change vs. the previous quarter (year)

Overall Value

- Customers who shop around are less satisfied with PPL value – significantly more so than default customers.

Overall Value

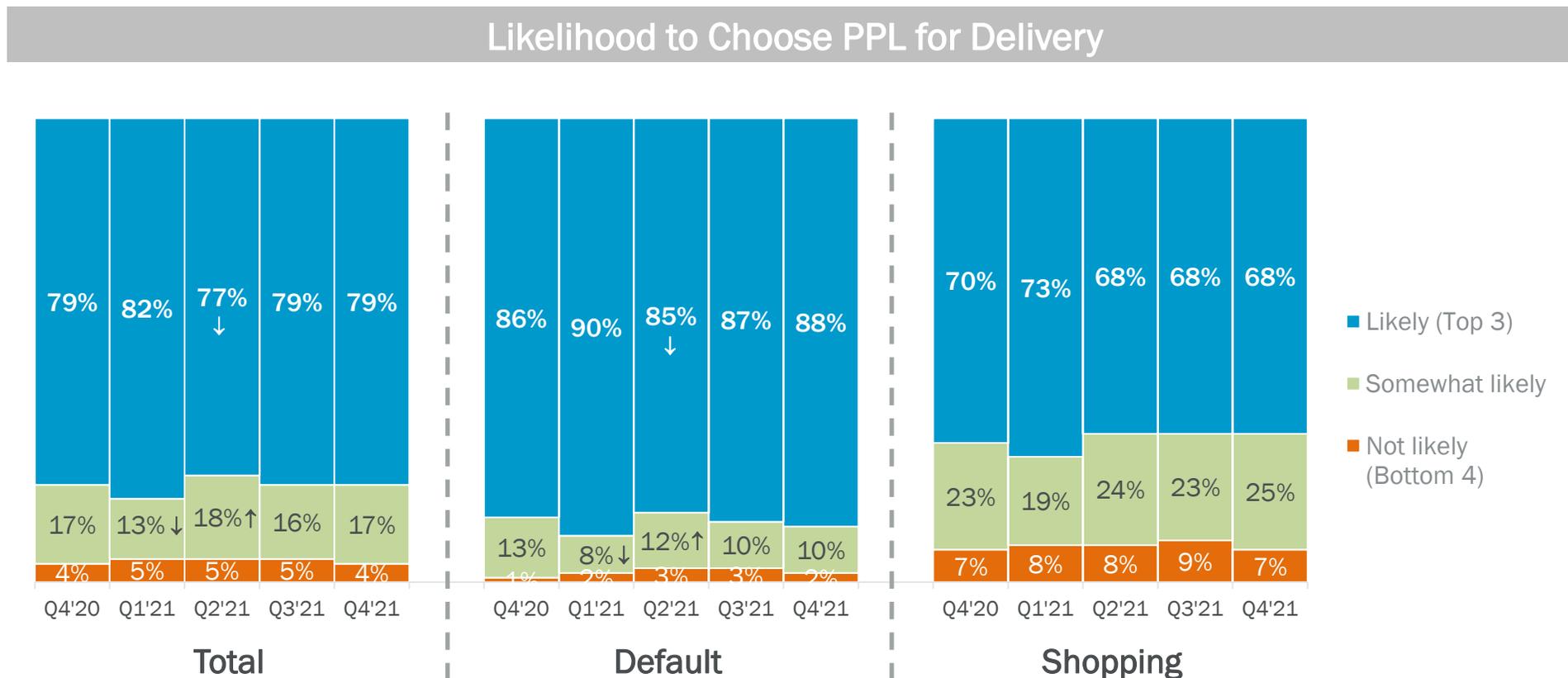


Top 3 Box on a 10-pt scale shown for Overall Metrics

↑↓ Indicates a significant change vs. the previous quarter

Likely to Choose PPL

- Customers on default supply continue to be much more likely to choose PPL for delivery if they had a choice.



↑↓ Indicates a significant change vs. the previous quarter

- Customers who have not experienced a scam are much more satisfied with PPL’s value.
- However, those who have experienced a scam tend to have higher advocacy.

Experienced Scamming

Tactics Used	2021
Any Scam	24%
Someone claiming to be from PPL trying to sell services over the phone	13%
Received a phone call where PPL appeared on the caller id, but it was not PPL	11%
Misrepresenting supplier: Have been told your supplier is changing or is not in business	9%
Have been pressured to renew or change suppliers or your electricity will be shut off	8%
Someone saying a payment is past due or did not go through and want immediate payment via wire transfer or gift card?	5%
Someone claiming to be PPL trying to sell services door to door	4%

Key Measures - 2021

	Scam (A)	No Scam (B)
Overall Satisfaction	88%	90%
Image	87%	89%
Value	71%	75% A
Reliability	92%	93%
Communication	86%	88%
Advocacy	51% B	45%
Customer Service	87%	88%

% Yes Among All Customers

Letter indicates a significant difference when comparing groups



PPL Electric Utilities 2021 Customer Satisfaction Research Business Customers

Quarter 4 - Detailed Results

The PPL CSAT Business program is conducted on a quarterly basis to measure and track overall satisfaction and other key components that impact performance. The program is used to improve operational effectiveness.

Several changes were made to the survey in Q1'21

- Overall attributes are now asked on the same grid
- Key diagnostic measures under each overall were moved, updated and changed from a 5-point to a 7-point scale
- Additional advertising messages were added
- Communication channels were updated and expanded
- JD Power Brand Health attributes were added
- New scam question added

Any trending that is potentially impacted by these changes are noted on the slide



Respondents are the decision makers for electric service or pay the electric bill for their organization



Online Survey
All business surveys were conducted online in Q4'21



October 19, 2021 – November 8, 2021



A total of 200 business surveys were completed in Q4'21. The breakdown was as follows:

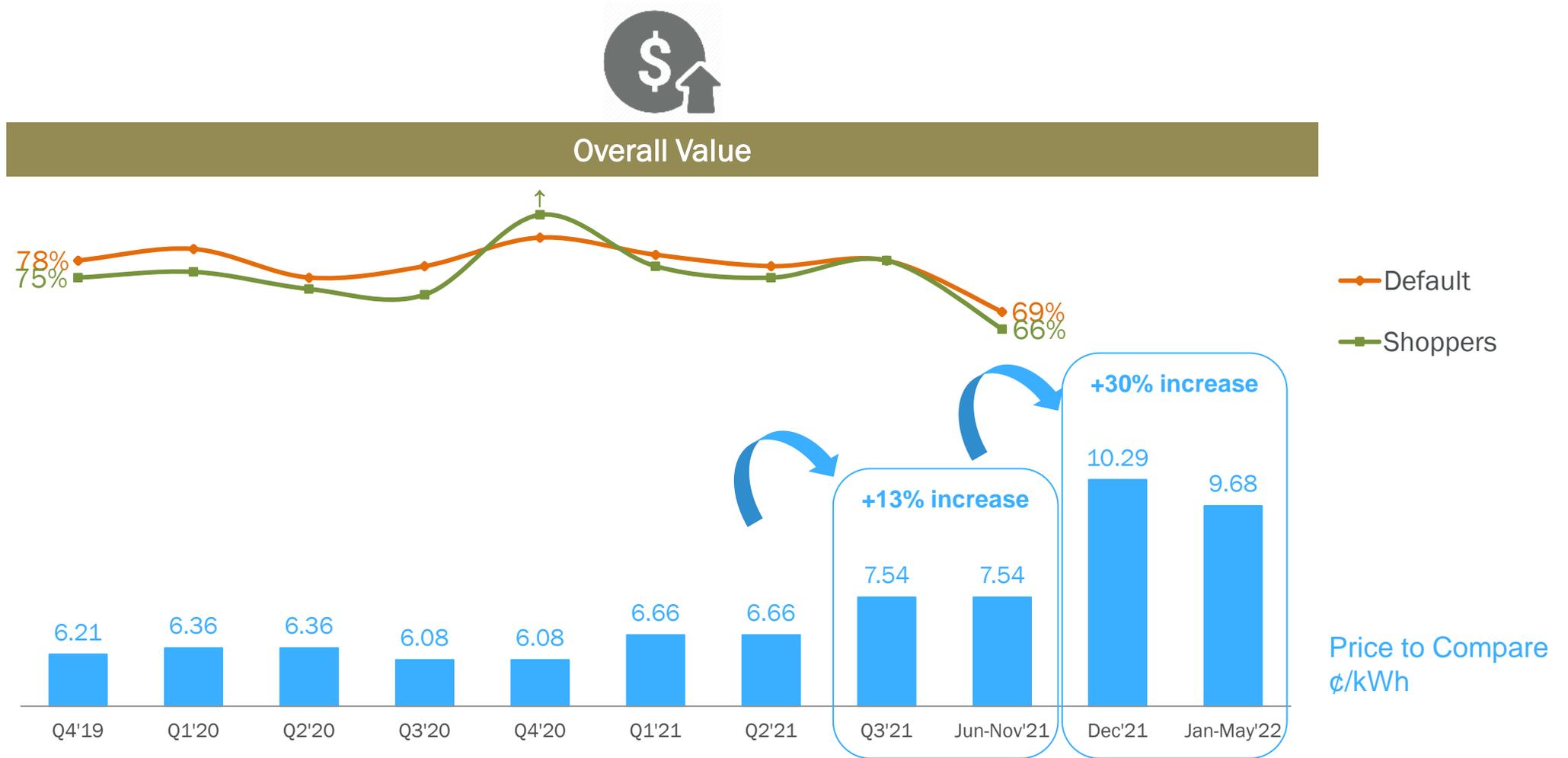
GS-1	GS-3
40	160



- Data weighted by rate class
- Significance testing conducted at a 95% confidence level

Shoppers vs. Default

- Value ratings declined among both shoppers and default customers possibly as contracts ended and new rates took effect, but also possibly because of the significant impending increase in December.

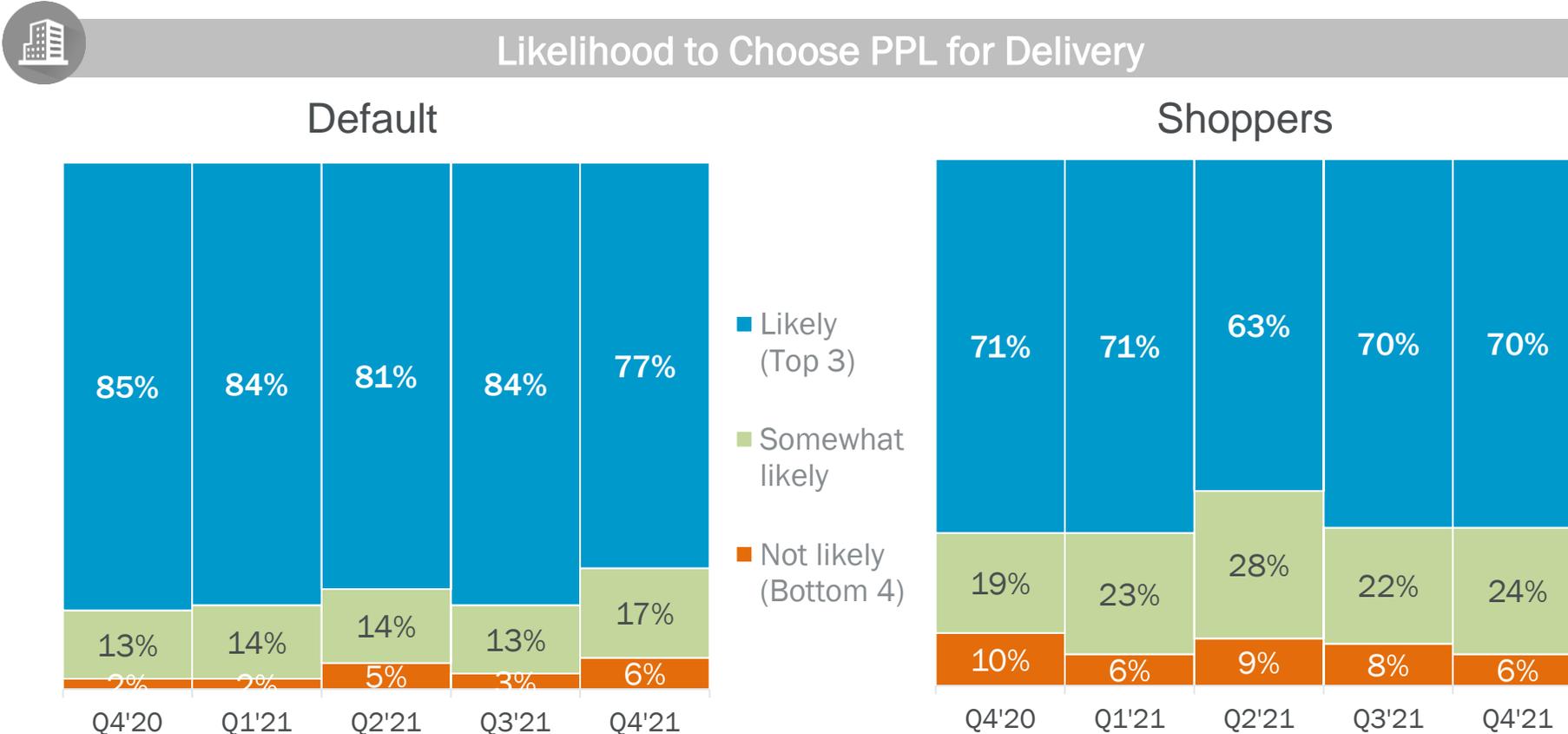


Top 3 Box on a 10-pt scale shown for Overall Metrics,

↑↓ Indicates a significant change vs. the previous quarter

Likely to Choose PPL

- Not as many default business customers would choose PPL for delivery compared to previous quarters, but likelihood is still much higher than shoppers.



- Four in ten business customers experienced a scam in the past three months, slightly higher than last quarter.
- Business customers that have experienced scams this quarter are less satisfied with value and customer service compared to those that were scammed last quarter. Advocacy is also lower.



Experienced Scamming

Tactics Used	Q3'21	Q4'21
Any Scam	37%	42%
Someone claiming to be from PPL trying to sell services over the phone	27%	25%
Misrepresenting supplier: Have been told your supplier is changing or is not in business	15%	21%
Have been pressured to renew or change suppliers or your electricity will be shut off	12%	18%
Received a phone call where PPL appeared on the caller id, but it was not PPL	18%	15%
Someone saying a payment is past due or did not go through and want immediate payment via wire transfer or gift card	9%	14%
Someone claiming to be PPL trying to sell services door to door	3%	5%

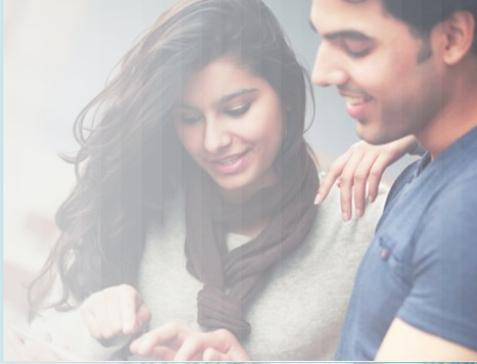
Key Measures

	Scam Q3'21	Scam Q4'21	No Scam Q3'21	No Scam Q4'21
Overall Satisfaction	92%	90%	88%	86%
Image	93%	84%	91%	87%
Value	80%	59% ↓	77%	74%
Reliability	97%	95%	97%	90% ↓
Communication	91%	80%	88%	81%
Advocacy	63%	45% ↓	42%	38%
Customer Service	93%	81% ↓	88%	84%

% Yes Among All Customers

↑↓ Indicates a significant change vs. the previous quarter

Q34. Some bad actors rely on scams or deceptive marketing to trick or pressure customers into making immediate payments or switching supply service, often at a higher cost. Have you experienced any of the following scamming tactics in the past three months?



PPL Electric Utilities 2022 Customer Satisfaction Research Residential Customers

Quarter 4 - Detailed Results

The PPL CSAT Residential program is conducted on a quarterly basis to measure and track overall satisfaction and other key components that impact performance. The program is used to improve operational effectiveness, and support customer experience initiatives.



Respondents are the decision makers for electric service or pay the electric bill for their household



Online Survey
 All residential surveys were conducted online in Q4'22



October 18, 2022 – October 31, 2022



A total of 1062 residential surveys were completed in Q4'22. The breakdown was as follows:

Central	Harrisburg	Lancaster	Lehigh	Northeast	Susquehanna
165	186	172	196	168	175



- Data weighted by region and age
- Significance testing conducted at a 95% confidence level

Overall Satisfaction

- Overall Satisfaction among residential customers remains low after significant declines last quarter.
- Overall Satisfaction is softening among business customers this quarter.



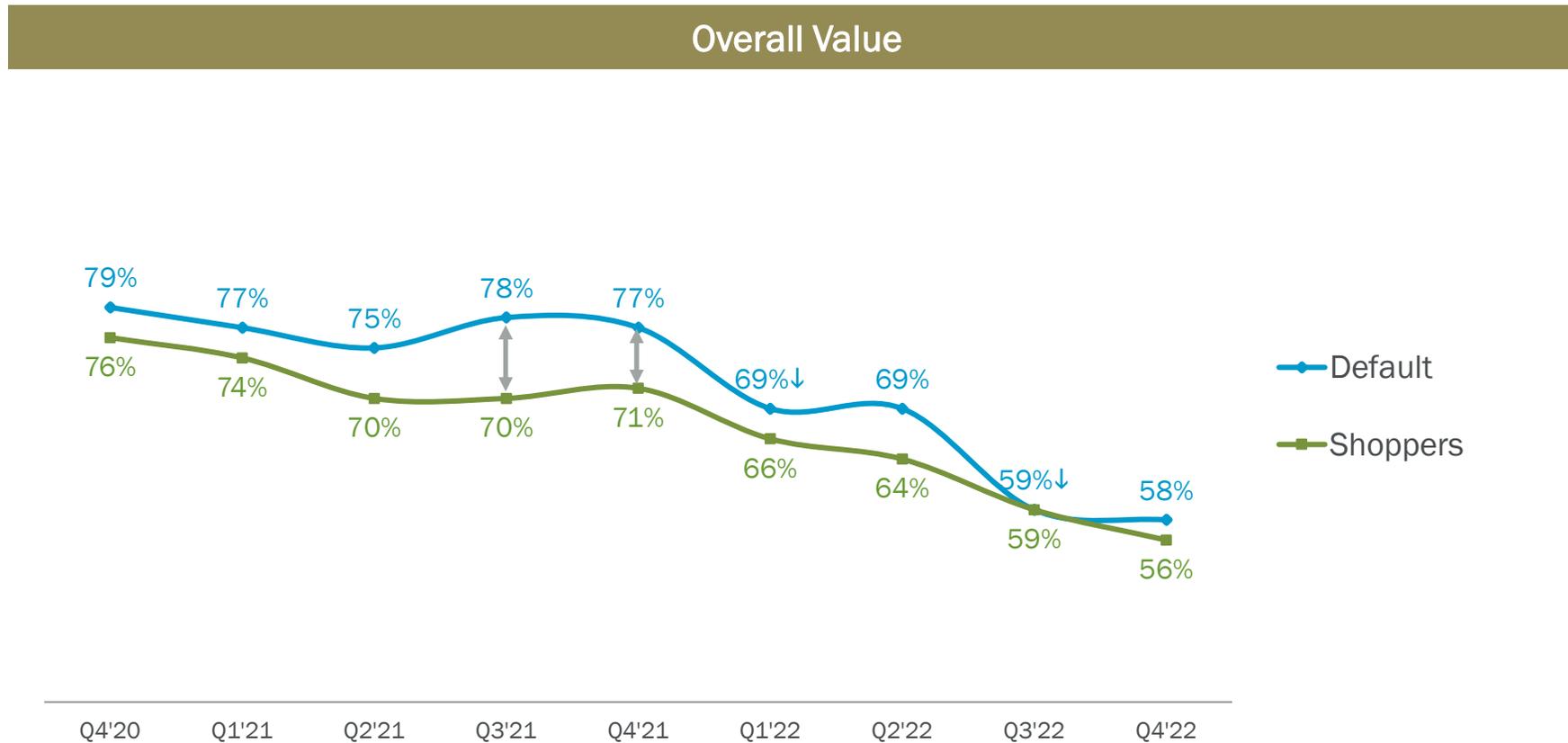
Top 3 Box on a 10-pt scale shown for Overall Metrics

↑↓ Indicates a significant change vs. the previous quarter (year)

Q1. Using a 10-pt scale, where 1 means unacceptable and 10 means outstanding, how do you rate your overall satisfaction with PPL as a provider of electric delivery service to your home/business?

Overall Value

- Value perceptions remain significantly lower than last year among shoppers and default customers.



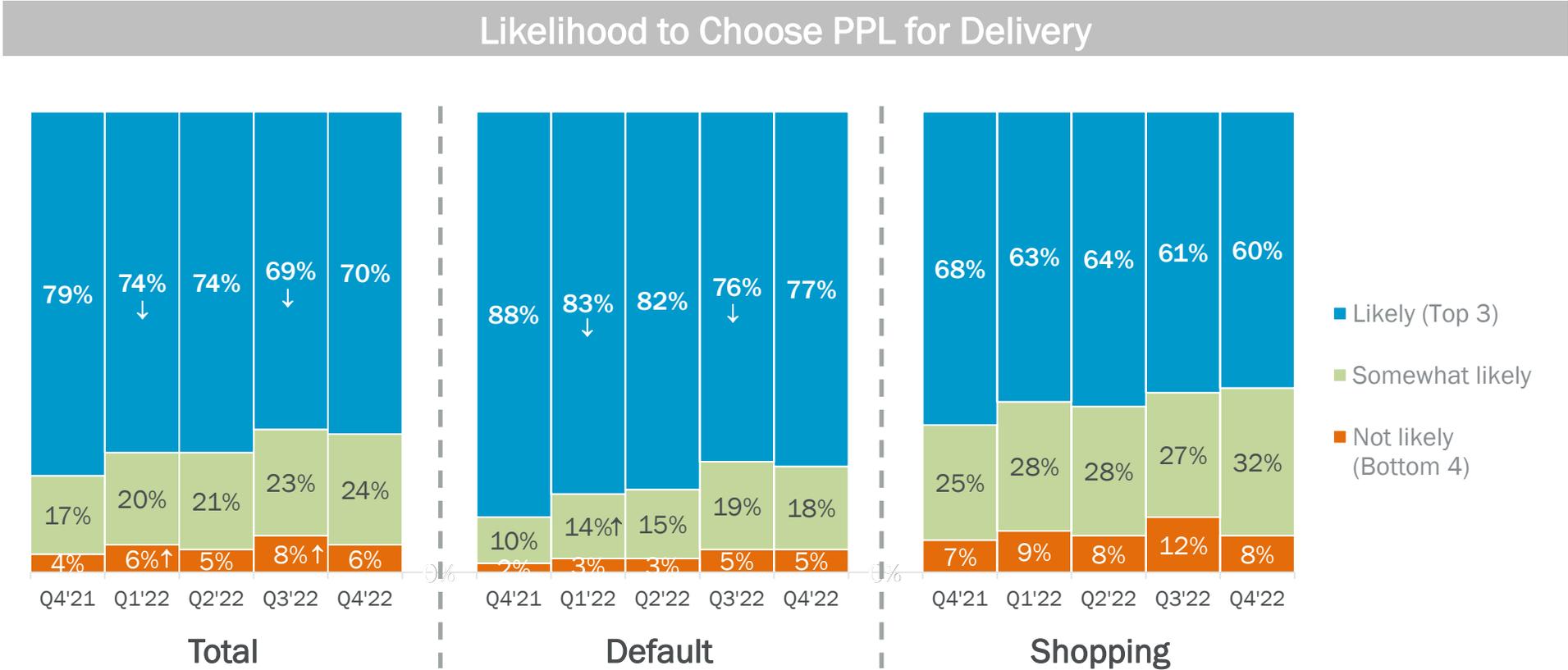
↑
Significant
↓

Top 3 Box on a 10-pt scale shown for Overall Metrics

↑↓ Indicates a significant change vs. the previous quarter

Likely to Choose PPL

- Likelihood to Choose PPL for delivery is steady after the decline last quarter and remains below last year.



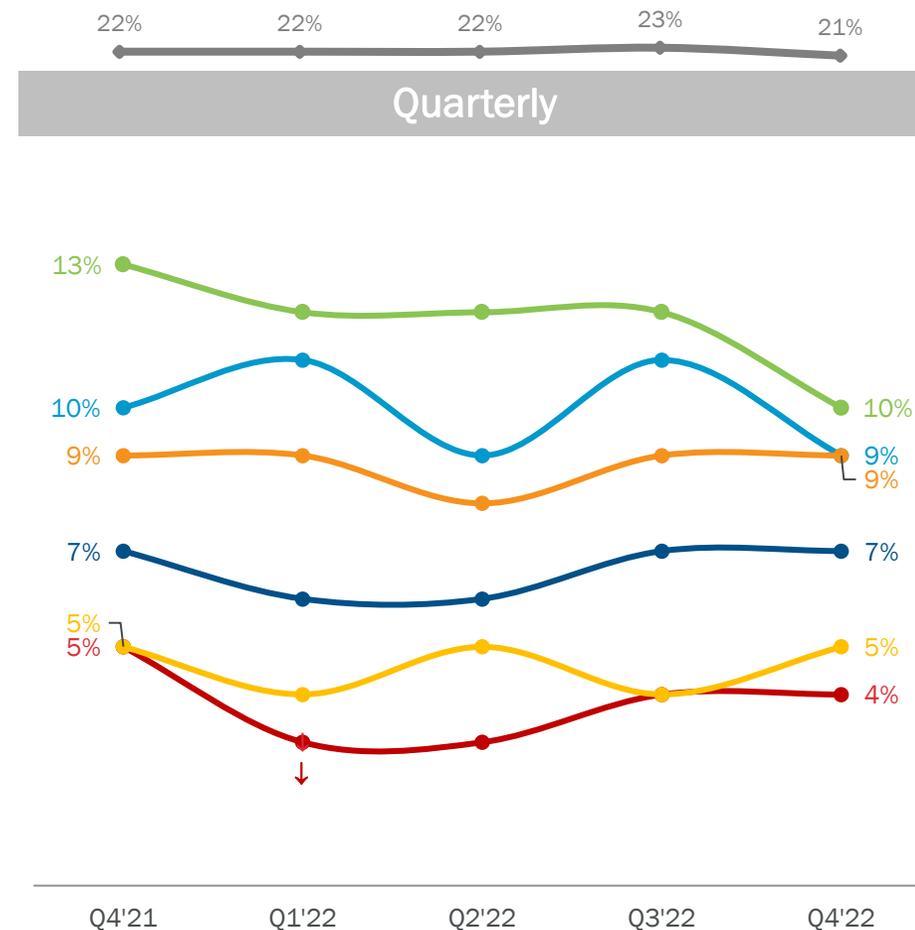
↑↓ Indicates a significant change vs. the previous quarter

- The percentage of customers experiencing a scam remains stable at around two in ten customers. The most common scam is *someone claiming to be from PPL trying to sell services over the phone*.



Experienced Scamming = 22%

2022



% Yes Among All Customers

↑↓ Indicates a significant change vs. the previous quarter



PPL Electric Utilities 2022 Customer Satisfaction Research Business Customers

Quarter 4 - Detailed Results

The PPL CSAT Business program is conducted on a quarterly basis to measure and track overall satisfaction and other key components that impact performance. The program is used to improve operational effectiveness.



Respondents are the decision makers for electric service or pay the electric bill for their organization



Online Survey
All business surveys were conducted online in Q4'22



October 18, 2022 – October 31, 2022



A total of 204 business surveys were completed in Q4'22. The breakdown was as follows:

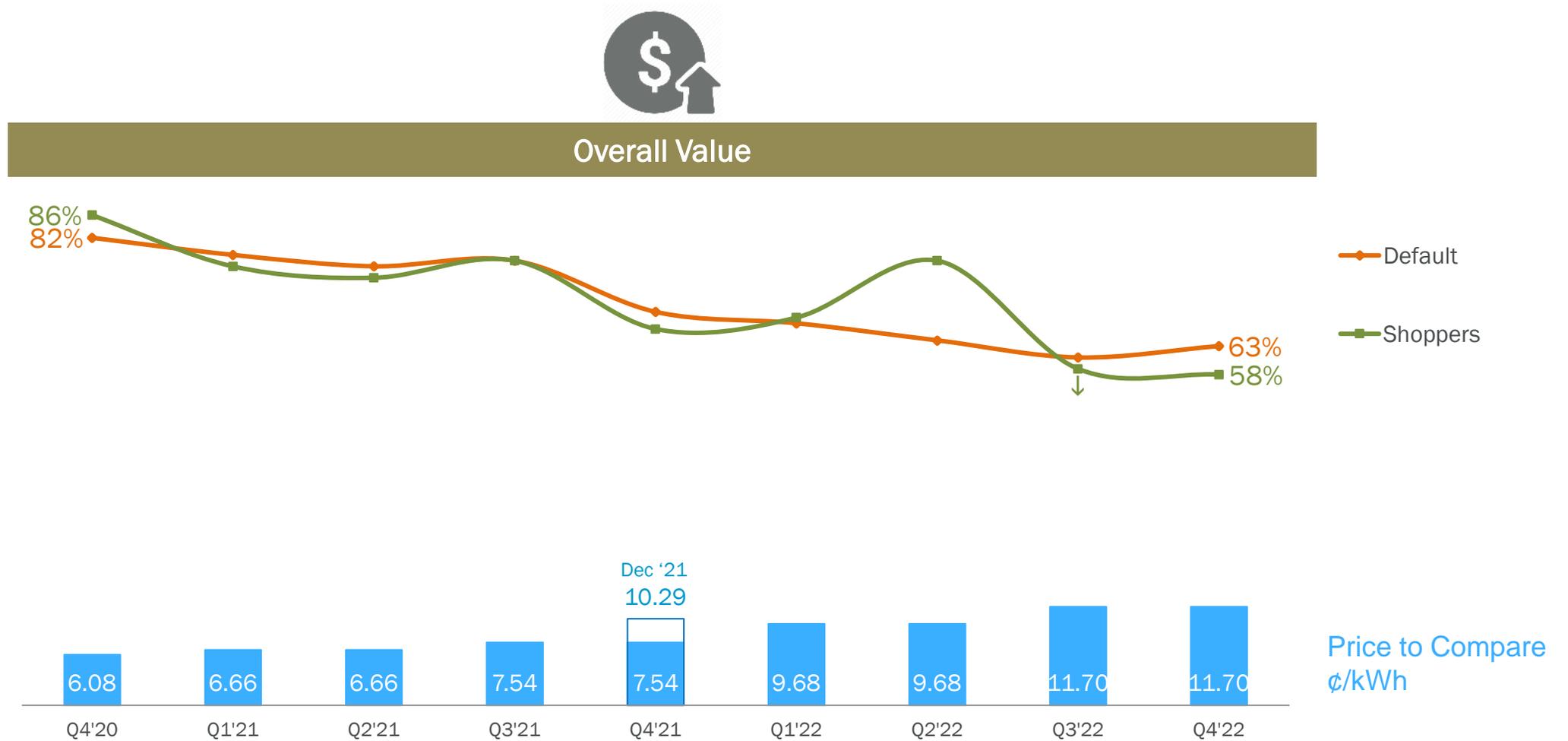
GS-1	GS-3
40	164



- Data weighted by rate class
- Significance testing conducted at a 95% confidence level

Shoppers vs. Default

- Overall Value perceptions are slightly higher among default customers.



Top 3 Box on a 10-pt scale shown for Overall Metrics,

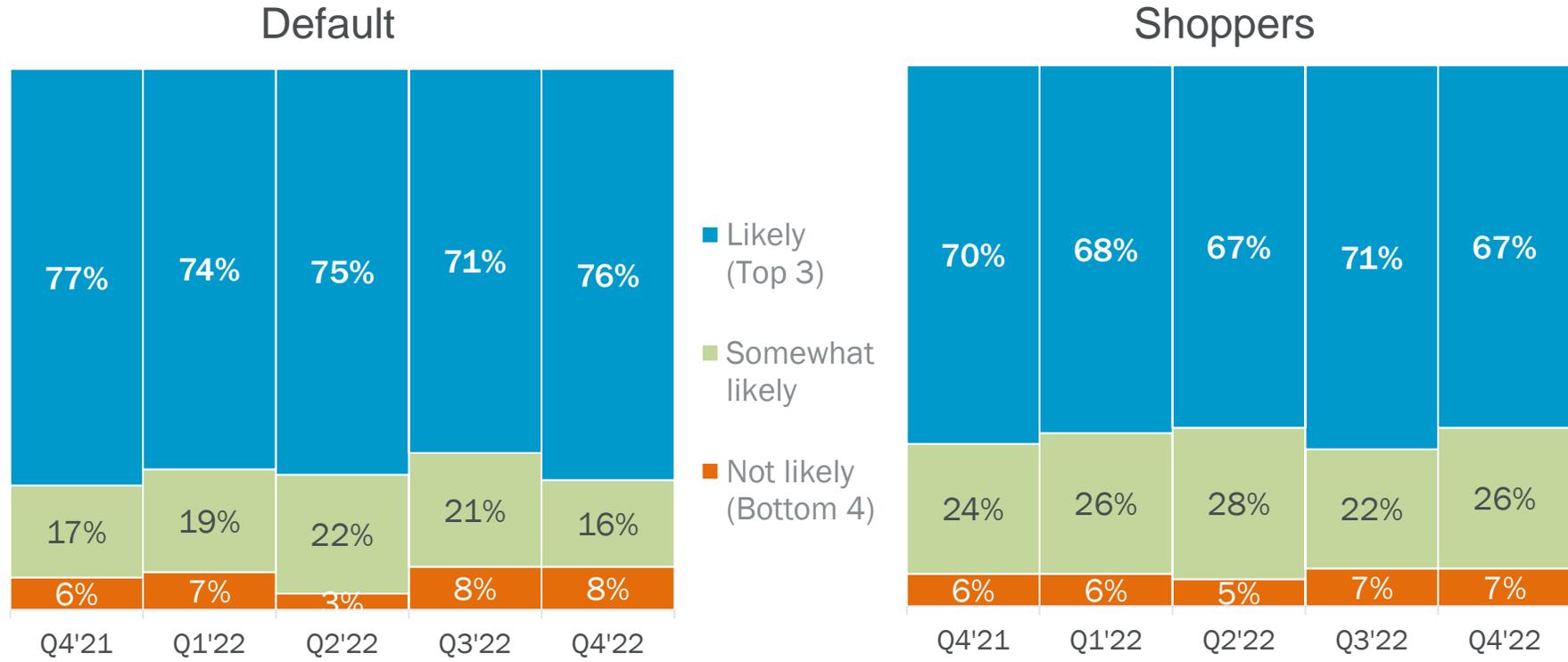
↑↓ Indicates a significant change vs. the previous quarter

Q2. How would you rate PPL Electric overall as a provider of electric delivery service to your [RES: home, BUS: business] in... Value for the price paid?

Likely to Choose PPL

- Shoppers are less likely to choose PPL than default customers.

Likelihood to Choose PPL for Delivery



↕ Indicates a significant change vs. the previous quarter

Q3H. And now, a hypothetical question for you: Today, in Pennsylvania, you have a choice for your electric generation supplier. Assuming you also had the opportunity to choose your electric delivery company, how likely would you be to choose PPL Electric?



- The percentage of business customers experiencing a scam is steady at just under four in ten customers.
- *Someone claiming to be from PPL to sell services over the phone* is most prevalent and has increased slightly.

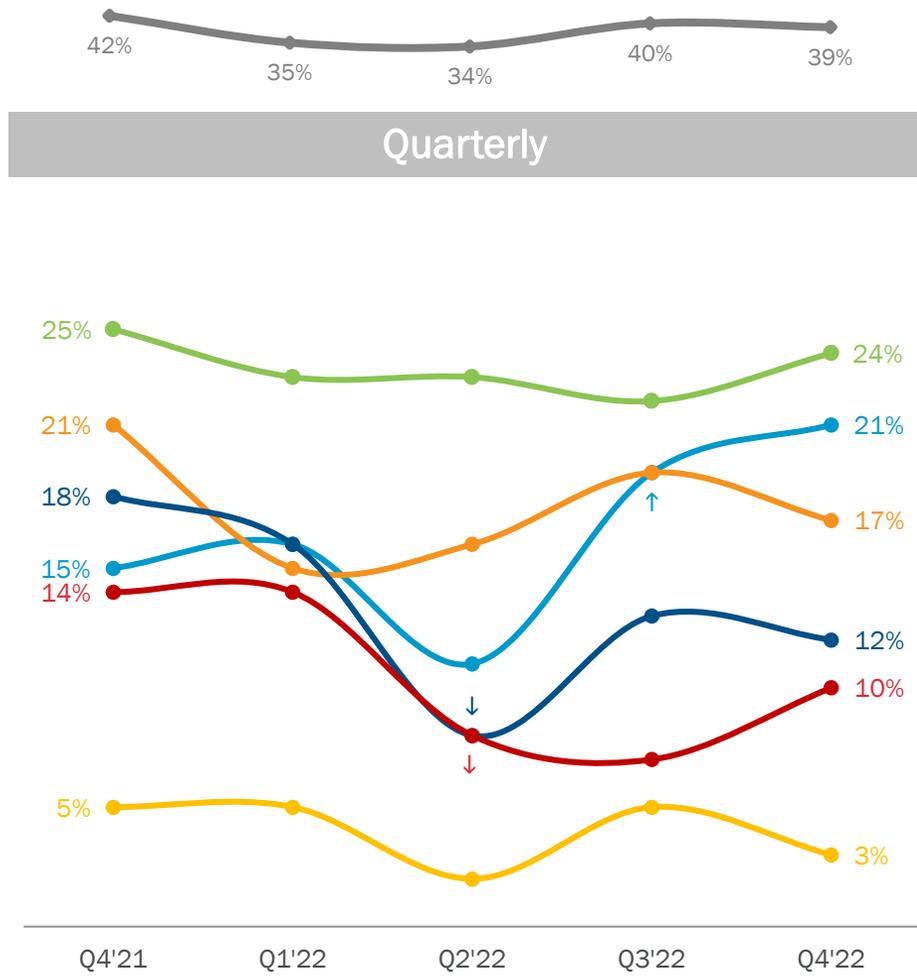


Experienced Scamming = 37%

2022



Quarterly

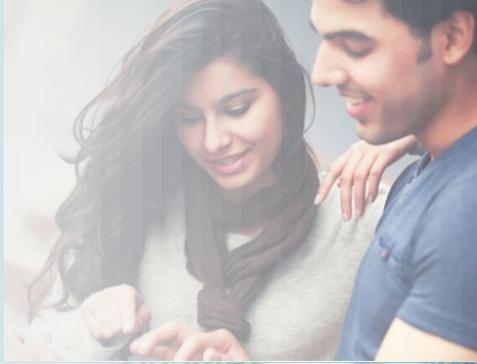


% Yes Among All Customers

↑↓ Indicates a significant change vs. the previous quarter

Q34. Some bad actors rely on scams or deceptive marketing to trick or pressure customers into making immediate payments or switching supply service, often at a higher cost. Have you experienced any of the following scamming tactics in the past three months?





PPL Electric Utilities 2023 Customer Satisfaction Research Residential Customers

Quarter 2 - Detailed Results

The PPL CSAT Residential program is conducted on a quarterly basis to measure and track overall satisfaction and other key components that impact performance. The program is used to improve operational effectiveness, and support customer experience initiatives.



Respondents are the decision makers for electric service or pay the electric bill for their household



Online Survey

All residential surveys were conducted online in Q2'23



April 18, 2023 – May 2, 2023



A total of 1025 residential surveys were completed in Q2'23. The breakdown was as follows:

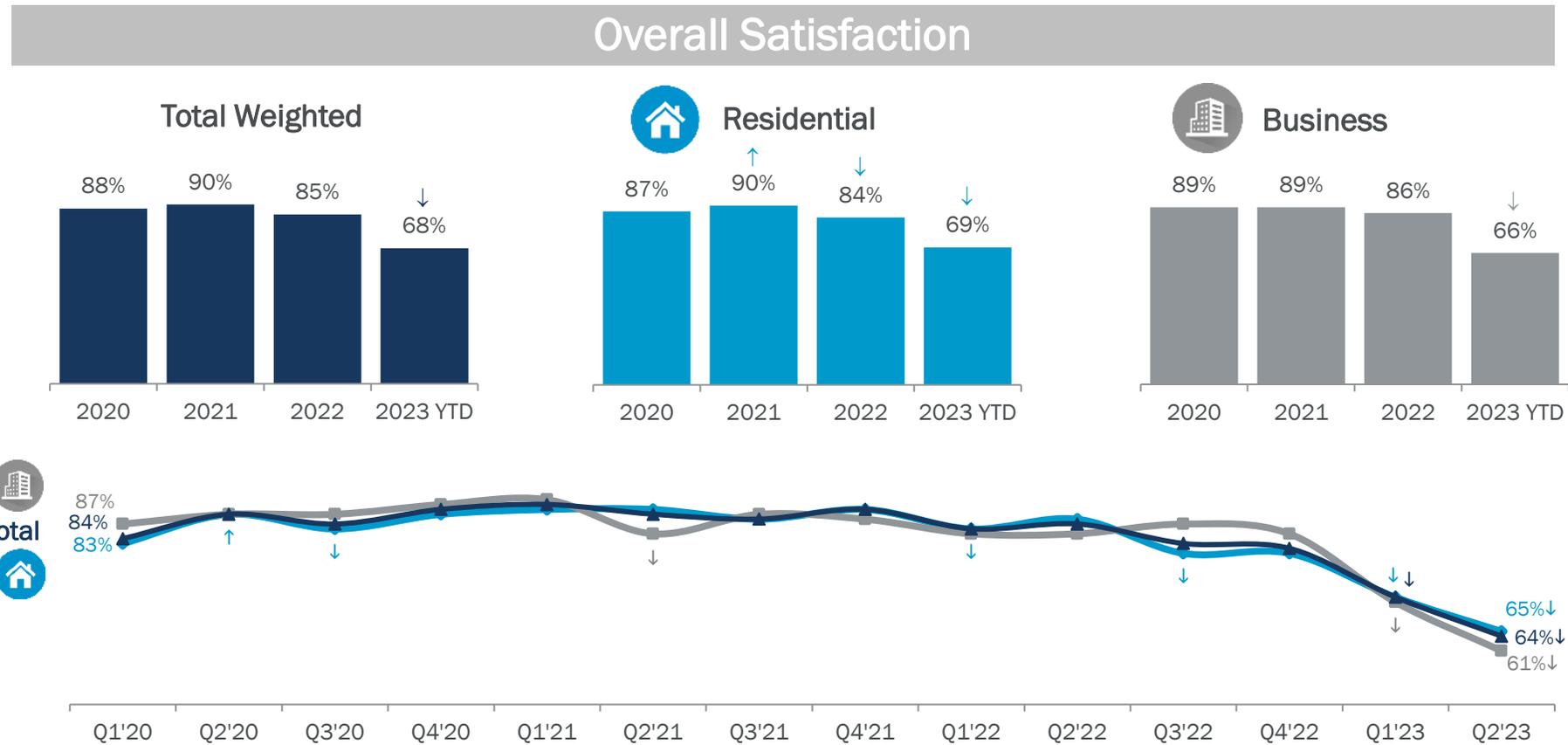
Central	Harrisburg	Lancaster	Lehigh	Northeast	Susquehanna
155	180	184	188	154	164



- Data weighted by region and age
- Significance testing conducted at a 95% confidence level

Overall Satisfaction

- Billing event impacts linger as customer satisfaction continues to decline significantly
 - ↓10 points among business since Q1, down 24 points compared to the same quarter last year
 - ↓ 7 points among residential, down 23 points compared to the same quarter last year
 - ↓ 8 points overall, down 23 points compared to the same quarter last year



Top 3 Box on a 10-pt scale shown for Overall Metrics

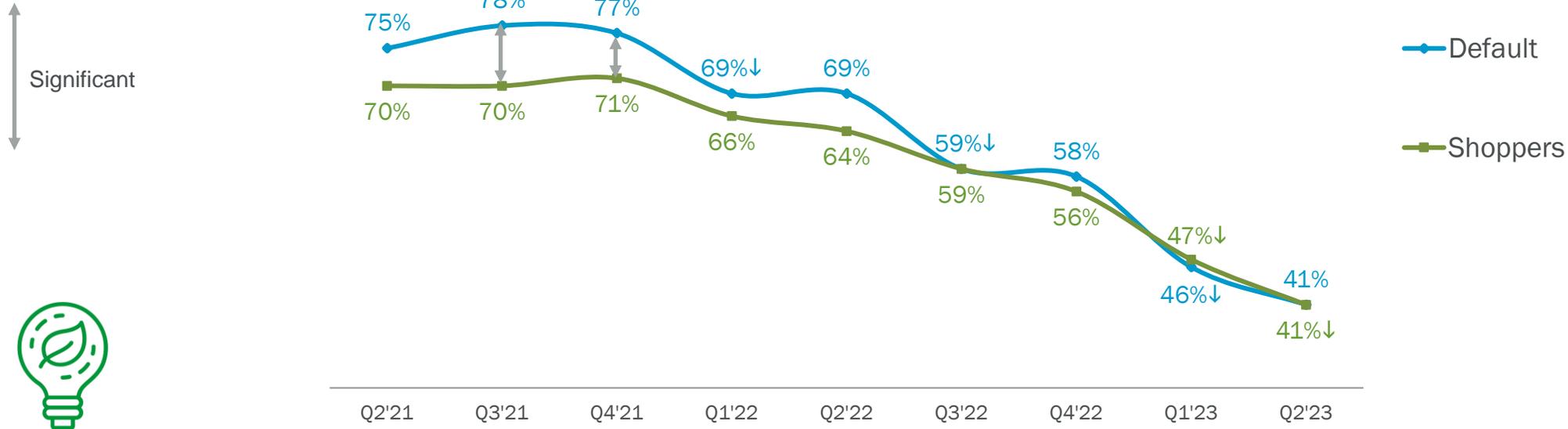
↑↓ Indicates a significant change vs. the previous quarter (year)

Q1. Using a 10-pt scale, where 1 means unacceptable and 10 means outstanding, how do you rate your overall satisfaction with PPL as a provider of electric delivery service to your home/business?

Overall Value

- The decline in Value perceptions is similar regardless of shopping status.

Overall Value



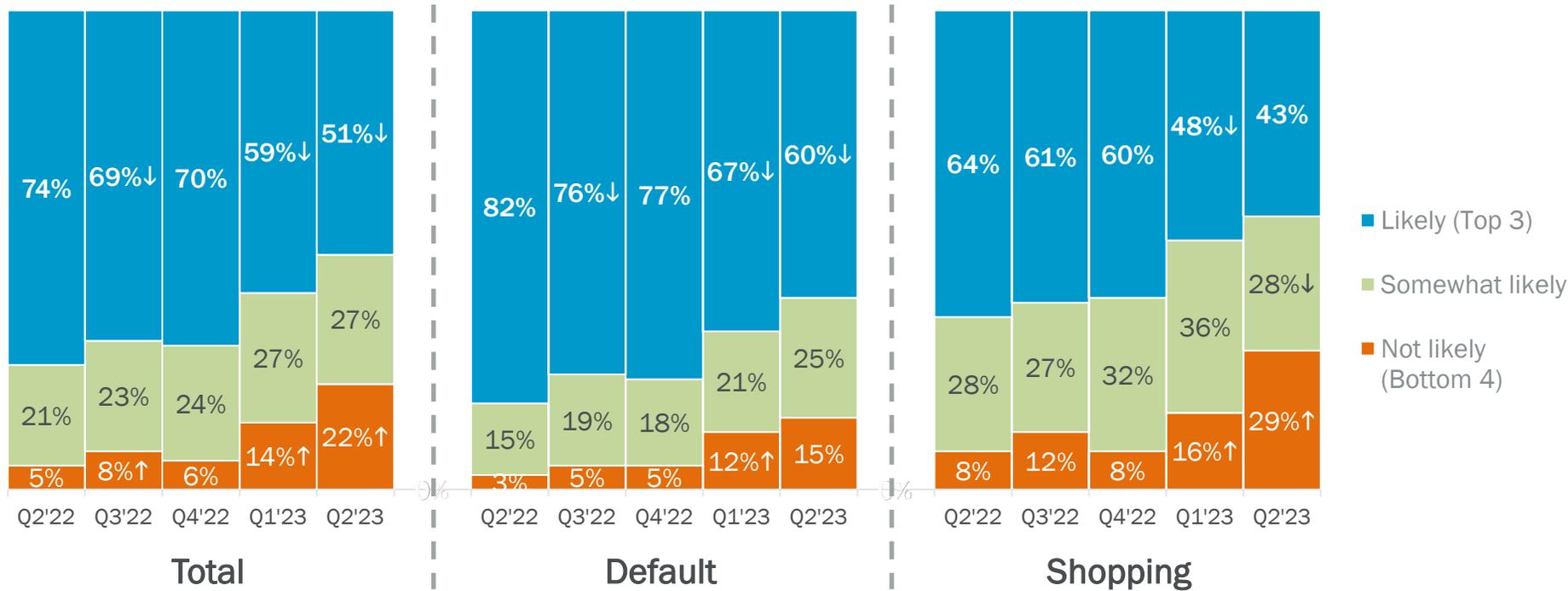
Top 3 Box on a 10-pt scale shown for Overall Metrics

↑↓ Indicates a significant change vs. the previous quarter

Likely to Choose PPL

- Shopping customers are significantly less likely to choose PPL for delivery if they had the choice.

Likelihood to Choose PPL for Delivery



↑↓ Indicates a significant change vs. the previous quarter

Q3H. And now, a hypothetical question for you: Today, in Pennsylvania, you have a choice for your electric generation supplier. Assuming you also had the opportunity to choose your electric delivery company, how likely would you be to choose PPL Electric?



- The percentage of customers experiencing a scam has decreased significantly in this quarter.
- Significantly fewer phone calls are being received where PPL appeared on the caller ID, but it was not PPL.

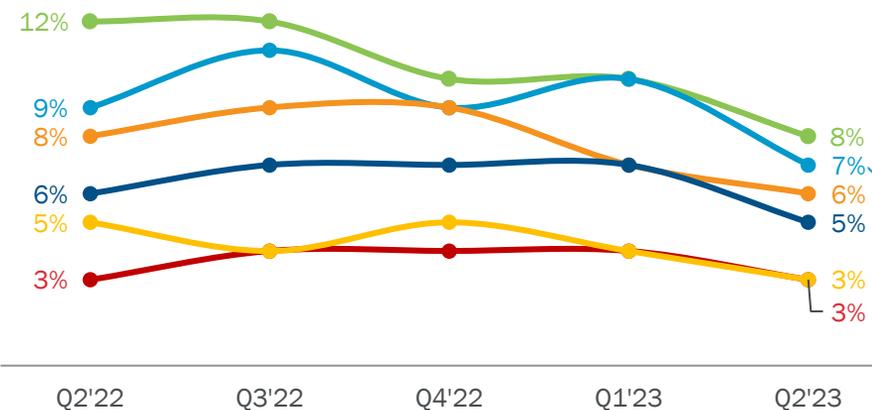


Experienced Scamming = 19%

22% 23% 21% 20% 17%↓

2023 YTD

Quarterly



% Yes Among All Customers

↑↓ Indicates a significant change vs. the previous quarter



PPL Electric Utilities 2023 Customer Satisfaction Research Business Customers

Quarter 2 - Detailed Results

The PPL CSAT Business program is conducted on a quarterly basis to measure and track overall satisfaction and other key components that impact performance. The program is used to improve operational effectiveness.



Respondents are the decision makers for electric service or pay the electric bill for their organization



Online Survey
All business surveys were conducted online in Q2'23



April 18, 2023 – May 2, 2023



A total of 201 business surveys were completed in Q2'23. The breakdown was as follows:

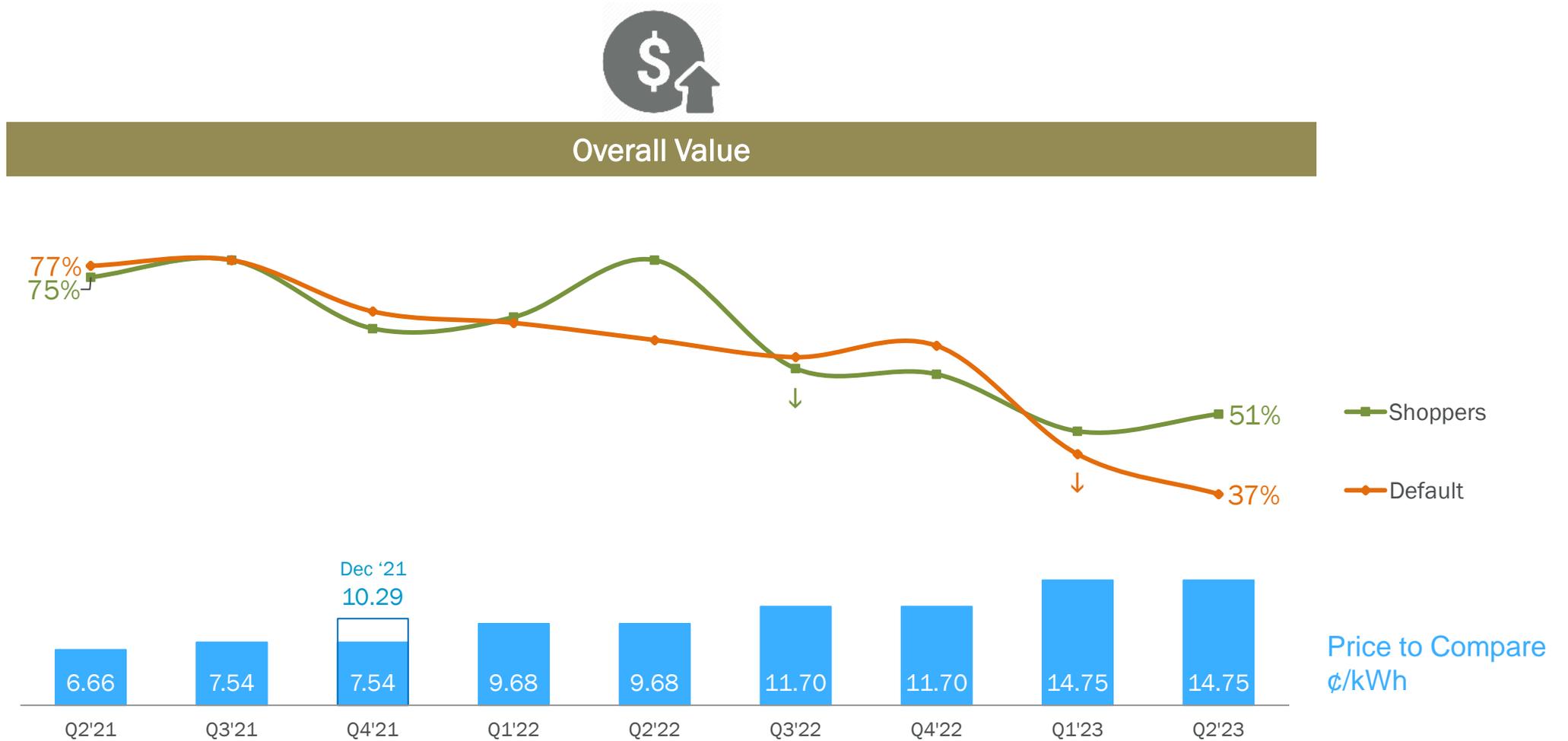
GS-1	GS-3
40	161



- Data weighted by rate class
- Significance testing conducted at a 95% confidence level

Shoppers vs. Default

- Perceptions among default customers continue to soften from a significant decline in Q1'23.



Top 3 Box on a 10-pt scale shown for Overall Metrics,

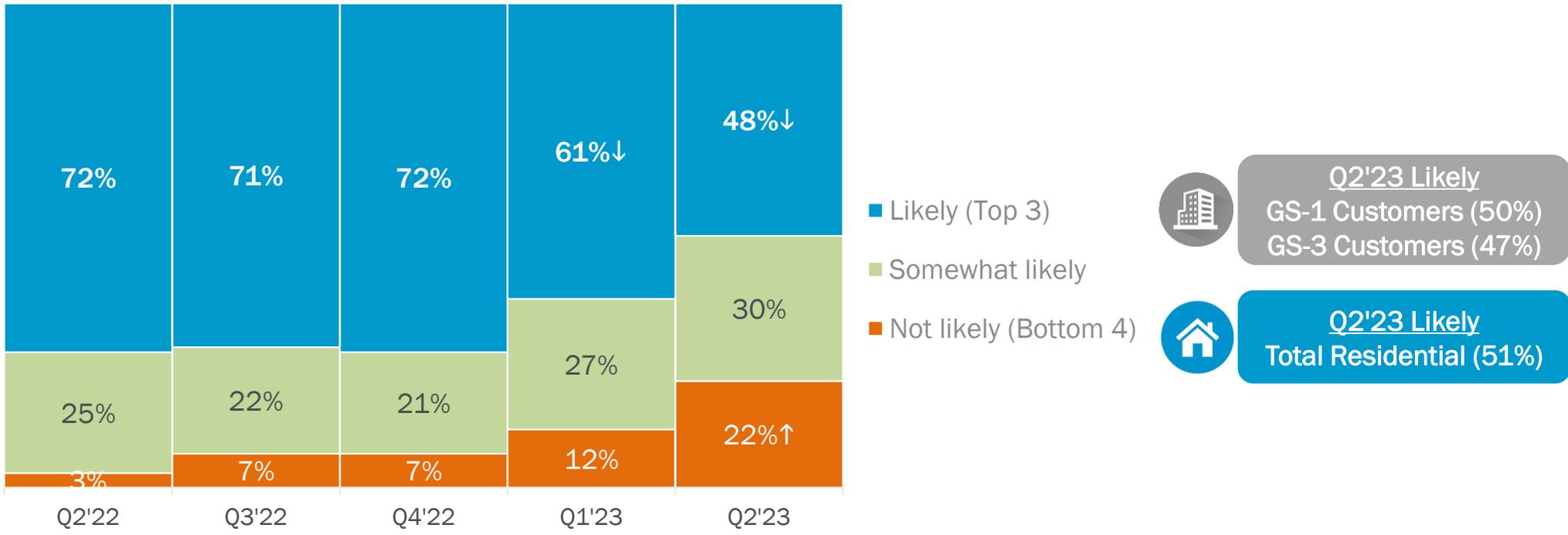
↑↓ Indicates a significant change vs. the previous quarter

Q2. How would you rate PPL Electric overall as a provider of electric delivery service to your [RES: home, BUS: business] in... Value for the price paid?

Likely to Choose PPL

- While the number of customers not likely to choose PPL increased slightly last quarter, it nearly doubled this quarter. Only roughly half of customers would actively choose PPL now.

Likelihood to Choose PPL for Delivery



↑↓ Indicates a significant change vs. the previous quarter

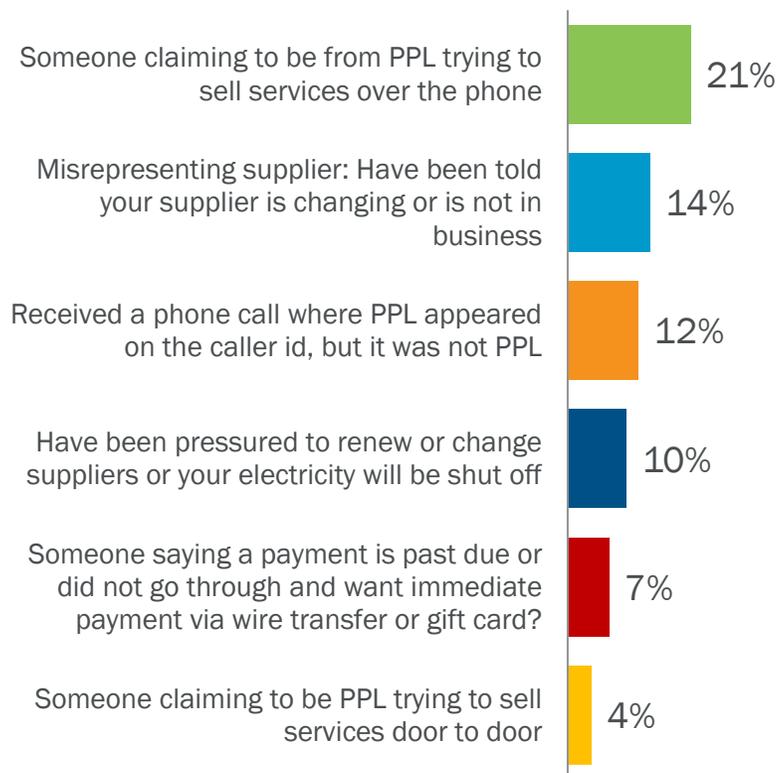
Scamming

- The percentage of business customers experiencing a scam is stable at three in ten customers.
- *Someone claiming to be from PPL to sell services over the phone* continues to be most prevalent.

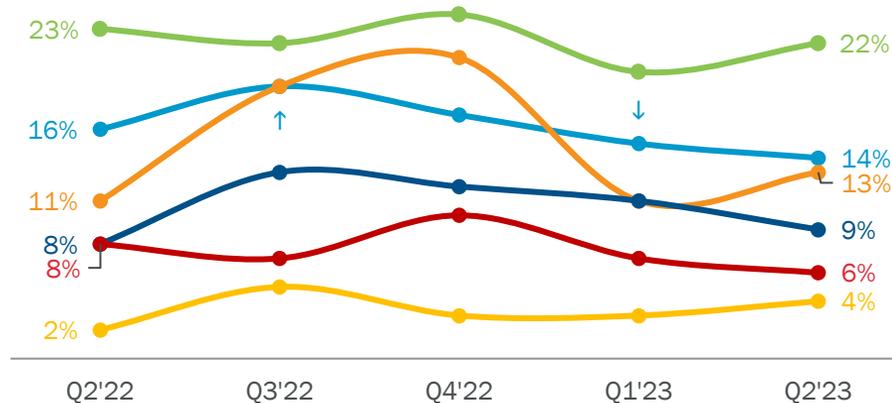


Experienced Scamming = 31%

2023 YTD



Quarterly



↑↓ Indicates a significant change vs. the previous quarter

% Yes Among All Customers

Q34. Some bad actors rely on scams or deceptive marketing to trick or pressure customers into making immediate payments or switching supply service, often at a higher cost. Have you experienced any of the following scamming tactics in the past three months?

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-4

Please refer to PPL's Answer to the Petition for Declaratory Order, ¶¶ 55 and 56, discussing efforts undertaken to share customer contact information with EGSs participating in the Standard Offer Program ("SOP"). In the Answer, PPL indicates that it has shared its customers' email addresses, upon customer consent, with the SOP EGSs. In connection therewith:

- A. Please confirm that PPL has not shared mobile telephone numbers with SOP EGSs. If you do not confirm, please explain. If you confirm, please explain why this information has not been shared with SOP EGSs.
- B. Please describe, and provide supporting documentation, of the communications PPL had with the parties in the Default Service Plan V proceeding regarding the sharing of customer contact information with SOP EGSs.
- C. Please detail any input or feedback PPL requested or obtained from SOP EGSs regarding the sharing of customer contact information.
- D. Please provide a copy of the script that PPL used to explain to customers the sharing of contact information, upon customer consent, with the SOP EGS during the enrollment process.
- E. Please describe, and provide supporting documentation, of the method by which PPL requested and obtained the consent of the customer.
- F. Please indicate the date on which PPL implemented the process for explaining to customers and obtaining the consent from customers to share contact information with SOP EGSs.
- G. Please provide the number of customers from whom PPL has sought consent to share contact information and the number of customers who have declined to have that information shared with the SOP EGS.
- H. Please describe the process through which PPL informs the SOP EGSs of the customer's contact information.

WITNESS: Shemeka Rodgers

PPL
Response

- A. PPL Electric complies with the DSP V Order and provides SOP EGSs with the customer's phone number, email address or both upon receiving consent from the customer to release the information during the SOP enrollment process. PPL Electric does not ask for customer mobile numbers specifically, and upon customer consent, provides SOP Suppliers with the phone number provided by the customer, mobile or otherwise. Therefore, PPL Electric cannot confirm that it has not shared mobile phone numbers with SOP EGSs.
- B. PPL Electric posted a broadcast message on May 6, 2021, inviting suppliers to a meeting on May 11, 2021, to review DSP V changes related to SOP. See the attached SOP Presentation attached hereto as Attachment RESA & NRG I-4-1.
- C. PPL Electric did not solicit any EGS feedback. However, the Company would consider EGS feedback if it were provided. To this date PPL Electric has not received any feedback.
- D. See Attachment RESA & NRG I-4-2 and Attachment RESA & NRG I-4-3.
- E. PPL Electric gathers consent when customers self-serve and sign up for the SOP on the Company's website. When a customer calls and is transferred to the SOP vendor, the vendor reads the script and asks the customer if they want to provide consent to release their contact information to the supplier. If the customer provides consent, PPL Electric gathers the information and saves it on solicitation table.
- F. PPL Electric implemented processes to obtain customer consent to share contact information with SOP EGSs on May 25, 2021.
- G. PPL Electric has sought consent from 152,056 customers. 89,392 customers have consented to providing their contact information to their SOP supplier, 55,980 customers have not provided consent, and 6,684 customers have not provided any response.
- H. PPL Electric provides the data on the Solicitation Report available to suppliers on the Supplier Portal. Suppliers are required to pull their own referral reports. Consent fields were added to the report. The report contains three fields consent,

WITNESS: Shemeka Rodgers

phone number and email address. If consent is not given, the phone number and email address fields will not be populated.

Standard Offer Conference Call

WELCOME

May 11, 2021

Billing and Supplier Services Team

- Diana Yunez
- Jenn Ainsworth
- Monica Andrews
- Aida Castro
- Tammy Kirschman
- Cheryl Oehler

SOP Changes

- EGS are required to OPT in semi-annual vs Quarterly
- PPL is required to provide the SOP supplier with the customers phone number, email address or both, upon receiving consent to release the information during the call. If consent is not given, the report will be blank and will not be provided.
- There are new fields that will be on the referral report with this information
- There will be a new format for the rates codes for future periods.
- A new Binding Agreement is needed for anyone that will start participating in the period starting **June 1, 2021.** Once you submit a new binding agreement you will not need to submit a new form, with the exception of a contact form change, missed period or change in your customer group participation (ie: Commercial/ Residential or both)

Rate Format Change

- There will be a new format for the rates codes for future periods (ie:SOR2P1 or SOS2P1)
 - SOR = Residential Rate
 - SOS= Commercial Rate
 - 1P would mean first period (December 1 to May 31)
 - 2P would mean second period (June 1 to November 30)
 - 1 would mean the last digit of the year we are in (but the year will change effective December for this program) ie: December 2021 will be SOR1P2

CAP Customer Changes

- As of June 1, 2021, CAP customers are no longer able to shop
- If the CAP customers have an existing supplier, they are allowed to finish out the contract, but the supplier **MUST** drop them at the end of the current contract
- If the customer is a **NEW** CAP customer, they must drop the supplier before they can be approved for the CAP program.
- When a CAP customer comes up for recertification, they must drop their supplier at that time recertification. If they do not choose to drop their supplier, they will no longer be eligible for the CAP program.

Enrollment Timeline

- EGS Obligations: Initiate EDI Enrollment transaction no later than 3 business days after the Referral.
- EGS Control: Suggest EGSs develop internal controls to ensure EDI Enrollments have been sent. Compare against Referral Report.

EDI Enrollment Transactions

- EGS Obligation: EGS must enroll the referred customers using the Rate Ready Bill Option.
- EGS Obligation: EGS must enroll using the correct rate code for the Referred date, regardless of when the Enrollment is sent. The appropriate rate code is on the Referral Report.
 - For example; Referral date is November 30th, and the Enrollment is not sent until December 1st, the rate code in affect in November is required. (SOR4Q3)
- EGS Obligation you must serve the account for 12 months from enrollment date unless customer decides to drop or re-enroll with SOP for lower rate. There is no cancellation charges permitted with SOP program

Enrollment Errors

- EGSs cannot use a non-standard offer rate code for SOP referrals.
- When a non-standard offer rate code is sent, the Enrollment will be rejected on a not-yet-active buffered account.

Frequently Asked Questions

- What happens when customers already enrolled with the EGS come in via the SOP process?
 - You will need to process an EDI change request for the proper rate and proper billing option for the referral that was sent.
- What happens when SOP accounts are submitted for enrollment, but then rejected by PPL for ‘Account Exists but Is Not Active.’?
 - This is because the EGS submitted the 814 Enrollment with a non-SOP rate code. Resend corrected 814 Enrollment.
- Website: <https://www.pplelectric.com/utility/about-us/for-generation-suppliers/general-supplier-reference-information/standard-offer-program>

Notification

- The Standard Offer EGS Participant need only execute and submit the Binding Agreement to PPL Electric one time.
 - Once you submit a new binding agreement you will not need to submit a new form, with the exception of a contact form change, missed period or change in your customer group participation (ie: Commercial/ Residential or both)
- However, in order to be a participant during each period, it must utilize distinct Rate Codes for each period through the PPL Electric System and notify the Company via e-mail of its intent to participate per Article 4 of the SOP Rules. Any EGS failing to notify the Company of its intent to participate in the Program will be excluded from that period's SOP offering.

Questions?



PPL Electric Utilities Corporation

Standard Offer Program Process and Rules

Dated: [EFFECTIVE DATE]

PPL Electric Utilities Corporation

Standard Offer Program Process & Rules

[EFFECTIVE DATE]
21379666v1

Business Use

STANDARD OFFER PROGRAM PROCESS and RULES

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ARTICLE 1 INTRODUCTION

1.0 Introduction

- 1.1 This Standard Offer Program Process and Rules document (“SOP Rules”) defines the processes and rules for PPL Electric Utilities Corporation’s (“Company” or “PPL Electric”) Standard Offer Program (“SOP” or “Program”), implemented pursuant to the Pennsylvania Public Utility Commission’s (“PA PUC” or “Commission”) Final Order to PPL Electric Utilities Corporation Default Service Program and Procurement Plan V at Docket No. P-2020-3019356.
- 1.2 PPL Electric is issuing this SOP Rules document, as a continuous program from June 1, 2021 through May 31, 2025, to solicit participation from Retail Electric Generation Suppliers (“EGS”) in a customer referral program, to serve Residential and Small Commercial & Industrial (“Small C&I”) Customer Groups. Customers who are participating in OnTrack¹ are not eligible to participate in SOP. The Residential Customer Group is defined on the basis of the Company’s existing specific rate schedules as shown in the following table. The Small C&I Customer Group is defined as those customers under 25kW demand and subsequently on the basis of the Company’s existing specific rate schedules as shown in the following table. To the extent an existing rate schedule is modified, or replaced by successor rate schedules, PPL Electric, at its sole discretion, will place that rate schedule in the appropriate Customer Group.

Customer Group	Rate Schedule	Description
Residential	RS	RS – Residential Service
	RTS	RTS(R) – Residential Service – Thermal Storage
Small Commercial & Industrial	GS-1	GS-1 – Small General Service
	GS-3	GS-3 – Large General Service – Customers with less than 100 kW peak demand
	GH-2	GH-2(R) – Separate Meter General Space Heating Service
	LP-4	LP-4 – Large General Service (12 KV or Higher) – Customers with less than 100 KW peak demand
	BL	BL – Borderline Service – Electric Utilities
	SA	SA – Private Area Lighting
	SM	SM(R) – Mercury Vapor Street Lighting
	SHS	SHS – High Pressure Sodium Street Lighting
	SE	SE – Energy Only Street Lighting Service
	SLE	SLE – Light Emitting Diode (LED) Street Lighting Service
TS	TS(R) – Municipal Traffic Signal Lighting Service	

¹ OnTrack is PPL Electric Customer Assistance Program.

SI-1	SI-1(R) – Municipal Street Lighting
Standby	Rule 6A – Standby Service for Qualifying Facilities applicable to customers in the above listed rate schedules.

- 1.3 Customers participating in the SOP will receive a fixed rate for a twelve-month period that is equal to a 7% discount off the Price-to-Compare (“PTC” or “Default Service”) in effect at the time the customer enrolls in the SOP.
- 1.4 A participating EGS, subject to the qualification requirements discussed in Article 4, will provide retail supply for eligible Residential and/or Small C&I customers who elect to participate in the Program and who are successfully enrolled into the Program as discussed in Article 5. Any Participating Customer may return to Default Service or choose another EGS in accordance with the Company’s standard switching requirements, without penalty.
- 1.5 EGSs interested in participating in the Program must initially meet Pre-Qualification Requirements to participate as provided in Section 4.2.
- 1.6 Once all Pre-Qualification Requirements are met, an EGS must meet the SOP Period Qualification Requirements in order to be an EGS Participant in any SOP Period (hereinafter defined). Section 4.3 details the Qualification requirements.
- 1.7 If during any SOP Period there are no EGSs meeting the Pre-Qualification Requirements to participate in the Program, or if no pre-qualified EGSs have met the SOP Period Qualification Requirements, the program will not be offered for that SOP Period. There must be at least one (1) qualified EGS with a submitted rate code for either the Residential or Small C&I Program. If a rate code is not submitted for either customer class, then that class (without a rate code) will not have a Program offering for that SOP Period.
- 1.8 Each Participating EGS must pay its share of the Program costs as set forth in Article 7.
- 1.9 EGSs are required to independently maintain their own data and information for all customers enrolled in the Program. The Company is not responsible for the reporting of any information on the Program for Participating EGSs. See Article 8 for more information.
- 1.10 Definitions:** In addition to terms defined elsewhere in this SOP Rules, the following definitions shall apply:

“CAP customers” means a residential customer enrolled in PPL Electric’s Customer Assistance Program, OnTrack.

“EDI” – Electronic Data Interchange, which is a standardized format for the electronic transfer of data between entities.

“Electric Generation Supplier” or “EGS” is defined as a retail generation supplier.

“Eligible Customers” include any default service Residential customer, with the exception of CAP customers, or Small Commercial & Industrial customer less than 25kW who contacts PPL Electric’s Call Center, other than for termination or emergency calls. This also includes any eligible shopping customer that actively requests participation in the Program. See Section 1.2 for a list of eligible customer rate classes by customer group.

“Participating EGS” or “EGS Participant” is an EGS that has successfully met Pre-Qualification and SOP Period Requirements.

“Participating Customer” means any eligible Residential customer or Small Commercial and Industrial customer under 25kW in PPL Electric’s service territory that affirmatively elects to participate and successfully enrolls in the Program.

“Program Costs” means the costs that PPL Electric will incur to administer and communicate the Program to Eligible Customers.

“Program Term” means the period beginning on June 1, 2021 through May 31, 2025.

“Price-to-Compare Period” or “SOP Period” means the six (6) calendar month periods as follows: June – November and December –March.

“Pre-Qualification Requirements” are those requirements that any interested EGS must complete to initially qualify for the Program, as set forth in Article 4 of this SOP Rules document.

“SOP Period Qualification Requirements” are those SOP Period requirements, corresponding to the Price-to-Compare Period, that an EGS must complete once meeting all Pre-Qualification Requirements, as set forth in Article 4 of this SOP Rules document.

“Rate Ready Billing” billing scenario in which the EGS provides the Company its billing rates so that the Company can complete the billing calculation and bill delivery.

ARTICLE 2 INFORMATION AND SCHEDULE

2.0 Information and Schedule

- 2.1 PPL Electric will post information for this Program on the PPL Electric website on its General Supplier Information webpage: <https://www.pplelectric.com/utility/about-us/for-generation-suppliers/general-supplier-reference-information/standard-offer-program.aspx>. This website will serve as the main source of information for the Standard Offer Program. Prospective EGS Participants are requested to use this website for current information about all aspects of this Program and to access all essential documents.
- 2.2 The Program will be offered by PPL Electric to all eligible non-shopping Residential customers and Small C&I customers under 25kW starting in June 2021. The Program will be offered on a semi-annual basis based upon the SOP Period.

ARTICLE 3 GENERAL REQUIREMENTS

3.0 General Requirements

- 3.1 Participating EGSs must adhere to the terms and conditions of the Program and fulfill all requirements of this SOP Rules document and Standard Offer Program Binding Participation Form. In the event an EGS fails to adhere to the Program terms and conditions the EGS will not be allowed to participate in the Program.
- 3.2 The submission of the Standard Offer Program Binding Participation Form to the Company constitutes the EGS's acknowledgement and acceptance of all the terms and conditions of this SOP Rules document.
- 3.3 All Representations in this Program and documents executed must be done by an individual authorized to 1) make contractual commitments on behalf of the EGS to provide retail customer generation supply and 2) to financially bind the Participating EGS.
- 3.4 Participation in this Program shall constitute an Agreement by EGS to abide by the terms and conditions of the Program as set forth herein. In the event of a material default by an EGS in any of its obligations under this Program, PPL Electric shall have the right to terminate the EGS's participation in the Program upon providing 10 business day written notice of the default to the EGS, directed to the contact listed in Exhibit 2. The EGS shall be permitted to continue participating in the Program if it cures the default during the 10 business day notice period. PPL Electric also may seek whatever remedies, including but not limited to reasonable

attorneys' fees, to which it may be entitled before the Commission, or a court of competent jurisdiction. The venue for any court action shall be in the Court of Common Pleas for Lehigh County or in the District Court for the Eastern District of Pennsylvania in Allentown.

ARTICLE 4

EGS Qualification Requirements

4.0 EGS Qualification Requirements

4.1 The EGS Qualification requirements are broken down into two components: 1) Pre-Qualifications (Section 4.2) and 2) SOP Period Qualifications (Section 4.3).

4.2 Pre-Qualification Requirements:

4.2.1 All EGSs must complete a one-time, pre-qualification process to allow the EGS access and future participation in the Program. Pre-qualification is composed of two primary steps: 1) Certification requirements (Section 4.2.2) and 2) Document completion and execution (Section 4.2.3).

4.2.2 Pre-qualification initially opens July 1, 2013 and remains open on a rolling basis. In order to pre-qualify for participation in any SOP Period, EGSs must submit all materials (as defined in this Article 4) at least 5 business days prior to the start of a new SOP Period. Pre-qualification is a one-time submission event.

4.2.3 Certification:

4.2.3.1 An EGS must be licensed as an EGS by the Commission with authority to provide service to Residential and/or Small C&I customers in PPL Electric's service territory. If an EGS loses its license to serve customers in PPL Electric's service territory it may not participate in the Program.

4.2.3.2 An EGS must be registered with PJM as an EGS to participate in the Program.

4.2.3.3 An EGS must be certified by PPL Electric to exchange data using the EDI process, through the EDC consolidated billing level. EGSs must be certified by PPL Electric as Rate Ready Billing.

4.2.3.4 All EGSs must meet the certification requirements on or before 5 business days prior to the start of a SOP Period to be

eligible to participate in the Program (contingent upon completion of the additional qualification requirements set forth in Section 4.2 and 4.3). Furthermore, EGSs must meet the certification requirements prior to PPL Electric accepting the Standard Offer Program Binding Participation Form and Standard Offer Program Contact Form.

4.2.3.5 Any EGS that is already Rate Ready Billing certified by the Company is already deemed certified and does not have to recertify to pre-qualify.

4.2.4 Documentation:

4.2.4.1 Every EGS must complete and execute the Standard Offer Program Binding Participation Form (Exhibit 1). The Standard Offer Program Binding Participation Form must be executed by an Authorized Individual of the EGS. Additionally, every EGS must fully complete the Standard Offer Program Contact Form.

4.2.4.2 Hardcopies of both the Standard Offer Program Binding Participation Form and Standard Offer Program Contact Form must be received in hard-copy format by PPL Electric at least 5 business days prior to the start of a SOP Period in order for the EGS to be eligible to participate in the Program (contingent upon completion of the additional qualification requirements set forth in Section 4.2 and 4.3). Any EGS failing to execute these documents will result in PPL Electric eliminating that EGS from participating in the Program until such time that the EGS submits completed and executed materials. It is of the sole responsibility of the EGS to cure any deficiency in the documentation materials.

4.2.4.3 All correspondence should be mailed to:

PPL Electric Utilities Corporation
Standard Offer Program
827 Hausman Road, LEHSC
Allentown, PA 18104
Attn: Manager – Billing Operations

4.3 SOP Period Qualification Requirements

4.3.1 Each EGS that is pre-qualified must notify the Company via e-mail of their intent to participate in the upcoming SOP Period, including identifying the Customer Groups in which they intend to serve. The

EGS must notify the Company by e-mail (see Section 4.3.2 for the contact e-mail address) on or before 5 business days prior to the start of the SOP Period. If the EGS does not notify the Company of their intent to participate, they will not be included in that SOP Period's Program.

- 4.3.2 All communications regarding an EGSs intent to participate in an SOP Period Program must be made to the following e-mail address:
PPLUtilitiesSupplier@pplweb.com.

ARTICLE 5

Customer Communications and Customer Allocation Process

5.0 Customer Communications and Customer Allocation Process

- 5.1 The Program will be initially offered by the Company to all eligible PPL Electric Default Service customers who contact the Company call center, with the exception of those defined in Section 5.1.4. Before offering the Program, the Company will first resolve the customer's concerns or inquiry that was the reason for the call. The initial Program offering will only include a summary overview of the Program – upon interest of the customer, they will be transferred to a third-party to learn more information and enroll.
- 5.1.1 The Company will offer the Program to new or moving customers upon completing new account set-up.
- 5.1.2 Enrolled Customer Assistance Program (CAP) customers are not eligible to participate in this Program.
- 5.1.3 Residential and Small C&I less than 25kW shopping customers in the PPL Service territory calling the Company will not be actively offered the Program. If a shopping customer actively inquires about the Program, the Company will allow for the customer's participation and inclusion. The Company will explain to the customer that terminating their existing shopping contract to participate in SOP may trigger early termination fees.
- 5.1.4 The Company will not offer the Program to Default Service customers calling for an emergency or for termination of service.
- 5.2 Customers interested in the Program will be transferred from PPL Electric to a third-party vendor, who will then give the customer additional information on the Program and allow the customer to enroll. Customers who have a specific EGS in mind may enroll with that EGS. Otherwise, customers will be told that they will be randomly assigned to a Participating EGS.

- 5.3 If during any SOP Period there are no EGSs meeting the SOP Period Qualification Requirements, the Program will not be offered to customers for that SOP Period. If such an event occurs, Company call scripts will be modified to not offer the Program.
- 5.4 The Company will utilize an algorithm to randomly assign customers to participating EGSs. The algorithm is designed to assign an equal amount of customers to participating EGSs. As the customer accounts get assigned to an EGS, the accounts will be added to each EGS's referral report, real time.
- 5.5 At any point during the day, an EGS can access customer-specific data and information for those customers which have been assigned to the EGS through the supplier portal. This data is available via the Company's Supplier portal for each participating supplier at:
<https://supplier.prod.pplweb.com/eusupplierportal/Secured/Retail/SOReferrals.aspx>

ARTICLE 6

EGS Obligations

6.0 EGS Obligations

- 6.1 All Participating EGSs, upon receipt of the customer assignment data file (see Article 5.5), must begin the customer enrollment process. This process includes communicating the terms and conditions of the Program to the customer (Section 6.2) and the completion and submission and processing of the EDI 814 enrollment request transaction with the Company (Section 6.3).
- 6.2 Within three (3) business days upon an EGS receiving a list of customer assignments, the EGS must issue a letter to the customer detailing the terms and conditions of the Program. Additionally, the EGS is obligated to comply with all rules and requirements set forth in 52 Pennsylvania Code Chapter 54. The terms and conditions of the Program that shall be communicated to the customer include:
- 6.2.1 The generation rate will be set at 7% below the PTC at the time the customer elects the Program. Additionally, the rate must remain fixed for a 12 billing cycle term.
- 6.2.2 There will be no early termination fee or penalties.
- 6.2.3 The customer will remain on the EGS's service at the conclusion of the contract on a month-to-month contract, at a rate set by the EGS, until the customer elects a different rate by the EGS, chooses an alternative supplier, or returns to default service.

- 6.3 Within 3 business days following the customer’s rescission period for enrollment, the EGS must enroll assigned customers through the EDI 814 enrollment process. The Company will respond to the EGS with an EDI 814 enrollment response transaction indicating to the EGS whether the enrollment has been accepted or rejected by the Company and if accepted, the date the EGS should begin serving the customer.
- 6.3.1 An EGS may not limit or reject any customer assigned to it through the Company’s assignment process.
- 6.4 Following the submission of the EDI 814 enrollment, a customer will begin supply with the EGS on the date communicated to the EGS by the Company via the EDI 814 enrollment response transaction. This date is calculated according to the 3 Business Day Switching Rule with an exception noted in Section 6.4.2, below.
- 6.4.1 Customers may choose to remain in their current shopping contract or on Default Service without taking service from their assigned EGS during the 3-day contract rescission period.
- 6.4.2 New and Moving customers will begin supply with the EGS on the date communicated to the EGS by the Company via the EDI 814 enrollment response transactions. The enrollment response will not be generated until the new account is active. The Company provides a separate pending enrollment report for each EGS that includes all accounts that have not been activated. An EGS will begin supplying the customer as of the customer’s connect date.

ARTICLE 7

Program Costs and Invoicing

7.0 Program Costs and Invoicing

- 7.1 Participating EGSs are required to pay a fee of \$28 per referred customer. Any remaining costs shall be included and recovered in the Company’s Competitive Enhancement Rider. The allocation of these costs to the Customer Groups will be determined consistent with the cost allocations accepted by the Commission in PPL Electric’s most recent base-rate proceeding.
- 7.2 Invoices will be issued within 10 business days following the conclusion of the month. Invoices will be issued via e-mail to the EGS based upon the contact information provided.
- 7.3 Once issued an invoice, the EGS is required to pay the invoice within 20 business days to PPL Electric. Payment must be made via Electronic Funds Transfer (EFT). The Company will issue banking information upon successful completion of Pre-Qualification requirements.

ARTICLE 8 REPORTING REQUIREMENTS

8.0 Reporting Requirements

- 8.1 Each Participating EGS is independently responsible to maintain data and information regarding its participation and assigned customer participation in the Program. It is also the Participating EGS's responsibility to provide support or evidence, if called upon, in the event of a formal or informal complaint filed at the PUC by or for a customer with regards to a customer's participation in the Program.
- 8.2 The Company will not be responsible for tracking or reporting on the Program for the benefit of the EGS. Any actions taken by the Company to monitor the program will be completed on its own behalf.

ARTICLE 9 RESERVED RIGHTS

9.0 Non-Binding Program

- 9.1 Prior to the commencement of any SOP Period Program offering and with PA PUC approval, PPL Electric has the right to withdraw and terminate this Program without any liability or responsibility to any Participating EGS or any other party.
- 9.2 Subject to PA PUC approval, the Company reserves the right to accept or reject, in whole or in part, any and all Agreements, without any liability or responsibility to any Participating EGS or any other party, for reasonable cause including, but not limited to, adverse statutory changes or interpretations, issuance of new PA PUC orders and/or regulations, market conditions, etc., that preclude this Program from being implemented in substantially the manner described herein. Pursuant to these SOP Rules, PPL Electric shall reject any documents or agreements, including but not limited to the Standard Offer Program Binding Participation Form and Standard Offer Program Contact Form, submitted in response to this Program that are incomplete, or do not conform to the requirements of this Program, or are submitted beyond the deadline for submission. If the SOP Binding Participation Form or Contact form are incomplete or do not conform to Program requirements, the EGS will be given written notice and will have 48 hours to cure non-conformance. In no event shall cure period extend or toll the 5 business day qualification submission requirements (see Article 4 for details).
- 9.3 All documents and agreements submitted by Participating EGSs in response to this Program will become the exclusive property of PPL Electric upon the receipt of such document(s).

Exhibit 1 Standard Offer Program Binding Participation Form

To be included in PPL Electric Utilities Corporation's ("PPL Electric") Standard Offer Program, _____ ("EGS Participant") agrees to be bound by the terms set forth below.

The Standard Offer EGS Participant hereby agrees that:

- (1) It acknowledges, understands and will abide by the rules set forth in the Standard Offer Program (SOP) Process and Rules document;
- (2) It is obligated to pay a fee of \$28 per customer referred, as incurred by PPL Electric Utilities from the third-party provider, within 20 business days of being invoiced;
- (3) It will issue an EDI 814 enrollment upon notification from PPL Electric of customer being assigned to it. The EDI enrollment will be processed by the Standard Offer EGS Participant no later than 3 business days after the expiration of the rescission period for enrollment;
- (4) It must accept all Standard Offer Customers who elect to participate and are assigned to it under the Standard Offer Program;
- (5) It must accept customers enrolled in the Standard Offer Program and implement a new SOP rate code. If the customer was previously enrolled with the EGS Participant under a different SOP Period rate code assignment, the EGS Participant must send an EDI 814 rate code change transaction no later than 3 business days after the expiration of the rescission period for enrollment or change;
- (6) Once notification is received that a SOP Customer is enrolled, the EGS Participant will send notification to such customer and include the following terms as part of its disclaimer:
 - a. the terms and conditions of the Program;
 - b. the Standard Offer price, herein described below, for a term of twelve (12) billing cycles;
 - c. notification that there is no early termination penalty to any customer who leaves the Program at any time during the twelve (12) billing cycles;
 - d. any additional terms or conditions as set forth in Title 52, Chapter 54 of the Pennsylvania Code;
- (7) The SOP customer's price must reflect a 7% discount to PPL Electric's Price to Compare ("PTC") in effect at the time the customer elects service under the Program. This price will be maintained for all 12 billing cycles for which the customer participates in the Program; and,
- (8) In accordance with the provisions of 52 Pennsylvania Code Chapter 54, prior to the termination of the contract with a customer under this Program, the EGS will notify the customer regarding the conclusion of the contract.

The EGS Participant warrants and agrees that it hereby undertakes all responsibilities and service delineated herein as to SOP customers, and expressly absolves PPL Electric from any and all liability for EGS Participant's failure to perform and/ or its default with respect to such responsibilities and service.

Participation in this Program shall constitute an Agreement by EGS to abide by the terms and conditions of the Program as set forth herein. In the event of a material default by an EGS in any of its obligations under this Program, PPL Electric shall have the right to terminate the EGS's participation in the Program upon providing 10 business day written notice of the default to the EGS, directed to the contact listed in Exhibit 2. The EGS shall be permitted to continue participating in the Program if it cures the default during the 10 business day notice period. PPL Electric also may seek whatever remedies, including but not limited to reasonable attorneys' fees, to which it may be entitled before the Commission, or a court of competent jurisdiction. The venue for any court action shall be in the Court of Common Pleas for Lehigh County or in the District Court for the Eastern District of Pennsylvania in Allentown.

The EGS Participant acknowledges that if PPL Electric is not able to confirm that the EGS Participant is licensed by the PUC, approved to participate in PPL Electric's service territory, is registered as an EGS at PJM, or has passed EDI "Rate Ready Billing" certification for the PPL Electric service territory as of the Submission Due Date, the EGS Participant will not be qualified to participate in the Program and will be excluded from the Program until such time as all deficiencies have been rectified. Furthermore, it is of the responsibility of the EGS Participant to cure such deficiencies.

The EGS Participant need only execute and submit this Form to PPL Electric once, unless the Standard Offer Program Binding Participation Form terms have been updated by PPL Electric. However, in order to be a participant during each SOP Period, the EGS Participant must utilize distinct Rate Codes for each SOP Period through the PPL Electric EDI system and notify the Company via e-mail of its intent to participate per Article 4 of the SOP Rules. Any EGS failing to notify the Company of its intent to participate in the Program will be excluded from that SOP Period.

The submission of this Form to PPL Electric shall constitute the Standard Offer EGS Participant's acknowledgment and acceptance of all the terms, conditions and requirements of this Standard Offer Program.

The undersigned represents and warrants that he/she has the authority to act on behalf of, and to bind, the Standard Offer EGS Participant to perform the terms and conditions and otherwise comply with all obligations stated herein.

Customer Group Participation:

Residential _____ Small C&I < 25kW _____ Both _____

Signature of Authorized Individual: _____

Name of Authorized Individual (*print*): _____

Title of Authorized Individual (*print*): _____

Date Signed: _____

As part of your submission to participate in the Standard Offer Program, please send one (1) original of this Form to:

PPL Electric Utilities Corporation
Standard Offer Program
827 Hausman Road, LEHSC
Allentown, PA 18104
Attn: Manager – Billing Operations

EXHIBIT 2
Standard Offer Program Contact Form

Please provide contact information for purposes of the SOP (*items with an * are required*):

Company:* _____

Contact Name:* _____

Contact Title:* _____

Address:

Street 1* _____

Street 2 _____

City* _____

State* _____

Zip Code* _____

Phone Number:* _____

E-mail Address:* _____

Fax (Optional):

Revised March 5, 2021

PPL Electric MLS-1

Draft – PPL Electric Associate Talking Points for Standard Offer Program (“SOP”) Prior to Transfer to Third-Party Vendor

- At PPL Electric Utilities, our job is to safely and reliably deliver power to your home or business, but we don’t own the power plants where that electricity is generated. In Pennsylvania, you can choose the supplier that provides your electricity without impacting the quality of service we provide. We have a program called the Standard Offer Program. Through the program, you may be able to save some money by enrolling with an electric generation supplier. Would you like to hear more?
 - If yes, PPL Electric customer service representative (“CSR”) will explain that the customer will be transferred to Third-Party who will explain more about the Program and can complete the enrollment process with an SOP-participating supplier if the customer chooses to do so.
 - If no, PPL Electric CSR thanks customer and ends call.

Guidelines for Potential Questions that Customers may ask PPL CSR before being transferred:

PPL Electric CSRs will follow these guidelines if customers request that the PPL CSR explain more about the SOP before being transferred or if customers have questions regarding the SOP that they would like the PPL CSR to answer.

- The SOP pairs customers with an electricity supplier or customers can choose a supplier who is participating in the SOP.

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Business Use

Revised March 5, 2021

- You will receive a 7% discount off the current PPL price to compare at the time of enrollment. Provide PPL's current price to compare and the current Standard Offer price. [Explain price to compare if customer does not understand.] The price to compare is the price you would pay if you decide to take default service from PPL.
 - The Program lasts 12 months.
- You will receive notices from your SOP supplier prior to the end of the 12-month period. At that time, your supplier will have the option to automatically renew your contract at a new rate unless you switch to another supplier or enroll in the default service offered by PPL.
 - While the SOP price will not go up during the 12 months, the SOP price is not guaranteed to remain lower than the price to compare if the price to compare changes.
- PPL's price to compare changes on June 1 and December 1 each year. On those dates, you can check with PPL for the new price to compare. You can find the price to compare on your monthly bill, or by checking papowerswitch.com. We encourage customers to compare prices often.
- If you enroll in the SOP, you will continue to receive a single monthly bill from PPL. Both your supplier charges and PPL delivery charges will appear on your monthly bill.
- You can drop your SOP supplier without penalty at any time during the 12-month program and select another supplier or PPL's default service.
- Regardless of whether or not you take advantage of the SOP, PPL always delivers your power, reads your meter, cares for the poles and wires, provides customer service, and restores power in the event of a service interruption.

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Business Use

Revised March 5, 2021

PPL Electric Exhibit MLS-2

Draft – Hansen Script for Standard Offer Program

ROUTINE CALL GREETING/CUSTOMER NEW TO SOP

STEP 1: Introduction and explain SOP.

- Hi, my name is [Hansen Associate Name]. I understand you would like to learn more about the Standard Offer Program and enroll with a supplier. Is that correct?
- PPL Electric is responsible for delivering your electric. The actual generation of the electric you receive can be provided by PPL Electric (called default service) or a participating supplier of your choice.
- The Standard Offer Program applies to the cost of your electricity supply only. Through the Standard Offer Program, you'll receive your power supply from an Electric Generation Supplier at a fixed price of fixed price of \$xx for one year. That's a 7% discount off today's Price to Compare.
- If you enroll in the Standard Offer Program, we will randomly select a supplier in our program or you can choose a supplier for yourself. During the 12-month term of the program, you can withdraw from the program at any time without penalty and select a different supplier, or you can enroll in PPL's default service.
- If you enroll in the program, PPL remains your utility company and we're responsible for supporting all of your billing and service needs. You will continue to receive only one bill from PPL.
- **The following paragraph will be read only if customer is currently enrolled with non-participating supplier:** You are currently receiving electric supply from [EGS Name]. [EGS Name] is not currently participating in this program. You can still participate in the Standard Offer Program but before you enroll, you should check your contract with [EGS Name] to make sure there aren't any cancellation fees or other surprises.
- **The following paragraph will be read only if customer is currently on net-metering:** If you are a net-metering customer you should contact your SOP supplier about how you they will compensate you for the generation you produce.
- Would you like me to enroll you with a supplier to receive the standard offer?
- PPL's Price to Compare changes on June 1 and December 1 each year. The Standard Offer Program price will not change during the 12 monthly bills, but you should understand that the

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Revised March 5, 2021

Price to Compare could be higher or lower than the Standard Offer price during this period when the Price to Compare changes. PPL Electric encourages you to visit papowerswitch.com to compare prices and see the current price to compare.

STEP 2: Enrollment and select supplier.

- If yes:
 - Okay, I will set your account up for the Standard Offer rate. Would you like us to assign you a supplier, or would you like to choose one for yourself?
 - [Hansen representative will use menu of participating suppliers to make selection based on customer's response.] NAME THE SUPPLIER
 - You will receive information from your supplier to confirm your enrollment. At the end of the Standard Offer Program annual term, your supplier will send you renewal notices, including terms and conditions. Please read the notices carefully. If you do not respond, the supplier can retain you with a new contract and new price.

Step 3: Close call and obtain consent to share information with supplier.

- To confirm, you are now enrolled with [NAME THE SUPPLIER] in the Standard Offer Program, and your supplier will be in touch with you soon. Just a few notes before we wrap up:
- The rate you'll be paying for supply is \$xxx.
- You can withdraw from the program at any time and select a different supplier or elect to receive default service at the price to compare; you will not be charged a cancellation fee. To change suppliers, return to default service, or for more information, visit ppllectric.com or contact PPL at [phone number].
- The Standard Offer Program is for 12 months. You will receive a notice at least 30 days before the expiration of the contract from your supplier. The supplier can keep you as a customer at a new price if you do not respond to these notices. At the end of the 12 months, you can stay with the supplier, enroll with another supplier, or enroll in PPL's default service at the price to compare. I encourage you to stay on top of the rate you're paying for supply and to compare rates and offers often. You want to make sure you're comfortable with the rate you're paying and the service you're receiving.
- Your new supplier will be in touch with you over this period. So that your supplier can contact you easily, do you give consent for PPL to share your phone numbers and/or email address with your supplier?
 - YES/NO checkbox.

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21924419v1

Revised March 5, 2021

- Enter best phone number and/or email address.

- To confirm, you are now enrolled in the Standard Offer Program at a rate of \$xxx. Thank you for being a valued PPL customer.

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-5

Please refer to Exhibit A attached to PPL's Answer to the Petition for Declaratory Order, and please provide the following:

- A. Dates of each communication.
- B. Number of customers to whom the communication was sent.
- C. Criteria used by PPL in selecting the customers to whom the communication was sent.
- D. Costs incurred by PPL to design, draft and develop the communications.

PPL
Response

PPL Electric sent the following emails. The Company used internal resources to prepare and send these emails. There are no specific costs associated with each email.

Email 1 – Important notice to business customers of PTC change

Send date: May 2, 2022

Number of emails delivered: 33,992

Audience/Criteria: Business customers on default service as of their last bill (not shopping)

Email 2 – Important notice to residential customers of PTC change

Send date: May 2, 2022

Number of emails delivered: 428,289

Audience/Criteria: Residential customers on default service as of their last bill (not shopping)

Email 3 – Have you checked your energy supply price recently?

Send date: May 26, 2021

Number of emails delivered: 132,061

Audience/Criteria: Residential customers with a supplier and paying more than PTC as of their last bill

Email 4 – Have you considered shopping for supply?

Send date: June 11, 2021

WITNESS: Shemeka Rodgers

Number of emails delivered: 32,027
Audience/Criteria: Mid-size business customers on default service as of their last bill (not shopping)

Email 5 – Have you considered shopping for supply?

Send date: June 11, 2021

Number of emails delivered: 373,481

Audience/Criteria: Residential customers on default service as of their last bill (not shopping)

Email 6 – Shop for electricity supply and save

Send date: June 25, 2021

Number of emails delivered: 7,433

Audience/Criteria: Business customers with a supplier and paying less than PTC as of their last bill

Email 7 – Shop for electricity supply and save

Send date: June 25, 2021

Number of emails delivered: 125,081

Audience/Criteria: Residential customers with a supplier and paying less than PTC as of their last bill

Email 8 – Winter means higher energy use. Consider your options

Send date: October 18, 2022

Number of emails delivered: 3,498

Audience/Criteria: Business customers enrolled on SOP

Email 9 - Winter means higher energy use. Consider your options

Send date: October 18, 2022

Number of emails delivered: 13,847

Audience/Criteria: Business customers shopping with a supplier as of their last bill, non-SOP

Email 10 - Winter means higher energy use. Consider your options

Send date: October 18, 2022

Number of emails delivered: 33,155

Audience/Criteria: Business customers on default service, non-shopping, as of their last bill

Email 11 - Winter means higher energy use. Consider your options

Send date: October 18, 2022

Number of emails delivered: 76,403

Audience/Criteria: Residential customers enrolled on SOP

Email 12 - Winter means higher energy use. Consider your options

Send date: October 18, 2022

WITNESS: Shemeka Rodgers

Number of emails delivered: 185,889
Audience/Criteria: Residential customers shopping with a supplier as of their last bill, non-SOP

Email 13 - Winter means higher energy use. Consider your options
Send date: October 18, 2022
Number of emails delivered: 390,919
Audience/Criteria: Residential customers on default service, non-shopping as of their last bill, excluding OnTrack

Email 14 – PTC Changes December 1
Send date: November 1, 2022
Number of emails delivered: 13,038
Audience/Criteria: Business customers shopping as of their last bill, non-SOP

Email 15 - PTC Changes December 1
Send date: November 1, 2022
Number of emails delivered: 3,377
Audience/Criteria: Business customers enrolled on SOP

Email 16 - PTC Changes December 1
Send date: November 1, 2022
Number of emails delivered: 187,582
Audience/Criteria: Residential customers shopping as of the last bill

Email 17 - PTC Changes December 1
Send date: November 1, 2022
Number of emails delivered: 75,357
Audience/Criteria: Residential customers enrolled on SOP

Email 18 - PTC Changes December 1
Send date: November 1, 2022
Number of emails delivered: 31,325
Audience/Criteria: Business customers on default service, non-shopping

Email 19 - PTC Changes December 1
Send date: November 1, 2022
Number of emails delivered: 381,510
Audience/Criteria: Residential customers on default service, non-shopping, excluding OnTrack

2023 Email – Your one year energy supply contract ends soon
Send date: April 26, 2023
Number of emails delivered: Residential: 17,456 and Business: 726

WITNESS: Shemeka Rodgers

Audience: Customers who enrolled in SOP during May 2022

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-6

Please provide a sample copy of each communication PPL sent from January 1, 2021 through the date of the response to supply customers of EGSs who were or are participating in PPL's Standard Offer Program that contained information regarding their contracts with EGSs, the impending expiration of those contracts or the options available to the customers upon the expiration of those contracts.

PPL
Response

See Exhibit A attached to PPL Electric's Answer to the Petition for Declaratory Order as well as PPL Electric's response to RESA & NRG I-5. One additional email, below, was not part of Exhibit A and was sent in 2023.



Last May, you enrolled in the Standard Offer Program with %%Supplier Name%%. This Program offers a 7% discount off the PPL Electric Price to Compare and is fixed for 12 months with no cancellation fees.

Although you've been saving for the past year, your contract ends soon. Now is the time to check your rate, compare it to other offers, and see how you can continue saving after your contract expires.

Here's what you can do:

1. **Check the rate you're paying** on the Account Summary page of your online profile at ppl electric.com. Keep an eye out for letters or emails from your current supplier before your 12-month term ends. They will include information about your new contract and rate, including whether it's fixed or variable.
2. **Review the Price to Compare**, also known as the PPL Electric default rate. This is the rate you pay if you choose not to shop for energy supply. This rate will change on June 1, 2023.
3. **Compare your options**. You can stay with your current supplier per their new contract terms or cancel and automatically return to the PPL Electric default rate. You can also re-enroll on the Standard Offer Program or shop for a new supplier at ppowerswitch.com.

We're here to help you save, and sharing information about smart shopping is just one way we do that.

[Learn more](#)

Connect with us



[Forward this email to a friend](#)

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-7

Please provide a sample copy of each communication PPL sent from January 1, 2021 through the date of the response to supply customers of EGSs who were not at that time participating in PPL's Standard Offer Program regarding their contracts with EGSs, the impending expiration of those contracts, the options available to the customers upon the expiration of those contracts or the supply prices paid by the customers to the EGSs.

PPL
Response

See Exhibit A attached to PPL Electric's Answer to the Petition for Declaratory Order as well as PPL Electric's response to RESA & NRG I-5.

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-8

With respect to the communications provided in response to Set I, No. 6, please provide the following:

- A. Date of each communication.
- B. Number of customers to whom the communication was sent.
- C. Criteria used by PPL in selecting the customers to whom the communication was sent.
- D. Method by which the communication was sent, including regular mail, electronic mail and/or text message.

PPL
Response

See PPL Electric's responses to RESA & NRG I-5 and 7.

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-9

With respect to the communications provided in response to Set I, No. 7, please provide the following:

- A. Date of each communication.
- B. Number of customers to whom the communication was sent.
- C. Criteria used by PPL in selecting the customers to whom the communication was sent.
- D. Method by which the communication was sent, including regular mail, electronic mail and/or text message.

PPL
Response

See PPL Electric's response to RESA & NRG I-7.

WITNESS: Shemeka Rodgers

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Retail Energy Supply Association and NRG Energy, Inc.
Dated June 6, 2023
Docket No. P-2022-3036985

RESA
& NRG I-10

From January 1, 2021 to present, please indicate whether PPL has contacted supply customers of EGSs by telephone call. If the answer is yes, please provide information regarding the number, date and content of those communications. In responding, please provide a script that was used by PPL representatives.

PPL
Response

After discussion with RESA & NRG's counsel, this interrogatory was modified by RESA & NRG on June 14, 2023, as follows:

“Reference Paragraph 6 of PPL’s Answer to RESA and NRG’s Petition for Declaratory Order: Please indicate whether PPL’s “customer education campaigns around retail shopping for electric generation” that started in “May 2020” included PPL initiating phone calls with shopping customers. If so, please generally describe when those communications took place and provide copies of any scripts that was used by PPL representatives when making those phone calls.”

With that understanding, PPL Electric responds as follows:

Blaster call

Send date: ~November 1, 2021

Audience/Criteria: Residential and Business customers – Shopping

Message:

This is a message from PPL Electric Utilities. We’ve noticed that the prices of many energy supply sources are on the rise due to a variety of external market conditions, including overall inflation.

We want to make sure that your bills are as low as possible. That’s why we’re reminding you to take a few minutes to check your current supply rate and consider shopping around for a better deal. To learn more and to shop for a new supplier, visit pplelectric dot com slash shop smart.

WITNESS: Yvette Belfort

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA I-1 Please explain how PPL defines the term “confirmed low income customers” and identify the criteria to be considered a confirmed low income (CLI) customer.

PPL Response PPL Electric considers the following customers to be confirmed low income:

- Participants in OnTrack;
- Customers who have received a LIHEAP Cash or Crisis grant within 12 months of reporting period; or
- Customers who have reported their income to PPL Electric and are level 1 (below 150% of poverty) within 12 months of reporting period.

WITNESS: Jim Bowman

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA I-2 In a live Excel spreadsheet, please provide the following for January 2018 to date, disaggregated by month and by year:

- (a) The total number of residential customers.
- (b) The total usage of residential customers
- (c) The total amount billed for generation supply charges for residential customers.
- (d) The total number of residential shopping customers.
- (e) The total usage of residential shopping customers.
- (f) The total amount billed for generation supply charges for residential shopping customers.
- (g) The total number of residential default service customers.
- (h) The total usage of residential default service customers.
- (i) The total amount billed for generation supply charges for residential default service customers.
- (j) The total number of CLI customers
- (k) The total usage of CLI customers.
- (l) The total amount billed for generation supply charges for all CLI customers.
- (m) The total number of CLI customers who are not enrolled in PPL's Customer Assistance Program, OnTrack (hereinafter "CAP" or "OnTrack").
- (n) The total usage of all non-CAP CLI customers.
- (o) The total amount billed for generation supply charges for all non-CAP CLI customers.
- (p) The total number of all CAP customers
- (q) The total usage of all CAP customers
- (r) The total amount billed for generation supply charges for all CAP customers before CAP credit was applied.
- (s) The total number of residential non-CAP CLI shopping customers.
- (t) The total usage of residential non-CAP CLI shopping customers.
- (u) The total amount billed for generation supply charges for non-CAP CLI shopping customers.

WITNESS: Jim Bowman

(v) The total number of residential, non-CAP, default service CLI customers.

(w) The total usage of residential, non-CAP, default service CLI customers.

(x) The total amount billed for generation supply charges for non-CAP default service CLI customers.

PPL
Response

See PPL Electric's response to CAUSE-PA Set I – Attachment 1, at tab CAUSE-PA to PPL I-2.

WITNESS: Jim Rouland

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA I-3 In a live Excel spreadsheet, please provide the applicable price to compare for January 2018 to date, disaggregated by month and by year.

PPL Response See PPL Electric's response to CAUSE-PA Set I – Attachment 1, at tab CAUSE-PA to PPL I-3.

WITNESS: Jim Bowman

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA I-4 From January 2018 to date, disaggregated by year, please provide the dollar amount of residential write-offs and the number of associated accounts attributed to the following residential customer groups:

- (a) Total residential
- (b) Residential shopping customers
- (c) Residential default service customers
- (d) CLI customers
- (e) CLI shopping customers
- (f) CLI default service customers
- (g) CLI customers not enrolled in CAP
- (h) CLI shopping customers not enrolled in CAP
- (i) CLI default service customers not enrolled in CAP
- (j) CAP customers
- (k) CAP shopping customers
- (l) CAP default service customers

PPL Response See PPL Electric's response to CAUSE-PA Set I – Attachment 1, at tab CAUSE-PA to PPL I-4. By way of further response, PPL Electric does not have responsive data for write-offs associated with shopping and CAP customers. The process to write-off an account involves the account first being finalized, which removes the shopping or CAP designation. The account is then written-off 60 days after it is finalized.

WITNESS: Jim Bowman

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA I-5 Please explain how PPL defines the term “payment troubled.”

PPL Response PPL Electric defines the term “payment troubled” as a household that has failed to maintain one or more payment agreements in a one-year period, as of the end of the month.

WITNESS: Jim Bowman

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA I-6 From January 2018 to date, disaggregated by year, please provide the number of payment troubled customers for the following residential customer groups:

- (a) Total residential
- (b) Residential shopping customers
- (c) Residential default service customers
- (d) CLI customers
- (e) CLI shopping customers
- (f) CLI default service customers
- (g) CLI customers not enrolled in CAP
- (h) CLI shopping customers not enrolled in CAP
- (i) CLI default service customers not enrolled in CAP
- (j) CAP customers
- (k) CAP shopping customers
- (l) CAP default service customers

PPL Response See PPL Electric's response to CAUSE-PA Set I – Attachment 1, at tab CAUSE-PA to PPL I-6. There are a small number of OnTrack customers that show up on the shopping report. This is due to one of two reasons. First, the customer may have an existing shopping contract and is auto recertified in OnTrack because of LIHEAP participation. In this scenario the customer is not prompted to drop their existing supply contract. Second, there is a timing issue in reporting out on a snapshot in time. There are a small number of customers who are approved for OnTrack but sign up with a supplier before final enrollment is complete. These customers will show up as shopping OnTrack customers, but the Company will inform the customer that the shopping contract must be terminated before final enrollment will be completed.

WITNESS: Jim Bowman

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA I-7 In a live Excel spreadsheet, please provide the following information, broken down by nine-digit zip code, for each year since 2018:

- (a) The total number of residential customers
- (b) The total number of residential shopping customers
- (c) The total number of residential default service customers

PPL Response See PPL Electric's response to CAUSE-PA Set I – Attachment 1, at tab CAUSE-PA to PPL I-7. PPL Electric only tracks customer information with the five-digit zip code. There are a small number of customers that the Company does not have zip code data associated with the account.

WITNESS: Jim Bowman

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA I-8 From January 2018 to date, disaggregated by year, please provide the number of involuntary service terminations for the following residential customer groups:

- (a) Total residential
- (b) Residential shopping customers
- (c) Residential default service customers
- (d) CLI customers
- (e) CLI shopping customers
- (f) CLI default service customers
- (g) CLI customers not enrolled in CAP
- (h) CLI shopping customers not enrolled in CAP
- (i) CLI default service customers not enrolled in CAP
- (j) CAP customers
- (k) CAP shopping customers
- (l) CAP default service customers

PPL Response See PPL Electric's response to CAUSE-PA Set I – Attachment 1, at tab CAUSE-PA to PPL I-8.

WITNESS: Jim Bowman

**PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985**

CAUSE-PA I-9 Please provide any internal reports, analyses, or studies conducted by PPL that examine the trends, patterns, or disparities in involuntary service terminations between residential default service customers and residential shopping customers, including any data on subsequent reconnection rates or customer outcomes following an involuntary service termination.

PPL Response PPL Electric has not conducted any of the requested reports, analyses, or studies.

WITNESS: Yvette Belfort

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA
I-10

How are PPL customers with limited English proficiency informed of their rights and obligations regarding shopping for energy services? Please provide a copy of PPL's policies related to language access or language assistance programs, including details on translated materials, interpreter services, or other means used to facilitate communication with non-English proficient consumers. If no such policies exist, please provide an explanation on how these consumers are informed.

PPL
Response

PPL Electric provides accommodations for customers with limited English proficiency in the following ways.

On the PPL Electric website, Spanish-speaking customers can access details related to rates and shopping by visiting the Company's shopping education page at www.pplelectric.com/site/Ways-to-Save/Rates-and-Shopping. After clicking Español in the upper right corner, the information will translate to Spanish.

For customers who speak a language other than English or Spanish, PPL Electric uses an interpreter service to communicate with these customers. The interpreter service is available to customers that contact the Company by phone. In the IVR, customers will be routed to the interpreter service after an unsuccessful attempt to understand why the customer is calling. The Company's SOP vendor also has interpreter services available for customers who are interested in the SOP.

WITNESS: Yvette Belfort and Jim Bowman

PPL Electric Utilities Corporation
Response to the Set I Data Requests of
The Coalition for Affordable Utility Services and Energy Efficiency in
Pennsylvania
Dated August 3, 2023
Docket No. P-2022-3036985

CAUSE-PA
I-11

Please refer to PPL’s Answer to the Petition for Declaratory Order, ¶¶ 55 and 56, discussing efforts undertaken to share customer contact information with EGSs participating in the Standard Offer Program (“SOP”). In connection therewith:

(a) Please provide the number of CAP customers from whom PPL has sought consent to share contact information and the number of CAP customers who have declined to have that information shared with the SOP EGS.

(b) Please provide details on how customers may revoke their consent for providing their contact information to suppliers and the process for removing their phone number and email address from the Supplier Portal.

PPL
Response

- a. PPL Electric OnTrack customers are not eligible to participate in the SOP. Therefore, none of the SOP customers who were informed that their contact information would be shared, upon customer consent, with the SOP EGS were OnTrack customers.
- b. PPL Electric conducts a triennial solicitation of customers to determine if customers wish to remain on the Eligible Customer List (“ECL”), in accordance with the Commission’s *Interim Guidelines for Eligible Customer Lists*, Final Order entered October 23, 2014. Additionally, if a customer specifically requests to be removed from the ECL outside of the triennial solicitation, the Company will honor that request.

RESA I-5 Attachment 3

CONFIDENTIAL

RESA I-5 Attachment 4

RESA Response

Communications to shopping customers

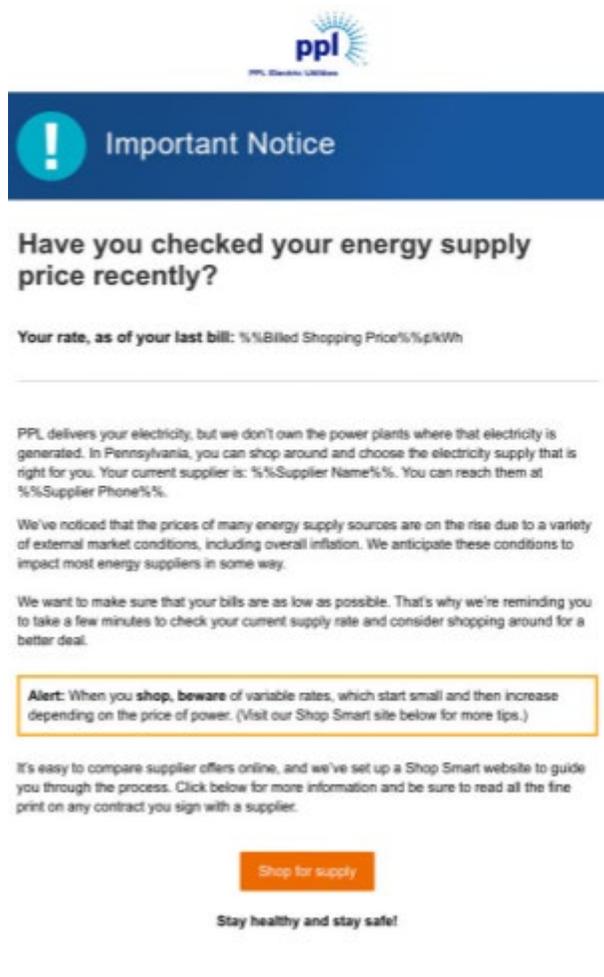
May 2024

Email – Have you checked your energy supply price recently?

Send date: May 26, 2021

Number of emails delivered: 132,061

Audience/Criteria: Residential customers with a supplier and paying more than PTC as of their last bill



Email – Shop for electricity supply and save

Send date: June 25, 2021

Number of emails delivered: 7,433

Audience/Criteria: Business customers with a supplier and paying less than PTC as of their last bill



Your current rate: 7.544¢/kWh

PPL's Price to Compare as of 6/1/21: 7.541¢/kWh

Shop for electricity supply and save

We have some good news! As of your last bill, your energy supplier is charging you less than PPL's Price to Compare. That means you're getting a good deal on electricity supply. It's an example of what smart shopping can do!

Who is your electricity supplier?

PPL delivers your electricity, but we don't own the power plants where that electricity is generated. In Pennsylvania, you can choose your own energy supplier, based on the rates and plans they provide. Your current supplier is: [Supplier Name]. You can reach them at [Supplier Phone Number].

What is the Price to Compare?

If you do not pick a supplier, PPL purchases supply for you as your default provider. We hold energy auctions twice a year, secure supply at the lowest rate possible at that time, and then pass the cost on to customers at no profit to us. The price we charge for electricity supply is the Price to Compare. It changes every June 1 and December 1. That's the rate you should use to compare supplier offers.

What should you do next?

Nothing. You're all good. But we do encourage you to stay on top of your electricity supply price to make sure you're always getting the best deal possible. You can see what you're paying for supply in any given month by taking a look at your PPL bill, or by logging in to your online PPL account.

It's easy to compare supplier offers online. Visit our Shop Smart website for everything you need to know to shop for electricity and compare rates.

Stay safe and shop smart!

[Shop for supply](#)

Email – Shop for electricity supply and save

Send date: June 25, 2021

Number of emails delivered: 125,081

Audience/Criteria: Residential customers with a supplier and paying less than PTC as of their last bill



Your current rate: 7.544¢/kWh

PPL's Price to Compare as of 6/1/21: 7.544¢/kWh

Shop for electricity supply and save

We have some good news! As of your last bill, your energy supplier is charging you less than PPL's Price to Compare. That means you're getting a good deal on electricity supply. It's an example of what smart shopping can do!

Who is your electricity supplier?

PPL delivers your electricity, but we don't own the power plants where that electricity is generated. In Pennsylvania, you can choose your own energy supplier, based on the rates and plans they provide. Your current supplier is: [Supplier Name]. You can reach them at [Supplier Phone Number].

What is the Price to Compare?

If you do not pick a supplier, PPL purchases supply for you as your default provider. We hold energy auctions twice a year, secure supply at the lowest rate possible at that time, and then pass the cost on to customers at no profit to us. The price we charge for electricity supply is the Price to Compare. It changes every June 1 and December 1. That's the rate you should use to compare supplier offers.

What should you do next?

Nothing. You're all good. But we do encourage you to stay on top of your electricity supply price to make sure you're always getting the best deal possible. You can see what you're paying for supply in any given month by taking a look at your PPL bill, or by logging in to your online PPL account.

It's easy to compare supplier offers online. Visit our Shop Smart website for everything you need to know to shop for electricity and compare rates.

Stay safe and shop smart!

Email – Shop for supply before you see an increase

Send: November 2021

Audience: Residential and business customers



Important Notice

Shop for supply today before you see an increase

Your rate, as of your last bill: 7.54¢/kWh
Your rate as of 12/1/21: 9.93¢/kWh

As of your last bill, you purchase your energy supply through PPL, paying the PPL, default rate. We want you to know that the default rate (we call it the price to compare) is going to increase on Dec. 1. 📅

Now is a good time to shop for a new supplier as you may be able to avoid or minimize this increase.

Alert: When you shop, beware of variable rates, which start small and then increase depending on the price of power. (Visit our Shop Smart site below for more tips.)

Here is everything you need to know to act now.

What is the PPL default rate?

PPL delivers your electricity, but we don't own the power plants where that electricity is generated. In Pennsylvania, you can shop around and choose the electricity supply that is right for you.

If you do not choose a supplier, you receive default supply through PPL, per state law. We hold competitive energy auctions twice a year, secure supply at the lowest rate offered, and then pass that supply on to customers at no profit to us. The price we charge for this default electricity supply is called the price to compare, and that is the rate that is changing on Dec. 1.

Why is the PPL default rate increasing?

The increase is related to external market conditions, like the rising cost of energy supply sources, including natural gas, as well as overall inflation.

We anticipate these conditions to impact most energy suppliers in some way.

How much will this increase impact my electric bill?

It depends on how much electricity you use every month, but you'll definitely notice an increase. For example, if you use 1,000 kWh of electricity a month (this is about average), your bill will go up by about \$15.

What can I do to avoid the increase?

Your best bet is to shop around for an electricity supplier that can offer you a better rate.

It's easy to compare supplier offers online, and we've set up a Shop Smart website to guide you through the process. Click below for more information and be sure to read all the fine print on any contract you sign with a supplier.

[Shop for supply](#)

Stay healthy and stay safe!

Connect with us

[Facebook](#) [Twitter](#) [Instagram](#) [YouTube](#) [LinkedIn](#)

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Email – Prices dip slightly in January

Send: December 2021

Audience: Residential and business customers



! Important Notice

Electricity supply prices will dip slightly in January

Your rate as of 12/1/21: 9.502¢/kWh
Your new rate as of 1/1/22: 8.941¢/kWh

As of your last bill, you purchase your energy supply through PPL, paying the default rate. We want you to know that the default rate (we call it the price to compare) is going to decrease slightly on Jan. 1.

What is the PPL default rate?
PPL delivers your electricity, but we don't own the power plants where that electricity is generated. In Pennsylvania, you can shop around and choose the electricity supply that's right for you.

If you don't choose a supplier, you receive default supply through PPL per state law. We hold competitive energy auctions twice a year, secure supply at the lowest rate offered, and then pass that supply on to customers **at no profit to us**. The price we charge for this default electricity supply is called the price to compare.

Because of the rising cost of natural gas and other energy supply sources, our price to compare increased significantly on Dec. 1.

Why is the rate changing again in January?
Over the summer we reached an agreement with a group of industrial customers to reduce our transmission return on equity. The settlement lowered the transmission component of our electric bills, which will lower the price to compare beginning on Jan. 1.

What should I do now?
It's up to you. This decrease in the price to compare means that the cost of your energy supply will dip slightly, but it won't offset the increase that went into effect on Dec. 1. Your best bet is to shop around often for an electricity supplier that can offer you a better rate.

It's easy to compare supplier offers online. Click below for more information, be sure to read all the fine print on any contract you sign with a supplier and **stay alert for variable rates** that can start low and increase dramatically with the price of energy.

[Shop for supply](#)

Stay healthy and stay safe.

Connect with us



Email – Winter means higher energy use. Consider your options

Send date: October 18, 2022

Number of emails delivered: 3,498

Audience/Criteria: Business customers enrolled on SOP



Winter means higher energy use. Consider your options.

Dear [Customer],

Winter is right around the corner. Cooler temperatures often mean more energy use and higher bills. We know budgets are stretched these days and that affordability is important to your business. That's why we wanted to remind you of ways we can help you manage your winter electric bills.

Check your supplier contract: We deliver your electricity, but we don't own the power plants where that electricity is generated. In Pennsylvania, you can shop around for the electricity supplier that is right for your business.

Last year, you enrolled in our Standard Offer Program. This is a 12-month program where an electricity supplier provides you a 7% discount off PPL Electric's default rate. Once your annual contract is up, that supplier could change your rate. We want to remind you that it's important to check your contract to see when it expires and what rate your supplier will charge after that.

If your contract is coming due, you have options.



Call your current supplier to discuss next steps.



Check out our smart shopping tips, including instructions on how to view your current supplier charges, and shop for a new supplier. [Click here.](#)



Cancel with your current supplier and automatically return to default service through PPL Electric. The default service rate is 11.695¢/kWh through December 1, 2022. We'll let you know what the new rate is in early November.

Save energy: We have tips, programs, and rebates available to help all customers. [Learn more.](#)

Get bill help: If you're struggling to keep up with your electric bill, we have programs that can help, including payment plans and budget billing. Small business customers, call 1-800-342-5775. Larger businesses, call 1-888-220-9991.

Stay safe and be well.

Email - Winter means higher energy use. Consider your options

Send date: October 18, 2022

Number of emails delivered: 13,847

Audience/Criteria: Business customers shopping with a supplier as of their last bill, non-SOP



Winter means higher energy use. Consider your options.

Dear [Customer],

Winter is right around the corner. Cooler temperatures often mean more energy use and higher bills. We know budgets are stretched these days and that affordability is important to your business. That's why we wanted to remind you of ways we can help you manage your winter electric bills.

Check your supplier contract: We deliver your electricity, but we don't own the power plants where that electricity is generated. In Pennsylvania, you can shop around for the electricity supplier that is right for your business.

As of your most recent electric bill, you have a contract with a third-party energy supplier. This is the perfect time to check that contract, see when it expires, and make sure you're getting the rate and service that is right for your business.

If you'd like to make a change, you have options.

-  Call your current supplier to discuss next steps.
-  Check out our smart shopping tips, including instructions on how to view your current supplier charges, and shop for a new supplier. [Click here.](#)
-  Cancel with your current supplier and automatically return to default service through PPL Electric. The default service rate is 11.695¢/kWh through December 1, 2022. We'll let you know what the new rate is in early November.

Save energy: We have tips, programs, and rebates available to help all customers. [Learn more.](#)

Get bill help: If you're struggling to keep up with your electric bill, we have programs that can help, including payment plans and budget billing. Small business customers, call 1-800-342-5775. Larger businesses, call 1-888-220-9991.

Stay safe and be well.

Email - Winter means higher energy use. Consider your options

Send date: October 18, 2022

Number of emails delivered: 76,403

Audience/Criteria: Residential customers enrolled on SOP

My Account | Outages | Ways to Save



Winter means higher energy use. Consider your options.

Dear [Customer],

Winter is right around the corner. Cooler temperatures often mean more energy use and higher bills. We know budgets are stretched these days and that affordability is important to you. That's why we wanted to remind you of ways we can help you manage your winter electric bills.

Check your supplier contract: We deliver your electricity, but we don't own the power plants where that electricity is generated. In Pennsylvania, you can shop around for the electricity supplier that is right for your family.

Last year, you enrolled in our Standard Offer Program. This is a 12-month program where an electricity supplier provides you a 7% discount off PPL Electric's default rate. Once your annual contract is up, that supplier could change your rate. We want to remind you that it's important to check your contract to see when it expires and what rate your supplier will charge after that.

If your contract is coming due, you have options.

-  Call your current supplier to discuss next steps.
-  Check out our smart shopping tips, including instructions on how to view your current supplier charges, and shop for a new supplier. [Click here.](#)
-  Cancel with your current supplier and automatically return to default service through PPL Electric. The default service rate is 12.366¢/kWh through December 1, 2022. We'll let you know what the new rate is in early November.

Save energy: We have tips, programs, and rebates available to help all customers. [Learn more.](#)

Get bill help: If you're struggling to keep up with your electric bill, we have programs that can help, including financial assistance, payment plans, and budget billing. [Learn more.](#)

For more ideas, tips, and information to help you manage higher bills this winter, visit ppl.com/highbill. If you ever need to give us a call, we're here for you at 1-800-342-5775.

Stay safe and be well.

Email - Winter means higher energy use. Consider your options

Send date: October 18, 2022

Number of emails delivered: 185,889

Audience/Criteria: Residential customers shopping with a supplier as of their last bill, non-SOP



**Winter means higher energy use.
Consider your options.**

Dear [Customer],

Winter is right around the corner. Cooler temperatures often mean more energy use and higher bills. We know budgets are stretched these days and that affordability is important to you. That's why we wanted to remind you of ways we can help you manage your winter electric bills.

Check your supplier contract: We deliver your electricity, but we don't own the power plants where that electricity is generated. In Pennsylvania, you can shop around for the electricity supplier that is right for your lifestyle, preferences, and budget.

As of your most recent electric bill, you have a contract with a third-party energy supplier. This is the perfect time to check that contract, see when it expires, and make sure you're getting the rate and service that is right for your family.

If you'd like to make a change, you have options.

-  Call your current supplier to discuss next steps.
-  Check out our smart shopping tips, including instructions on how to view your current supplier charges, and shop for a new supplier. [Click here.](#)
-  Cancel with your current supplier and automatically return to default service through PPL Electric. The default service rate is 12.366¢/kWh through December 1, 2022. We'll let you know what the new rate is in early November.

Save energy: We have tips, programs, and rebates available to help all customers. [Learn more.](#)

Get bill help: If you're struggling to keep up with your electric bill, we have programs that can help, including financial assistance, payment plans, and budget billing. [Learn more.](#)

For more ideas, tips, and information to help you manage higher bills this winter, visit www.ppl.com/budget. If you ever need to give us a call, we're here for you at 1-800-342-5775.

Stay safe and be well.

Email – PTC Changes December 1

Send date: November 1, 2022

Number of emails delivered: 13,038

Audience/Criteria: Business customers shopping as of their last bill, non-SOP



Important Notice

Check your rate and consider your options.

Your electricity supply rate on your last bill: X.XXX¢/kWh

As of your most recent electric bill, your business has a contract with a third-party energy supplier. Your current supplier was: [Supplier Name]. You can reach them at [Supplier Phone Number].

Like the prices of many products and services across the board, energy supply prices are on the rise. We want to make sure that your bills are as low as possible. That's why we're reminding you to take a few minutes to check your business's current supply rate (noted above) with other options that are available.

If you'd like to make a change for your business, here's what you need to do:



Call your current supplier to discuss next steps.



Check out our smart shopping tips, including instructions on how to view your current supplier charges, and shop for a new supplier. [Click here.](#)



Cancel with your current supplier and automatically return to default service through PPL Electric. The default service rate is 11.695¢/kWh until December 1, 2022. On December 1, 2022, that rate will rise to 14.751¢/kWh. Before cancelling, make sure to check your current contract. You don't want to be hit with any unexpected fees.

We know that rising prices are a major concern, and we want to help you manage your electricity bills.

- **Save energy:** We have tips, programs, and rebates available to help all customers. [Learn more.](#)
- **Spread out your costs:** Our budget billing program evens out your bills over 12 months and makes payments more predictable. [Go to your account to sign up.](#)
- **Get bill help:** We have tools – like payment arrangements – that can help you keep up with your bill. Contact us to review your options. Small businesses, call 1-800-342-5775. Larger businesses, call 1-888-220-8951.

Thank you.

Email - PTC Changes December 1

Send date: November 1, 2022

Number of emails delivered: 3,377

Audience/Criteria: Business customers enrolled on SOP



! Important Notice

Check your energy supply contract today

Your electricity supply rate on your last bill: XXXX¢/kWh

As of your most recent electric bill, your business is enrolled in our Standard Offer Program. This is a 12-month program where an electricity supplier provides you a 7% discount off the PPL Electric Utilities default rate. Once your annual contract is up, that supplier could change your rate.

Like the prices of many products and services across the board, energy supply prices are on the rise. We're here to provide your business with safe, reliable electricity, and we care about helping you manage your costs. That's why we want to remind you that it's important to check your contract to see when it expires and what rate your supplier will charge after that.

Important Note: The Standard Offer Program is currently NOT available and may continue to not be available after December 1. If you want to change your electricity supplier when your 12-month term ends, you'll need to take action. You have options:



Call your current supplier to discuss next steps.



Check out our smart shopping tips, including instructions on how to view your current supplier charges, and shop for a new supplier. [Click here.](#)



Cancel with your current supplier and automatically return to default service through PPL Electric. The default service rate is 11.695¢/kWh until December 1, 2022. On December 1, 2022, that rate will rise to 14.751¢/kWh. Before cancelling, make sure to check your current contract. You don't want to be hit with any unexpected fees.

We know that rising prices are a major concern, and we want to help you manage your electricity bills.

- **Save energy:** We have tips, programs, and rebates available to help all customers. [Learn more.](#)
- **Spread out your costs:** Our budget billing program evens out your bills over 12 months and makes payments more predictable. [Learn how your account is set up.](#)
- **Get bill help:** We have tools – like payment arrangements – that can help you keep up with your bill. Contact us to review your options. Small businesses, call 1-800-342-5775. Larger businesses, call 1-888-220-9991.

Thank you.

Email - PTC Changes December 1

Send date: November 1, 2022

Number of emails delivered: 187,582

Audience/Criteria: Residential customers shopping as of the last bill



! Important Notice

Have you checked your energy supply price recently?

Your electricity supply rate on your last bill: X.XXX¢/kWh

As of your most recent electric bill, you have a contract with a third-party energy supplier. Your current supplier was: [Supplier Name]. You can reach them at [Supplier Phone Number].

Like the prices of many products and services across the board, energy supply prices are on the rise. We want to make sure that your bills are as low as possible. That's why we're reminding you to take a few minutes to compare your current supply rate (noted above) with other options that are available.

If you'd like to make a change, here's what you need to do:



Call your current supplier to discuss next steps.



Check out our smart shopping tips, including instructions on how to view your current supplier charges, and shop for a new supplier. [Click here.](#)



Cancel with your current supplier and automatically return to default service through PPL Electric. The default service rate is 12.366¢/kWh until December 1, 2022. On December 1, 2022, that rate will rise to 14.612¢/kWh. Before cancelling, make sure to check your current contract. You don't want to be hit with any unexpected fees.

We know that rising prices are a major concern, and we want to help you manage your electricity bills.

- **Save energy:** We have tips, programs, and rebates available to help all customers. [Learn more.](#)
- **Spread out your costs:** Our budget billing program eases out your bills over 12 months and makes payments more predictable. [Log into your account to sign up.](#)
- **Get bill help:** If you're struggling to keep up with your electric bill, we have programs that can help, including financial assistance, payment plans, and budget billing. [Learn more.](#)

Thank you.

Email - PTC Changes December 1

Send date: November 1, 2022

Number of emails delivered: 75,357

Audience/Criteria: Residential customers enrolled on SOP



Important Notice

Check your energy supply contract today

Your electricity supply rate on your last bill: XX.XX¢/kWh

We're here to provide you with safe, reliable electricity, and we care about helping you manage your costs. That's why we want to remind you that it's important to check your contract to see when it expires and what rate your supplier will charge after that.

As of your most recent electric bill, you are enrolled in our Standard Offer Program. As a reminder, this is a 12-month program where an electricity supplier provides you a 7% discount off the PPL Electric Utilities default rate. Once your annual contract is up, that supplier could change your rate.

Important Note: The Standard Offer Program is currently NOT available and may continue to not be available after December 1. If you want to change your electricity supplier when your 12-month term ends, you'll need to take action. You have options:



Call your current supplier to discuss next steps.



Check out our smart shopping tips, including instructions on how to view your current supplier charges, and shop for a new supplier. [Click here.](#)



Cancel with your current supplier and automatically return to default service through PPL Electric. The default service rate is 12.366¢/kWh until December 1, 2022. On December 1, 2022, that rate will rise to 14.612¢/kWh. Before cancelling, make sure to check your current contract. You don't want to be hit with any unexpected fees.

Like the prices of many products and services across the board, energy supply prices are on the rise. We know that rising prices are a major concern, and we want to help you manage your electricity bills.

- **Save energy:** We have tips, programs, and rebates available to help all customers. [Learn more.](#)
- **Spread out your costs:** Our budget billing program evens out your bills over 12 months and makes payments more predictable. [Log into your account to sign up.](#)
- **Get bill help:** If you're struggling to keep up with your electric bill, we have programs that can help. [Learn more.](#)

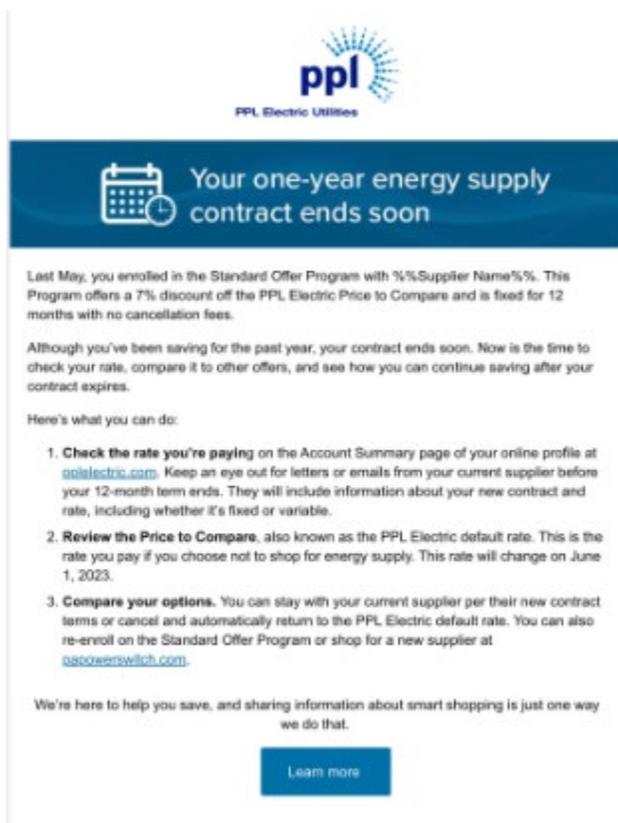
Thank you.

Email – Your one-year energy supply contract ends soon

Send date: April 26, 2023

Number of emails delivered: Residential: 17,456 and Business: 726

Audience: Customers who enrolled in SOP during May 2022



SOP roll off Email – Your one-year energy supply contract ends soon

Send date: November 8, 2023 - and continuously each month thereafter changing month of enrollment in copy

Number of emails delivered: Varies monthly

Audience: Residential and business customers in the 11th month of their SOP contract

ppl
PPL Electric Utilities

Your one-year energy supply contract ends soon

Last December, you enrolled in the Standard Offer Program with an alternative supplier. This program offers a 7% discount off the PPL Electric Price to Compare at the time of enrollment and is fixed for 12 months with no cancellation fees.

Although you've been saving with the Standard Offer Program, your contract ends soon. Now is a good time to review your supplier's price and contract terms to see if you're getting the best deal. You can find the supply price at the top of your bill or on your online PPL Electric account.

Supply \$47.97 Usage from Sep 8 - Oct 9 \$29.69 **Delivery**

MAJOR ENERGY 1-877-875-7763 **Effective Date** 10/1/2023 **PPL Electric UT**

ENERGY CHARGE XXXXX-XXXX-XXXXXXX

PPL Electric Utilities Price to Compare XXXXXX Use this price when comparing supplier offers.

SHOP FOR ELECTRICITY
Visit PPLElectricUtilities.com or www.ppl.com if you're shopping, know your contract expiration date, Account Number XXXXX-XXXX-XXXX, and provide company name, address, and ZIP and business ID.

We will debit \$87.66 from your bank account on Nov 6, 2023. We will credit your prior bill amount(s) on the dates shown on your previous bills.

WANT TO SAVE!
Skip the rising! Today's dishes are designed to do the cleaning. I escape the food off dishes before loading the dishwasher.

You will also receive letters or emails from your current supplier before your Standard Offer contract ends. They'll include information about your new contract and rate, and whether it's fixed or variable. You can stay with your current supplier per their new contract terms, re-enroll on the Standard Offer Program, return to the PPL Electric default rate or shop for a new supplier.

Whatever you decide, use the Price to Compare as a reference to compare your options and see if you can save.

[Compare rates](#)

Connect with us

Facebook, Twitter, Instagram, YouTube, RSS

Forward this email to a friend

SOP roll off blaster call

Send monthly since November 2023

Audience: Residential and business customers in the 11th month of their SOP contract who do not have consent to email

*This is a message from PPL Electric Utilities regarding your one-year energy supply contract. Last **December**, you enrolled on the Standard Offer Program at a 7% discount off the PPL Electric Price to Compare at the time of enrollment. Although you've been saving since then, your contract ends soon. Check your current rate and contract terms and compare your options. For more information, visit ppllectric.com/shop-smart.*

Email: PTC decreases on December 1

Send: November 2023

Audience: Residential customers paying more than PTC



On December 1, PPL Electric Utilities' Price to Compare will decrease to 11.028¢ per kWh.

As of your last bill, you're shopping for your energy supply and paying more than the Price to Compare. We understand there are a variety of factors for choosing an energy supplier. We encourage you to use the Price to Compare as a reference point to see if you're getting the best deal.

Now is the ideal time to review your supplier's price and contract terms. You can find the supply price at the top of your bill or on your online PPL Electric account.



Steps to shop for a supplier:

You have the option to shop around and choose the electricity supplier that is right for you.



1. Review the Price to Compare
On Dec. 1 it will decrease to 11.028¢ per kWh.



2. Confirm your electricity supply price
See page 1 of your bill or your online account summary.



3. Explore options at papowerswitch.com
Make sure to have your electric bill or account number handy.



4. Review contract terms closely
Make your bill more predictable by looking for fixed rates and longer-term contracts.



5. Select a supplier
Your electricity supply charges from your supplier will be included with your regular PPL Electric bill.

Compare rates

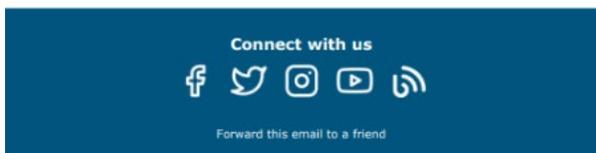
Other useful resources:

We provide many ways you can manage your bill, gain control over your energy usage and save money.

- [Manage your bill](#)
- [Use less energy](#)
- [Get help with your bill](#)
- [Sign up for alerts](#)

About the Price to Compare

We are committed to managing energy prices and securing the lowest cost of energy for our customers. We deliver your electricity, but we don't own the power plants where it is generated. If you don't shop for electricity supply, you'll pay the default rate, or Price to Compare, which is updated twice per year. We pass along the supply cost without markup to you.



Email: PTC decreases December 1

Send: November 2023

Audience: Residential customers shopping



On December 1, PPL Electric Utilities' Price to Compare will decrease to 11.028¢ per kWh.

As of your last bill, you're shopping for your energy supply with an alternative supplier. We understand there are a variety of factors for choosing an energy supplier. We encourage you to use the Price to Compare as a reference point to see if you're getting the best deal.

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2. Confirm your electricity supply price
See page 1 of your bill or your online account summary.
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3. Explore options at papowerswitch.com
Make sure to have your electric bill or account number handy.
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4. Review contract terms closely
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- 
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Connect with us



Forward this email to a friend

Email - PTC decreases December 1

Send: November 2023

Audience: Business customers paying more than PTC



Price to Compare decreases on December 1

On December 1, PPL Electric Utilities' Price to Compare will decrease slightly to 11.386¢ per kWh.

As of your last bill, you're shopping for your energy supply and paying more than the Price to Compare. We understand there are a variety of factors for choosing an energy supplier. We encourage you to use the Price to Compare as a reference point to see if you're getting the best deal.

Now is the ideal time to review your supplier's price and contract terms. You can find the supply price at the top of your bill or on your online PPL Electric account.



Steps to shop for a supplier:

You have the option to shop around and choose the electricity supplier that is right for your business.



1. Review the Price to Compare

On Dec. 1 it will decrease slightly to 11.386¢ per kWh.



2. Confirm your electricity supply price

See page 1 of your bill or your online account summary.



3. Explore options at papowerswitch.com

Make sure to have your electric bill or account number handy.



4. Review contract terms closely

Make your bill more predictable by looking for fixed rates and longer-term contracts.



5. Select a supplier

Your electricity supply charges from your supplier will be included with your regular PPL Electric bill.

We provide many ways you can manage your bill, gain control over your energy usage and save money. Check out additional resources [here](#).

About the Price to Compare

We are committed to managing energy prices and securing the lowest cost of energy for our customers. We deliver your electricity, but we don't own the power plants where it is generated. If you don't shop for electricity supply, you'll pay the default rate, or Price to Compare, which is updated twice per year. We pass along the supply cost without markup to you.

Email - PTC decreases December 1

Send: November 2023

Audience: Business customers shopping



On December 1, PPL Electric Utilities' Price to Compare will decrease slightly to 11.386¢ per kWh.

As of your last bill, you're shopping for your energy supply with an alternative supplier. We understand there are a variety of factors for choosing an energy supplier. We encourage you to use the Price to Compare as a reference point to see if your business is getting the best deal.

Now is the ideal time to review your supplier's price and contract terms. You can find the supply price at the top of your bill or on your online PPL Electric account.



Steps to shop for a supplier:

You have the option to shop around and choose the electricity supplier that is right for your business.



1. Review the Price to Compare
On Dec. 1 it will decrease slightly to 11.386¢ per kWh.



2. Confirm your electricity supply price
See page 1 of your bill or your online account summary.



3. Explore options at papowerswitch.com
Make sure to have your electric bill or account number handy.



4. Review contract terms closely
Make your bill more predictable by looking for fixed rates and longer-term contracts.



5. Select a supplier
Your electricity supply charges from your supplier will be included with your regular PPL Electric bill.

We provide many ways you can manage your bill, gain control over your energy usage and save money. Check out additional resources [here](#).

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Email – Low-income customers paying more than PTC

Send: February 2, 2024

Audience: Low-income customers paying more than PTC, not enrolled on OnTrack



We have a range of options to help with your bill

We understand life can get busy and it's easy to fall behind on your bill. The good news is — we're here to help. We offer payment plans and assistance programs to help pay off your past due balance over time.

Apply for assistance

Sign into your online profile at ppl.electric.com or create one in 5 easy steps. Then, click "Get help paying," they'll ask you some questions about your household and match you with the options that will benefit you most.

Here are two programs you may qualify for:

OnTrack Get a fixed monthly payment, debt forgiveness and referrals to energy saving programs. [Learn more](#)

LIHEAP Apply for up to \$2,000 from the federal Low-Income Home Energy Assistance Program to help with your winter heating bills. [Learn more](#)

Shop smart and save

As of your last bill, we noticed you're paying more than the Price to Compare with your supplier. Choosing an electricity supplier is your choice, but we're here to help you with options to make your bill more affordable. We encourage you to use the Price to Compare, or PPL Electric default rate, as a reference to see if you're getting the best deal. Compare this rate to the price you're paying for electricity supply with your supplier, which can be found on your bill or the Account Summary page of your online profile. Then, compare your options and make the best choice for your family.

Find the Price to Compare and more shopping tips at ppl.electric.com/ShopSmart

Seasonal savings

Between managing your energy bill, becoming more energy efficient, and getting payment assistance when you need it, find the right combination of options to help you reduce your energy costs and stay comfortable this season at ppl.electric.com/SeasonalSavings.

Email – Low-income customers paying more than PTC

Send: April 26, 2024

Audience: Low-income customers paying more than PTC, not enrolled on OnTrack



We have a range of options to help with your bill

We understand life can get busy and it's easy to fall behind on your bill. The good news is — we're here to help. We offer payment plans and assistance programs to help pay off your past due balance over time.

1 of 3

Shop smart and save

As of your last bill, we noticed you're paying more than the Price to Compare with your supplier. Choosing an electricity supplier is your choice, but we're here to help you with options to make your bill more affordable. We encourage you to use the Price to Compare, or PPL Electric default rate, as a reference to see if you're getting the best deal. Compare this rate to the price you're paying for electricity supply with your supplier, which can be found on your bill or the Account Summary page of your online profile. Then, compare your options and make the best choice for your family.

Find the Price to Compare and more shopping tips at ppllectric.com/ShopSmart.

Apply for assistance

Sign into your online profile at ppllectric.com or create one in 3 easy steps. Then, click "Get help paying." We'll ask you some questions about your household and match you with the options that will benefit you most.

Here are two programs you may qualify for:



Get a fixed monthly payment, debt forgiveness and referrals to energy saving programs. [Learn more](#).



Apply for a grant from our fuel fund to help pay your electric bill. [Learn more](#).



But assistance when you need it, find the right combination of options to help you reduce your energy costs and stay comfortable this season at ppllectric.com/SeasonSavings.

Email – June 1 PTC decrease

Send: May 1, 2024

Audience: Residential customers shopping



Price to Compare decreases on June 1

On June 1, our Price to Compare, or PPL Electric default rate, will drop to 10.040¢ per kWh. Since you did not have an electric generation supplier as of your last bill, this is the price you'll pay for electricity supply. If you're using approximately 1,000 kWh per month, you can expect this to decrease your bill by \$9.77.

You also have the option to shop around, compare offers and choose an electricity supplier that is right for you. If you choose to shop, use the Price to Compare as a reference point to see if you're getting the best deal.

Check out this video to learn more about how to shop smart and save:

1 of



[Learn to shop](#)

Other useful resources

We offer a variety of ways to manage your bill, track your electricity use and save money.

[Manage your bill](#)

[Use less energy](#)

[Get help paying your bills](#)

[Sign up for alerts](#)

About the Price to Compare

We are committed to managing energy prices and securing the lowest cost of energy for our customers. We deliver your electricity, but we don't own the power plants where it is generated. If you don't shop for electricity supply, you'll pay the default rate, or Price to

2

Compare, which is updated twice per year. We pass along the supply cost without markup to you.

Connect with us

Forward this email to a friend

Email – June 1 PTC decrease

Send: May 1, 2024

Audience: Business customers shopping

The email content is presented on two pages. The top page features the PPL logo and a blue banner with the text "Price to Compare decreases on June 1" next to a price tag icon. Below the banner, there are three paragraphs of text explaining the rate change and providing a video link. The bottom page shows a video player with a woman, a calendar icon for June 1, and a "Compare offers" button. Below the video player are three resource links: "Manage your bill", "Use less energy", and "Sign up for alerts". A section titled "About the Price to Compare" follows, containing a paragraph about PPL's pricing policy. The email concludes with a "Connect with us" section featuring social media icons and a "Forward this email to a friend" link.

ppl
PPL Electric Utilities

Price to Compare
decreases on June 1

On June 1, our Price to Compare, or PPL Electric default rate, will drop to 9.237¢ per kWh. If your business uses approximately 1,000 kWh per month and does not shop for your supply, this would decrease your bill by \$22.24.

As of your last bill, you were shopping with an electric generation supplier. Now is the ideal time to review your supplier's price and contract terms and compare offers. Use the Price to Compare as a reference point to see if you're getting the best deal.

Check out this video to learn more about how to shop smart and save:

1 of

ppl
PPL Electric Utilities

1

Compare offers

Other useful resources

We offer a variety of ways to manage your bill, track your electricity use and save money.

- [Manage your bill](#)
- [Use less energy](#)
- [Sign up for alerts](#)

About the Price to Compare

We are committed to managing prices and securing the lowest cost of energy for our customers. We deliver your electricity, but we don't own the power plants where it is generated. If you don't shop for electricity supply, you'll pay the default rate, or Price to Compare, which is updated twice per year. We pass along the supply cost without markup to you.

2 of

Connect with us

Forward this email to a friend

PPL Electric Exhibit MS19-R

Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the
Period of June 1, 2025 through May 31, 2029

Docket No. P-2024-3047290

Responses of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania
to the Interrogatories and Requests for the Production of Documents of PPL Electric Utilities, Inc.

Set I

PPL to CAUSE-PA-I-3: Reference CAUSE-PA Statement No. 1, page 39, lines 14-16. Please identify where in OCA's direct testimony there is any discussion of an annual SOP Stakeholder meeting or the topics to be addressed at such a meeting.

Response:

Note that this response addresses CAUSE-PA's direct testimony and not OCA's direct testimony. Counsel for CAUSE-PA confirmed with PPL that this interrogatory was intended by PPL to request information regarding CAUSE-PA's direct testimony, not OCA's direct testimony.

This recommendation was included in error at CAUSE-PA Statement No. 1, page 39, lines 14-16 and was not addressed in CAUSE-PA's direct testimony. CAUSE-PA intends to circulate a corrected version of CAUSE-PA Statement 1 removing this recommendation from the Summary of Recommendations.

Respondent: Harry S. Geller, Esq.

Date: June 17, 2024