

COMMONWEALTH OF PENNSYLVANIA



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September 13, 2024

Via Electronic Filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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. R-2024-3047290

Dear Secretary Chiavetta:

Enclosed for filing in accordance with Section 5.412a of the Commission's regulations, 52 Pa. Code § 5.412a, and as directed by the Order Granting Joint Stipulation for Admission of Testimony and Exhibits into the Evidentiary Record, dated September 3, 2024, in the referenced proceeding, please find the following pre-served and admitted testimony:

- OCA St. 1 - Direct Testimony of Dr. Serhan Ogur
- OCA St. 2 - Direct Testimony of Barbara Alexander (Public and **Confidential** Versions)
 - Exh. BA-1 through BA-4
- OCA St. 1R - Rebuttal Testimony of Dr. Serhan Ogur
- OCA St. 2R - Rebuttal Testimony of Barbara Alexander
 - Exh. BA-1R
- OCA St. 1SR - Surrebuttal Testimony of Dr. Serhan Ogur (Public and **Confidential** Versions)
- OCA St. 2SR - Surrebuttal Testimony of Barbara Alexander
 - Exh. BA-1SR

Copies will be served, as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby

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Enclosures

cc: Administrative Law Judge F. Joseph Brady (Via E-mail)
Pamela McNeal, Legal Assistant (Via E-mail)
Certificate of Service (As Indicated)

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Pre-Served and Admitted Testimony as follows:

OCA Statement 1	Direct Testimony of Dr. Serhan Ogur
OCA Statement 2	Direct Testimony of Barbara Alexander Exhibits BA-1 through BA-4 (PUBLIC and CONFIDENTIAL versions)
OCA Statement 1R	Rebuttal Testimony of Dr. Serhan Ogur
OCA Statement 2R	Rebuttal Testimony of Barbara Alexander Exhibit BA-1R
OCA Statement 1SR:	Surrebuttal Testimony of Dr. Serhan Ogur (PUBLIC and CONFIDENTIAL versions)
OCA Statement 2SR:	Surrebuttal Testimony of Barbara Alexander Exhibit BA-1SR

upon parties of record in this proceeding 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 13th day of September 2024.

* Received CONFIDENTIAL version

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Dated: September 13, 2024

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PPL ELECTRIC)
UTILITIES CORPORATION FOR)
APPROVAL OF A DEFAULT SERVICE) DOCKET NO. P-2024-3047290
PROGRAM AND PROCUREMENT)
PLAN FOR THE PERIOD FROM)
JUNE 1, 2025 THROUGH MAY 31, 2029)

DIRECT TESTIMONY

OF

SERHAN OGUR

ON BEHALF OF THE

PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

JUNE 3, 2024

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1 **I. QUALIFICATIONS**

2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. My name is Serhan Ogur. I am a Principal and Senior Economist at Exeter
4 Associates, Inc. (“Exeter”). My office is located at 10480 Little Patuxent Parkway,
5 Suite 300, Columbia, Maryland, 21044. Exeter is a consulting firm specializing in
6 issues pertaining to public utilities.

7 Q. PLEASE STATE YOUR EDUCATIONAL BACKGROUND.

8 A. I received a B.A. degree in Economics from Bogazici University (Istanbul, Turkey) in
9 1996 and a Ph.D. in Economics from Northwestern University (Evanston, IL) in
10 2007.

11 Q. WHAT IS YOUR PROFESSIONAL EXPERIENCE?

12 A. I have 23 years of experience in the energy industry specializing in organized
13 wholesale and retail electricity markets. My diverse background comprises energy
14 management and consulting; analysis, design, and reporting of Regional
15 Transmission Organization (“RTO”) electricity markets and products; and state and
16 federal regulation of electric utilities. I was employed as Economic Analyst at the
17 Illinois Commerce Commission (“ICC”) between 2001 and 2005; Senior Economist
18 at PJM Interconnection, LLC (“PJM”) between 2005 and 2014; and Senior System
19 Operator at Fellon-McCord & Associates, LLC (“Fellon-McCord”) between 2014 and
20 2015. I joined Exeter as Senior Analyst in 2015 and became a Principal of the firm in
21 2020. A complete description of my professional background is provided in
22 Appendix A.

23 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

24 A. Yes. I testified in Docket No. P-2016-2534980 in PECO Energy Company’s Default
25 Service Program IV proceeding; Docket Nos. P-2020-3019383 and P-2020-3019384

1 in the joint Default Service Plan VI of Citizens' Electric Company of Lewisburg,
2 Pennsylvania and Wellsboro Electric Company; Docket No. P-2020-3019522 in
3 Duquesne Light Company's Default Service Plan IX proceeding; Docket No. P-2020-
4 3019907 in UGI Utilities, Inc. – Electric Division's Default Service Plan IV
5 proceeding; Docket No. P-2020-3022988 in Pike County Light & Power Company's
6 Default Service Plan; Docket Nos. A-2021-3025659 and A-2021-3025662 in the case
7 concerning the acquisition of Pike County Light & Power Company and
8 Leatherstocking Gas Company, LLC; Docket Nos. P-2021-3030012, P-2021-
9 3030013, P-2021-3030014 and P-2021-3030021 in the joint Default Service Plan of
10 Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power
11 Company, and West Penn Power Company; Docket No. A-2023-3038771 *et al* in the
12 merger of Metropolitan Edison Company, Pennsylvania Electric Company,
13 Pennsylvania Power Company, and West Penn Power Company; Docket No. P-2023-
14 3039927 in Pike County Light & Power Company's Default Service Plan; and in
15 Docket No. P-2024-3046008 in PECO Energy Company's Default Service Program
16 VI proceeding. All of my prior testimony before the Commission was on behalf of
17 the Pennsylvania Office of Consumer Advocate ("OCA").

18 Q. ON WHOSE BEHALF ARE YOU OFFERING THIS TESTIMONY?

19 A. I am offering this testimony on behalf of the OCA.

20 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
21 PROCEEDING?

22 A. My testimony addresses certain elements of PPL Electric Utilities Corporation's
23 ("PPL's" or the "Company's") proposed Default Service Plan VI ("DSP VI") for
24 providing default service to its residential and non-residential customers for the four-
25 year period from June 1, 2025 through May 31, 2029. The specific issues I address

1 are related to the procurement of wholesale default service supply products, including
2 the proposed Capacity Proxy Price (“CPP”) mechanism; PPL’s plan for compliance
3 with the Alternative Energy Portfolio Standards Act (“AEPS Act”); and the
4 Company’s proposed voluntary time-of-use (“TOU”) rate program. Issues related to
5 consumer protection, as well as some issues related to the TOU program, are
6 addressed by OCA witness Ms. Barbara Alexander. Our testimony is meant to be
7 complementary.

8 **II. SUMMARY AND RECOMMENDATIONS**

9 **A. Overview of the PPL Petition**

10 Q. WHAT IS PPL REQUESTING IN THIS CASE?

11 A. PPL, a subsidiary of PPL Corporation, is an electric distribution company (“EDC”)
12 which provides regulated electric delivery service to 1.5 million customers in 29
13 counties in central and eastern Pennsylvania.¹ On March 12, 2024, PPL filed a
14 petition for the approval of its DSP VI filing, which includes supporting testimony
15 and exhibits, including draft supplier contracts and its proposed revised tariffs, by the
16 Pennsylvania Public Utility Commission (“Commission”).

17 I have been asked by the OCA to review the proposed plan as it pertains to the
18 Company’s residential customers and to develop recommendations that would
19 provide improvements if those recommendations were adopted by the Commission.

20 Q. WHAT ARE THE PRIMARY ELEMENTS OF PPL’S PETITION AS IT
21 RELATES TO RESIDENTIAL CUSTOMERS?

22 A. The primary elements of the proposed DSP VI that affect PPL’s residential customers
23 are: (1) the structure of the wholesale supply portfolio for default service, including

¹ <https://pplelectric.com/site/More/About-Us/Our-Company>.

1 scheduling of the purchases and the wholesale products purchased to supply
2 residential default service customers; (2) the Company’s proposed method of meeting
3 the requirements of the AEPS Act; (3) the Company’s proposed method of
4 reconciling Default Service Plan revenues and costs; and (4) PPL’s proposed
5 voluntary TOU rate program.

6 The residential default service load is proposed to be supplied from four
7 sources: 24-month fixed-price full-requirements (“FPFR”) contracts; 12-month FPFR
8 contracts; two existing five-year, 50 megawatt (“MW”) block energy products
9 (expiring on May 31, 2026 and on November 30, 2026, respectively); and 150 MW of
10 Long-Term Power (“LTP”) Product (also referred to in the Petition and supporting
11 testimony as Long-Term Block supply), delivery of which is proposed to commence
12 on June 1, 2026.² Energy from existing block energy and LTP Product contracts
13 would make up approximately 10 percent of the residential default service portfolio
14 through May 2026; 20 percent from June 2026 through November 2026; and 15
15 percent starting in December 2026 and thereafter. The FPFR contracts would make
16 up the bulk of the power supply, with laddered contracts procured every six months to
17 replace prior contracts set to expire. The remaining 85 percent (after the expiration of
18 the existing five-year energy blocks at the end of November 2026) of residential
19 default service load requirement is to be met from 40 tranches of FPFR contracts, of
20 which 32 (80 percent) are 24-month products and eight (20 percent) are 12-month
21 products.³ Each residential tranche represents 2.5 percent of the residential default
22 service load after it is offset by the existing energy block and LTP Product deliveries.

² In addition, for the Residential Customer Group, the Default Service Load will be reduced by PPL Electric’s fractional percentage of committed capacity and energy obtained under a long-term contract with the Allegheny Electric Cooperative, Inc. for supply from the New York Power Authority.

Source: Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.4.

³ PPL Exhibit JC-2.

1 If the default service load shrinks or increases (e.g., shrinks due to customers
2 migrating to competitive retail supply or increases due to customers returning to
3 default service), the size of the tranches measured in kilowatt-hours (“kWh”) would
4 correspondingly change in size. Thus, the wholesale suppliers assume the
5 “volumetric risk” of an uncertain load obligation.

6 The FPFR contracts would be procured through a competitive request for
7 proposals (“RFP”) process, which is consistent with PPL’s procurement approach
8 taken in DSP V. Procurements would be conducted every six months and would be
9 held in February and July of each year, which is approximately four and five months,
10 respectively, prior to the start of deliveries.⁴

11 The Company proposes to meet the requirements of the AEPS Act by having
12 the default service wholesale suppliers provide the appropriate number and category
13 of Alternative Energy Credits (“AECs”) to PPL. However, since FPFR contracts
14 would supply approximately 85 percent of the residential default service load, PPL
15 would need to self-supply the AECs corresponding to the energy-only block and LTP
16 Product contracts. To fulfill part of that obligation, PPL proposes to enter into 20-
17 year contracts to procure up to 30,000 solar Tier I AECs annually for delivery
18 beginning June 1, 2026.

19 The Company is proposing to continue offering a voluntary TOU rate to
20 residential and small commercial default service customers, which includes peak and
21 off-peak prices.⁵ PPL’s TOU proposal for DSP VI is similar to the TOU program
22 currently in place in DSP V, the only change being changing the on-peak hours to 3
23 PM – 7 PM annually and eliminating the seasonality component.⁶

⁴ Petition of PPL Electric Utilities Corporation, page 14, paragraph 39.

⁵ Petition of PPL Electric Utilities Corporation, page 35, paragraph 108.

⁶ Petition of PPL Electric Utilities Corporation, page 36, paragraph 111.

1 PPL proposes to continue its practice of annual reconciliation of over/under
2 collections of default service costs by the respective class, the Generation Supply
3 Charge-1 (“GSC-1”) being the rate applicable to residential default service
4 customers.⁷ The Company is also proposing to maintain the status quo from DSP V
5 with regard to semiannual GSC-1 rate adjustments,⁸ and a 50 percent supplier load
6 cap applicable to the residential customer class.⁹

7 **B. Review of Findings and Recommendations**

8 Q. WHAT ARE THE SPECIFIC TOPICS THAT YOU ADDRESS IN YOUR
9 DIRECT TESTIMONY?

10 A. I address the residential default service supply portfolio and its implications for rate
11 volatility; PPL’s proposal to enter into long-term solar Tier 1 AEC purchase
12 contracts; and the TOU rate construct.

13 Q. WHAT ARE YOUR PRINCIPAL CONCERNS WITH RESPECT TO PPL’S
14 PROPOSED DEFAULT SERVICE PLAN?

15 A. My principal concerns include the following: (1) PPL is unnecessarily bundling
16 Block Service and Bilateral Transferred Capacity under the proposed LTP Product;
17 (2) the Bilateral Transferred Capacity element of the LTP Product could lock
18 residential default service customers into capacity prices that are higher than
19 prevailing market prices for 10 years in the absence of customer protections built into
20 the procurement process; and (3) the elimination of the seasonality in the TOU rate
21 structure would reduce the alignment between the TOU rate multipliers and cost
22 causation. My recommendations should be read to complement those of OCA
23 Witness Ms. Barbara Alexander.

⁷ PPL Electric Utilities Corporation Statement No. 4, page 7, lines 19-20.

⁸ PPL Electric Utilities Corporation Statement No. 4, page 7, lines 17-19.

⁹ Petition of PPL Electric Utilities Corporation, page 27, paragraph 87.

1 Q. WHAT ARE YOUR RECOMMENDED MODIFICATIONS TO THE FILED
2 PLAN?

3 A. My principal recommendations are that: (1) PPL’s proposal to procure 150 MW of
4 LTP Product, consisting of 150 MW of around-the-clock block energy (i.e., Block
5 Service) and 150 MW of unforced capacity located in the Mid-Atlantic Area Council
6 (“MAAC”) region of PJM Interconnection, LLC (“PJM”) (i.e., Bilateral Transferred
7 Capacity), be replaced with the procurement of 150 MW of around-the-clock block
8 energy; (2) if the Commission is inclined to authorize PPL to procure both a 10-year
9 block energy product and a 10-year capacity product, the Company be directed to
10 solicit these two products separately; and (3) the Company’s residential TOU rate
11 design retain the seasonality component, with the same seasonal definitions and the
12 same summer peak hours (2 PM – 6 PM), and assign all capacity costs to the summer
13 season peak TOU period. These recommendations should be read in concert with
14 those of Ms. Alexander.

15 C. **Testimony Organization**

16 Q. HOW IS THE REMAINDER OF YOUR TESTIMONY ORGANIZED?

17 A. Section III of my testimony addresses the default service supply portfolio, including
18 the proposed LTP Product (or Long-Term Block), the Capacity Proxy Price
19 mechanism, AEPS Act compliance, and long-term solar Tier 1 AEC contracts.
20 Section IV addresses the Company’s voluntary residential TOU program.

1 **III. DEFAULT SERVICE SUPPLY PORTFOLIO**

2 Q. ARE THERE PENNSYLVANIA STATUTES THAT GOVERN AN EDC'S
3 PROVISION OF DEFAULT SERVICE?

4 A. Yes. The provision of default service is required under Pennsylvania's Electricity
5 Generation Customer Choice and Competition Act, which was amended by Act 129
6 in 2008. Act 129 requires that the default generation supply for customers reflect a
7 prudent mix of spot, short- and long-term supply resources to ensure adequate and
8 reliable service to customers at least cost over time. Default service also must
9 comply with the AEPS Act. PPL states that its filed plan complies with these
10 requirements.

11 Q. HOW DOES PPL PROPOSE TO PROVIDE DEFAULT SERVICE TO
12 RESIDENTIAL CUSTOMERS DURING THE DSP VI TERM?

13 A. PPL will use a competitive RFP process to acquire a series of FPFR contracts to
14 provide generation service for approximately 85 percent of the residential default
15 service load. The remaining approximately 15 percent of the load is proposed to be
16 supplied under two, five-year contracts, each for a 50-MW block of power until the
17 existing contracts for these blocks expire; and then under three, 10-year LTP Product
18 (or Long-Term Block) contracts, each for a 50-MW block of power and 50 MW of
19 unforced capacity located in the MAAC region of PJM which is recognized by PJM
20 as a cleared capacity resource for each PJM Delivery Year.¹⁰ The FPFR contracts
21 will have terms of either 12 or 24 months and would cover the four-year DSP VI
22 period with some overlap into the subsequent plan period.¹¹ Similarly, the three LTP

¹⁰ A PJM Delivery Year runs from June 1 of a year through May 31 of the subsequent year.

¹¹ In addition to the 12- and 24-month FPFR contracts, PPL will also conduct a one-time procurement of six-month residential FPFR contracts at the beginning of DSP VI as part of the transition from its DSP V portfolio mix to its proposed DSP VI portfolio mix.

1 Product contracts would extend into the following DSP period, that is, extend beyond
2 May 31, 2029. The power supply contracts would be procured using a sealed
3 bid/RFP approach, consistent with the approach used by PPL under DSP V. The
4 FPFR procurements are proposed to be conducted every six months so that the 12-
5 month FPFR contracts and 24-month FPFR contracts are laddered to avoid procuring
6 100 percent of the default service products at the same time. The 24-month FPFR
7 contracts would represent 80 percent of the power supply in excess of the block
8 energy and LTP Product contracts, and the 12-month FPFR contracts would represent
9 the other 20 percent. Therefore, 30 percent of the power supply procured using FPFR
10 contracts would be procured every six months – a quarter of the 24-month FPFR
11 contracts and half of the 12-month FPFR contracts.

12 Under the Company’s proposal, the FPFR portion of the residential default
13 service power supply would be provided by wholesale suppliers that would bid to
14 supply load “tranches,” with each tranche representing 2.5 percent of the residential
15 default service load in excess of the block energy and LTP Product contracts.

16 Each winning bid price for the FPFR contracts, specified in dollars per
17 megawatt-hour (“MWh”), is fixed for the duration of the contract term (either 12 or
18 24 months) and includes all generation products (with a few exceptions) required to
19 serve load (e.g., energy, capacity, AECs, and ancillary services).

20 Q. PLEASE EXPLAIN THE TRANCHE STRUCTURE.

21 A. PPL has divided the residential default service load into 40 tranches. Each tranche is
22 a “slice” of load, meaning that each tranche incorporates the same residential load
23 “shape,” i.e., the hourly residential default service load profile over the course of the
24 year. In other words, each tranche represents 2.5 percent of the residential load (after
25 the block energy and LTP Product delivery offset) in each hour.

1 Q. DO YOU AGREE WITH PPL'S PROPOSAL TO RETAIN THE FOUR-
2 YEAR PLAN TERM FOR DSP VI?

3 A. Yes. The four-year default service plan period reduces administrative costs relative
4 to the shorter default service plan periods that have been relied on historically. It is
5 also consistent with the default service plan terms for other EDCs in Pennsylvania.

6 Q. DO YOU OBJECT TO THE USE OF THE SEALED BID/RFP APPROACH
7 PROPOSED BY PPL TO PROCURE PPL'S RESIDENTIAL WHOLESALE
8 DEFAULT SERVICE SUPPLY?

9 A. No. This process has generally worked as proposed and implemented by PPL and the
10 Company has successfully procured default service supplies with this procurement
11 method in the past. In the absence of clear cost or administrative benefits to changing
12 the procurement method, I do not see a compelling reason to change the existing RFP
13 approach.

14 Q. IS THE COMPANY PROPOSING ANY CHANGES TO THE
15 COMPOSITION AND PROCUREMENT OF ITS RESIDENTIAL
16 DEFAULT SERVICE PRODUCT PORTFOLIO?

17 A. Yes. First, the Company is proposing to transition from the use of a mix of six-month
18 and 12-month FPFRR contracts to the use of a mix of 12-month and 24-month FPFRR
19 contracts.¹² Second, the Company is proposing to conduct the semiannual FPFRR
20 solicitations in February and July of each year (four months and five months,
21 respectively, before the start of deliveries) under DSP VI whereas PPL conducts the
22 FPFRR auctions in April and October under DSP V.¹³ Third, under PPL's proposal in
23 DSP VI, the AECs needed to meet the requirements of the AEPS Act for residential

¹² Petition of PPL Electric Utilities Corporation, page 6, footnote 3.

¹³ Petition of PPL Electric Utilities Corporation, page 13, paragraph 36.

1 default service loads would be provided by the wholesale power suppliers and the
2 costs of meeting those requirements would be included in the competitive bids of
3 those wholesale suppliers.¹⁴ In the current DSP (“DSP V”), PPL relieves the FPFR
4 suppliers of the obligation to meet the AEPS Act requirements and separately
5 procures the needed AECs (solar Tier I, non-solar Tier I, and Tier II AECs) through a
6 competitive RFP process similar to the process used for the procurement of the
7 default service power supply. Fourth, PPL is proposing to replace the two 50-MW
8 energy-only blocks (expiring on May 31, 2026 and on November 30, 2026,
9 respectively) with three 50-MW LTP Product (inclusive of block energy deliveries
10 and PJM capacity credit transfers) contracts (with delivery commencing on June 1,
11 2026).¹⁵ Fifth, the Company is proposing to enter into 20-year contracts to procure
12 up to 30,000 solar Tier I AECs annually for delivery beginning June 1, 2026.¹⁶ Sixth,
13 PPL is proposing to establish a Capacity Proxy Price and a true-up mechanism for
14 when PJM does not conduct a Base Residual Auction (“BRA”) for capacity in time
15 for bidders to incorporate a known capacity price into the formulation of their bids.¹⁷

16 Q. HOW DO YOU VIEW THESE CHANGES AND PPL’S PROPOSED
17 RESIDENTIAL PORTFOLIO IN GENERAL?

18 A. In general, I view both the changes from DSP V to DSP VI and the residential
19 portfolio proposed by PPL for DSP VI favorably, with one exception. That
20 exception, as discussed in more detail below, relates to the LTP Product (or the Long-
21 Term Block).

¹⁴ Petition of PPL Electric Utilities Corporation, page 13, paragraph 36.

¹⁵ Petition of PPL Electric Utilities Corporation, page 14, paragraph 39.

¹⁶ Petition of PPL Electric Utilities Corporation, pages 14-15, paragraph 39.

¹⁷ PPL Electric Utilities Corporation Statement No. 1, p. 44, lines 1-9.

1 Q. WHAT IS YOUR ASSESSMENT OF THE COMPOSITION OF PPL'S
2 PROPOSED RESIDENTIAL DEFAULT SERVICE FPFR PORTFOLIO?

3 A. I strongly support PPL's proposal to transition from the use of a mix of six-month and
4 12-month FPFR contracts to the use of a mix of 12-month and 24-month FPFR
5 contracts. The mix of 12- and 24-month FPFR contracts procured four or five months
6 prior to delivery represents a reasonable balance between rate stability, which is
7 extremely important to residential customers, and reflectiveness of competitive
8 market conditions. As PPL witness Mr. Andrew Castanaro also observed, the
9 Company's residential price-to-compare ("PTC") increased from 9.502 cents per
10 kilowatt-hour on December 1, 2021 to 14.612 cents per kilowatt-hour on December 1,
11 2022, and the 12-month and 24-month contract mix is a straightforward procurement
12 strategy used by other EDCs in Pennsylvania and is intended to achieve more price
13 stability for customers.¹⁸

14 Table 1 and Figure 1 below show that PPL's current residential default service
15 portfolio (six-month and 12-month FPFR contracts) produced more PTC volatility
16 compared to those of its peers which utilized a residential portfolio made up of 12-
17 month and 24-month FPFR contracts during the recent wholesale power and natural
18 gas market volatility. Table 1 presents the relative standard deviation (the ratio of
19 standard deviation to average) of Pennsylvania EDCs' quarterly PTC, sorted in
20 descending order, from December 2019 to date. Figure 1 is a visual representation of
21 the trend of PTCs of Pennsylvania EDCs. PECO Energy Company ("PECO") had the
22 lowest PTC volatility among Pennsylvania EDCs over the last four years, followed
23 closely by Duquesne Light Company ("Duquesne"), both of which procure residential
24 default service supplies in the form of 12-month and 24-month FPFR contracts. With

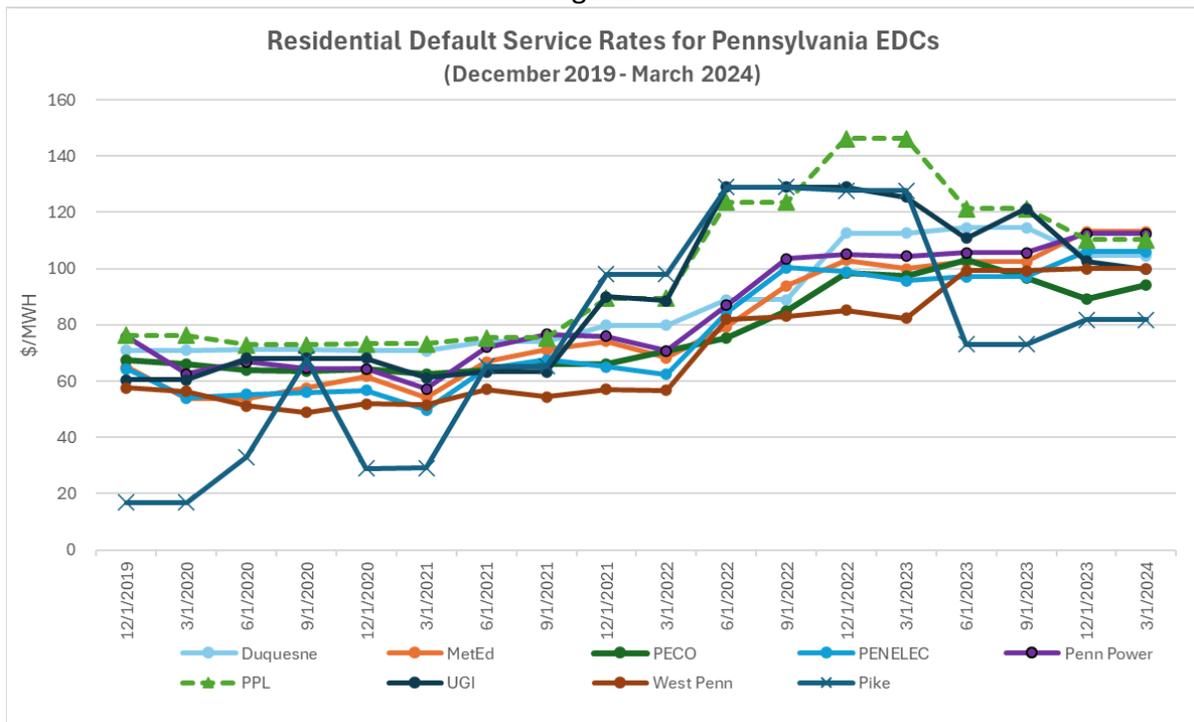
¹⁸ PPL Electric Utilities Corporation Statement No. 1, p. 15, lines 15-23.

1 reliance on 80 percent 24-month FPCR contracts for the FPCR portion of the portfolio
 2 as well as longer-term (five and 10 years) energy block products, I would expect
 3 PPL’s proposed residential default service supply portfolio to perform similarly to
 4 that of PECO’s and Duquesne’s in terms of delivering PTC stability to residential
 5 customers.

Table 1

Volatility of Residential Default Service Rates of Pennsylvania EDCs			
EDC	Standard Deviation	Average	Relative Standard Deviation
PECO	\$15.02/MWh	\$77.45/MWh	19%
Duquesne	17.85	87.46	20%
Penn Power	19.58	84.57	23%
PPL	26.49	98.72	27%
PENELEC	20.66	76.74	27%
Met-Ed	21.47	79.65	27%
West Penn	19.94	70.77	28%
UGI	27.56	91.03	30%
Pike	38.72	74.55	52%

Figure 1



6

1 Q. PLEASE DESCRIBE PPL’S REASONING FOR PROPOSING TO
2 CONDUCT FPFR SOLICITATIONS IN FEBRUARY AND IN JULY OF
3 EACH YEAR, AND STATE WHETHER YOU OPPOSE THIS PROPOSAL.

4 A. The Company conducted an analysis of the trend of forward block prices between
5 2015 and 2023. This analysis revealed that having a lead time from the auction to
6 delivery of between four to six months has produced lower prices compared to a two-
7 month lead time, with the auctions that are held in February and July having the most
8 favorable results.¹⁹ Mr. Castanaro states that PPL believes this analysis supports
9 changing the auction lead times to try to secure lower auction prices for customers,
10 even though he recognizes that past performance does not guarantee future results.²⁰

11 Forward block energy prices for a given term in the future (e.g., December 1,
12 2024 through November 30, 2025; June 1, 2025 through May 31, 2026) can fluctuate
13 from day to day or over the months up to the delivery date for a variety of reasons
14 including weather forecasts, forward natural gas prices, load forecasts, generation
15 additions and retirements. If the forward energy market offered systematic and
16 statistically reliable opportunities to “arbitrage” by buying the same forward energy
17 strip in February and selling it two months later in April, or buying in July and selling
18 three months later in October, for up to 8 percent profit, I would expect energy traders
19 to buy in February and sell in April (similarly, buy in July and sell in October) to
20 make profits. As more and more traders would follow this profitable strategy, the
21 price differential would be significantly narrowed or eliminated. Therefore, I would
22 not expect Mr. Castanaro’s observation to hold true into the future, if it is not an

¹⁹ PPL Electric Utilities Corporation Statement No. 1, p. 25, lines 1-10.

²⁰ PPL Electric Utilities Corporation Statement No. 1, p. 26, line 6 through p. 27, line 2.

1 artifact of special and random circumstances (such as the timing of the Ukraine war
2 and subsequent developments in the natural gas markets) in the first place.

3 Having said that, all else equal, just as I do not have good reason to expect
4 forward prices to be lower in February (than in April) and in July (than in October), I
5 also do not have good reason to expect them to be higher in February and in July.
6 Therefore, I am not necessarily opposed to PPL conducting FPFR auctions in
7 February and in July instead of in April and in October. Further, conducting the
8 auctions four or five months before the start of deliveries would provide more time
9 for PPL and for the Commission to consider and implement contingency plans in the
10 event that PPL does not receive sufficient number of bids, or the Commission rejects
11 some or all winning bids in an FPFR auction. Thus, I am not opposed to PPL's
12 proposed change.

13 Q. PLEASE EXPLAIN WHY PPL IS PROPOSING TO RETURN THE
14 RESPONSIBILITY OF PROVIDING THE AECs FOR AEPS ACT
15 COMPLIANCE TO THE WHOLESALE SUPPLIERS IN DSP VI, AND
16 STATE WHETHER YOU ARE OPPOSED TO THE COMPANY'S
17 PROPOSAL.

18 A. According to Mr. Castanaro, PPL anticipated in the DSP V proceeding being able to
19 achieve lower costs for AECs by having a separate auction. However, based on the
20 analysis conducted by the Company which compared various Pennsylvania EDCs'
21 (including PPL's) FPFR auction prices, some of which included AECs and some of
22 which excluded AECs, between 2017 and 2023, Mr. Castanaro concludes that the
23 savings contemplated by PPL did not materialize. In addition, the Company is
24 incurring additional auction and administrative costs by conducting AEC auctions.
25 As a result, PPL is proposing that in DSP VI the AECs needed to meet the

1 requirements of the AEPS Act for residential default service loads would be provided
2 by the FPFR suppliers and the costs of meeting those requirements would be included
3 in the competitive bids of those suppliers.²¹

4 Pennsylvania AECs (solar Tier I, non-solar Tier I, and Tier II) are standard
5 products which are traded in the bilateral Renewable Energy Certificate (“REC”)
6 market with ample liquidity and transparent pricing available from multiple sources
7 and publications. Therefore, I would not expect there to be a large price differential
8 between PPL buying the AECs directly and procuring them as part of FPFR contracts.
9 As Mr. Castanaro also acknowledges, his comparison method (analyzing the
10 differences between FPFR auction prices of PPL, PECO, and Duquesne) can be
11 inconclusive (particularly with very few data points) because those auction price
12 differentials, and the differences thereof over time, can be attributed to many factors
13 including procurement timing as well as load profile and pricing location of each
14 EDC. An alternative analysis approach could be to compare the Company’s average
15 AEC procurement prices to the prevailing REC index pricing from one or multiple
16 publications on the date of each PPL AEC auction.

17 Since I do not expect there to be a large price differential between PPL buying
18 AECs directly and procuring them as part of FPFR contracts, and PPL can lower its
19 administrative and auction costs by shifting the AEC provision responsibility to FPFR
20 suppliers, I am not opposed to PPL’s proposal to include the responsibility and cost of
21 AEPS Act compliance in the FPFR contracts.

²¹ PPL Electric Utilities Corporation Statement No. 1, p. 28, line 23 through p. 31, line 2.

1 Q. PLEASE DESCRIBE THE LONG-TERM POWER PRODUCT WHICH PPL
2 IS PROPOSING TO PROCURE FOR THE RESIDENTIAL DEFAULT
3 SERVICE PORTFOLIO UNDER DSP VI.

4 A. The proposed LTP Product is a hybrid supply contract which includes both Block
5 Service and Bilateral Transferred Capacity.²² Block Service is a fixed MW block of
6 around-the-clock electricity service, for a given time period (i.e., delivery period,
7 which is 10 years from June 1, 2026 through May 31, 2036 under PPL’s proposal),
8 delivered to PPL’s PJM load settlement point (PPL_RESID_AGG), which includes
9 all necessary energy, transmission (excluding non-market-based transmission
10 services), transmission losses, congestion management costs, and such other services
11 or products (but excluding capacity obligation, ancillary services, and AECs to meet
12 Pennsylvania’s AEPS Act requirements) that are required with that block supply.²³
13 Stated more succinctly, Block Service is identical to the existing five-year block
14 energy contracts other than the term of the delivery.

15 Bilateral Transferred Capacity is a transfer of the title and rights to a specified
16 megawatt quantity of unforced capacity that has cleared the PJM RPM auctions for a
17 Delivery Year and that is associated with one or more capacity resource in the PJM
18 MAAC region that is not an ELCC Resource.^{24 25} The specified MW quantity of

²² PPL Electric Utilities Corporation Attachment D, Exhibit 1 – Transaction Confirmation Example.

²³ Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.4.

²⁴ Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.4.

²⁵ ELCC stands for Effective Load Carrying Capability and represents a capacity resource’s PJM-assigned capacity value. PJM’s Manual 21A defines ELCC Resource as a Generation Capacity Resource that is a Variable Resource, a Limited Duration Resource, or a Combination Resource, as these terms are defined in PJM Agreements. Variable Resource means a Generation Capacity Resource with output that can vary as a function of its energy source, such as wind, solar, run of river hydroelectric power without storage, and landfill gas units without an alternate fuel source. All Intermittent Resources are Variable Resources, with the exception of Hydropower with Non-Pumped Storage. Limited Duration Resource means a Generation Capacity Resource that is not a Variable Resource, that is not a Combination Resource, and that is not capable of running

1 unforced capacity is required to be identical to the MW amount of Block Service
2 under the specification of the LTP Product as proposed by PPL.²⁶ The LTP Product
3 supply would be provided at a single specified firm price (in \$/MWh) for both the
4 delivery of Block Service and for the transfer of Bilateral Transferred Capacity prior
5 to each Delivery Year.²⁷ PPL is proposing to procure three 50-MW LTP Product
6 (inclusive of block energy deliveries and PJM capacity credit transfers) contracts (or
7 tranches) (with delivery commencing on June 1, 2026).²⁸

8 Q. IS THERE A REQUIREMENT IN THE SPECIFICATION OF THE LTP
9 PRODUCT THAT BLOCK SERVICE AND BILATERAL TRANSFERRED
10 CAPACITY BE SOURCED FROM THE SAME GENERATING UNITS
11 LOCATED IN PJM'S MAAC REGION?

12 A. No. The Block Service and the Bilateral Transferred Capacity are defined
13 independently of each other both in the RFP document and in the SMA document
14 related to the procurement of the LTP Product as filed by the Company. As a matter
15 of fact, 50 MW of around-the-clock energy cannot be reliably sourced from a
16 capacity resource with 50 MW of PJM unforced capacity because no generator can be
17 guaranteed to produce up to its unforced capacity level at all times for 10 years.
18 Every generator needs to go offline periodically for planned maintenance and also
19 experiences forced outages. Therefore, PPL would not be procuring energy and
20 capacity from designated PJM MAAC capacity resources for a period of 10 years
21 under this proposal.

continuously at Maximum Facility Output for 24 hours or longer. A Capacity Storage Resource is a Limited Duration Resource.

²⁶ Attachment D, Default Service Long Term Power Supplier Master Agreement, p. 7.

²⁷ Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.5.

²⁸ Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.6.

1 Q. IS THERE A REQUIREMENT IN THE SPECIFICATION OF THE LTP
2 PRODUCT THAT BILATERAL TRANSFERRED CAPACITY BE
3 SOURCED FROM THE SAME GENERATING UNITS FOR ALL 10
4 DELIVERY YEARS COVERED BY THE LTP SUPPLY CONTRACT?

5 A. No. The LTP supplier can transfer capacity from any combination of units in each
6 Delivery Year in fulfillment of the LTP Product contract requirements as long as each
7 unit is located in PJM's MAAC region, is not an ELCC resource, and has cleared one
8 of PJM's capacity auctions for that Delivery Year.

9 Q. DO YOU HAVE CONCERNS WITH THE COMPANY'S LTP PRODUCT
10 PROPOSAL?

11 A. Yes, I have two concerns. First, while I do not have a concern with the Block Service
12 element of the LTP Product, I am concerned about the Bilateral Transferred Capacity
13 element. There is a liquid forward market and index pricing availability from
14 multiple sources for the energy-only block. Furthermore, PPL (as well as other
15 Pennsylvania EDCs) have experience with procuring long-term (up to 10 years)
16 energy-only blocks. However, there is greater uncertainty regarding forward capacity
17 prices in PJM going out 10 years and, as far as I am aware, there is no widely
18 recognized index pricing availability for forward capacity prices in PJM. PJM's Base
19 Residual Auction clearing prices for resources located in MAAC have been volatile
20 since the start of Reliability Pricing Model ("RPM") auctions. In the 13 BRAs
21 conducted by PJM since PJM began defining MAAC as a modeled local
22 deliverability area, the MAAC resource auction clearing price has fluctuated between
23 a low of \$49.49 per megawatt per day ("MW-day") for the 2024/2025 Delivery Year
24 and a high of \$226.15/MW-day for the 2013/2014 Delivery Year, with an average

1 price of \$122.17/MW-day over those 13 Delivery Years.²⁹ Given this lack of
2 transparency and the volatility of PJM capacity price (at least historically), there is
3 concern that the approach proposed by PPL would lock residential default customers
4 into capacity contracts which are above prevailing market prices for 10 years. As an
5 example, one or multiple suppliers could offer a price equal to or slightly lower than
6 the highest price administratively permitted under PJM's capacity auction rules, and
7 PPL could still accept one or more of those offers under the rules of the RFP, which
8 in turn would leave no upside for the customers. While I am generally supportive of
9 procuring some level of long-term hedges for major cost components of the
10 residential portfolio, I cannot support the capacity element of PPL's LTP Product
11 proposal without adequate customer protections built into the procurement process.

12 My second concern is that PPL's LTP Product proposal unnecessarily bundles
13 the 10-year Block Energy element with the 10-year Bilateral Transferred Capacity
14 element. As I explained above, there is no synergy between procuring or supplying
15 an energy-only block and unforced capacity, other than the administrative
16 convenience of conducting one procurement process rather than conducting two.
17 Bundling Block Service with Bilateral Transferred Capacity artificially under the LTP
18 Product unnecessarily restricts competition for both products. There could be
19 potential bidders specializing in selling energy-only block products that do not trade
20 long-term capacity. Similarly, there could also be potential bidders that specialize in
21 trading long-term capacity that do not engage in block energy trading. Soliciting the
22 Block Service and the Bilateral Transferred Capacity separately would increase
23 participation in both product solicitations while enabling PPL to choose the best offer

²⁹ <https://www.pjm.com/-/media/markets-ops/rpm/rpm-auction-info/rpm-auctions-resource-clearing-price-summary.ashx>

1 for each element separately. In addition, if the market is unable to provide one of the
2 products (either capacity or block energy) under terms acceptable to the Commission,
3 PPL could still procure the other product if they are solicited separately. Therefore, if
4 the Commission is inclined to authorize PPL to procure both a 10-year block energy
5 product and a 10-year capacity product, I recommend that the Commission direct the
6 Company to solicit these two products separately.

7 Q. WOULD A 10-YEAR CAPACITY CONTRACT BETWEEN PPL AND A
8 CAPACITY SUPPLIER SUPPORT RESOURCE ADEQUACY IN PJM?

9 A. Not necessarily. There is no reason to believe that a capacity contract would
10 necessarily lead to the development of a new resource that otherwise would not have
11 been developed in the absence of a capacity contract with PPL. The sellers of the
12 capacity contracts to PPL could be owners of existing resources that are selling to
13 PPL because they believe they can get a higher price from PPL than they would from
14 PJM's capacity auctions. The sellers could also be capacity traders that acquire
15 capacity from owners of existing capacity resources and try to sell it to PPL at a
16 profit. In both cases, PPL would acquire a long-term capacity price hedge on
17 residential default customers' behalf, but that transaction would not necessarily
18 support resource adequacy in PJM, in MAAC, or in PPL's service territory.

19 As Mr. Castanaro also recognizes, "ultimately PJM is responsible for ensuring
20 resource adequacy."³⁰ As part of its resource adequacy construct (known as RPM),
21 PJM procures, commits, and pays generation resources one Delivery Year at a time at
22 amounts that cover PJM's projected peak load and a reserve margin, for the overall
23 PJM footprint and for each constrained region of the PJM grid. PJM will procure this

³⁰ PPL Electric Utilities Corporation, Statement No. 1, p. 17, lines 13-14.

1 same targeted amount of capacity regardless of whether PPL enters into a fixed-price
2 capacity contract with a capacity supplier or not.

3 Q. WHAT IS YOUR ULTIMATE RECOMMENDATION CONCERNING
4 PPL'S PROPOSAL FOR A LONG-TERM POWER PRODUCT?

5 A. I recommend that PPL's proposal to procure 10-year, 150 MW of LTP product,
6 consisting of 10-year, 150 MW of around-the-clock block energy (i.e., Block Service)
7 and 10-year, 150 MW of unforced capacity (i.e., Bilateral Transferred Capacity), be
8 replaced with the procurement of 10-year, 150 MW of around-the-clock block
9 energy. The adoption of this recommendation would entail the elimination of the
10 long-term capacity contract, but the acceptance of the procurement of the around-the-
11 clock block energy. Further, if the Commission is inclined to authorize PPL to
12 procure both a 10-year block energy product and a 10-year capacity product, I
13 recommend that the Commission direct the Company to solicit these two products
14 separately.

15 Q. DO YOU SUPPORT THE COMPANY'S PROPOSAL TO RELY ON
16 LONG-TERM CONTRACTS FOR SOLAR AECs FOR THE
17 SATISFACTION OF A PORTION OF THE AEPS ACT COMPLIANCE
18 OBLIGATION FOR RESIDENTIAL DEFAULT SERVICE?

19 A. Yes. Solar RECs, which are the equivalent of solar Tier 1 AECs in other PJM states
20 having Renewable Energy Portfolio Standards ("RPSs"), have exhibited prices that
21 can rise significantly in response to tight market conditions. These market conditions
22 can arise from either supply constraints or from increases in demand resulting from
23 changes in the underlying legislative requirements. Non-RPS-related demand, such
24 as voluntary corporate renewable energy procurements and the federal government's
25 carbon-free electricity targets, has also started to play a role in the demand/supply

1 fundamentals of REC and solar REC markets. Long-term contracts for the provision
2 of solar Tier 1 AECs can help stabilize prices for what would otherwise be a volatile
3 component of the overall portfolio. Solar AECs (or solar RECs) typically exhibit
4 higher price volatility (and price levels) than Tier 1 AECs (or Tier 1 RECs) because
5 the in-state requirement associated with solar AECs dramatically reduces the size of
6 the supply pool in comparison to non-solar Tier 1 AECs (or RECs), which can be
7 sourced from resources located across a larger footprint (typically the PJM region).

8 Q. PLEASE DESCRIBE THE COMPANY'S CPP PROPOSAL.

9 A. The CPP is meant to serve as a placeholder if the PJM BRA clearing price is not
10 known for all months of the delivery period for an FPFR product offered at least five
11 business days prior to the bid date. If this occurs bidders would use the CPP as the
12 proxy for the final zonal PJM capacity rate (expressed in dollars per megawatt of PJM
13 capacity obligation per day) to formulate their bids. The CPP would be calculated as
14 the average of the most recent results under PJM's RPM from the two most recent
15 delivery years for which PJM has held a capacity auction. Winning bidders would
16 then be made whole through a reconciliation mechanism. For each month for which
17 the capacity price was not known at the time of the FPFR auction, a true-up for a
18 given day would be calculated as the difference between the final zonal PJM capacity
19 rate and the CPP, multiplied by the winning bidder's daily capacity obligation. If the
20 CPP is less than the actual capacity price, the winning bidder would receive an
21 additional payment to ensure that it is fully compensated for its capacity cost to serve
22 the FPFR contract. Conversely, if the CPP is greater than the actual capacity price
23 from PJM, PPL's payment to the winning bidder under the contract would be reduced
24 based on the same calculation.³¹

³¹ PPL Electric Utilities Corporation Statement No. 1, page 44.

1 Q. WHAT ARE SOME OTHER OPTIONS FOR HANDLING DELAYS IN
2 PJM'S CAPACITY AUCTIONS?

3 A. There are three alternatives to the Company's CPP proposal. First, the bidders could
4 be asked to include capacity costs in their bids, without a subsequent true-up, even if
5 PJM has not conducted a capacity auction for part or all of the delivery period of the
6 FPFRR contract. Second, the Company could assign PJM capacity charges to itself
7 (and not to the FPFRR suppliers) and recover those costs from customers through a
8 Commission-approved rate. Third, PPL could shorten the term of the FPFRR products
9 (likely from 24 to 12 months) for which capacity price is unknown for at least a part
10 of the delivery period.

11 Q. DO YOU AGREE WITH PPL'S CPP PROPOSAL?

12 A. Yes. The CPP proposal is preferable to the other three identified alternatives. The
13 first identified alternative should not be adopted because it places the price risk of an
14 unhedgeable, large, and highly variable component on the FPFRR suppliers, which in
15 turn would result in the incorporation of large risk premiums into the bids. This
16 would have the effect of increasing costs to consumers. The second identified
17 alternative should not be adopted because it appears to be administratively
18 cumbersome both for the Company and for the Commission, without a clear
19 corresponding benefit. The third alternative is particularly unattractive because it
20 would adversely affect residential default service rate stability by forcing PPL to
21 procure shorter term hedges and exposing the overall portfolio to wholesale market
22 volatility through more frequent repricing of the portfolio than necessary. Therefore,
23 the CPP approach proposed by the Company is the best option among the available

1 alternatives. I also note that the CPP approach is utilized by other EDCs in
2 Pennsylvania,³² as well as EDCs in other retail choice states.

3 **IV. TIME-OF-USE RATES**

4 Q. PLEASE DESCRIBE PPL'S CURRENT TOU RATE STRUCTURE
5 AVAILABLE TO RESIDENTIAL DEFAULT SERVICE CUSTOMERS ON
6 A VOLUNTARY BASIS.

7 A. Currently under DSP V, PPL offers a residential TOU rate on a voluntary basis. The
8 residential TOU rate includes a seasonality component, with the summer period
9 running from June 1 through November 30 and the winter term running from
10 December 1 through May 31 each year. The two seasons entail different peak and
11 off-peak hours — the summer peak hours are the four hours beginning at 2 PM
12 Monday through Friday, excluding holidays. Winter peak hours are the four hours
13 beginning at 4 PM Monday through Friday, excluding holidays. All other hours are
14 designated as off-peak. The residential TOU tariff does not include either a super-
15 peak period or a super-off-peak period. PPL relies on the non-TOU residential
16 default service power supply for the provision of power supply to residential TOU
17 customers and applies a formulaic approach to establishing an off-peak price relative
18 to the generation component of the PTC. PPL sets the off-peak price to 90 percent of
19 the generation component of the PTC, with peak period prices based on average peak-
20 to-off-peak market ratios. The ratios are computed as a five-year moving average,
21 updated each year as more recent data become available.

³² For example, Met-Ed, Penelec, Penn Power, and West Penn (approved by the Commission in Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021), and Duquesne (approved by the Commission in Docket No. P-2020-3023149).

1 Q. IS PPL PROPOSING ANY CHANGES TO ITS RESIDENTIAL TOU RATE
2 OPTION FOR DSP VI?

3 A. Yes. PPL is proposing to change the TOU on-peak hours to 3 PM – 7 PM annually,
4 and to eliminate the separate summer and winter terms. No changes are proposed to
5 the off-peak hour percentage discount.³³

6 Q. DO YOU CONCUR WITH THESE PROPOSED CHANGES?

7 A. No. I recommend that the Company retain the seasonality component, with the same
8 seasonal definitions and the same summer peak hours (2 PM – 6 PM), and assign all
9 capacity costs to the summer season peak TOU period. I also agree with Ms.
10 Alexander’s recommendations that PPL should explore incentive and reward
11 programs to determine customer interest in peak load reductions, in addition to or in
12 lieu of more traditional TOU rates.

13 Q. PLEASE PROVIDE YOUR BASIS FOR RECOMMENDING THAT PPL
14 MAINTAIN SEASONALLY DIFFERENTIATED TOU PRICING
15 MULTIPLIERS UNDER DSP VI.

16 A. Similar to most EDCs in retail choice Mid-Atlantic states, PPL allocates PJM
17 capacity cost responsibility to the suppliers of individual customers based on the
18 “Five PJM Coincident Peaks” (“5CP”) construct.³⁴ The 5CP days are limited to the
19 period from June 1 through September 30. Since capacity costs are incurred based
20 exclusively on usage during certain summer period hours, setting TOU pricing
21 multipliers by season and assigning all capacity costs to the summer season provides
22 the appropriate signal for customers on TOU rates to reduce usage during those
23 critical hours in the summer season.

³³ PPL Electric Utilities Corporation Statement No. 1, page 53, lines 13-17.

³⁴ <https://www.pplelectric.com/-/media/PPLElectric/At-Your-Service/Docs/General-Supplier-Reference-Information/2023/2023-PJM-and-PPL-Zone-Peak-Load-Dates-for-PLC-Calcs.ashx>

1 Q. PLEASE EXPLAIN YOUR REASONING FOR RECOMMENDING THAT
2 PPL ASSIGN OF ALL ANNUAL CAPACITY COSTS TO THE SUMMER
3 SEASON PEAK TOU PERIOD.

4 A. An analysis of the hours, days, and months during which 5CPs occurred in the last
5 five years (2019-2023) reveals that,³⁵ of the 25 hours comprising the 5CPs in the last
6 five years, 11 occurred at hour-ending (“HE”) 17 (between 4 PM and 5 PM), 11 at
7 HE 18, two at HE 16, and one at HE 15. Of those 25 hours, 16 occurred in the
8 calendar month of July, six in August, two in September, and one in June. Of the
9 PJM-wide single-hour system peaks, which have particular significance in PJM’s
10 zonal capacity requirement determination, four of them occurred at HE 18 and one at
11 HE 17, while four of them occurred in July and one in August, in the last five years.
12 This analysis demonstrates that all the hours which determine annual capacity
13 allocation between PJM zones and within the PPL zone fall within PPL’s current
14 summer season peak TOU pricing period (non-holiday weekday afternoons from 2
15 PM to 6 PM). Therefore, assigning all capacity costs to the summer season peak
16 TOU pricing period sends the appropriate price signal to customers on the residential
17 TOU rate to shift usage away from the peak period.

18 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

19 A. Yes, it does.

³⁵ <https://www.pjm.com/planning/resource-adequacy-planning/load-forecast-dev-process.aspx>

Appendix A

Statement of Qualifications of Serhan Ogur

SERHAN OGUR, Ph.D.

Dr. Ogur is a Principal of Exeter Associates, Inc. with 23 years of experience in the energy industry specializing in organized wholesale (Regional Transmission Organization / Independent System Operator) and retail electricity markets. Dr. Ogur's diverse background comprises energy management and consulting; analysis, design, and reporting of RTO electricity markets and products; and state and federal regulation of electric utilities.

Dr. Ogur's coursework in graduate school focused on Microeconomic Theory, Game Theory, and Industrial Organization. His doctoral dissertation investigates imperfect competition in deregulated wholesale electricity markets and oligopolistic competition between private and public generators.

Education

Ph.D. (Economics), 2007
Northwestern University
Evanston, Illinois

B.A. (Economics), 1996
Bogazici University
Istanbul, Turkey

Previous Employment

2014-2015 Senior System Operator
Fellon-McCord & Associates, LLC
Louisville, KY

2005-2014 Senior Economist
PJM Interconnection, LLC
Audubon, PA

2001-2005 Economic Analyst
Illinois Commerce Commission
Springfield, IL

Professional Experience

Dr. Ogur's work at Exeter includes analysis of electricity supply contracts; utility rates and tariffs; energy markets and prices; power procurement; default electric service design; project evaluation; demand response opportunities; congestion hedging strategies; and price forecasting.

Prior to joining Exeter, Dr. Ogur's responsibilities at Fellon-McCord encompassed overseeing and performing the daily tasks of the "24/7" wholesale electricity desk, including all aspects of scheduling, managing, and monitoring direct market participant load and generation assets (mostly in ISO/RTO markets) as well as their settlements and custom reporting. He was also in charge of developing strategies and making recommendations, through

analytical, financial, and market research, for longer-term management of clients' load obligations and generation assets such as Auction Revenue Rights (ARR) nominations; participation in energy, ancillary services, and capacity markets; load forecasting; energy, basis, and capacity price forecasting; hedging; and peak load management. Dr. Ogur also served as the company's lead analyst in various special consulting projects.

In PJM Interconnection's Market Strategy and Market Analysis departments, Dr. Ogur was responsible for analyzing and reporting on all PJM-administered electricity market products, including day-ahead and real-time energy, operating reserve, regulation, synchronized reserve, virtual transactions, financial transmission rights, capacity, demand response, energy efficiency, and renewables. He was part of the team that developed the protocols and business rules for participation of energy efficiency in PJM markets as well as a lead reviewer for energy efficiency plans and post-installation measurement and verification (M&V) reports for PJM's capacity market auctions. He also has training and experience in PJM's stakeholder management process.

Dr. Ogur's responsibilities at the Illinois Commerce Commission (ICC) included monitoring all Illinois-related developments under federal jurisdiction, mostly Federal Energy Regulatory Commission (FERC) filings and rulings concerning major Illinois electric public utilities. In addition, Dr. Ogur reviewed all actions concerning Illinois public utilities at the FERC level (applications to join RTOs, market-based rate authority filings, merger applications, transmission rate cases, etc.), and developed positions and official comments for the consideration of the ICC to file in the related FERC dockets. Dr. Ogur also filed written testimony and served as staff witness (including standing cross-examination) in the ICC dockets establishing auction-based competitive wholesale energy procurement mechanisms for major Illinois electric public utilities.

Sample Major Publications and Reports

New Hampshire Solicitation and Procurement of Default Energy Service, prepared for the New Hampshire Department of Energy, March 2023 (with Matthew Hoyt, Olivia Kuykendall, Grace Koenig, and Cali Clark of Exeter Associates)

Review of the Non-Market-Based Services Riders Established by Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company and Associated Pilot Program, prepared for the Public Utilities Commission of Ohio in response to Case No. 22-391-EL-RDR, July 2023 (with Matthew Hoyt and Ari Weissfeld of Exeter Associates)

Retail Supply and Standard Offer Service Reform for Maine, prepared for Maine Office of the Public Advocate, February 2023 (with Steven Estomin, Matthew Hoyt, Olivia Kuykendall, Afton Hauer, and Cali Clark of Exeter Associates)

Expert Testimony

Before the Pennsylvania Public Utility Commission, Docket No. P-2023-3039927, Pike County Light & Power Company, 2023, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed default service issues.

Before the Pennsylvania Public Utility Commission, Docket Nos. A-2023-3038771 *et al*, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company, 2023, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed public utility merger and acquisition issues.

Before the Pennsylvania Public Utility Commission, Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014 and P-2021-3030021, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company, 2022, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed default service issues.

Before the Ontario Superior Court of Justice, In the Matter of Just Energy Group Inc. et al, Court File No. CV-21-00658423-00CL, 2021, on behalf of the *Donin and Jordet* Plaintiffs. Testified on overcharges by a retail electric supplier in a class action suit with plaintiffs in 11 states in the U.S.

Before the Pennsylvania Public Utility Commission, Docket Nos. A-2021-3025659 and A-2021-3025662, Pike County Light & Power Company and Leatherstocking Gas Company, LLC, 2020, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed public utility merger and acquisition issues.

Before the U.S. District Court for the District of New Jersey, Civil Action No. 3:17-cv-02680-MAS- LHG, 2021, on behalf of Janet Rolland, et al. Testified on systematic overcharges by a retail electric supplier in a class action suit with plaintiffs in eight states.

Before the Pennsylvania Public Utility Commission, Docket No. P-2020-3022988, Pike County Light & Power Company, 2020, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed default service issues.

Before the Pennsylvania Public Utility Commission, Docket No. P-2020-3019907, UGI Utilities, Inc. – Electric Division, 2020, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed default service issues.

Before the Pennsylvania Public Utility Commission, Docket No. P-2020-3019522, Duquesne Light Company, 2020, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed default service issues.

Before the Pennsylvania Public Utility Commission, Docket Nos. P-2020-3019383 and P-2020-3019384, Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company, 2020, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed default service issues.

Before the Pennsylvania Public Utility Commission, Docket No. P-2016-2534980, PECO Energy Company, 2016, on behalf of the Pennsylvania Office of Consumer Advocate. Testimony addressed default service issues.

Before the Illinois Commerce Commission, Docket No. 05-0159, Commonwealth Edison Company, 2005, on behalf of the Staff of Illinois Commerce Commission. Testimony addressed default service design and competitive procurement issues.

Before the Illinois Commerce Commission, Docket Nos. 05-0160, 05-0161, and 05-0162 (Consolidated), Central Illinois Light Company d/b/a AmerenCILCO, 2005, on behalf of the Staff of Illinois Commerce Commission. Testimony addressed default service design and competitive procurement issues.

Before the Illinois Commerce Commission, Docket No. 02-0428, Central Illinois Light Company and Ameren Corporation, 2002, on behalf of the Staff of Illinois Commerce Commission. Testimony addressed competition issues in a utility merger case.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

VERIFICATION

I, Serhan Ogur, hereby state that the facts above set forth in my Direct Testimony, OCA Statement 1, 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 3, 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 a Default Service Program : Docket No. P-2024-3047290
And Procurement Plan for the Period :
June 1, 2025 through May 31, 2029 :

DIRECT TESTIMONY

OF

BARBARA R. ALEXANDER

Barbara Alexander Consulting LLC

ON BEHALF OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

PUBLIC VERSION

June 3, 2024

1 **I. INTRODUCTION AND SUMMARY**

2

3 Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

4 A. My name is Barbara R. Alexander. I am the sole member manager of Barbara Alexander
5 Consulting LLC. My address is 44 Beech St., Hallowell, ME 04347. I appear in this case
6 as a witness on behalf of the Office of Consumer Advocate (OCA).

7 Q. WHAT IS YOUR BACKGROUND AND EXPERIENCE WITH RESPECT TO THE
8 ISSUES ON WHICH YOU ARE PROVIDING TESTIMONY IN THIS PROCEEDING?

9 A. I opened my consulting practice in March 1996, after nearly ten years as the Director of
10 the Consumer Assistance Division of the Maine Public Utilities Commission. While there,
11 I testified as an expert witness on consumer protection, customer service and low-income
12 issues in rate cases and other investigations before the Commission. My consulting practice
13 is directed to consumer protection, customer service and low-income programs and policies
14 relating to the regulation of the telephone, electric and gas industries. In particular, I have
15 focused on the changes in policies and procedures required by state regulation in the
16 transition to retail competition. Among my areas of expertise are policies and programs
17 related to Default Service and related issues concerning the transition to retail competition
18 for both the electric and natural gas industries. I have appeared in over 30 U.S. and
19 Canadian provinces on these issues and made numerous presentations on this issue before
20 state regulatory commissions and at national conferences.

21 I am a graduate of the University of Michigan (B.A. 1968) and the University of
22 Maine School of Law (J.D. 1976).

Direct Testimony of Barbara R. Alexander
On Behalf of the OCA

1 I have been involved in the implementation of retail electric and natural gas
2 competition in Pennsylvania on behalf of the OCA since 1997. I testified on consumer
3 education, consumer protection, supplier licensing, customer enrollment, default service,
4 and Code of Conduct issues for the OCA in the Pennsylvania Public Utility Commission's
5 (Commission) electric restructuring proceedings in 1997 and 1998 and in the natural gas
6 restructuring cases beginning in 1999. I have provided testimony submitted on behalf of
7 the OCA on service quality and low-income program issues associated with recent electric
8 and natural gas distribution company mergers. With respect to issues relating to retail
9 market competition policies, I testified on behalf of the OCA on policies that should govern
10 the planning and acquisition of Default Service for residential customers and on proposals
11 to adopt Purchase of Receivables (POR) programs, Customer Referral Programs, and other
12 "retail market enhancement" programs for electric and natural gas utilities, including
13 FirstEnergy distribution companies, Duquesne Light Co., PPL Energy (both gas and electric
14 service), PPL Electric, UGI Utilities, Columbia Gas of Pennsylvania, T.W. Phillips Gas and
15 Oil Co. and Peoples Natural Gas. I testified on behalf of the OCA in PPL's prior Default
16 Service Program proceedings with regard to retail market programs. I have opined on the
17 design and impacts of various "smart meter" enabled rate programs, including incentive rate
18 options and time of use rate options in Maryland, Massachusetts, and Maine. My updated
19 CV with the specific identification of these proceedings is attached as Exhibit BA-1.

20 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

21 Q. I am filing Direct Testimony on behalf of the OCA with respect to the proposal by PPL
22 Electric Utilities Corp. ("PPL" or "Company") to continue its current Standard Offer
23 Program (SOP) with several changes and the Company's proposal concerning the

Direct Testimony of Barbara R. Alexander
On Behalf of the OCA

1 implementation of its optional Time of Use (TOU) generation supply rate for residential
2 customers.

3 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS WITH
4 REGARD TO PPL'S STANDARD OFFER PROGRAM.

5 A. Regarding PPL's Standard Offer Program, I recommend that PPL terminate this program.
6 Alternatively, the program should be reformed to require customers to be returned to
7 default service at the end of the 12-month Standard Offer program contract. I will explain
8 both recommendations below.

9 • The Referral Program or Standard Offer Program (SOP) has been in effect for 10
10 years. The purpose of this program, to expose PPL's residential and small commercial
11 customers to the retail energy supply market, has been fulfilled. PPL as the Electric
12 Distribution Company should not operate further as the marketing and enrollment arm of
13 the Electric Generation Suppliers (EGS) whose profits and service quality is unregulated
14 and rife with a long history of charging more than the Price to Compare (PTC) or default
15 service. During this decade long program there is substantial evidence as reflected in prior
16 Default Service Proceedings that customers who enroll at the fixed price contract suffer
17 charges in excess of the PTC during periods in which the PTC decreases during the 12-
18 month term of the SOP contract. My current evaluation of the recent implementation of
19 the SOP program confirms once again that customers who sign up for a 7% discount based
20 on the current rate lose the value of that discount when the PTC changes to a lower rate
21 than the one in effect when the customer enrolled. Furthermore, even if the customer does
22 not see a price higher than the PTC during the 12-month contract that PPL and its agents
23 promote, the price that the supplier charges the customer after the end of the contract is a

Direct Testimony of Barbara R. Alexander
On Behalf of the OCA

1 significant concern in light of the supplier's ability to retain the customer under the
2 negative option renewal rules currently in effect.

3 • If the Commission declines to terminate this program, I recommend a substantial
4 reform regarding the customer's rights at the end of the 12-month contract. Specifically, I
5 agree with PPL's recommendation that the program requires the supplier to return the
6 customer to PPL's PTC unless the supplier has obtained an affirmative agreement from the
7 customer to enroll or renew the contract. This feature would require the EGS to either
8 submit a drop order to PPL to return the customer to default service or submit a new
9 enrollment after obtaining the necessary proof of customer authorization.

10 • I recommend that PPL promptly revise its bill to show a dollars and cents
11 calculation of the customer's supplier charges with the dollars and cents calculation of what
12 the customer would pay under the PTC. The current presentation that relies on comparing
13 a cents per kWh comparison is insufficient, particularly when the supplier either does not
14 include such information in its billing detail or actually misrepresents its cents per kWh
15 presentation by failing to include the impact of fixed or additional monthly charges. PPL
16 should not present any supplier cents per kWh charge on its bills that is not an accurate
17 reflection of the total supplier charges divided by the customer's monthly kWh usage.

18 Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS FOR PPL'S TIME OF USE
19 RATE OPTION FOR RESIDENTIAL CUSTOMERS.

20 A. I acknowledge that PPL has an obligation to offer a TOU rate program that takes advantage
21 of the expensive Advanced Metering Infrastructure, or "smart meters" paid for by
22 ratepayers. However, this program does not meet any criteria for satisfying the intent to
23 make use of the expensive smart metering investment. Furthermore, the current TOU

1 program is poorly designed, has poor enrollment, and has not documented value in the
2 form of peak usage reduction or impact on wholesale market prices. I take no position on
3 whether PPL's TOU should remain as it is currently constructed or whether it should be
4 simplified as proposed by PPL, but I note that given its current enrollment, it likely does
5 not matter as the program is likely insufficiently attractive to produce the desired systemic
6 results. In addition to a TOU rate option, I recommend that PPL develop one or more pilot
7 programs with a properly designed evaluation protocol that targets customers to reduce
8 peak usage with demand response features, such as incentive payments for customers with
9 usage profiles that reflect high usage due to hot water heating, electric home heating, and
10 other appliances that contribute to peak usage.

11 **II. PPL'S STANDARD OFFER PROGRAM SHOULD BE TERMINATED OR**
12 **SUBSTANTIALLY REFORMED**

13
14 Q. PLEASE DESCRIBE PPL'S SOP.

15 A. PPL's SOP was approved in its DSP II proceeding and was initiated with enrollments in
16 2013. PPL's program has been reviewed and approved in all of the following DSP
17 proceedings with various changes to the scripts used by PPL's customer representatives
18 and PPL's third party agent who actually presents the program, obtains the customer's
19 approval to participate in the program, and enrolls customers with a supplier authorized
20 by PPL to participate in this program. PPL requires EGSs to offer a fixed price
21 agreement for 12 billing cycles to participating customers. The fixed price is set at 7%
22 below the PTC in effect at the time of a customer's agreement to participate in the

1 program. However, the actual discount varies during the term of the contract because
2 PPL's PTC is adjusted semi-annually. As a result, if the PTC drops during the SOP
3 contract, the customer may lose the value of the promised discount or pay more than
4 default service as I have documented in prior DSP proceedings for this program.¹ This
5 same adverse impact on participating customers has occurred in the current SOP as I
6 describe below. If the PTC increases during the SOP contract, the customer's discount is
7 more than 7% compared to the PTC for those months. Even more confusing for
8 customers, their actual discount can change several times during the 12-month contract
9 depending on the month in which the customer enrolls because of timing of the semi-
10 annual PTC changes, thus contributing to confusion and a lack of understanding of these
11 risks.

12 Q. DO PPL'S SCRIPTS EXPLAIN THE PROGRAM?

13 A. PPL uses script language based on the Commission's previous orders. The Commission
14 issued an Order in a prior FirstEnergy DSP proceeding that provided guidance on CAP
15 Shopping programs and Standard Offer Program scripts.² In this Order the Commission
16 actually set forth specific script language for the EDC customer representatives and their
17 SOP contractors to use with customers. In addition, the Commission issued a Secretarial
18 Letter on January 23, 2020 to give direction to the EDCs about certain aspects of the
19 implementation of Default Service.³ In this Secretarial Letter the Commission referenced

¹ See, Direct Testimony of Barbara Alexander on behalf of the OCA, *Petition of PPL Electric Utilities Corporation for Approval of Its Default Service Plan for the Period from June 1, 2021 through May 31, 2025 (DSP V Petition)*, Docket No. P-2020-3019356.

² *Petition of Metropolitan Edison Company et al. for Approval of Its Default Service Plan*, Docket No. P-2017-2637855 et al. Order (February 28, 2019).

³ *Investigation into Default Service and PJM Interconnection, LLC Settlement Reforms*, Docket No. M-2019-3007101 (January 23, 2020).

1 SOP Referral Scripting and directed the EDCs to the scripting language included in the
2 FirstEnergy DSP Order quoted above, stating, “We suggest that EDCs, when preparing
3 their upcoming DSP filings, review the Commission’s actions in the above noted
4 FirstEnergy proceeding and to include in their filings analysis of their SOPs, the current
5 scripting, and any proposed scripting that adequately informs customers about the SOPs
6 while maintaining important safeguards and protections.”⁴

7 Q. DOES THIS LANGUAGE PROPERLY EXPLAIN THE RISK TO CUSTOMERS
8 ABOUT THEIR ACTUAL SAVINGS OR LACK THEREOF DURING THE TERM OF
9 THE CONTRACT?

10 A. No. The EDC and the SOP vendor presents the program to customers with the term
11 “potential savings.” The customer is secondarily informed correctly that the contract will
12 provide a 7% discount on the PTC currently in effect. Then the customer is also told that
13 the PTC will change semi-annually. The statement that the PTC will change during the
14 12-month contract period does not plainly inform the customer that the 7% discount is
15 not guaranteed during the term of the contract. The use of the term “potential savings”
16 and a later reference that the PTC will change during the contract is contradictory and
17 confusing. It is also important to remember that when people call their utility, they are
18 often calling for something other than to inquire about retail choice and are then asked
19 about whether they want to be referred to this program to save money on their bill.
20 Customers may or may not be readily interested in comparing offers that are available
21 and may simply latch on to the prospect of savings. I remain concerned about what I

⁴ Ibid., at 10.

1 consider as the contorted and contradictory disclosures that reflect a program design that
2 transfers market risk of future PTC changes to the customer. Furthermore, the program
3 offers no protections to customers about the terms of the supplier contract after the 12-
4 month fixed price contract, terms that can change based on a negative option renewal
5 notice.⁵

6 Q. DOES THE SOP REQUIRE SUPPLIERS TO INCLUDE ANY OTHER SERVICES
7 OTHER THAN “PLAIN VANILLA” GENERATION SUPPLY SERVICE?

8 A. No. These SOP contracts focus specifically on the customer’s cents per kWh rate
9 compared to the current PTC.

10 Q. PLEASE DESCRIBE THE EVIDENCE THAT DOCUMENTS THAT CUSTOMERS
11 WHO ENROLL IN THE SOP DO NOT ALWAYS EXPERIENCE A 7% DISCOUNT
12 DURING THEIR 12-MONTH CONTRACT.

13 A. PPL provided a document that shows the residential customer’s PTC and the SOP
14 discount rate for each month from January 2021 through March 2023.⁶ When the
15 customer’s SOP contract rate is lower than the PTC during the 12 months of their
16 contract, the customer sees a lower monthly bill for generation supply service. This
17 happens when the PTC rate change during their SOP contract term remains the same or
18 higher than the PTC at the time of enrollment. However, when the PTC decreases during
19 the term of the SOP contract, the discount is less than 7% or disappears altogether. In
20 December 2021, the PPL PTC was \$0.09502 and 13,440 residential customers enrolled

⁵ The term “negative option” refers to the policy that allows a supplier to retain the customer under new contract terms based on issuing notices to the customer but does not require the customer to affirmatively agree to the new terms. In other words, silence by the customer is interpreted as consent.

⁶ PPL Response to OCA-I-7, Attachment 1.

1 with a supplier in the SOP at a rate of \$0.08837. However, during the next month the
2 PTC dropped to \$0.08941, resulting in only a **1.6% discount** from January 2022 through
3 May 2022. The PTC then increased significantly, which did increase the customer's SOP
4 savings who enrolled in December 2021 for the June through December 2022 period. In
5 May 2023, customers who enrolled with an SOP discounted rate of \$0.13589
6 immediately saw the value of that discount disappear when the PTC decreased to
7 \$0.12126 the following month. As a result, those customers ended up paying **12% more**
8 than the PTC for six months and then **23% more** than the PTC when that rate changed
9 again in January 2024. I attach this information as Exhibit BA-2 based on PPL's
10 Response to OCA-I-7, Attachment 1. The unpredictability of the customer's actual
11 discount under the SOP compared to the applicable PTC during the term of their 12-
12 month fixed price SOP contract is a feature that contributes to my recommendation to end
13 this program.

14 Q. HAS PPL IDENTIFIED CONCERNS WITH SOP?

15 A. Yes. PPL has documented that customers who enroll with the SOP often are confused
16 about the role of PPL in enrolling them with an EGS and their research has documented
17 that many customers who enroll in the SOP contracts end up with rates higher than the PTC
18 under the post-SOP contract with the supplier.⁷ According to PPL Witness Melinda
19 Stumpf, PPL conducted an analysis of the prices paid by residential customers after the end
20 of the SOP contract and found that 82.45% of residential customers who remain with their

⁷ PPL St. No. 3, Direct Testimony of Melinda Stumpf, at 7. See, also, PPL Response to OCA-I-24 that documents 174 complaints about suppliers categorized as "no notice of rate change" and about 25% of these complaints are from customers who started in the SOP program.

1 SOP supplier after the conclusion of their SOP contract are paying a rate at or above the
2 PTC in the first month following the end of their SOP contract. Even four months later,
3 when approximately 18,000 customers took some action, of the remaining customers,
4 82.91% are still paying rates at or above the PTC, with over 76.11% paying 10% or more
5 above the PTC. Only 17.09% of these customers are paying rates at or below the PTC.⁸ In
6 addition, the uncollectible costs associated with residential customers served by an EGS
7 totaled \$6,427,158 for the period January 2023 through March 2024.⁹ PPL has also tracked
8 supplier charges that exceed the PTC for all customers and identifies accounts in which the
9 supplier is charging **BEGIN CONFIDENTIAL** [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED] **END CONFIDENTIAL.**¹⁰ However, PPL has
14 not undertaken any analysis to compare the SOP customer price to the PTC during the SOP
15 contract terms as I presented above.¹¹

16 Q. DO YOU HAVE ANY CONCERNS ABOUT PPL'S IMPLEMENTATION OF THE SOP
17 VIA ITS THIRD-PARTY CONTRACTOR?

18 A. Yes. PPL's third-party contractor has not been audited or evaluated in terms of compliance
19 in any recent reasonable period.¹² Furthermore, this contractor is allowed to operate their

⁸ PPL St. No. 3, page 14.

⁹ PPL Response to OCA-III-17.

¹⁰ PPL Response to CAUSE-PA-I-7, Attachment 5 (March 2023), **CONFIDENTIAL**

¹¹ PPL Response to OCA-I-6.

¹² PPL Response to OCA-I-17: "PPL Electric has not completed any evaluations or audits of the SOP vendor since January 2021."

1 call center with **BEGIN CONFIDENTIAL** [REDACTED]

2 [REDACTED]

3 [REDACTED] **END CONFIDENTIAL.**¹³ As a result, there is no basis for
 4 any assurance that the contractor has adhered to the script or that customers are properly
 5 informed if they ask questions.

6 Q. WHAT REFORMS DOES PPL RECOMMEND FOR THE SOP?

7 A. PPL’s proposes to continue its SOP with several modifications, including: (1) requiring
 8 SOP suppliers to automatically transfer SOP customers to Default Service upon the
 9 expiration of the SOP contract unless the customer affirmatively elects to remain a
 10 shopping customer; (2) requiring suppliers to lock-in their participation status in the SOP
 11 20 days before the start of the period rather than 5 days; (3) allowing PPL Electric to
 12 communicate with customers to inform them that their SOP contract is ending; and (4)
 13 requiring customer service representatives to offer the SOP to customers only once per
 14 month. PPL Electric is also proposing to modify the SOP script to adjust for any changes
 15 that may be approved by the Commission.¹⁴

16 Q. DO YOU AGREE WITH THESE REFORMS?

17 A. In part. My primary recommendation is to terminate the SOP. Based on the continuing
 18 documentation that customers who enroll may experience either a discount less than 7% as
 19 promised or pay more than the PTC during their SOP contract term, as well as the
 20 documented impact of higher prices under the negative option renewal policy after the SOP
 21 contract ends, the program reflects defects that cannot be corrected. It is inappropriate to

¹³ PPL Response to OCA-I-11, Attachment 1 (contract). **CONFIDENTIAL**

¹⁴ PPL St. No. 3, Direct Testimony of Melinda Stumpf, at 16.

1 inject the EDC into marketing and enrolling customers with an EGS in a mature market
2 that has existed for over 10 years. Furthermore, the lack of consistent EGS participation
3 in the SOP¹⁵ supports my concern that the program is tilted to favor the EGS rather than
4 the customer because the EGSs are clearly deciding when or whether to incur market price
5 risks based on information not available to consumers. What I find very troubling is that
6 PPL enrolls customers in the SOP with a discount that it knows is not actually a benefit to
7 the customer because of the forthcoming change in the PTC, a fact that is known to the
8 Company and the suppliers for at least a 60-day period prior to the rate change. While I
9 agree that the reform recommended by PPL to require that the customer be returned to
10 default service unless the customer has affirmatively agreed to the new contract terms may
11 be a reasonable response to their research, it is a second-best solution. My primary
12 recommendation to terminate the program responds to both PPL's research as well as my
13 concerns about the basic flawed design of the SOP itself.

14 Q. SHOULD PPL CONTINUE TO ACT AS A MARKETING AND ENROLLMENT
15 AGENT FOR SUPPLIERS AS A RESULT OF THIS PROGRAM?

16 A. No. This is not an appropriate role for the EDC and contributes to the confusion among
17 customers. Furthermore, customers have access to robust information about the offers
18 available to them with the upgraded and well-designed PaPowerSwitch web portal that
19 includes many features that did not exist when the web portal was launched in 2010. It is
20 far past time to reconsider the value of this program.

¹⁵ PPL Response to OCA-I-5 documents that during several period no suppliers (e.g., June 1-November 30, 2022) or very few suppliers (e.g., four suppliers from December 1, 2021, to May 31, 2022) participated in the SOP.

1 Q. DO YOU AGREE WITH THE COMMUNICATIONS THAT PPL HAS
2 IMPLEMENTED TO EDUCATE CUSTOMERS ABOUT THEIR SUPPLIER PRICES
3 COMPARED TO THE PTC?

4 A. Yes. PPL has issued text messages and other customer communications when customers
5 are paying more than the PTC.¹⁶ This is an important factual and educational message that
6 reflects PPL's obligation to bill and collect these charges that have been purchased from
7 the supplier under the Purchase of Receivables program. As a result, it is PPL's ratepayers
8 who bear the risk of nonpayment and increased collection costs. However, these messages
9 are needed in part due to the defects in the PPL customer bill in presenting supplier charges
10 in a manner that cannot be easily compared to the PTC.

11 Q. CAN A PPL CUSTOMER SERVED BY AN EGS (THROUGH SOP OR OTHERWISE)
12 ACTUALLY COMPARE THE SUPPLIER PRICE WITH THE APPLICABLE PTC ON
13 PPL'S BILL?

14 A. No. PPL's residential customer bill provides the supplier's total monthly charges in a
15 line item but does not calculate and compare the customer's supplier charges to what the
16 customer would pay had they remained on the PTC.¹⁷ PPL's bill gives the customer the
17 total dollar amount of the EGS charges and includes a statement that gives the current
18 PTC as a cents per kWh rate.¹⁸ I attach this sample EGS bill as Exhibit BA-3. As
19 presented, the customer would have to manually calculate their PTC charges by
20 multiplying the current usage by the PTC rate to compare to the EGS charges. As a

¹⁶ PPL St. No. 3 (Stumpf), Exhibits MS-1 and MS-2.

¹⁷ PPL Response to OCA-1-15.

¹⁸ PPL Response to OCA-I-38, Attachment 1.

1 result, there is a significant defect or discrepancy in the customer's ability to even
2 understand whether their EGS contract (whether obtained in the SOP or otherwise)
3 provides savings compared to the PTC.

4 Q. LOOKING PARTICULARLY AT THE SUPPLIER BILL REFLECTED IN EXHIBIT
5 BA-3, DO YOU SEE AN ADDITIONAL CONCERN THAT PREVENTS THE
6 CUSTOMER FROM BEING ABLE TO COMPARE THE SUPPLIER CHARGES TO
7 THE PTC?

8 A. Yes. The first page of this bill states an "energy charge" of "1,363 KWH @\$0.1199."
9 The fact that this charge is billed by an EGS is not disclosed. The bill also states the
10 "PPL Electric Utilities Price to Compare" is \$0.11028. However, the second page of the
11 bill shows the breakdown of the supplier charges and identifies the EGS. In the "Supply
12 Detail" box, the supplier's charges are presented as a \$0.1199 cents per kWh rate labeled
13 as an "energy charge" for a total of \$163.42 and a "customer charge (32 days)" in the
14 amount of \$44.16. The total of the "supply" charges by this supplier is identified as
15 \$207.58. Thus, while the front of the bill would lead a customer to think that they were
16 paying a rate comparable to PPL (\$0.1199 v. \$0.11028), the customer is actually paying
17 considerably more when one includes the supplier customer charge. When this additional
18 customer charge is included to calculate the actual supplier price, the total dollar amount
19 of the supplier's charges reflects a much higher cents per kWh rate of \$0.1523 (\$207.58
20 divided by 1363 kWh). As a result, the customer is misled into thinking that their
21 supplier rate is close to the PTC disclosed on the front of the bill when in fact it is
22 considerably higher. According to PPL, this "bill ready" bill reflects EGS charges and
23 wording sent by the EGS to PPL and PPL does not perform any calculations or verify the

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1 accuracy of the information presented.¹⁹

2 Q. DOES PPL REQUIRE SUPPLIERS TO PRESENT THEIR CHARGES IN A MANNER
3 THAT ALLOWS FOR A FAIR COMPARISON TO THE PTC?

4 A. No. PPL allows suppliers to present their charges in a manner dictated by the supplier.²⁰

5 As a result, there is no basis for a realistic opportunity to compare the supplier charges
6 with the applicable PTC when a supplier chooses to only present a dollar amount of their
7 charges or, as reflected in Exhibit BA-3, to present their charges in a manner that hides
8 the actual cents per kWh charge under their contract terms when all costs are reflected.

9 This is unlikely to be a unique situation since a recent search of supplier offers on
10 papowerswitch.com to PPL customers indicates that at least 20 suppliers require a
11 monthly charge in addition to a cents per kWh rate in their contracts for residential
12 customers.²¹ I attach this search result from the PaPowerSwitch website as Exhibit BA-
13 4.

14 Q. WHAT BILL DISCLOSURE REFORMS DO YOU RECOMMEND?

15 A. I recommend that PPL promptly revise its bill to show a dollars and cents calculation of
16 the customer's supplier charges with the dollars and cents calculation of what the customer
17 would pay under the PTC. PPL should not allow suppliers to submit "bill ready" charges
18 that do not include a properly calculated cents per kWh rate that reflects all supplier
19 charges. The reliance on comparing a cents per kWh comparison is insufficient,

¹⁹ PPL Response to OCA-III-10.

²⁰ PPL Response to OCA-III-12. PPL allows a "bill ready bill" such as that presented in Exhibit BA-2 in which the supplier's charges are presented without any changes as sent by the EGS.

²¹ The attached spreadsheet shows the supplier offers for a residential PPL customer in Harrisburg, PA conducted on May 13, 2024.

1 particularly when the supplier either does not include such information in its billing detail
 2 or misrepresents its cents per kWh presentation by failing to include the impact of fixed or
 3 additional monthly charges. PPL should not present any supplier cents per kWh charge on
 4 its bills that is not an accurate reflection of the total supplier charges divided by the
 5 customer's monthly kWh usage.

6 **III. PPL'S TOU RATE OPTION FOR RESIDENTIAL CUSTOMERS NEEDS** 7 **SIGNIFICANT REFORM**

8
 9 Q. PLEASE DESCRIBE PPL'S CURRENT TOU RATE OPTION FOR RESIDENTIAL
 10 CUSTOMERS.

11 A. PPL has a TOU rate option available to residential and small commercial customers, but
 12 the enrollment is very low (less than 1% of eligible customers) and with a high level of
 13 customers who leave the program. While PPL currently enrolls about 850-900
 14 customers, 800 customers have left the program since its inception.²²

15 Q. HAS THIS PROGRAM BEEN SUCCESSFUL IN TERMS OF SHIFTING USAGE TO
 16 OFF-PEAK HOURS OR SHOW ANY INDICATION THAT IT WOULD LOWER
 17 WHOLESALE MARKET PRICES IF EXPANDED?

18 A. No. PPL agrees that there is no evidence that this rate option has shifted usage from on-
 19 peak hours to off-peak hours or that it would impact wholesale market prices.²³ While
 20 residential customers experience some savings calculated on an annual basis compared to

²² PPL Response to OCA-I-34 (monthly enrollment) and PPL Response to OCA-I-35 (monthly return to PTC).

²³ PPL Response to OCA-III-3: "PPL Electric agrees that there is no significant difference in peak load reduction between the residential TOU group and the control group."

1 the PTC,²⁴ the potential that these customers have a usage profile that benefits from these
 2 bill savings without any shift in usage to off peak hours is a major concern. A rate design
 3 focused on “free riders” incurs costs without any significant benefits to residential
 4 customers generally.

5 Q. DOES PPL PROVIDE CUSTOMERS WITH THE ABILITY TO CALCULATE THE
 6 IMPACT OF THE TOU RATE OPTION COMPARED TO THE PTC?

7 A. No.²⁵ This is a significant defect in terms of presenting the program to customers who
 8 naturally would want to compare their bills under the current fixed price PTC with a time
 9 of use rate option.

10 Q. WHAT DOES PPL PROPOSE FOR THE TOU PROGRAM IN THIS PROCEEDING?

11 A. According to Mr. Castanaro, “PPL Electric analyzed a variety of on-peak and off-peak
 12 hours for summer and winter terms, as well as for an annual term. The analysis indicates
 13 that shifting the on-peak hours to 3:00 PM to 7:00 PM annually provides slight savings
 14 versus the current summer and winter terms while providing a simplified structure for
 15 customers, which may encourage increased participation in the program. While shifting
 16 on-peak hours to 5:00 PM to 9:00 PM offered the greatest savings, the Company
 17 determined that timeframe may not be preferred by customers and could negatively
 18 impact customer participation.”²⁶

19 Q. HAS PPL EVALUATED THE IMPACT OF THIS PROPOSED CHANGE IN THE
 20 TOU RATE STRUCTURE ON CURRENT TOU CUSTOMERS?

²⁴ PPL Response to OCA-III-4. The total savings vary by customer, but are, however, relatively minor for the residential customer class: 5% for all residential TOU customers in 2022 and 7% in 2023.

²⁵ PPL Response to OCA-I-28.

²⁶ PPL St. No. 1, Direct Testimony of Andrew Castanaro, page 52.

1 A. No.²⁷

2 Q. HAS PPL DEVELOPED ANY COMMUNICATIONS OR MARKETING STRATEGY
3 FOR THEIR PROPOSED CHANGE IN TOU RATE DESIGN?

4 A. No.²⁸

5 Q. HAS PPL EVALUATED WHETHER OR WITH WHAT IMPACT THIS PROPOSED
6 TOU RATE STRUCTURE CHANGE WOULD CAUSE MORE ENROLLMENT?

7 A. No.²⁹ In fact, PPL has not conducted any customer survey about their views and
8 experiences with the current TOU rate option.³⁰

9 Q. IS A TOU RATE COMPATIBLE WITH BUDGET BILLING OR OTHER INDICIA OF
10 PAYMENT DIFFICULTIES AND PAYMENT ARRANGEMENTS?

11 A. No. A customer with different prices based on the time of day needs to “see” how the price
12 signal impacts their monthly bill in order to appropriately respond. However, budget
13 billing that calculates an average monthly payment that is stable and payment plans that
14 allow payment of a lump sum plus a current bill are not compatible with a more volatile
15 time-based pricing plan that requires the customer to understand their hourly electric usage
16 and the impact of different prices during the day. Therefore, there are a substantial number
17 of customers for whom a TOU rate option is not particularly helpful or even
18 understandable, including low usage customers generally, those with electrically powered
19 medical equipment, households that are unable to shift usage from peak hours due to family

²⁷ PPL Response to OCA-III-7 explains that they have not done an analysis of customer bill impact of the proposed rate change on their current TOU customers.

²⁸ PPL Response to OCA-III-8.

²⁹ PPL Response to OCA-III-2.

³⁰ PPL Response to OCA-I-27.

1 and employment obligations, as well as low-income customers who require a stable
2 monthly affordable bill. PPL's TOU rate is not available to its CAP customers, but it is
3 available to "confirmed low income" customers. However, only 90 such customers are
4 enrolled in TOU and, as a result, the resulting analysis was not "meaningful."³¹

5 Q. DOES PPL PURCHASE THIS TOU RATE OPTION IN THE WHOLESALE MARKET?

6 A. No. This rate option is offered without bidding the TOU rates into the market, and instead,
7 PPL reconciles its TOU rates against its default service portfolio. In light of the small level
8 of interest in this program, I agree that pursuing a separate TOU portfolio is neither
9 necessary nor reasonable. However, the low level of interest and enrollment also means
10 that there is no value to default service prices generally from this program.

11 Q. DOES THIS RATE OPTION RESULT IN A COST SHIFT TO NON-TOU
12 CUSTOMERS?

13 A. Yes. While residential TOU customers might see some savings on their bills over time,³²
14 the program results in lower revenues compared to other DSP customers.³³ While the
15 current level of TOU enrollment means that this issue is not significant, the pattern suggests
16 that expanded marketing and enrollment of this program is not reasonable. Nor does this
17 calculation reflect the incremental costs incurred by PPL to market, enroll, bill, and provide
18 account information to these customers with frequent communications and web portal
19 features.

³¹ PPL St. No. 1 (Castanaro), page 53.

³² PPL Response to OCA-III-4. The total savings are, however, relatively minor: 5% for all residential TOU customers in 2022 and 7% in 2023.

³³ PPL Response to OCA-I-40, Attachment 1 documents a net under collection of \$56,905 for the period January 2021 through February 2024. This calculation shows that losses due to off-peak usage exceed the revenues associated with the on-peak periods.

1 Q. IN LIGHT OF THE POOR ENROLLMENT AND LACK OF DOCUMENTED
2 BENEFITS TO THE VAST MAJORITY OF PPL'S RESIDENTIAL CUSTOMERS,
3 WHAT ARE YOUR RECOMMENDATIONS?

4 A. First, I acknowledge that PPL has an obligation to offer a TOU rate program that takes
5 advantage of the expensive Advanced Metering Infrastructure, or "smart meters" paid for
6 by ratepayers. It is unfortunate that the directive is not expressed in a more generic manner
7 to require the development of a rate option or program that relies on the functionalities of
8 the AMI system. As a result, I do not, therefore, recommend that this program be
9 terminated at this time. However, the current rate option does not meet the criteria for a
10 successful program that justifies ratepayer expense, such as adequate customer interest, or
11 resulting peak usage reduction. Such a program should ideally be offered to attract a
12 significant number of customers, result in lower peak usage compared to the participating
13 customer's prior usage profile, and document value by linking the results of the rate option
14 to the lower price for capacity or energy in the wholesale market for all customers. The
15 purpose of the program is not necessarily to provide a benefit only to a small group of
16 customers who enroll but who do not contribute their fair share of revenue to support the
17 customer class.

18 Q. DO YOU HAVE A RECOMMENDATION FOR THE DEVELOPMENT OF
19 ALTERNATIVE RATE OPTIONS?

20 A. Yes, I recommend that PPL develop one or more pilot programs with a properly designed
21 evaluation protocol that targets customers to reduce peak usage with demand response
22 features, such as incentive payments for customers with usage profiles that reflect high
23 usage due to hot water heating, electric home heating, and other appliances that contribute

1 to peak usage. It is not necessary to offer a program that is suited to all residential
2 customers, particularly those with low or modest usage whose profile does not suggest any
3 benefit from shifting usage to non-peak periods. Rather, the program should be focused
4 on a well-developed analysis of customers whose usage pattern will benefit from an
5 incentive to either reduce or shift usage during expensive peak hours. There are several
6 examples of such programs, particularly those being implemented by Maryland's electric
7 distribution companies who offer a peak time rebate to all customers during critical peak
8 days and also are accompanied by the installation of smart thermostats to automate
9 reasonable changes in appliance usage in return for rewards in the form of a bill credit.³⁴
10 Such programs can be monetized in the wholesale market and, if well designed, can benefit
11 all default service customers with lower prices. Furthermore, such a program is likely to
12 make use of the expensive AMI investment in a manner more effective and wider customer
13 interest and participation compared to the current TOU rate option that is poorly
14 subscribed.

15 Q. DOES THIS COMPLETE YOUR TESTIMONY AT THIS TIME?

A. Yes.

³⁴ See, e.g., BGE's savings programs that rely on bill credits and not TOU rates: <https://bgesavings.com/#gsc.tab=0>

BA-1

Resume of Barbara R. Alexander

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AARP

The Utility Reform Network (TURN) (California)

Pennsylvania Office of Consumer Advocate

Public Counsel Unit, Attorney General, Washington

Arkansas Attorney General

The Public Utility Project of New York

Ohio Office of Consumer Counsel

District of Columbia Office of People's Counsel

Delaware Division of Public Advocate

Maryland Office of People's Counsel

Areas of Expertise:

- Default Service, Consumer Protection, Service Quality, and Universal Service policies and programs associated with the alternative rate plans and mergers;
- Consumer Protection and Service Quality policies and programs associated with the regulation of competitive energy and telecommunications providers;
- The regulatory policies associated with the regulation of Credit, Collection, Consumer Protection, Low Income, and Service Quality programs and policies for public utilities;
- Customer Education and Rate design and pricing policies applicable to residential customers; and
- Advanced Metering Infrastructure and Grid Modernization costs and benefits, time-based pricing proposals, and performance standards.

Prior Employment

DIRECTOR

Consumer Assistance Division

1986-96

Maine Public Utilities Commission

Augusta, Maine

One of five division directors appointed by a three-member regulatory commission and part of commission management team. Direct supervision of 10 employees, oversight of public utility consumer complaint function, appearance as an expert witness on customer services, consumer protection, service quality and low income policy issues before the PUC. Chair, NARUC Staff Subcommittee on Consumer Affairs.

SUPERINTENDENT

1979-83

*Bureau of Consumer Credit Protection
Department of Professional and Financial Regulation*

Augusta, Maine

Director of an independent regulatory agency charged with the implementation of Maine Consumer Credit Code and Truth in Lending Act. Investigations and audits of financial institutions and retail creditors, enforcement activities, testimony before Maine Legislature and U.S. Congress.

Education

JURIS DOCTOR

University of Maine School of Law

1973-76

Portland, Maine

Admitted to the Bar of the State of Maine, September 1976. Currently registered as “inactive.”

B.A. (WITH DISTINCTION) IN POLITICAL SCIENCE
University of Michigan

1964-68

Ann Arbor, Michigan

Boards and Commissions

Councilor, Winthrop (ME) City Council

2020-2022

Member, Board of Trustees, University of Maine System

May 2022

Publications and Testimony

“How to Construct a Service Quality Index in Performance-Based Ratemaking”, The Electricity Journal, April, 1996

“The Consumer Protection Agenda in the Electric Restructuring Debate”, William A. Spratley & Associates, May, 1996

Direct Testimony on behalf of the Telecommunications Workers Union, Telecom Public Notice 96-8, Price Cap Regulation and Related Issues, Canadian Radio-Television and Telecommunications Commission, September, 1996. [Analysis of and recommendations concerning the need to regulate service quality in move to price cap regulation]

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Transportation Commission, September, 1996 [Need for and design of a Service Quality Index for both electric and gas business units as part of a multi-year rate plan]

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Direct and Reply Testimony on behalf of the Maryland Office of People’s Counsel, Investigation into Certain Unauthorized Practices (Slamming and Cramming), Case. No. 8776, before the Maryland Public Service Commission, 1998 and 1999.

Direct Testimony on behalf of the Maryland Office of People’s Counsel, Universal Service Issues, Case No. 8745, before the Maryland Public Service Commission, November 20, 1998.

“Cramming is the Last Straw: A Proposal to Prevent and Discourage the Use of the Local Telephone Bill to Commit Fraud,” NRRI Quarterly Bulletin, Fall. 1998.

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Alexander, Barbara, “Consumer Protection Issues in Electric Restructuring for Colorado: A Report to the Colorado Electricity Advisory Panel,” on behalf of the Colorado Office of Consumer Counsel, February 1999.

Testimony on Proposed Interim Rules (Consumer Protection, Customer Enrollment, Code of Conduct, Supplier Licensing) on behalf of the New Jersey Division of Ratepayer Advocate before the New Jersey BPU, May 1999.

Direct Testimony on behalf of AARP, West Virginia PUC Investigation into Retail Electric Competition (consumer protection, universal service, Code of Conduct), June 15, 1999.

Direct and Surrebuttal Testimony on behalf of the Pennsylvania OCA, Natural Gas Restructuring proceedings (8 natural gas utilities): consumer protection; consumer education; code of conduct, before the Pennsylvania PUC, October 1999-April 2000.

Comments on Draft Rules addressing Slamming and Cramming (Docket No. RMU-99-7) on behalf of the Iowa Office of Consumer Advocate, before the Iowa Utilities Board, October 1999.

Alexander, Barbara, "Door to Door Sales of Competitive Energy Services," LEAP Letter, January-February 2000 [Wm. A. Spratley & Associates, Columbus, OH]

Direct Testimony on behalf of the Maine Office of Public Advocate, Central Maine Power Company Alternative Regulation Plan [Docket 99-666] on service quality issues, before the Maine PUC, May 2000.

Direct Testimony on behalf of AARP, Universal Service Programs and Funding of low-income programs for electric and natural gas service, before the New Jersey Board of Public Utilities, Docket No. EX000200091, July, 2000.

Comments (on behalf of NASUCA and AARP) on Uniform Business Practices Reports, May and September 2000.

Direct Testimony on behalf of the Pennsylvania OCA, Verizon-Pennsylvania Structural Separation Plan on service quality, customer service and consumer protection issues [Docket No. M-00001353] before the Pennsylvania PUC, October 2000.

Direct and Rebuttal Testimony on behalf of the Maine Office of Public Advocate, Verizon-Maine Alternative Form of Regulation on service quality issues [Docket No. 99-851] before the Maine PUC, January and February 2001.

Direct and Rebuttal Testimony on behalf of the Citizens Utility Board, Nicor Gas Customer Select Pilot Program, on consumer protection and regulation of competitive natural gas suppliers [Docket Nos. 00-0620 and 00-0621] before the Illinois Commerce Commission, December 2000 and February 2001.

Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate on consumer protection and service quality issues associated with the pending merger between GPU Energy and FirstEnergy, before the Pennsylvania PUC, Docket Nos. A-110300F0095 and A-110400F.0040 (February and March, 2001)

Direct and Surrebuttal Testimony on behalf of the New Jersey Division of Ratepayer Advocate on consumer protection, service quality, and universal service issues associated with the pending merger between GPU Energy and FirstEnergy, before the New Jersey Board of Public Utilities, Docket No. EM00110870 (April 2001).

Alexander, Barbara, "Default Service: What Should be Done When the Experiment Goes Awry?" (April 2001)

Responsive Testimony on behalf of the New Jersey Division of Ratepayer Advocate on service quality issues associated with a Plan for Alternative Regulation by Verizon-New Jersey, before the New Jersey Board of Public Utilities, Docket No. To01020095 (May 2001).

Direct and Surrebuttal Testimony on behalf of the New Jersey Division of Ratepayer Advocate on service quality, consumer protection, and universal service issues associated with the pending merger between Conectiv and Pepco, before the New Jersey Board of Public Utilities, BPU Docket No. EM101050308 (September and November 2001).

Direct Testimony on behalf of the Public Interest Advocacy Centre (and others) on service quality regulation in the context of price cap rate plans, before the Canadian Radio-Television and Telecommunications Commission, Docket No. CRTC 2001-37 (August 2001).

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Alexander, Barbara, "Default Service for Retail Electric Competition: Can Residential and Low-Income Customers be Protected When the Experiment Goes Awry?" (April 2002) Available at www.ncat.org/liheap/pubs/barbadefault3.doc

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Comments on behalf of Consumer Groups before the Texas PUC on Rulemaking Proceeding to Amend Requirements for Provider of Last Resort Service, Docket No. 25360, June 28, 2002.

Direct Testimony on behalf of the New Jersey Division of Ratepayer Advocate before the Board of Public Utilities on Joint Petition of New Jersey-American Water Co. and Thames Water Aqua Holding for Approval of a Change in Control of New Jersey-American Water Co., Docket No. WM01120833, July 18, 2002.

Alexander, Barbara, Consumer Education Programs to Accompany the Move to Retail Electric Competition, prepared for the National Association of State Utility Consumer Advocates (NASUCA), July 2002. Available at www.nasuca.org

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Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania PUC on Philadelphia Gas Works' Gas Restructuring Filing, Docket No. M-00021612, September 2002 and November 2002.

Direct Testimony on behalf of Consumer Groups before the Texas PUC on Notice and Request of Mutual Energy CPL and Mutual Energy WTU for Approval of Changes in Ownership and Affiliation, Docket No. 25957, October 15, 2002.

Comments on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania PUC, Advanced Notice of Proposed Rulemaking for Revision of Chapter 54 Pertaining to Electric Generation Supplier Licensing, Docket No. L-00020158, March 5, 2003.

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Comments and Reply Comments on behalf of AARP before the Maine PUC, Inquiry into Standard Offer Supply Procurement for Residential and Small Commercial Customers, Docket No. 2004-147 (April 2004).

Comments on behalf of Wisconsin Citizens' Utility Board before the Wisconsin Public Service Commission's Gas Service Standards, Docket No. 1-AC-210 (July 2004).

Comments on behalf of the Colorado Office of Consumer Counsel before the Public Utilities Commission of Colorado, In the Matter of the Proposed Repeal and Reenactment of all Rules Regulating Telephone Utilities and Providers (Docket No. 03R-524T) (September 2004).

Direct Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania PUC, Investigation of Metropolitan Edison Co., Pennsylvania Electric Co. and Pennsylvania Power Co. Reliability Performance, Docket no. I-00040102, [customer service and reliability performance] (June 2004).

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Direct and Rebuttal Testimony on behalf of the Maine Office of Public Advocate before the Maine PUC, Investigation into Verizon Maine's Alternative Form of Regulation, Docket No. 2005-155 [Retail Service Quality] (January and May 2006).

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Direct and Rebuttal Testimony on behalf of the Government and Consumer Parties (CUB, Attorney General of Illinois) before the Illinois Commerce Commission, Petition to Initiate Rulemaking with Notice and Comment for Approval of Certain Amendments to Illinois Administrative Code Part 280, Docket No. 06-0379 (May and September 2006). [Consumer Protection rules]

Direct Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania PUC, In Re Application of UGI Utilities, Inc., UGI Utilities Newco, Inc., and Southern Union Co., Docket Nos. A-120011F2000, A-125146, A-125146F5000 (June 2006). [Customer Service, Service Quality, and Universal Services]

Direct and Rebuttal Testimony on behalf of the Maryland Office of People's Counsel before the Maryland PSC, In The Competitive Selection of Electricity Supplier/Standard Offer or Default Service for Investor-Owned Utility Small Commercial Customers and, Delmarva Power and Light and Potomac Electric Power Residential Customers, Case No. 9064 (August and September 2006). [Default Service policies]

Direct and Rebuttal Testimony on behalf of the Maryland Office of People's Counsel before the Maryland PSC, In The Matter of the Optimal Structure of the Electric Industry of Maryland, Case No. 9063 (October and November 2006). [Default service policies]

Comments on behalf of AARP Maine before the Maine PUC on various dockets and notices concerning the implementation of Standard Offer Service for residential customers, Docket Nos. 2006-314, 2006-557, and 2006-411 (July-November 2006). [Default service policies]

Comments on behalf of AARP District of Columbia before the District of Columbia PSC, In the Matter of the Development and Designation of Standard Offer Service in the District of Columbia, Case No. 1017 (2006). [Default service policies]

Comments on behalf of AARP New Jersey before the New Jersey Board of Public Utilities, In the Matter of the Establishment of a Universal Service Fund Pursuant to Section 12 of the Electric Discount and Energy Competition Act of 1999, Docket No. EX00020091 (August 2006) [Recommendations for USF program changes]

Direct and Rebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania PUC, Joint Application of Equitable Resources, Inc. and the People's Natural Gas Co., d/b/a Dominion Peoples, for Approval of the Transfer of All Stock Rights of the Latter to the Former and for the Approval of the Transfer of All Stock of Hope Gas, Inc., d/b/a/ Dominion Hope to Equitable Resources, Inc., Docket No. A-122250F5000 (September and October 2006). [Customer Service, Service Quality, and Universal Service issues]

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Direct and Reply Testimony on behalf of the District of Columbia Government through its Department of Environment before the Public Service Commission of the District of Columbia, In the Matter into the Investigation into the Issues Regarding the Implementation of Dynamic Pricing in the District of Columbia, Formal Case No. 1114 (April and May 2014) [Dynamic pricing policies and programs for residential customers]

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Alexander, Barbara, "An Analysis of State Renewable Energy and Distributed Generation Mandates on Low Income Consumers: Recommendations for Reform" (Oak Ridge National Laboratory, DOE, September 2014)

Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission, Pennsylvania PUC v. West Penn Power, Metropolitan Edison, Penn Power, and Penelec, Dockets Nos. R-2014-2428742-24287245 (November 2014 and January 2015) [FirstEnergy rate cases: customer service; reliability of service; estimated billing protocols; proposed Storm Damage Expense Rider; tariff revisions]

Comments on behalf of Delaware Division of the Public Advocate before the Delaware Public Service Commission, Rulemaking for Retail Electric Competition, PSC Regulation Docket No. 49 (Revised) (January 2015) [consumer protection regulations for retail electric competition]

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Direct Testimony of Barbara Alexander before the Public Utilities Commission of Ohio on behalf of the Office of Consumer Counsel, In the Matter of the Application of Ohio Power Co. for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan, Case No. 16-1852-EL-SSO (May 2017) [Response to proposal for new surcharge for certain distribution grid investments]

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Direct Testimony of Barbara Alexander before the Arkansas Public Service Commission on behalf of the Attorney General of Arkansas, Application of Entergy Arkansas, Inc. for an Order to find Advanced Metering Infrastructure to be in the Public Interest, Docket No. 16-06-U (June 2017) [Analysis of AMI business case; consumer protection policies]

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Direct and Surrebuttal Testimony of Barbara Alexander before the Maryland Public Service Commission on behalf of the Office of People's Counsel, In the Matter of the Application of Potomac Electric Power Co. for Adjustments to its Retail Rates for the Distribution of Electric Energy, Case No. 9443 (June and August 2017) [Service Quality and Reliability of Service]

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Rebuttal Testimony of Barbara Alexander on behalf of the Office of Consumer Advocate, before the Pennsylvania Public Utility Commission, PUC v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2018-2647577 (July 3, 2018) [Analysis of gas utility billing policies for non-commodity services and retail natural gas suppliers]

Direct Testimony of Barbara Alexander on behalf of TURN and Center for Accessible Technology before the California Public Utility Commission, 2018 Rate Design Window, Docket No. A.17-12-011, et al. (October 26, 2018) [Consumer Protections to Accompany the Transition to Default Time of Use Rates for residential customers; analysis of customer education and messaging]

Direct and Surrebuttal Testimony of Barbara Alexander on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Utility Commission, PUC vs. Pittsburgh Water and Sewer Authority, Docket Nos. R-2018-3002645, R-2018-3002647 (September and October 2018) [Analysis of compliance with Pennsylvania consumer protection and service quality performance of a large water and sewer utility; base rate case]

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Direct, Surrebuttal and Supplemental Surrebuttal Testimony of Barbara Alexander on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission, Implementation of Chapter 32 of The Public Utility Code Regarding Pittsburgh Water and Sewer Authority – Stage 1, Docket Nos. M-2018-2640802 and M-2018-2640803 (April, May and August 2019) [Analysis of consumer protection, customer service, and customer education programs of large water and wastewater utility]

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Rebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission, Interstate Gas Supply, Inc., Direct Energy Services LLC and Shipley Choice LLC v. Metropolitan Edison Co., Pennsylvania Electric Col, Pennsylvania Power Col, West Penn Power Co., Docket Nos. C-2019-30138-5 et al. (May 2020) [Complaint by retail suppliers seeking to bill non-basic services on utility bill]

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Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission, Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc, Docket Nos. R-2021-3027385 et al. (November-December 2021) [Base rate case; analysis of customer service and consumer protection programs and policies]

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Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission, Pennsylvania American Water Co., Docket Nos. R-2022-3031672, et al (July and September 2022) [Base rate case: analysis of customer service and consumer protection performance]

Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission, York Water Company base rate increase, Docket Nos. R-2022-3031340, R-2022-3032806 (August and September 2022) [Base rate case: analysis of customer service and consumer protection performance]

Direct, Rebuttal and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission, Columbia Gas of Pennsylvania Proposal for Green Path Tariff, Docket Nos. R-2022-3032167 and C-2022-3032404 (December 2022 and January and February 2023) [Proposal to offer an optional "green" product to residential customers with Renewable Natural Gas and Carbon Offsets]

Direct, Rebuttal, and Surrebuttal Testimony on behalf of AARP Maine before the Maine Public Utilities Commission, Central Maine Power Company Request for Distribution Rate Increase and Rate Design Changes, Docket No. 2022-00152 (December 2022, March and April 2023) [Rate impacts; multi-year rate plan; rate design]

Direct and Surrebuttal Testimony on behalf of AARP Maine before the Maine Public Utilities Commission, Versant Power Request for Approval of Rate Change, Docket No. 2022-00255 (January and April 2023) [Rate impacts, AMI costs and benefits]

Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utilities Commission, Application of Manwalamink Water and Sewer and NextEra Water Pennsylvania, Docket Nos. A-2022-3035298, et al. (January and March 2023) [consumer protection; service quality; acquisition of small water and sewer utility]

Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utilities Commission, National Fuel Gas Distribution Corp. Base Rate Case, Docket No. R-2022-3035730 (January and March 2023) [analysis of consumer protection and service quality performance in base rate case]

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Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utilities Commission, FirstEnergy Pennsylvania Electric Distribution Companies Application for Merger, Docket No. A-2023-3038771 et.al (June and August 2023) [analysis of implication of proposed merger for customer service performance and low income programs]

Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utilities Commission, Pittsburgh Water and Sewer Authority Base Rate Case, Docket No. R-2023-3039920, et al., (August and September 2023) [customer service performance; compliance with statutory and regulatory rules; multi-year rate plan conditions]

Direct and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utilities Commission, Application of Pennsylvania-American Water Co. to Acquire Wastewater Assets of Borough of Brentwood, Docket No. A-2021-3024058 (October and November 2023) [analysis of public benefits of acquisition]

Direct, Supplemental Direct, and Surrebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utilities Commission, Pennsylvania PUC v. Pennsylvania American Water Co., Docket Nos. R-2023-3043189 and R-2023-3043190 (February and March 2024) [customer service performance, compliance with statutory and regulatory rules; billing for non-basic services; tariffs]

Direct Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utilities Commission, Pennsylvania PUC v. Peoples Natural Gas Company LLC, Docket No. R-2023-3044549 (March 2024) [customer service performance, compliance with statutory and regulatory rules; billing for non-basic services; tariffs]

Presentations and Training Programs:

- Presentation on Consumer Protection Policies for Solar Providers, New Mexico Public Regulatory Commission, Santa Fe, NM, January 2017
- Presentation on Residential Rate Design Policies, National Energy Affordability and Energy Conference, Denver, CO., June 2016
- Presentation on “Regulatory-Market Arbitrage: From Rate Base to Market and Back Again,” before the Harvard Electricity Policy Group, Washington, D.C., March 2016.
- Presentation on Residential Rate Design and Demand Charges, NASUCA, November 2015.
- Alexander, Barbara, “Residential Demand Charges: A Consumer Perspective,” presentation for Harvard Electricity Policy Group, Washington, D.C., June 2015.
- Presentation on “Future Utility Models: A Consumer Perspective,” for Kleinman Center for Energy Policy, U. of Pennsylvania, August 2015.
- Presentation, EUCI Workshop on Demand Rates for Residential Customers, Denver, CO [May 2015]
- Presentation, Smart Grid Future, Brookings Institute, Washington, DC [July 2010]
- Participant, Fair Pricing Conference, Rutgers Business School, New Jersey [April 2010]
- Presentation on Smart Metering, National Regulatory Conference, Williamsburg, VA [May 2010]
- Presentation on Smart Metering, Energy Bar Association Annual Meeting, Washington, DC [November 2009]
- Presentation at Workshop on Smart Grid policies, California PUC [July 2009]
- National Energy Affordability and Energy Conference (NEAUC) Annual Conference
- NARUC annual and regional meetings
- NASUCA annual and regional meetings
- National Community Action Foundation’s Annual Energy and Community Economic Development Partnerships Conference
- Testimony and Presentations to State Legislatures: Virginia, New Jersey, Texas, Kentucky, Illinois, and Maine
- Training Programs for State Regulatory Commissions: Pennsylvania, Georgia, Kentucky, Illinois, New Jersey
- DOE-NARUC National Electricity Forum
- AIC Conference on Reliability of Electric Service
- Institute of Public Utilities, MSU (Camp NARUC) [Instructor 1996-2006]
- Training Programs on customer service and service quality regulation for international regulators (India and Brazil) on behalf of Regulatory Assistance Project
- Georgia Natural Gas Deregulation Task Force [December 2001]
- Mid Atlantic Assoc. of Regulatory Utility Commissioners [July 2003]
- Illinois Commerce Commission’s Post 2006 Initiative [April 2004]
- Delaware Public Service Commission’s Workshop on Standard Offer Service [August 2004]

BA-2

PPL Response to OCA 1-7, Attachment 2

MONTH	GROUP	PTC_RATE	SOP_RATE	COUNT	ACTUAL DISCOUNT
2021-01	Residential	\$0.07317	\$0.06805	2,799	
2021-02	Residential	\$0.07317	\$0.06805	2,826	
2021-03	Residential	\$0.07317	\$0.06805	2,814	
2021-04	Residential	\$0.07317	\$0.06805	2,768	
2021-05	Residential	\$0.07317	\$0.06805	2,626	
2021-06	Residential	\$0.07544	\$0.07016	2,803	
2021-07	Residential	\$0.07544	\$0.07016	2,722	
2021-08	Residential	\$0.07544	\$0.07016	3,114	
2021-09	Residential	\$0.07544	\$0.07016	3,419	
2021-10	Residential	\$0.07544	\$0.07016	4,532	
2021-11	Residential	\$0.07544	\$0.07016	7,725	
2021-12	Residential	\$0.09502	\$0.08837	13,440	1.16%
2022-01	Residential	\$0.08941	\$0.08315	5,118	1.16%
2022-02	Residential	\$0.08941	\$0.08315	5,068	1.16%
2022-03	Residential	\$0.08941	\$0.08315	5,827	1.16%
2022-04	Residential	\$0.08941	\$0.08315	5,546	1.16%
2022-05	Residential	\$0.08941	\$0.08315	30,142	1.16%
2022-06	Residential	\$0.12366	\$0.11500	41,563	28.54%
2022-07	Residential	\$0.12366	\$0.11500	298	28.54%
2022-08	Residential	\$0.12366	\$0.11500	81	28.54%
2022-09	Residential	\$0.12366	\$0.11500	55	28.54%
2022-10	Residential	\$0.12366	\$0.11500	57	28.54%
2022-11	Residential	\$0.12366	\$0.11500	136	28.54%
2022-12	Residential	\$0.14612	\$0.13589	2,112	
2023-01	Residential	\$0.14612	\$0.13589	2,895	
2023-02	Residential	\$0.14612	\$0.13589	3,120	
2023-03	Residential	\$0.14612	\$0.13589	2,073	
2023-04	Residential	\$0.14612	\$0.13589	1,438	
2023-05	Residential	\$0.14612	\$0.13589	1,627	-12.06%
2023-06	Residential	\$0.12126	\$0.11277	2,732	-12.06%
2023-07	Residential	\$0.12126	\$0.11277	2,134	-12.06%
2023-08	Residential	\$0.12126	\$0.11277	2,447	-12.06%
2023-09	Residential	\$0.12126	\$0.11277	1,565	-12.06%
2023-10	Residential	\$0.12126	\$0.11277	1,521	-12.06%
2023-11	Residential	\$0.12126	\$0.11277	1,522	-12.06%
2023-12	Residential	\$0.11028	\$0.10256	2,234	-23.22%
2024-01	Residential	\$0.11028	\$0.10256	1,922	-23.22%
2024-02	Residential	\$0.11028	\$0.10256	1,639	-23.22%
2024-03	Residential	\$0.11028	\$0.10256	1,286	-23.22%

BA-3

PPL Response to OCA 1-38, Attachment 1



We deliver.

1-800-342-5775
For hours of operation and to
pay/manage your account, visit
ppl electric.com.

Meter [REDACTED] Account [REDACTED]

Due Date	Amount Due
4/2/24	\$475.34

[Billing Details on Back](#)

Because of Other Charges, your amount due does not equal your Usage Charges.

Service to:



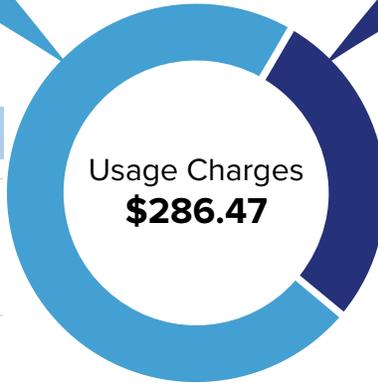
Supply	\$207.58	Usage from Feb 8 - Mar 11	\$78.89	Delivery
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Effective Date
6/8/23

ENERGY CHARGE 1,363 KWH @ \$0.1199

PPL Electric Utilities Price to Compare

\$0.11028 Use this price when comparing supplier offers.



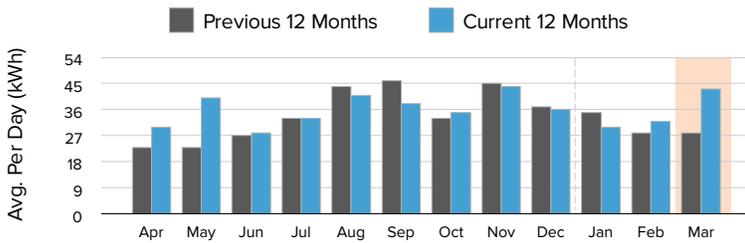
WANT TO SAVE?

Clean or replace furnace and air filters at least every 3 months. Dirty filters block air flow.

SHOP FOR ELECTRICITY

Visit PAPowerSwitch.com or www.oca.state.pa.us
If you're shopping, know your contract expiration date.
Account Number: [REDACTED]
The price to compare is updated June 1st and December 1st.
Rate: RS. View schedule at ppl electric.com/rates

Usage Summary



For usage and billing details, visit us online at ppl electric.com

March

Electricity Usage (kWh)	Avg. Temperature	Avg. Daily Cost
+63%	-2°	+53%
834 (2023) / 1363 (2024)	43° (2023) / 41° (2024)	\$5.84 (2023) / \$8.95 (2024)

Questions/concerns? Contact us by 4/2/24

1-800-342-5775
Visit ppl electric.com for hours of operation.

Correspondence to:
PPL Customer Service
827 Hausman Road
Allentown, PA 18104-9392

Account Number	Due Date	Amount Due
[REDACTED]	4/2/24	\$475.34

Amount Enclosed:

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Please make check payable to: PPL ELECTRIC UTILITIES
PO BOX 419054
ST LOUIS, MO 63141-9054



kWh Delivered (to Customer)			
Meter Number	Reading Dates	Meter Reading	Kilowatt-Hours
[REDACTED]	Mar 11	76618	1363
	Feb 8	75255	
Days Billed: 32		Avg. kWh/Day: 43	Total Delivered: 1363
Date Range	Annual Total Usage	Avg Monthly	
Apr 2023 - Mar 2024	13127 kWh	1094 kWh	

Next meter reading on or about: Apr 10, 2024.
 State taxes this bill: About \$2.59. PA Gross Receipts Tax: About \$15.79.

Supply Details	
Generation & Transmission Charges for Feb 8-Mar 11	
State Sales Tax	0.00
ENERGY CHARGE 1,363 KWH @ \$0.1199	163.42
CUSTOMER CHARGE (32 DAYS)	44.16
Gross Receipts Tax \$9.64	
Total [REDACTED] Charges	\$207.58

For questions on these charges, please contact this supplier at:



General information: Generation prices and charges are set by the electric generation supplier you have chosen. The Public Utility Commission regulates distribution rates and services. The Federal Energy Regulatory Commission regulates transmission prices and services.

Billing Summary	
Previous Balance	\$294.88
Payment Received - Thank You!	-\$40.00
Balance as of Mar 12, 2024	\$186.54
Total Supply Charges	\$207.58
Total Delivery Charges	\$78.89
Other Charges	
Late Payment Charge	\$2.33
Total Other Charges	\$2.33

Amount Due By 4/2/24	\$475.34
Account Balance	\$475.34

Delivery Details	
Distribution Charges	
Residential Rate: RS for Feb 8 - Mar 11	
Customer Charge	15.77
1,363 kWh at 4.717¢ per kWh	64.30
Tax Cut and Jobs Act Credit at -7.67%	-4.78
System Improvement Charge at 5.00%	3.76
PA Tax Adj Surcharge at -0.208%	-0.16
Total Delivery Charges	\$78.89

Understanding Your Bill

- Act 129 Compliance Rider** - Monthly charge to recover costs for energy efficiency and conservation programs approved by the PUC.
- Customer Charge** - The basic service charge to partially cover costs for billing, meter reading, equipment and service line maintenance. If you select a new supplier, the name, address and telephone number for both your distribution and supplier company will appear on your bill.
- Distribution Charge (Delivery)** - Part of the basic service charges on every customer's bill for delivering electricity from the electric distribution company to your home or business. The distribution charge is regulated by the Public Utility Commission. This charge will vary according to how much electricity you use.
- Kilowatt-hour (kWh)** - The basic unit of electric energy for which most customers are charged in cents per kilowatt-hour. A kilowatt-hour is the equivalent of using ten 100-watt light bulbs for one hour.
- Late Payment Charge** - Charge added if you do not pay your bill by the due date.
- kWh Delivered** - The amount of electricity we delivered to you for your use.
- Storm Damage Expense Rider** - Monthly charge to recover certain costs to make repairs after major storms.
- System Improvement Charge** - Monthly charge to recover costs for improving, repairing and replacing equipment that delivers electricity to your home or business.



Account Number	Due Date	Amount Due
[REDACTED]	4/2/24	\$475.34

Understanding Your Bill - Continued

Smart Meter Rider - Monthly charge to recover costs associated with the smart meter programs approved by the PUC.

State Tax Adjustment Surcharge - Monthly charge or credit to reflect changes in various state taxes. The surcharge may vary by bill component.

Tax Cut and Jobs Act Credit - Monthly adjustment for federal tax changes.

Type(s) of Meter Readings:

Actual - Measures your monthly electricity use based on an actual reading.

BA-4

Results of Search on PAMPowerSwitch for
Supplier Offers for a Residential PPL
Customer in Harrisburg, PA, Conducted on
May 13, 2024

Price	Supplier	Type	Cancellation	Discounts available?	Introductory price?	More info	Service Type	Rate type	Term Length	PA wind	Renewable E	Term End Date	Enrollment Fee	Monthly service fee amount	Contact Phone Number
0.0948	Achieve Energy Solutions LLC DBA EnergyPricing.com	Fixed	No	No	No	Achieve Energy Solutions, LLC d/	Residential	RS - Regular	7	No	No	No	No		1-800-225-3813
0.0909	Achieve Energy Solutions LLC DBA EnergyPricing.com	Fixed	150	No	No	Achieve Energy Solutions, LLC d/	Residential	RS - Regular	6	No	No	No	No		1-800-225-3813
0.0949	Achieve Energy Solutions LLC DBA EnergyPricing.com	Fixed	75	No	No	Achieve Energy Solution, LLC d/	Residential	RS - Regular	12	No	No	No	No		1-800-225-3813
0.1038	Achieve Energy Solutions LLC DBA EnergyPricing.com	Fixed	No	No	No	Achieve Energy Solutions, LLC d/	Residential	RS - Regular	18	No	No	No	No		1-800-225-3813
0.1019	Achieve Energy Solutions LLC DBA EnergyPricing.com	Fixed	No	No	No	Achieve Energy Solutions, LLC d/	Residential	RS - Regular	14	No	No	No	No		1-800-225-3813
0.0985	AEP Energy	Fixed	No	No	No	Enroll in this price plan and you'l	Residential	RS - Regular	18	No	No	No	No		1-877-648-1923
0.0919	AEP Energy	Fixed	No	No	No	Enroll in this price plan and you'l	Residential	RS - Regular	12	No	No	No	No		1-877-648-1923
0.1125	AEP Energy	Fixed	No	No	No	Enroll in this price plan and you'l	Residential	RS - Regular	36	No	No	No	No		1-877-648-1923
0.1159	AEP Energy	Fixed	No	No	No	Enroll in this price plan and you'l	Residential	RS - Regular	36	No	Yes	No	No		1-877-648-1923
0.0879	AEP Energy	Fixed	No	No	No	Enroll in this price plan and you'l	Residential	RS - Regular	6	No	No	No	No		1-877-648-1923
0.109	Agway Energy Services LLC	Variable	No	No	No	In order to help you make the mc	Residential	RS - Regular	0	No	No	No	No		888-982-4929
0.109	Agway Energy Services LLC	Variable	No	No	No	In order to help you make the mc	Residential	RS - Regular	0	No	Yes	No	No		888-982-4929
0.15	Alpha Gas and Electric LLC	Fixed	No	No	No	Green-e certified Electric, 2 Year	Residential	RS - Regular	0	No	No	No	No		845-810-0088
0.0589	American Power & Gas of Pennsylvania LLC	Variable	No	Yes	No	Our famous 25% rebate is availa	Residential	RS - Regular	1	No	Yes	No	No		800-380-9261
0.1193	American Power & Gas of Pennsylvania LLC	Fixed	Yes	No	No	Our famous 25% rebate is availa	Residential	RS - Regular	12	No	Yes	No	No		800-380-9261
0.0698	American Power & Gas of Pennsylvania LLC	Fixed	No	No	No	Switch to our electric plan today	Residential	RS - Regular	3	No	Yes	No	No		800-380-9261
0	American Power & Gas of Pennsylvania LLC	Unlimited	50	No	No	Flat Rate supply plans start at \$1	Residential	RS - Regular	48	No	No	No	No		800-380-9261
0.0879	American Power & Gas of Pennsylvania LLC	Fixed	No	No	No	Switch to our electric plan today	Residential	RS - Regular	3	No	Yes	No	No		800-380-9261
0.1203	American Power & Gas of Pennsylvania LLC	Fixed	No	No	No	Our famous 25% rebate is availa	Residential	RS - Regular	0	No	Yes	No	No		800-380-9261
0.0890	American Power & Gas of Pennsylvania LLC	Variable	No	Yes	No	Our famous 25% rebate is availa	Residential	RS - Regular	1	No	Yes	No	No		800-380-9261
0.1049	American Power & Gas of Pennsylvania LLC	Variable	No	No	No	Our famous 25% rebate is availa	Residential	RS - Regular	1	No	Yes	No	No		800-380-9261
0.1349	American Power & Gas of Pennsylvania LLC	Variable	No	No	No	Our famous 25% rebate is availa	Residential	RS - Regular	1	No	Yes	No	No		800-380-9261
0.0918	AP Gas & Electric (PA), LLC dba APG&E	Fixed	No	No	No	Don't get caught paying high enr	Residential	RS - Regular	7	No	No	No	No		877-544-4857
0.1088	AP Gas & Electric (PA), LLC dba APG&E	Fixed	No	No	No	Don't get caught paying high enr	Residential	RS - Regular	36	No	No	No	No		877-544-4857
0.1098	AP Gas & Electric (PA), LLC dba APG&E	Fixed	No	No	No	Don't get caught paying high enr	Residential	RS - Regular	24	No	No	No	No		877-544-4857
0.0984	AP Gas & Electric (PA), LLC dba APG&E	Fixed	No	No	No	Don't get caught paying high enr	Residential	RS - Regular	18	No	No	No	No		877-544-4857
0.0948	AP Gas & Electric (PA), LLC dba APG&E	Fixed	0	No	No	Don't get caught paying high enr	Residential	RS - Regular	14	No	No	No	No		877-544-4857
0.1199	Astral Energy LLC	Fixed	No	No	No	Looking for a short-term fixed plr	Residential	RS - Regular	3	No	No	No	No		888-850-1872
0.0939	Better Buy Energy	Fixed	No	No	No	One full year of price protection.	Residential	RS - Regular	12	No	No	No	No		833-200-9831
0.0889	Better Buy Energy	Fixed	No	No	No	Get a guaranteed rate for up to 7	Residential	RS - Regular	7	No	No	No	No		833-200-9831
0.0969	Brighten Energy	Fixed	No	No	No	Choose renewable energy for a y	Residential	RS - Regular	12	No	Yes	No	No		833-223-0917
0.0989	Brighten Energy	Fixed	No	No	No	Showing your commitment to cle	Residential	RS - Regular	15	No	Yes	No	No		833-223-0917
0.0919	Brighten Energy	Fixed	No	No	No	Power your home with 100% cle	Residential	RS - Regular	7	No	Yes	No	No		833-223-0917
0.11	Cirro Energy	Fixed	No	No	No	Choose the Smart Secure PS 12	Residential	RS - Regular	12	No	No	No	No		844-845-6151
0.106	Cirro Energy	Fixed	No	No	No	Choose the Smart Secure PS 8 p	Residential	RS - Regular	6	No	No	No	No		844-845-6151
0.109	Cirro Energy	Variable	No	Yes	No	Choose the Smart Flex PS 3 plan	Residential	RS - Regular	3	No	No	No	No		844-845-6151
0.124	Cirro Energy	Fixed	No	No	No	Choose the Smart Secure PS 24	Residential	RS - Regular	24	No	No	No	No		844-845-6151
0.08	CleanChoice Energy	Variable	No	Yes	No	This web-exclusive pricing is ava	Residential	RS - Regular	3	No	Yes	No	No		1-800-460-4900
0.1139	Cleanview Energy	Fixed	150	No	No	CLEARCHARGE12PLUS Fixed Kil	Residential	RS - Regular	12	No	No	January 01, 0001	No		800-746-4702
0.1139	Constellation Energy	Fixed	150	No	No	What you get: A 90-day custome	Residential	RS - Regular	24	No	No	No	No		1-855-799-7022
0.1079	Constellation Energy	Fixed	150	No	No	What you get: A 90-day custome	Residential	RS - Regular	12	No	No	No	No		1-855-799-7022
0.0969	Direct Energy	Fixed	No	No	No	Direct Energy gives you price stal	Residential	RS - Regular	9	No	No	No	No		855-331-0021
0.1029	Direct Energy	Fixed	No	No	No	Direct Energy gives you price stal	Residential	RS - Regular	12	No	No	No	No		855-331-0021
0.1089	Direct Energy	Fixed	No	No	No	Direct Energy gives you price stal	Residential	RS - Regular	18	No	No	No	No		855-331-0021
0.1099	Direct Energy	Fixed	No	No	No	Direct Energy gives you price stal	Residential	RS - Regular	24	No	No	No	No		855-331-0021
0.0899	Dynegy	Fixed	No	No	No	Get a guaranteed rate for up to 7	Residential	RS - Regular	7	No	No	No	No		833-223-0914
0.0949	Dynegy	Fixed	No	No	No	Rest easy with a guaranteed elec	Residential	RS - Regular	12	No	No	No	No		833-223-0914
0.0969	Dynegy	Fixed	No	No	No	Seasons change, but your rate d/	Residential	RS - Regular	15	No	No	No	No		833-223-0914
0.1029	Eligo Energy	Fixed	No	No	No		Residential	RS - Regular	12	No	No	No	No		888-410-5081
0.1219	Eligo Energy	Fixed	No	No	No	100% green energy product matr	Residential	RS - Regular	12	No	Yes	No	No		888-410-5081
0.1599	Energy Co-op	Variable	No	No	No	Support cleaner air and the local	Residential	RS - Regular	0	Yes	Yes	No	No		215.413.2122
0.1149	Energy Co-op	Variable	No	No	No	Choose 100% wind and solar fro	Residential	RS - Regular	0	No	Yes	No	No		215.413.2122
0.1299	Energy Co-op	Fixed	No	No	No	Choose 100% wind and solar fro	Residential	RS - Regular	12	No	Yes	30-Apr-25	No		215.413.2122
0.1699	Energy Co-op	Fixed	No	No	No	Support cleaner air and the local	Residential	RS - Regular	12	Yes	Yes	30-Apr-25	No		215.413.2122
0.1048	Energy Cooperative of America	Variable	No	No	No		Residential	RS - Regular	0	No	No	No	No		1-800-422-1475
0.1048	Energy Cooperative of America	Variable	No	No	No		Residential	RS - Regular	0	No	No	No	No		1-800-422-1475
0.0899	Energy Harbor LLC	Fixed	No	No	No	Length of Agreement: Up to 7 mc	Residential	RS - Regular	7	No	No	No	No		504-350-0310
0.0949	Energy Harbor LLC	Fixed	No	No	No	Length of Agreement: Up to 12 m	Residential	RS - Regular	12	No	No	No	No		504-350-0310
0.0989	Energy Harbor LLC	Fixed	No	No	No	Length of Agreement: Up to 15 m	Residential	RS - Regular	15	No	No	No	No		504-350-0310
0.0999	Energy Harbor LLC	Fixed	No	No	No	Lock in a low rate for 12 months!	Residential	RS - Regular	12	No	No	No	No		1-866-777-5159
0.0929	Frontier Utilities Northeast LLC	Fixed	No	No	No	Lock in a low rate for 8 months!	Residential	RS - Regular	6	No	No	No	No		1-866-777-5159
0.169	Green Mountain Energy Company	Fixed	No	No	No	All of our residential customers	Residential	RS - Regular	12	Yes	Yes	No	No		855-724-6473
0.11	Green Mountain Energy Company	Fixed	No	No	No	All of our residential customers	Residential	RS - Regular	12	No	Yes	No	No		855-724-6473
0.113	Green Mountain Energy Company	Fixed	No	No	No	All of our residential customers	Residential	RS - Regular	12	No	Yes	No	No		855-724-6473
0.0993	IDT Energy, Inc.	Fixed	No	No	No	Our 6-month fixed supply rate. G	Residential	RS - Regular	6	No	No	No	No		877-887-6866
0.1193	IDT Energy, Inc.	Fixed	No	No	No	Our 6-month fixed supply rate. G	Residential	RS - Regular	6	No	Yes	No	No		877-887-6866

0.1099	IGS Energy	Fixed	99	No	No	How you benefit: With a fixed rate	Residential	RS - Regular	12	No	Yes	No	No	1-800-280-4474
0.1379	IGS Energy	Fixed	199	No	No		Residential	RS - Regular	36	No	Yes	No	No	1-800-280-4474
0.1279	IGS Energy	Fixed	149	No	No	How you benefit: With a fixed rate	Residential	RS - Regular	24	No	Yes	No	No	1-800-280-4474
0.0889	Inspire Clean Energy	Fixed	No	No	No	Inspire is a clean energy supplier	Residential	RS - Regular	6	No	Yes	No	No	844-275-4022
0.0919	Inspire Clean Energy	Fixed	No	No	No	Inspire is a clean energy supplier	Residential	RS - Regular	12	No	Yes	No	No	844-275-4022
0.0959	Inspire Clean Energy	Fixed	No	No	No	Inspire is a clean energy supplier	Residential	RS - Regular	24	No	Yes	No	No	844-275-4022
0.0939	Inspire Clean Energy	Fixed	No	No	No	Inspire is a clean energy supplier	Residential	RS - Regular	18	No	No	No	No	844-275-4022
0.0879	Just Energy	Fixed	50	No	No	If you call us to cancel, Just Ener	Residential	RS - Regular	12	No	No	No	19.99	866-239-5107
0.0979	Just Energy	Fixed	50	No	No	If you call us to cancel, Just Ener	Residential	RS - Regular	24	No	No	No	19.99	866-239-5107
0.0999	Just Energy	Fixed	50	No	No	If you call us to cancel, Just Ener	Residential	RS - Regular	36	No	No	No	19.99	866-239-5107
0.1049	Just Energy	Fixed	50	No	No	If you call us to cancel, Just Ener	Residential	RS - Regular	60	No	No	No	19.99	866-239-5107
0.159	Mpower Energy NI LLC	Fixed	No	No	No		Residential	RS - Regular	12	No	Yes	No	No	877-286-7693
0.096	New Wave Energy	Fixed	\$99.00	No	Yes	Enroll online at https://nwecncr	Residential	RS - Regular	3	No	No	No	No	716-887-9700
0.095	New Wave Energy	Fixed	\$99.00	No	No	Enroll online at https://nwecncr	Residential	RS - Regular	6	No	No	No	No	716-887-9700
0.098	New Wave Energy	Fixed	\$99.00	No	No	Enroll online at https://nwecncr	Residential	RS - Regular	12	No	No	No	No	716-887-9700
0.103	New Wave Energy	Fixed	\$199.00	No	No	Enroll online at https://nwecncr	Residential	RS - Regular	24	No	No	No	No	716-887-9700
0.108	New Wave Energy	Fixed	199	No	No	Enroll online at https://nwecncr	Residential	RS - Regular	36	No	No	No	No	716-887-9700
0.081	New Wave Energy	Variable	NO	No	Yes	Enroll online at https://nwecncr	Residential	RS - Regular	1	No	Yes	No	No	716-887-9700
0.0999	NextEra Energy Services Pennsylvania LLC	Fixed	No	No	No	Lock in a low rate for 12 months!	Residential	RS - Regular	12	No	No	No	No	800-882-1276
0.0929	NextEra Energy Services Pennsylvania LLC	Fixed	No	No	No	Lock in a low rate for 6 months!	Residential	RS - Regular	6	No	No	No	No	800-882-1276
0.0989	NextEra Energy Services Pennsylvania LLC	Fixed	\$10/Month	Rc	No	Lock in a low rate for 12 months!	Residential	RS - Regular	12	No	No	No	No	800-882-1276
0.10599	Nordic Energy Services LLC	Variable	No	No	No	No early termination fees!	Residential	RS - Regular	2	No	No	No	No	630-321-0888
0.1099	North American Power	Fixed	10	No	No	25% renewable energy locked in	Residential	RS - Regular	12	No	No	No	No	877-572-9965
0.1194	North American Power	Fixed	10	No	No	100% renewable energy locked in	Residential	RS - Regular	12	No	Yes	No	No	877-572-9965
0.1089	North American Power	Fixed	10	No	No	25% renewable energy locked in	Residential	RS - Regular	14	No	No	No	No	877-572-9965
0.113	NRG Home	Fixed	No	No	No	The PA Power Switch Fixed Plan	Residential	RS - Regular	12	No	Yes	No	No	855-692-8330
0.0859	Pennsylvania Gas & Electric	Fixed	50	No	No	Get peace of mind with a fixed ra	Residential	RS - Regular	12	No	No	No	9.95	888-947-7880
0.0889	Pennsylvania Gas & Electric	Fixed	50	No	No	Get peace of mind with a fixed ra	Residential	RS - Regular	15	No	No	No	9.95	888-947-7880
0.0819	Pennsylvania Gas & Electric	Fixed	50	No	No	Get peace of mind with a fixed ra	Residential	RS - Regular	7	No	No	No	9.95	888-947-7880
0.1176	Powervine Energy	Fixed	No	No	No	Fixed Rate. No hidden fees. No n	Residential	RS - Regular	6	No	No	No	0	1-888-263-2806
0.1133	Powervine Energy	Fixed	No	No	No	Fixed Rate. No hidden fees. No n	Residential	RS - Regular	12	No	No	No	0	1-888-263-2806
0.117	Powervine Energy	Fixed	No	No	No	Fixed Rate. No hidden fees. No n	Residential	RS - Regular	24	No	No	No	0	1-888-263-2806
0.0809	Public Power, LLC	Fixed	50	No	No	With a fixed rate from Public Pow	Residential	RS - Regular	12	No	No	No	14.95	888-354-4415
0.0969	Public Power, LLC	Fixed	No	No	No	With a fixed rate from Public Pow	Residential	RS - Regular	15	No	No	No	14.95	888-354-4415
0.0769	Public Power, LLC	Fixed	50	No	No	With a fixed rate from Public Pow	Residential	RS - Regular	7	No	No	No	14.95	888-354-4415
0.0987	Residents Energy LLC	Fixed	No	No	No	Residents Energy ResiSURE: Loc	Residential	RS - Regular	6	No	No	No	No	1-888-828-RESI(7374)
0.1187	Residents Energy LLC	Fixed	No	No	No	Residents Energy ResiSURE: Loc	Residential	RS - Regular	6	No	Yes	No	No	1-888-828-RESI(7374)
0.0869	Major Energy	Fixed	No	No	No	You may be able to lock in your fi	Residential	RS - Regular	12	No	No	No	0	1-888-625-6760
0.0949	Major Energy	Fixed	No	No	No	A great time for new customers t	Residential	RS - Regular	12	No	No	No	No	1-888-625-6760
0.0949	Major Energy	Fixed	No	No	No	Simple Choice 15: Only applicab	Residential	RS - Regular	15	No	No	No	4.99	1-888-625-6760
0.0949	Major Energy	Fixed	No	No	No	Simple Choice 10: Only applicab	Residential	RS - Regular	10	No	No	No	9.99	1-888-625-6760
0.1895	RPA Energy dba Green Choice Energy	Fixed	\$100, if there	No	No	100% of the electricity you purch	Residential	RS - Regular	12	No	Yes	No	No	800-685-0960
0.2912	RPA Energy dba Green Choice Energy	Variable	No	No	No	No Cancellation/Early Terminat	Residential	RS - Regular	0	No	Yes	No	No	800-685-0960
0.0807	Santanna Energy Services	Fixed	\$120.00	No	No	Santanna's Competitive Fixed Pr	Residential	RS - Regular	12	No	No	No	No	866-752-1907
0.0848	Santanna Energy Services	Fixed	\$120.00	No	No	Santanna's Competitive Fixed Pr	Residential	RS - Regular	6	No	No	No	No	866-752-1907
0.1009	Santanna Energy Services	Fixed	\$120.00	No	No	Santanna's 100% Renewable Fix	Residential	RS - Regular	12	No	Yes	No	5.99	866-752-1907
0	Santanna Energy Services	Unlimited	\$120.00	No	No	Use all the natural gas and electr	Residential	RS - Regular	12	No	No	No	No	866-752-1907
0.0697	SFE Energy Pennsylvania, Inc.	Fixed	\$7.50	No	Yes	Online offer only and this offer is	Residential	RS - Regular	6	No	No	No	20.99	1-877-316-6344
0.1009	Shipley Energy	Fixed	No	No	No	Shopping for Electric Supply just	Residential	RS - Regular	12	No	No	No	No	866-477-9180
0.0959	Shipley Energy	Fixed	No	No	No	Shopping for Electric Supply just	Residential	RS - Regular	6	No	No	No	No	866-477-9180
0.1037	Shipley Energy	Fixed	No	No	No	Support renewable energy today	Residential	RS - Regular	12	No	Yes	No	No	866-477-9180
0.0987	Shipley Energy	Fixed	No	No	No	Support renewable energy today	Residential	RS - Regular	6	No	Yes	No	No	866-477-9180
0.114	SmartEnergy	Fixed	No	No	No	Fixed Rate for 100% renewable e	Residential	RS - Regular	6	Yes	Yes	No	No	800-443-4440
0.0999	Spring Power & Gas	Variable	No	Yes	Yes	Spring Green 50 is a month-to-m	Residential	RS - Regular	36	No	Yes	No	No	8772087636
0.0999	Spring Power & Gas	Variable	No	Yes	Yes	Spring Green 100 is a month-to-	Residential	RS - Regular	36	No	Yes	No	No	8772087636
0.105	Think Energy	Fixed	No	No	No	Sign up and receive a \$100 gift c	Residential	RS - Regular	12	No	Yes	No	No	(888) 699-4471
0.119	Think Energy	Fixed	No	No	No	Sign up and receive a \$100 gift c	Residential	RS - Regular	36	No	Yes	No	No	(888) 699-4471
0.0569	ThinkEnergy	Fixed	No	No	No	Environmental Donation Availabl	Residential	RS - Regular	7	No	No	No	14.95	(888) 699-4471
0.1115	CleanSky Energy	Fixed	0	No	No	This plan is for new customers o	Residential	RS - Regular	12	No	Yes	No	No	1-888-355-6205
0.1099	CleanSky Energy	Fixed	0	No	No	This plan is for new customers o	Residential	RS - Regular	6	No	Yes	No	No	1-888-355-6205
0.1125	CleanSky Energy	Fixed	0	No	No	This plan is for new customers o	Residential	RS - Regular	24	No	Yes	No	No	1-888-355-6205
0.1183	Tomorrow Energy	Fixed	75	No	No	This 12 Month Fixed Rate plan is	Residential	RS - Regular	12	Yes	Yes	No	No	888-682-8082
0.0927	Town Square Energy	Fixed	No	No	No	6 monthly bill cycles fixed at 9.2	Residential	RS - Regular	6	No	No	No	No	8774300093
0.1097	Town Square Energy	Fixed	No	No	No	12 monthly bill cycles fixed at 10	Residential	RS - Regular	12	No	No	No	No	8774300093
0.1197	Town Square Energy	Fixed	No	No	No	24 monthly bill cycles fixed at 11	Residential	RS - Regular	24	No	No	No	No	8774300093
0.0989	Verde Energy USA, Inc.	Fixed	100	No	No	Enjoy \$100 in digital Home Depo	Residential	RS - Regular	12	No	Yes	No	No	1-800-388-3862
0.1009	Verde Energy USA, Inc.	Fixed	100	No	No	Enjoy \$200 in digital Home Depo	Residential	RS - Regular	24	No	Yes	No	No	1-800-388-3862

0.0949	Verde Energy USA, Inc.	Fixed	No	No	Only applicable for new customer	Residential	RS - Regular	6	No	Yes	No	No	0	1-800-388-3862
0.0899	Verde Energy USA, Inc.	Fixed	No	No	You may be able to lock in your fi	Residential	RS - Regular	12	No	Yes	No	No		1-800-388-3862
0.0979	Verde Energy USA, Inc.	Fixed	100	No	Only applicable for new customer	Residential	RS - Regular	16	No	Yes	No	No		1-800-388-3862
-2	Vista Energy Marketing L.P.	Fixed	No	No	NO ENROLLMENT FEES! \$1 per	Residential	RS - Regular	3	No	No	No	No	\$1 per day	888-508-4782
0.1989	Vista Energy Marketing L.P.	Fixed	No	No	Commodity prices fluctuate but	Residential	RS - Regular	3	No	No	No	No		888-508-4782
0.1999	Vista Energy Marketing L.P.	Fixed	\$75	No	NO ENROLLMENT FEES! \$1 per	Residential	RS - Regular	12	No	No	No	No	\$1 per day	888-508-4782
0.1135	WGL Energy Services	Variable	No	No		Residential	RS - Regular	0	Yes	No	No	No		1-844-427-5945
0.1134	WGL Energy Services	Fixed	To cancel, wri	Yes	As a WGL Energy customer, you'l	Residential	RS - Regular	12	Yes	Yes	No	No		1-844-427-5945
0.1226	WGL Energy Services	Fixed	To cancel, wri	Yes	As a WGL Energy customer, you'l	Residential	RS - Regular	12	No	Yes	No	No		1-844-427-5945
0.1417	YEP Energy	Fixed	150	No	Fixed Price NO monthly fee	Price	Residential	RS - Regular	24	No	No	No		855-363-7736
0.1382	YEP Energy	Fixed	150	No	Fixed Price NO monthly fee	Price	Residential	RS - Regular	12	No	No	No		855-363-7736
0.1385	YEP Energy	Fixed	150	No	Fixed Price NO monthly fee	Price	Residential	RS - Regular	18	No	No	No		855-363-7736
0.1184	YEP Energy	Fixed	150	No	.Fixed Price NO monthly fee	Price	Residential	RS - Regular	24	No	No	No		855-363-7736
0.10242	Polaris Power Services	Fixed	75	No		Residential	RS - Regular	6	No	No	No	No		866-362-9800
0.10072	Polaris Power Services	Fixed	75	No		Residential	RS - Regular	16	No	No	No	No		866-362-9800
0.10209	Polaris Power Services	Fixed	75	No		Residential	RS - Regular	18	No	No	No	No		866-362-9800
0.1071	City Power & Gas PA	Fixed	No	No	As a City Power & Gas customer,	Residential	RS - Regular	9	No	No	No	No		1-877-518-9339
0.0965	City Power & Gas PA	Fixed	No	No	As a City Power & Gas customer,	Residential	RS - Regular	3	No	No	No	No		1-877-518-9339
0.0999	City Power & Gas PA	Fixed	No	No	As a City Power & Gas customer,	Residential	RS - Regular	6	No	No	No	No		1-877-518-9339
0.1184	City Power & Gas PA	Fixed	No	No	As a City Power & Gas customer,	Residential	RS - Regular	12	No	No	No	No		1-877-518-9339
0.1184	City Power & Gas PA	Fixed	No	No	100% of energy attributes come	Residential	RS - Regular	12	Yes	Yes	No	No		1-877-518-9339
0.0899	EcoPlus Power LLC	Fixed	No	No	Experience the future of energy	Residential	RS - Regular	6	No	Yes	No	No	19	866-302-0559
0.0545	EcoPlus Power LLC	Variable	No	Yes	Experience the future of energy	Residential	RS - Regular	0	No	Yes	No	No		866-302-0559
0.1	Atlantic Energy MD LLC	Variable	No	No	With Atlantic you get more than j	Residential	RS - Regular	2	No	No	No	No		800-917-9133

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

VERIFICATION

I, Barbara R. Alexander, hereby state that the facts above set forth in my Direct Testimony, OCA Statement 2, 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 3, 2024

Signature: 
Barbara R. Alexander

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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PPL ELECTRIC)
UTILITIES CORPORATION FOR)
APPROVAL OF A DEFAULT SERVICE) DOCKET NO. P-2024-3047290
PROGRAM AND PROCUREMENT)
PLAN FOR THE PERIOD FROM)
JUNE 1, 2025 THROUGH MAY 31, 2029)

REBUTTAL TESTIMONY

OF

SERHAN OGUR

ON BEHALF OF THE

PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

JULY 1, 2024

EXETER

ASSOCIATES, INC.

10480 Little Patuxent Parkway, Suite 300
Columbia, Maryland 21044

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1 **I. INTRODUCTION**

2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. My name is Serhan Ogur. I am a Principal and Senior Economist at Exeter Associates,
4 Inc. (“Exeter”). My office is located at 10480 Little Patuxent Parkway, Suite 300,
5 Columbia, Maryland, 21044.

6 Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

7 A. Yes. I submitted Direct Testimony in this proceeding on June 3, 2024 on behalf of the
8 Pennsylvania Office of Consumer Advocate (“OCA”).

9 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS
10 PROCEEDING?

11 A. My Rebuttal Testimony addresses certain issues raised by Mr. Joseph Olikier in his Direct
12 Testimony filed on behalf of the Retail Energy Supply Association (“RESA”). These
13 issues relate to PPL Electric Utilities Corporation’s (“PPL’s” or the “Company’s”) proposed residential default service supply portfolio under PPL’s Default Service Plan VI (“DSP VI”), and PPL’s proposal to enter into 20-year contracts for the provision of a
14 portion of the Company’s expected solar Alternative Energy Credit (“AEC”) requirement.
15
16
17

1 **II. DEFAULT SERVICE SUPPLY PORTFOLIO**

2 Q. PLEASE DESCRIBE PPL’S PROPOSED RESIDENTIAL DEFAULT SERVICE
3 SUPPLY PORTFOLIO FOR DSP VI.

4 A. PPL proposes to use a competitive Request for Proposals process to acquire a series of
5 fixed-price full-requirements (“FPFR”) contracts to provide generation service for
6 approximately 85 percent of the residential default service load. The remaining
7 approximately 15 percent of the load is proposed to be supplied under two, five-year
8 contracts, each for a 50-megawatt (“MW”) block of power until the existing contracts for
9 these blocks expire; and then under three, 10-year Long-Term Power (“LTP”) Product (or
10 Long-Term Block) contracts, each for a 50-MW block of power and 50 MW of unforced
11 capacity located in the Mid-Atlantic Area Council (“MAAC”) region of PJM
12 Interconnection, LLC (“PJM”) which is recognized by PJM as a cleared capacity
13 resource for each PJM Delivery Year.¹ The FPFR contracts will have terms of either 12
14 or 24 months and would cover the four-year DSP VI period with some overlap into the
15 subsequent plan period.² Similarly, the three LTP Product contracts would extend into
16 the following DSP period, that is, extend beyond May 31, 2029. The FPFR procurements
17 are proposed to be conducted every six months so that the 12-month FPFR contracts and
18 24-month FPFR contracts are laddered to avoid procuring 100 percent of the default
19 service products at the same time. The 24-month FPFR contracts would represent 80
20 percent of the power supply in excess of the block energy and LTP Product contracts, and
21 the 12-month FPFR contracts would represent the other 20 percent. Therefore, 30
22 percent of the power supply procured using FPFR contracts would be procured every six

¹ A PJM Delivery Year runs from June 1 of a year through May 31 of the subsequent year.

² In addition to the 12- and 24-month FPFR contracts, PPL will also conduct a one-time procurement of six-month residential FPFR contracts at the beginning of DSP VI as part of the transition from its DSP V portfolio mix to its proposed DSP VI portfolio mix.

1 months – a quarter of the 24-month FPFR contracts and half of the 12-month FPFR
2 contracts.

3 Q. DID YOU ADDRESS THIS ISSUE IN YOUR DIRECT TESTIMONY?

4 A. Yes. I supported the Company’s proposed default service supply portfolio for the
5 residential class,³ with the exception of the unforced capacity procurement.⁴ I opined
6 that PPL’s proposed supply portfolio for residential default service represents a
7 reasonable balance between rate stability, which is extremely important to residential
8 customers, and reflectiveness of competitive market conditions.⁵

9 Q. PLEASE SUMMARIZE MR. OLIKER’S POSITION WITH RESPECT TO THE
10 COMPANY’S PROPOSED DEFAULT SERVICE SUPPLY PORTFOLIO.

11 A. Mr. Oliker states that he does not believe that the overarching goal of default service
12 ratemaking should be ensuring that the default service product provides price stability.⁶
13 He posits that continuing to make changes in the way default service products are
14 procured erode the ability of electric generation suppliers (“EGSs”) to offer viable
15 competitive products.⁷ Mr. Oliker opines that it is not PPL’s role to structure the default
16 service rate in a manner that provides longer-term price stability, and that the
17 Pennsylvania Public Utility Commission (“Commission”) should direct PPL to focus on
18 providing a reasonably structured default service product that maximizes the ability of
19 EGSs to develop competitive products.⁸

³ OCA Statement No. 1, page 12, lines 1-8.

⁴ OCA Statement No. 1, page 22, lines 3-14.

⁵ OCA Statement No. 1, page 12, lines 5-8.

⁶ RESA St. No. 1, p. 50, lines 21-23.

⁷ RESA St. No. 1, p. 51, lines 4-6.

⁸ RESA St. No. 1, p. 52, lines 14-20.

1 Q. DOES MR. OLIKER RECOMMEND ANY SPECIFIC CHANGES TO PPL'S
2 PROPOSED DEFAULT SERVICE SUPPLY PORTFOLIO OR PROPOSE A
3 SPECIFIC PRODUCT PORTFOLIO?

4 A. No.

5 Q. DID THE COMMISSION PROVIDE ANY GUIDANCE ON THE ROLE OF
6 CONCERN FOR RATE STABILITY IN ACQUISITION OF ELECTRIC
7 GENERATION SUPPLY FOR DEFAULT SERVICE CUSTOMERS?

8 A. Yes. In addition to being inconsistent with the statutory requirements under the Public
9 Utility Code, Mr. Oliker's position is inconsistent with the Commission's Final
10 Rulemaking Order on default service. In its Final Rulemaking Order in Docket No. L-
11 2009-2095604,⁹ the Commission emphasized the importance of rate stability in numerous
12 places, including, but not limited to, the following:

13 In implementing default service standards, Act 129 requires that the Commission be
14 concerned about **rate stability** as well as other considerations such as ensuring a "prudent
15 mix" of supply and ensuring safe and reliable service. (Second Default Service Rulemaking
16 Order, pp. 11-12, emphasis added).

17 Additionally, we endorse the concepts advanced by generators that the "least cost"
18 language of Act 129 does not represent the adoption of a "cookie-cutter" or "one size fits
19 all" approach to procurement but provides the DSP with a range of options to procure
20 energy that maximizes the types of energy products available and balances the concerns of
21 "least cost" with energy stability and **minimizing volatility**. We do not endorse, at this
22 time, the position of those parties that recommend solely a mix of just short and
23 intermediate term contracts and spot purchases as that unduly limits the range of supply
24 products available. (Second Default Service Rulemaking Order, p. 38, emphasis added).

25 We disagree with RESA's overall recommendations as to the proper interpretation of the
26 "least cost" standard as mandating that default service rates approximate, on a prospective
27 basis, the market price of energy. Such an interpretation would signal retention of the
28 "prevailing market price" standard that has been expressly replaced under Act 129.
29 Moreover, this interpretation conflicts with **the Act 129 objective of achieving price
30 stability which dictates consideration of a range of energy products, not just those
31 that necessarily reflect the market price of electricity at a given point in time. Price**

⁹ Implementation of Act 129 of October 15, 2008: Default Service and Retail Electric Markets, Docket No. L-2009-2095604 (Order entered Oct. 4, 2011) ("Second Default Service Rulemaking Order").

1 **stability benefits are very important to some customer groups in that exposing them**
2 **to significant price volatility through general reliance on short term pricing would be**
3 **inconsistent with Act 129 objectives.** (Second Default Service Rulemaking Order, pp. 38-
4 39, emphasis added).

5 In implementing default service standards, the Commission must be concerned about **rate**
6 **stability** as well as other considerations such as ensuring a “prudent mix” of supply and
7 ensuring safe and reliable service. (Second Default Service Rulemaking Order, p. 40,
8 emphasis added).

9 We agree with the majority of parties that the “prudent mix” of contracts be interpreted in
10 a flexible fashion which allows the DSPs to design their own combination of products that
11 meets the various obligations to achieve “least cost to customers over time,” ensure **price**
12 **stability**, and maintain adequate and reliable service. (Second Default Service Rulemaking
13 Order, p. 60, emphasis added).

14 Q. BASED ON THE ABOVE GUIDANCE PROVIDED BY THE COMMISSION,
15 DO YOU AGREE WITH MR. OLIKER THAT IT IS NOT PPL’S ROLE TO
16 STRUCTURE THE DEFAULT SERVICE RATE IN A MANNER THAT
17 PROVIDES LONGER-TERM PRICE STABILITY?

18 A. No. It is clear from the Commission’s guidance in the Second Default Service
19 Rulemaking Order that the Commission requires PPL (and other default service providers
20 jurisdictional to the Commission) to consider achieving rate stability and minimizing rate
21 volatility as one of the primary goals (alongside ensuring least cost over time and
22 maintaining adequate and reliable service). Therefore, the Commission should dismiss
23 Mr. Oliker’s objections related to PPL’s proposed residential default service supply
24 portfolio and reject the notion that customers should be forced to shop to be ensured of a
25 reasonable level of rate stability.

26 Q. DO YOU CONTINUE TO RECOMMEND THAT THE COMMISSION
27 APPROVE PPL’S PROPOSED RESIDENTIAL DEFAULT SERVICE SUPPLY
28 PORTFOLIO AS YOU DID IN YOUR DIRECT TESTIMONY, WITH THE
29 EXCEPTION YOU MENTIONED ABOVE?

30 A. Yes.

1 **III. LONG-TERM SOLAR AEC CONTRACTS**

2 Q. PLEASE DESCRIBE PPL'S PROPOSAL TO ENTER INTO LONG-TERM
3 SOLAR AEC CONTRACTS.

4 A. PPL proposes to enter into 20-year contracts to procure up to 30,000 solar Tier I AECs
5 annually for delivery beginning June 1, 2026, and use these solar AECs to self-supply the
6 AECs corresponding to the energy-only block and LTP Product contracts.¹⁰

7 Q. DID YOU ADDRESS THIS ISSUE IN YOUR DIRECT TESTIMONY?

8 A. Yes. I supported the Company's proposal because long-term contracts for the provision
9 of solar Tier 1 AECs can help stabilize prices for what would otherwise be a volatile
10 component of the overall portfolio.¹¹

11 Q. PLEASE SUMMARIZE MR. OLIKER'S POSITION WITH RESPECT TO
12 PPL'S PROPOSAL TO ENTER INTO LONG-TERM SOLAR AEC
13 CONTRACTS.

14 A. Mr. Oliker opposes PPL's proposal to enter into 20-year contracts to obtain solar AECs
15 and allocating them only to default service load.¹² His reasoning is that there could be a
16 situation where supplier offers reflecting the then-current market price of solar AECs are
17 priced higher than the price-to-compare because PPL entered into a long-term contract
18 for cheaper solar AECs, in which case consumers would be unlikely to consider availing
19 themselves of competitive supplier options.¹³

¹⁰ OCA Statement No. 1, page 5, lines 11-18.

¹¹ OCA Statement No. 1, page 23, lines 1-3.

¹² RESA St. No. 1, p. 53, lines 12-13.

¹³ RESA St. No. 1, p. 54, lines 2-6.

1 Q. DO YOU AGREE WITH MR. OLIKER’S REASONING FOR HIS
2 OPPOSITION TO LONG-TERM SOLAR AEC CONTRACTS ON BEHALF OF
3 DEFAULT SERVICE CUSTOMERS?

4 A. No. If there is an improvement that can be made to the default service procurement
5 process which is likely to enhance price stability or affordability for default service
6 customers, it should be approved by the Commission regardless of whether it is practical
7 or economic for EGSs to replicate the same procurement strategy. Since entering into
8 long-term solar AEC contracts promotes rate stability for default service customers, it
9 should be approved by the Commission. The goal of retail competition is to increase
10 service and pricing alternatives to customers, not to attempt to increase the market share
11 of EGSs by purposefully designing default service to be less attractive to customers.

12 Q. DID THE COMMISSION PROVIDE ANY GUIDANCE ON THE
13 APPROPRIATENESS OF USING LONG-TERM CONTRACTS TO PROCURE
14 AECs FOR DEFAULT SERVICE CUSTOMERS?

15 A. Yes. The Commission stated that “it is appropriate for [default service providers] to
16 acquire AECs through a variety of methods, including [full requirements] purchases, as
17 well as **long-term**, short-term and spot purchases” (emphasis added).¹⁴ PPL’s
18 Alternative Energy Portfolio Standards Act (“AEPS Act”) compliance and the
19 corresponding AEC acquisition proposal includes all of the methods specified in the
20 Commission’s guidance in its Second Default Service Rulemaking Order. Therefore,
21 PPL’s AEPS Act compliance proposal, including the proposed 20-year solar AEC
22 contracts, complies with the Commission’s guidance in its Second Default Service
23 Rulemaking Order.

¹⁴ Second Default Service Rulemaking Order, p. 77.

1 Q. ARE YOU STILL RECOMMENDING THAT THE COMMISSION APPROVE
2 PPL'S PROPOSAL TO ENTER INTO 20-YEAR SOLAR AEC CONTRACTS?

3 A. Yes.

4 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

5 A. Yes, it does.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

VERIFICATION

I, Serhan Ogur, hereby state that the facts above set forth in my Rebuttal Testimony, OCA Statement 1R, 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: July 1, 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 Company	:	
For Approval of its Default Service Program	:	Docket No. P-2024-3047290
for the Period from	:	
June 1, 2025, through May 31, 2029	:	

REBUTTAL TESTIMONY

OF

BARBARA R. ALEXANDER

Barbara Alexander Consulting LLC

ON BEHALF OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

July 1, 2024

1 Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

2 A. My name is Barbara R. Alexander. I am the sole member of Barbara Alexander Consulting
3 LLC. My address is 44 Beech St., Hallowell, ME 04347. I appear in this case as a witness
4 on behalf of the Office of Consumer Advocate (OCA).

5 Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

6 A. Yes. I filed Direct Testimony on behalf of the OCA on June 3, 2024

7 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

8 A. I am submitting Rebuttal Testimony in response to the Direct Testimony of Mr. Joseph
9 Olikier on behalf of the Retail Energy Supply Association (RESA).¹

10 Q. PLEASE IDENTIFY THE ACRONYMS THAT YOU ARE USING IN YOUR
11 TESTIMONY.

12 A. For clarity, I refer to PPL Electric as PPL, the Electric Distribution Company as EDC, the
13 Price to Compare as PTC or default service, the Purchase of Receivables Program as POR,
14 and the Standard Offer Program as SOP. I use the term “supplier” to refer to an Electric
15 Generation Supplier or EGS.

16 Q. PLEASE SUMMARIZE YOUR OVERALL RESPONSE TO MR. OLIKER’S
17 TESTIMONY ON BEHALF OF RESA.

18 A. Mr. Olikier’s testimony consists of unsubstantiated claims of benefits associated with the
19 retail energy market and proposals that conflict with the statutory and regulatory policies
20 governing default service in Pennsylvania. Most importantly, his citations to the 2013 End
21 State Order² do not reflect the subsequent legislative reforms and Commission proceedings

¹ RESA St. No. 1.

² *Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service*, Docket No. I-2011-2237952 (Order entered February 15, 2013) (*End State Final Order*).

1 and directives that have occurred as the market has matured and developed over time.
2 Specifically, Mr. Oliker ignores the statutory requirement that default service “shall be
3 procured through competitive procurement processes” (including auctions, requests for
4 proposals and/or competitively procured bilateral agreements procured at no greater than
5 the cost of obtaining generation under comparable terms in the wholesale market), and such
6 procurement must be a “prudent mix” of spot market purchases, short-term contracts and
7 long-term purchase contracts.³ Further PPL and other Pennsylvania EDCs are required to
8 recover their actual costs incurred to procure and administer this portfolio in a fully
9 reconcilable Section 1307(e) cost recovery mechanisms for each class.⁴ Mr. Oliker’s
10 complaints about these policies or attempts to make radical changes may reflect RESA’s
11 policy preferences, but they are ill suited to this proceeding.

12 Q. DOES MR. OLIKER PROVIDE ANY INFORMATION ON PRICES CHARGES BY
13 RESA MEMBERS OR ANY OTHER SUPPLIER OR DESCRIBE ANY PRODUCT OR
14 SERVICE PROVIDED BY RESA MEMBERS?

15 A. No. In fact, Mr. Oliker relies on anecdotal stories⁵ that he does not document with any
16 specific attribution or citation and he explicitly states that his testimony may not reflect the
17 views of all RESA members⁶ or reflect any analysis or presentation of prices charged by
18 RESA members or the products and services they offer or plan to offer. He offers no
19 evidence to support his claims or recommendations.

20

³ 66 Pa. C.S. § 2807(e)(3.1)-(3.2).

⁴ 66 Pa. C.S. §§ 1307(e), 2807(e)(3.9).

⁵ RESA St. No. 1, page 2, line 16. Mr. Oliker states that his proposals reflect “anecdotal information from the members....”

⁶ RESA St. No. 1, fn. 1.

1 Q. MR. OLIKER STATES THAT RETAIL SUPPLIERS ARE “EAGER FOR THE
2 OPPORTUNITY TO DEVELOP AND OFFER THE INNOVATIVE AND CREATIVE
3 PRODUCTS THAT CONSUMERS WANT...”⁷ PLEASE RESPOND.

4 A. RESA’s members have had the ability to offer “innovative and creative products that
5 consumers want” since the onset of retail competition in Pennsylvania. Mr. Oliker offers
6 no description of what these “innovative and creative products” are, why consumers would
7 want them, or why these suppliers have not actually offered such products to date. RESA’s
8 position that the structure of the default service market is the barrier that prevents such
9 innovation and demonstration of what consumers want has been an ongoing and repeated
10 claim without any evidence to support what products or services would be offered or
11 documentation that most consumers want anything other than a least cost electricity supply
12 to maintain essential electric service. Mr. Oliker ignores the subsidies currently provided
13 to RESA and suppliers generally in their access to the customer bill through PPL’s POR
14 program that shifts the risk of nonpayment to the utility and its ratepayers. Additionally,
15 the SOP that enrolls customers with participating suppliers converts the EDC into the
16 marketing and enrollment arm for the participating suppliers, at a modest expense to the
17 suppliers.

⁷ Ibid., page 8, lines 6-7.

1 Q. DOES THE RECORD IN THIS PROCEEDING DOCUMENT THAT SUPPLIERS
2 CHARGE MORE THAN THE PRICE TO COMPARE (PTC) AND THAT SUCH
3 PRICES RESULT IN HIGHER TERMINATIONS OF SERVICE AND ADVERSE BILL
4 PAYMENT ABILITY FOR MANY KNOWN LOW INCOME CUSTOMERS OF PPL?

5 A. Yes. The Direct Testimony of Harry Geller on behalf of CAUSE-PA ⁸ and my Direct
6 Testimony on behalf of OCA document the actual adverse impacts of higher supplier
7 charges compared to the PTC on PPL’s residential customers generally and low income
8 customers specifically. It is unreasonable for Mr. Oliker to suggest or opine about the
9 “value” of RESA’s member products and services without any evidence about what that
10 value is and without confronting the reality of the impact of the retail market on PPL’s
11 residential customers and their ability to pay for essential service when supplier prices are
12 in excess of the PTC. This concern is particularly important given the supplier’s right to
13 use a negative option renewal practice to change the customer’s price after an introductory
14 rate that might be temporarily lower than the PTC or to change a fixed rate contract to a
15 variable rate contract.⁹

16 Q. TURNING TO MR. OLIKER’S SPECIFIC RECOMMENDATIONS, PLEASE
17 COMMENT ON THE PROPOSAL THAT THE COMMISSION OPEN A STATEWIDE
18 INVESTIGATION ON DEFAULT SERVICE MESSAGING.¹⁰

19 A. I oppose this recommendation. Mr. Oliker seeks to question the label of “price to compare”
20 (PTC) and change this term to “default service rate” and reform the messaging to promote

⁸ CAUSE-PA St. No. 1.

⁹ See, e.g., the Statement of Vice Chair Kimberly Barrow in the resolution of the formal complaint *Kevin Brabank vs. PPL Energy Company—Electric and Tomorrow Energy Corp.*, Docket No. F-2023-3042345 (April 25, 2024). I attach Commissioner Barrow’s Statement as Exhibit BA-5.

¹⁰ RESA St. No. 1 at 16-19.

1 the potential benefits of “competitive offers.” The use of the term PTC permeates the
2 Commission’s educational messaging about the retail energy market, appears on all EDC
3 customer bills, and is the basis for comparing offers among suppliers and with default
4 service on the Commission’s shopping web portal. The suggestion that the costs incurred,
5 and more than twenty years of customer education should be wiped away in favor of a
6 different term for the same service and to promote customer confusion about how to shop
7 and compare is not reasonable.

8 Q. MR. OLIKER OBJECTS TO COMPARING SUPPLIER PRICES TO THE PTC
9 BECAUSE HE CLAIMS THIS IS AN EDC “MONOPOLY” AND THAT IT
10 DISADVANTAGES SUPPLIERS WHO PROVIDE “ACTUAL COMPETITIVE
11 MARKET PRICES.”¹¹ PLEASE RESPOND.

12 A. Mr. Oliker’s characterization is not only incorrect, but also highly misleading. Default
13 service is procured in the same competitive market that suppliers purchase electrons to sell
14 to Pennsylvania consumers. The fact that the procurement policy governing default service
15 is based on a statutory and regulatory obligation to avoid price volatility and reflect a stable
16 and fixed price product reflects what consumers want and what policymakers have
17 required. It is unfortunate that suppliers choose not to compete with this customer
18 preference but that is not a sufficient reason for embarking on a reform of this essential
19 electricity product to allow profit making suppliers to gain market share. Suppliers should
20 look to their own conduct and procurement policies, as well as their troubling and
21 widespread history of violating basic consumer protection policies in most states, to solve

¹¹ Ibid., at 18.

1 their competitive disadvantage.¹² The EDCs operate in Pennsylvania according to the
 2 Commission’s directives through the open and transparent process of designing a
 3 reasonable default service portfolio, unlike suppliers whose procurement policies and
 4 pricing methodologies are not revealed to the public.

5 Q. IS DEFAULT SERVICE IN PENNSYLVANIA “HIGHLY REGULATED” AS
 6 ALLEGED BY MR. OLIKER?

7 A. No. The use of this term repeatedly by Mr. Oliker is incorrect and misleading.¹³ The price
 8 for default service reflects competitive bids obtained in the wholesale competitive market.
 9 The suppliers who “win” their bids are wholesale market suppliers unrelated to the EDC.
 10 The contract terms are developed pursuant to state and regulatory policies in an open and
 11 transparent proceeding. The fact that default service is required by law does not mean that
 12 the prices that result are “regulated” as that term is used for distribution service that is
 13 regulated in base rate cases. The Commission does not approve the resulting prices but
 14 does affirm the process by which those prices are obtained in the wholesale market.

15 Q. MR. OLIKER’S TESTIMONY DEVOTES A SUBSTANTIAL ATTACK ON PPL FOR
 16 ITS MESSAGING TO ITS CUSTOMERS ABOUT CUSTOMER CHOICE. DO YOU
 17 AGREE WITH HIS CHARACTERIZATION OF THESE MESSAGES?

18 A. No. Mr. Oliker devotes a substantial portion of his testimony describing PPL’s customer
 19 education messaging to its customers and characterizes these communications as part of a

¹² See, e.g., *BI&E v. Verde Energy USA, Inc.*, Docket No. C-2020-3017229, Formal Complaint (Non-Proprietary Version) at ¶ 14 (Jan. 30, 2020) (“PPL alerted OCMO to Verde’s potential use of the Eligible Customer List to employ deceptive practices and access approximately 4,000 customer accounts on PPL’s website without the customer’s knowledge or authorization.”); *BI&E v. Green Mountain Energy Co.*, Docket No. M-2021-3009235, Settlement at ¶15 (July 9, 2021) (complaints alleged that customer was enrolled with Green Mountain without customer consent and “Green Mountain acknowledged that the switch was unauthorized, occurred at an in-person location and used information obtained from the ECL.”).

¹³ *Ibid.*, e.g., page 19, line 11 refers to default service as “highly regulated.”

1 “win back” scheme and a “marketing opportunity,” and “an unfair competitive
2 advantage.”¹⁴ He attaches a compilation of these customer communications to his
3 testimony. However, at no point does Mr. Oliker document a factual error or any
4 misrepresentation in these communications. PPL advises customers about prices charged
5 for default service, changes in default service prices, urges customers to pay attention to
6 prices charged by their supplier, urges customers to communicate with their supplier, and
7 alerts customers to the need to compare prices, which is the exact messaging used by the
8 Commission and reflected in the Commission’s PaPowerSwitch.com web portal that
9 highlights the current PTC with available supplier offers. I can only conclude that suppliers
10 don’t like their customers being reminded about the prices that appear on their customer
11 bill issued by PPL after PPL has purchased the supplier’s receivables and has an obligation
12 to incur ratepayer funds to collect those charges.

13 Q. WITH REGARD TO THE POR PROGRAM, PLEASE DESCRIBE THE VALUABLE
14 SUPPLIER SUBSIDY OFFERED BY THIS PROGRAM.

15 A. Mr. Oliker ignores the existence of the POR program that provides a significant benefit
16 and subsidy to suppliers. While I do not agree about the need for any “investigation” of
17 default service messaging, any investigation of messaging about default service or structure
18 of default service should include, among other things, the consideration of eliminating this
19 subsidy or requiring significantly more consumer protections to eliminate the obligation of
20 the EDC to threaten termination of service for these unregulated charges, treating these
21 supplier charges similar to “non-basic” charges. Suppliers who find that the use of the
22 EDC bill to collect their charges is not productive or in the supplier’s best interests can

¹⁴ Ibid., page 23, lines 16-20.

1 always opt to offer dual bills to customers to directly collect for supply service, which
2 allow for a more direct communication with customers and a fuller explanation of their
3 billed products and services. Additionally, there is nothing that is preventing a supplier
4 from communicating directly with their customers and offering whatever so called value
5 added goods and services they believe the customer would be interested in purchasing
6 directly from the supplier.

7 Q. DOES MR. OLIKER RECOGNIZE THAT SUPPLIERS ARE ALSO OFFERED
8 ANOTHER SUBSTANTIAL SUBSIDY THROUGH THE SOP?

9 A. No. This program turns the EDC into the marketing and enrollment arm of the supplier at
10 a very modest charge, thus allowing the supplier to avoid marketing and enrollment
11 expenses. This program carries the Commission's and EDC's imprimatur, a very valuable
12 marketing advantage for the participating suppliers. I have documented significant defects
13 in this program in my Direct testimony and recommend that it be terminated. I also
14 recommended that customers in the SOP should be returned to default service at the end of
15 the contract unless the supplier has obtained affirmative agreement for a different contract.
16 The purpose of my recommendation is to eliminate the substantial subsidy and advantage
17 given to suppliers in this program and focus on actual customer authorization to continue
18 their relationship with a supplier at the end of their SOP contract term.

19 Q. DO YOU AGREE WITH MR. OLIKER'S PROPOSAL TO PROHIBIT PPL FROM
20 COMMUNICATING WITH THEIR CUSTOMERS ABOUT EGS CONTRACT TERMS
21 AND EGS PRICES?

22 A. No. In addition to the potential Constitutional issues involved in prohibiting PPL or any
23 utility from factual communications with their customers, Mr. Oliker's proposal is simply

1 poor public policy. The EDC has an obligation to present the EGS charges on their
2 customer bill and collect unpaid EGS charges pursuant to the POR. The EDC has an
3 obligation to use the terms for default service required by the Commission and include the
4 PTC on its customer bills. As a result, the EDC has an obvious obligation to educate
5 customers about these charges in a factual manner. I cannot identify any communication
6 made by PPL in the materials attached to Mr. Oliker's testimony that are factually incorrect
7 or misleading and Mr. Oliker fails to do so as well. None of these communications need
8 to be "negotiated" with suppliers since the suppliers have sold their receivables to PPL and
9 it is PPL's obligation to collect them in an efficient and cost effective manner.

10 Q. MR. OLIKER RECOMMENDS THAT PPL FOCUS ON ITS "CORE FUNCTIONS."
11 PLEASE RESPOND.

12 A. Mr. Oliker states, "In my view, PPL would be well-advised to focus on its core distribution
13 functions, including the timely issuance of bill that include EGS charges, rather than
14 devoting resources to an area that lies outside their statutory duties as an EDC."¹⁵ This is
15 an extraordinary statement since among PPL's core functions is to collect the bills with
16 EGS charges, and, as a result, it has a duty to use its ratepayer funds to collect those bills
17 in a cost effective manner. When the EGS charges cause customers to fall into the
18 collection cycle due in part to their higher prices compared to default service, it is exactly
19 PPL's "core" duty to educate its customers on the changes in default service, how to
20 compare to supplier prices, and to alert customers on such comparisons from time to time.

21 Q. DO YOU AGREE WITH MR. OLIKER'S PROPOSAL TO REFORM THE SOP?

22 A. No. Mr. Oliker suggests an alternative to PPL's revisions to the SOP that would require

¹⁵ Ibid., page 38, lines 11-13.

1 the participating EGSs to offer the same rate as the PTC for their 12-month contracts and
2 eliminate any suggestion in marketing the SOP as a “savings” opportunity.¹⁶ This proposal
3 would not improve the documented failures of the SOP and provide no inherent advantage
4 to customers. I can see no reason why ratepayer money should be spent to send customers
5 to a supplier with no discount and the continued practice of a negative option renewal.
6 While I have expressed concerns about PPL and other EDCs marketing the SOP as a
7 program that has a savings opportunity, the remedy is not that which Ms. Olikier suggests
8 but rather elimination of the SOP in its entirety or if not eliminated, ensuring that customers
9 are returned to default service at the end of their SOP contract if they do not choose an
10 alternative supplier or affirmatively choose to remain with their SOP supplier. Again, this
11 program is a substantial subsidy to suppliers and should not be continued. There is no
12 policy reason for the EDC to act as the marketing and enrollment arm of suppliers since
13 that is not a “core” function.

14 Q. MR. OLIKER OPPOSES PPL’S PROPOSAL TO RETURN SOP CUSTOMERS TO
15 DEFAULT SERVICE AT THE END OF THEIR 12-MONTH CONTRACT UNLESS
16 THE CUSTOMER HAS AFFIRMATIVELY ENROLLED WITH A NEW EGS OFFER.
17 PLEASE RESPOND.

18 A. I do not agree with Mr. Olikier’s policy argument or support for his objection to this
19 proposal. Legal aspects of Mr. Olikier’s argument will be addressed in briefs. However,
20 the SOP contract is based on the customer’s discussion of the contract offer with the EDC
21 and the customer’s agreement with the EDC acting as the agent of the supplier to enroll
22 with the supplier. It is only reasonable to require the customer to affirmatively engage with

¹⁶ Ibid., page 41.

1 the supplier to renew or change the terms of the SOP contract. The post-SOP contract is
2 an entirely new transaction. It differs from the negative option exercised by the EGS under
3 the current rules in that the original enrollment was promoted by and conducted by the
4 EDC. Any subsequent renewal or change in terms should be done based on a direct
5 interaction between the customer and the EGS. Of course, my recommendation also
6 reflects the higher prices charged by the EGS for a substantial number of SOP customers
7 after the 12-month SOP contract. My position puts the customer in charge of the post-SOP
8 contract experience.

9 Q. DOES THIS COMPLETE YOUR TESTIMONY AT THIS TIME?

10 A. Yes.

Exhibit BA-5
(Statement of Vice Chair K. Barrow)

PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, Pennsylvania 17120

**Kevin Brabank vs.
PECO Energy Company – Electric
and Tomorrow Energy Corp.**

**Public Meeting held April 25, 2024
3042345-ALJ
Docket No. F-2023-3042345**

STATEMENT OF VICE CHAIR KIMBERLY BARROW

On August 21, 2023, Mr. Kevin Brabank filed a Formal Complaint against PECO Energy Company (PECO) and Tomorrow Energy Corporation (Tomorrow Energy) averring various allegations relating to his enrollment in PECO's Standard Offer Program (SOP), and the high variable rate which took effect after the SOP ended. Tomorrow Energy and Mr. Brabank settled the Complaint and PECO filed a Certificate of Satisfaction. An Initial Decision was issued on February 23, 2024, dismissing the Formal Complaint against PECO.

While I agree with the Administrative Law Judge's dismissal of the Formal Complaint, I want to take this opportunity to discuss shopping awareness and the issues that arise after an individual's contract or participation in a SOP ends. First and foremost, customers who choose to shop or utilize SOPs need to be aware of their contract terms and review all documentation provided by the Electric Generation Supplier (EGS). Notably, when the EGS contract is near its expiration, the EGS is required to provide an Initial Notice 45-60 days prior to the expiration date of the fixed duration contract or the effective date of the proposed change in terms.¹ An Options Notice is then provided 30 days prior to the expiration date of the fixed-duration contract or the effective date of the proposed change in terms.² If the customer does not respond to either the Initial Notice or the Options Notice, the EGS contract will be converted automatically to either a month-to-month contract or another fixed-duration contract, as explained in the notices.³ Shopping for a supplier is not a passive act, and customers must remain vigilant and be aware of contract terms and rates.

Additionally, while the Commission's Regulations permit an EGS to convert a non-responsive customer to a month-to-month or fixed-duration contract, I caution the EGS industry to exercise good faith and reasonableness when offering the new contract terms and prices. I am concerned with the fact pattern often seen in shopping complaints. Customers complain that any savings experienced during the initial contract term are more than wiped out once they are moved to a month-to-month or new fixed-duration contract. It is important that shopping customers pay attention to the notices sent near the end of the contract, but it is also important for EGSs to be good ambassadors for their industry to retain customer confidence in the competitive market.

April 25, 2024



Kimberly Barrow, Vice Chair

¹ 52 Pa. Code § 54.10(1).

² 52 Pa. Code § 54.10(2).

³ 52 Pa. Code § 54.10(3).

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

VERIFICATION

I, Barbara R. Alexander, hereby state that the facts above set forth in my Rebuttal Testimony, OCA Statement 2R, 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: July 1, 2024

Signature:

Barbara Alexander

Barbara R. Alexander

Address:

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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PPL ELECTRIC)
UTILITIES CORPORATION FOR)
APPROVAL OF A DEFAULT SERVICE) DOCKET NO. P-2024-3047290
PROGRAM AND PROCUREMENT)
PLAN FOR THE PERIOD FROM)
JUNE 1, 2025 THROUGH MAY 31, 2029)

SURREBUTTAL TESTIMONY

OF

SERHAN OGUR

ON BEHALF OF THE

PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

PUBLIC VERSION

JULY 15, 2024

EXETER

ASSOCIATES, INC.

10480 Little Patuxent Parkway, Suite 300
Columbia, Maryland 21044

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1 **I. INTRODUCTION**

2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. My name is Serhan Ogur. I am a Principal and Senior Economist at Exeter Associates,
4 Inc. (“Exeter”). My office is located at 10480 Little Patuxent Parkway, Suite 300,
5 Columbia, Maryland, 21044.

6 Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

7 A. Yes. I submitted Direct Testimony and Rebuttal Testimony in this proceeding on June 3,
8 2024 and on July 1, 2024, respectively, on behalf of the Pennsylvania Office of
9 Consumer Advocate (“OCA”).

10 Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY IN THIS
11 PROCEEDING?

12 A. My Surrebuttal Testimony responds to certain issues raised by PPL Electric Utilities
13 Corporation (“PPL” or the “Company”) witness Mr. Andrew Castanaro in his Rebuttal
14 Testimony; and by the Retail Energy Supply Association (“RESA”) witness Mr. Joseph
15 Olikier in his Rebuttal Testimony related to the Company’s filed Default Service Plan VI
16 (“DSP VI”). These issues relate to (i) the Long-Term Power Product (“LTP Product”)
17 proposed by PPL; (ii) the Company’s proposed residential default service product
18 portfolio; (iii) PPL’s proposal to enter into 20-year contracts for solar alternative energy
19 credits (“AECs”); and (iv) time-of-use (“TOU”) rates. Each of these issues is addressed
20 in turn in the following sections of my Surrebuttal Testimony.

1 **II. LONG-TERM POWER PRODUCT AND RESIDENTIAL SUPPLY PORTFOLIO**

2 Q. PLEASE DESCRIBE THE LONG-TERM POWER PRODUCT WHICH PPL IS
3 PROPOSING TO PROCURE FOR THE RESIDENTIAL DEFAULT SERVICE
4 PORTFOLIO UNDER DSP VI.

5 A. The proposed LTP Product is a hybrid supply contract which includes 150 megawatts
6 (“MW”) of around-the-clock block energy (“Block Service”), and 150 MW of unforced
7 capacity located in the Mid-Atlantic Area Council (“MAAC”) region of PJM
8 Interconnection, LLC (“PJM”) (“Bilateral Transferred Capacity”).¹ Block Service is a
9 fixed MW block of around-the-clock electricity service, for a given time period (i.e.,
10 delivery period, which is 10 years from June 1, 2026 through May 31, 2036 under PPL’s
11 proposal), delivered to PPL’s PJM load settlement point (PPL_RESID_AGG), and it
12 includes all necessary energy, transmission (excluding non-market-based transmission
13 services), transmission losses, congestion management costs, and such other services or
14 products (but excluding capacity obligation, ancillary services, and AECs to meet
15 Pennsylvania’s Alternative Energy Portfolio Standards Act (“AEPS Act”) requirements)
16 that are required with that block supply.² Stated more succinctly, Block Service is
17 identical to the existing five-year block energy contracts in the Company’s DSP V, other
18 than the term of the delivery.

19 Bilateral Transferred Capacity is a transfer of the title and rights to a specified
20 megawatt quantity of unforced capacity that has cleared the PJM Reliability Pricing
21 Model (“RPM”) auctions for a Delivery Year and that is associated with one or more

¹ PPL Electric Utilities Corporation Attachment D, Exhibit 1 – Transaction Confirmation Example.

² Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.4.

1 capacity resource in the PJM MAAC region that is not an ELCC Resource.^{3 4} The
2 specified MW quantity of unforced capacity is required to be identical to the MW amount
3 of Block Service under the specification of the LTP Product as proposed by PPL.⁵ The
4 LTP Product supply would be provided at a single specified firm price (in dollars per
5 megawatt-hour) for both the delivery of Block Service and for the transfer of Bilateral
6 Transferred Capacity prior to each Delivery Year.⁶ PPL is proposing to procure three 50-
7 MW LTP Product (inclusive of block energy deliveries and PJM capacity credit transfers)
8 contracts (or tranches) (with delivery commencing on June 1, 2026).⁷

9 Q. DID YOU ADDRESS THIS ISSUE IN YOUR DIRECT TESTIMONY?

10 A. Yes. I made a two-tiered recommendation. My primary recommendation was to reject
11 the Bilateral Transferred Capacity procurement and procure only the Block Service
12 component of PPL's LTP Product proposal. My alternative recommendation, in the
13 event that the Commission is inclined to authorize PPL to procure both a 10-year block
14 energy product and a 10-year capacity product, was to solicit and procure these two
15 products separately.⁸ I provided my detailed rationale for making these
16 recommendations on pages 17-22 of my Direct Testimony.

³ Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.4.

⁴ ELCC stands for Effective Load Carrying Capability and represents a capacity resource's PJM-assigned capacity value. PJM's Manual 21A defines ELCC Resource as a Generation Capacity Resource that is a Variable Resource, a Limited Duration Resource, or a Combination Resource, as these terms are defined in PJM Agreements. Variable Resource means a Generation Capacity Resource with output that can vary as a function of its energy source, such as wind, solar, run of river hydroelectric power without storage, and landfill gas units without an alternate fuel source. All Intermittent Resources are Variable Resources, with the exception of Hydropower with Non-Pumped Storage. Limited Duration Resource means a Generation Capacity Resource that is not a Variable Resource, that is not a Combination Resource, and that is not capable of running continuously at Maximum Facility Output for 24 hours or longer. A Capacity Storage Resource is a Limited Duration Resource.

⁵ Attachment D, Default Service Long Term Power Supplier Master Agreement, p. 7.

⁶ Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.5.

⁷ Attachment C, PPL Electric Utilities Corporation Default Service Long Term Power Supply Request for Proposals (RFP) Process and Rules, Section 1.1.6.

⁸ OCA Statement No. 1, p. 7, lines 3-10.

1 Q. HOW DID MR. CASTANARO RESPOND TO YOUR PRIMARY
2 RECOMMENDATION TO ELIMINATE THE BILATERAL TRANSFERRED
3 CAPACITY PROCUREMENT?

4 A. Mr. Castanaro disagreed with my primary recommendation of eliminating the Bilateral
5 Transferred Capacity procurement for three reasons. First, he stated that including
6 Bilateral Transferred Capacity procured for a longer term provides more price stability
7 even though the Company realizes that there is uncertainty in forward capacity prices.⁹
8 Second, he claimed that the proposed 10-year contract would either result in construction
9 of new capacity or help contribute to retaining a unit in PJM's MAAC region for 10
10 years.¹⁰ Third, he posited that the Company issued a Request for Interest ("RFI") inquiry
11 to wholesale suppliers regarding the LTP Product, and that several respondents expressed
12 interest in including capacity in the Long-Term Block product.¹¹ Mr. Castanaro also
13 stated that while I brought up the lack of adequate customer protections in my Direct
14 Testimony, I did not identify such protections in my Direct Testimony. As also
15 acknowledged by Mr. Castanaro, I did identify some possible solutions in response to
16 discovery. Mr. Castanaro found two of my proposed solutions (forward capacity price
17 index, and forward capacity price projection or forecast) to be not viable, but he offered a
18 commitment by the auction manager to prepare a market information report and to
19 consider the degree of competition in the responses to the solicitation.¹²

20 Q. DO YOU AGREE WITH MR. CASTANARO'S REASONING?

21 A. No. First, while I concur that a longer-term capacity purchase would increase price
22 stability, it is also important to achieve that price stability without raising the level of

⁹ PPL Electric Utilities Corporation Statement No. 1-R, p. 9, lines 21-23.

¹⁰ PPL Electric Utilities Corporation Statement No. 1-R, p. 9, line 23 through p. 10, line 3.

¹¹ PPL Electric Utilities Corporation Statement No. 1-R, p. 10, lines 8-12.

¹² PPL Electric Utilities Corporation Statement No. 1-R, pp. 11-12.

1 prices and complying with the “least cost over time” standard. Without a reasonable
2 assurance that PPL will not pay above market or fair price for the long-term capacity
3 hedge, the proposed capacity hedge would not be consistent with the least cost over time
4 standard. I do not believe that the Company’s Bilateral Transferred Capacity
5 procurement proposal provides that assurance.

6 Second, as I also explained in my Direct Testimony, entering into a long-term
7 capacity contract, which would not even necessarily be with a generation owner, would
8 not result in new capacity construction in PJM,¹³ nor would it help retain any capacity. It
9 would merely displace other generation which would have been built in the absence of
10 PPL’s capacity contract or lead to the retirement of other PJM capacity resources because
11 it is PJM’s responsibility to procure a target level of capacity (projected peak load plus a
12 reserve margin), and PJM will procure or retain that target amount of capacity whether or
13 not PPL signs a 10-year, 150 MW capacity contract with a generation owner or a capacity
14 trader. As Mr. Castanaro also recognizes, “ultimately PJM is responsible for ensuring
15 resource adequacy.”¹⁴

16 Third, while Mr. Castanaro stated that several respondents to PPL’s RFI
17 expressed interest in including capacity in the Long-Term Block product, he did not
18 provide those responses as an exhibit to his testimony, nor did he provide any
19 information or detail regarding the content of those responses.

20 In response to discovery the Company provided the RFI and the responses
21 received by PPL.¹⁵ I commend the Company for conducting market research before
22 proposing to procure a product for the default service supply portfolio. However, after
23 reviewing both the RFI and the responses received by PPL, I conclude that the responses

¹³ OCA Statement No. 1, p. 21, line 7 through p. 22, line 2.

¹⁴ PPL Electric Utilities Corporation, Statement No. 1, p. 17, lines 13-14.

¹⁵ PPL’s Response to OCA-V-1 subparts (a) and (b).

1 to the RFI do not justify the Company’s proposal to procure Bilateral Transferred
2 Capacity as a single product with Block Service. Neither do the responses justify the
3 Company’s proposal to procure 10-year PJM MAAC capacity. I reached this conclusion
4 based on the following reasons:

- 5 • In the RFI, PPL requested feedback on long-term energy block transactions,
6 meeting AEPS requirements, and renewable and conventional power purchase
7 agreements. The Company did not seek feedback specifically on long-term
8 capacity procurement. The word “capacity” does not come up even once in the
9 RFI.
- 10 • In the RFI, PPL did not request indicative pricing for any of the products.
- 11 • **BEGIN CONFIDENTIAL** [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
- 16 • [REDACTED]
17 **END CONFIDENTIAL**

18 Finally, it is the Company’s responsibility to justify that its proposal is consistent
19 with the “least cost over time” standard and to establish adequate customer protection
20 measures in a manner which convinces the Commission and other intervening parties that
21 customers are adequately protected from being locked into unreasonably high, above-
22 market capacity prices for 10 years. That I did not offer specific customer protections to
23 the liking of the Company does not justify the Company’s long-term capacity purchase
24 proposal. To the contrary, that the Company did not provide such protections as part of
25 its LTP Product proposal should prompt the Commission to reject PPL’s proposal.

26 Q. HOW DID MR. CASTANARO RESPOND TO YOUR ALTERNATIVE
27 RECOMMENDATION TO PROCURE BLOCK SERVICE SEPARATELY
28 FROM BILATERAL TRANSFERRED CAPACITY?

29 A. Mr. Castanaro opposed my alternative recommendation to procure Block Service and
30 Bilateral Transferred Capacity as separate products, citing two reasons. First, Mr.

1 Castanaro posited that procuring energy and capacity together enables a generation owner
2 to directly participate and offer energy and capacity while not precluding a marketer from
3 separately buying or hedging energy and capacity and bundling them for the Company.¹⁶
4 Second, according to Mr. Castanaro, auctions for separate products would entail
5 increased administrative costs.¹⁷

6 Q. DO YOU AGREE WITH MR. CASTANARO'S REASONING?

7 A. No. First, a generation owner can offer energy and capacity separately just as easily as it
8 can offer them together because in PJM they are inherently different products that are
9 procured and priced independently of each other. However, it would be more difficult for
10 energy-only or capacity-only traders to put in place arrangements to offer an energy +
11 capacity product. As I explained in my Direct Testimony, there could be potential
12 bidders specializing in selling energy-only block products that do not trade long-term
13 capacity. Similarly, there could also be potential bidders that specialize in trading long-
14 term capacity that do not engage in block energy trading. Soliciting the Block Service
15 and the Bilateral Transferred Capacity separately would increase participation in both
16 product solicitations while enabling PPL to choose the best offer for each component
17 separately. In addition, if the market is unable to provide one of the products (either
18 capacity or block energy) under terms acceptable to the Commission, PPL could still
19 procure the other product if they are solicited separately. Therefore, soliciting the two
20 components separately better supports price stability for residential customers.

21 Second, Mr. Castanaro does not quantify the incremental cost of soliciting Block
22 Service and Bilateral Transferred Capacity separately. As I explained above, soliciting
23 them separately would allow PPL to choose the best offer for each component, which

¹⁶ PPL Electric Utilities Corporation Statement No. 1-R, p. 10, lines 13-16.

¹⁷ PPL Electric Utilities Corporation Statement No. 1-R, p. 10, lines 16-18.

1 would lower the total cost of the procurement and potentially offset the increased
2 administrative cost. PPL can also procure both Block Service and Bilateral Transferred
3 Capacity as part of the same solicitation, yet still as separate products, so that it does not
4 incur the additional cost of administering two separate auctions.

5 Q. DID YOUR RECOMMENDATIONS REGARDING THE LTP PRODUCT
6 CHANGE AFTER REVIEWING MR. CASTANARO'S REBUTTAL
7 TESTIMONY?

8 A. No. I continue to recommend that PPL's proposal to procure 10-year, 150 MW of LTP
9 product, consisting of 10-year, 150 MW of around-the-clock block energy (i.e., Block
10 Service) and 10-year, 150 MW of unforced capacity (i.e., Bilateral Transferred Capacity),
11 be replaced with the procurement of 10-year, 150 MW of around-the-clock block energy.
12 The adoption of this recommendation would entail the elimination of the long-term
13 capacity contract, but the acceptance of the procurement of the around-the-clock block
14 energy. Further, if the Commission is inclined to authorize PPL to procure both a 10-
15 year block energy product and a 10-year capacity product, I recommend that the
16 Commission direct the Company to solicit these two products separately.

17 Q. DID YOU ADDRESS THE COMPANY'S PROPOSED SUPPLY PORTFOLIO
18 FOR RESIDENTIAL DEFAULT SERVICE CUSTOMERS IN YOUR DIRECT
19 TESTIMONY?

20 A. Yes. I opined that the mix of 12- and 24-month fixed-price full-requirements ("FPFR")
21 contracts represents a reasonable balance between rate stability, which is extremely
22 important to residential customers, and reflectiveness of competitive market conditions.¹⁸

23 Q. HOW DID MR. OLIKER RESPOND TO YOUR DIRECT TESTIMONY ON
24 THIS ISSUE?

¹⁸ OCA Statement No. 1, p. 12, lines 5-8.

1 A. In his Rebuttal Testimony, Mr. Oliker responded by repeating the claims presented in his
2 Direct Testimony and stated that he does not believe that the overarching goal of default
3 service ratemaking should be ensuring that the default service product provides price
4 stability.¹⁹

5 Q. DO YOU AGREE WITH MR. OLIKER’S STATEMENT?

6 A. No. As I also explained in my Direct Testimony, in its Final Rulemaking Order in
7 Docket No. L-2009-2095604,²⁰ the Commission emphasized the importance of rate
8 stability in numerous places, including, but not limited to, the following:

9 In implementing default service standards, Act 129 requires that the Commission be
10 concerned about **rate stability** as well as other considerations such as ensuring a “prudent
11 mix” of supply and ensuring safe and reliable service. (Second Default Service Rulemaking
12 Order, pp. 11-12, emphasis added).

13 Additionally, we endorse the concepts advanced by generators that the “least cost”
14 language of Act 129 does not represent the adoption of a “cookie-cutter” or “one size fits
15 all” approach to procurement but provides the DSP with a range of options to procure
16 energy that maximizes the types of energy products available and balances the concerns of
17 “least cost” with energy stability and **minimizing volatility**. We do not endorse, at this
18 time, the position of those parties that recommend solely a mix of just short and
19 intermediate term contracts and spot purchases as that unduly limits the range of supply
20 products available. (Second Default Service Rulemaking Order, p. 38, emphasis added).

21 We disagree with RESA’s overall recommendations as to the proper interpretation of the
22 “least cost” standard as mandating that default service rates approximate, on a prospective
23 basis, the market price of energy. Such an interpretation would signal retention of the
24 “prevailing market price” standard that has been expressly replaced under Act 129.
25 Moreover, this interpretation conflicts with **the Act 129 objective of achieving price
26 stability which dictates consideration of a range of energy products, not just those
27 that necessarily reflect the market price of electricity at a given point in time. Price
28 stability benefits are very important to some customer groups in that exposing them
29 to significant price volatility through general reliance on short term pricing would be
30 inconsistent with Act 129 objectives.** (Second Default Service Rulemaking Order, pp. 38-
31 39, emphasis added).

¹⁹ RESA St. No. 1, p. 50, lines 21-23.

²⁰ Implementation of Act 129 of October 15, 2008: Default Service and Retail Electric Markets, Docket No. L-2009-2095604 (Order entered Oct. 4, 2011) (“Second Default Service Rulemaking Order”).

1 In implementing default service standards, the Commission must be concerned about **rate**
2 **stability** as well as other considerations such as ensuring a “prudent mix” of supply and
3 ensuring safe and reliable service. (Second Default Service Rulemaking Order, p. 40,
4 emphasis added).

5 We agree with the majority of parties that the “prudent mix” of contracts be interpreted in
6 a flexible fashion which allows the DSPs to design their own combination of products that
7 meets the various obligations to achieve “least cost to customers over time,” ensure **price**
8 **stability**, and maintain adequate and reliable service. (Second Default Service Rulemaking
9 Order, p. 60, emphasis added).

10 Q. BASED ON THE ABOVE GUIDANCE PROVIDED BY THE COMMISSION,
11 DID YOU CHANGE YOUR RECOMMENDATION REGARDING THE
12 COMPANY’S PROPOSED FPFR PORTFOLIO?

13 A. No. I continue to recommend that the Commission approve PPL’s transition to a mix of
14 12-month and 24-month FPFR contracts to supply the residential default service portfolio
15 to establish a reasonable balance between rate stability and market reflectiveness. It is
16 clear from the Commission’s guidance in the Second Default Service Rulemaking Order
17 that the Commission requires PPL (and other default service providers jurisdictional to
18 the Commission) to consider achieving rate stability and minimizing rate volatility as one
19 of the primary goals (alongside ensuring least cost over time and maintaining adequate
20 and reliable service). Therefore, I continue to recommend that the Commission dismiss
21 Mr. Oliker’s objections related to PPL’s proposed residential default service supply
22 portfolio and reject the notion that customers should be forced to shop to be ensured of a
23 reasonable level of rate stability.

24 Q. DID YOU OPINE ON THE COMPANY’S PROPOSAL TO ENTER INTO 20-
25 YEAR SOLAR AEC CONTRACTS TO SATISFY A PORTION OF THE AEPS
26 ACT COMPLIANCE OBLIGATION FOR RESIDENTIAL DEFAULT
27 SERVICE?

1 A. Yes. In my Direct Testimony, I supported the Company's related proposal on the basis
2 that long-term contracts for the provision of solar Tier 1 AECs could help stabilize prices
3 for what would otherwise be a volatile component of the overall portfolio.²¹ In response
4 to Mr. Oliker's objection to PPL entering into long-term contracts for solar AECs in his
5 Direct Testimony, I reiterated my support for the Company's proposal in my rebuttal
6 Testimony.²²

7 Q. HOW DID MR. OLIKER RESPOND TO YOUR SUPPORT OF THE
8 COMPANY'S LONG-TERM SOLAR AEC PROCUREMENT PROPOSAL?

9 A. In his Rebuttal Testimony Mr. Oliker responded by repeating the argument he put forth in
10 his Direct Testimony and stated that the Commission should reject the Company's
11 proposal because the use of long-term contracts to forecast and set the cost of solar AECs
12 over a 20-year period for default service customers leads to a PTC that is misaligned with
13 market forces.²³

14 Q. DO YOU AGREE WITH MR. OLIKER'S REASONING FOR HIS
15 OPPOSITION TO LONG-TERM SOLAR AEC CONTRACTS ON BEHALF OF
16 DEFAULT SERVICE CUSTOMERS?

17 A. No. As I also explained in my Direct Testimony, if there is an improvement that can be
18 made to the default service procurement process which is likely to enhance price stability
19 or affordability for default service customers, it should be approved by the Commission
20 regardless of whether it is practical or economic for EGSs to replicate the same
21 procurement strategy. Since entering into long-term solar AEC contracts promotes rate
22 stability for default service customers, it should be approved by the Commission. The
23 goal of retail competition is to increase service and pricing alternatives to customers, not

²¹ OCA Statement No. 1, p. 22, line 15 through p. 23, line 7.

²² OCA Statement No. 1R, pp. 7-8.

²³ RESA Statement No. 1-R, p. 9, line 14 through p. 10, line 3.

1 to attempt to increase the market share of EGSs by purposefully designing default service
2 to be less attractive to customers.

3 Q. DID THE COMMISSION PROVIDE ANY GUIDANCE ON THE
4 APPROPRIATENESS OF USING LONG-TERM CONTRACTS TO PROCURE
5 AECs FOR DEFAULT SERVICE CUSTOMERS?

6 A. Yes. The Commission stated that “it is appropriate for [default service providers] to
7 acquire AECs through a variety of methods, including [full requirements] purchases, as
8 well as **long-term**, short-term and spot purchases” (emphasis added).²⁴ PPL’s AEPS Act
9 compliance and the corresponding AEC acquisition proposal includes all of the methods
10 specified in the Commission’s guidance in its Second Default Service Rulemaking Order.
11 Therefore, PPL’s AEPS Act compliance proposal, including the proposed 20-year solar
12 AEC contracts, complies with the Commission’s guidance in its Second Default Service
13 Rulemaking Order.

14 Q. AFTER REVIEWING MR. OLIKER’S REBUTTAL TESTIMONY, DO YOU
15 CONTINUE TO SUPPORT THE COMPANY’S PROPOSAL TO ENTER INTO
16 20-YEAR SOLAR AEC CONTRACTS?

17 A. Yes. For the reasons I provided above, as well as the reasons I explained in my Direct
18 Testimony and Rebuttal Testimony in this docket, I continue to support the Company’s
19 long-term solar AEC procurement proposal.

20 **III. TIME-OF-USE RATES**

21 Q. PLEASE DESCRIBE PPL’S CURRENT TOU RATE STRUCTURE
22 AVAILABLE TO RESIDENTIAL DEFAULT SERVICE CUSTOMERS.

23 A. Currently under DSP V, PPL offers a residential TOU rate on a voluntary basis. The
24 residential TOU rate includes a seasonality component, with the summer period running

²⁴ Second Default Service Rulemaking Order, p. 77.

1 from June 1 through November 30 and the winter term running from December 1 through
2 May 31 each year. The two seasons entail different peak and off-peak hours — the
3 summer peak hours are the four hours beginning at 2 PM Monday through Friday,
4 excluding holidays. Winter peak hours are the four hours beginning at 4 PM Monday
5 through Friday, excluding holidays. All other hours are designated as off-peak. The
6 residential TOU tariff does not include either a super-peak period or a super-off-peak
7 period. PPL relies on the non-TOU residential default service power supply for the
8 provision of power supply to residential TOU customers and applies a formulaic
9 approach to establishing an off-peak price relative to the generation component of the
10 PTC. PPL sets the off-peak price to 90 percent of the generation component of the PTC,
11 with peak period prices based on average peak-to-off-peak market ratios. The ratios are
12 computed as a five-year moving average, updated each year as more recent data become
13 available.

14 Q. DID PPL PROPOSE ANY CHANGES TO ITS RESIDENTIAL TOU RATE
15 OPTION FOR DSP VI?

16 A. Yes. PPL proposed to change the TOU on-peak hours to 3 PM – 7 PM annually, and to
17 eliminate the separate summer and winter terms. No changes were proposed to the off-
18 peak hour percentage discount.²⁵

19 Q. DID YOU ADDRESS THIS ISSUE IN YOUR DIRECT TESTIMONY?

20 A. Yes. In my Direct Testimony I recommended that the Company retain the seasonality
21 component, with the same seasonal definitions and the same summer peak hours (2 PM –
22 6 PM) and assign all capacity costs to the summer season peak TOU period.²⁶ I based
23 these recommendations on PPL’s capacity cost allocation mechanism (i.e., the “Five PJM

²⁵ PPL Electric Utilities Corporation Statement No. 1, page 53, lines 13-17.

²⁶ OCA Statement No. 1, p. 26, lines 7-9.

1 Coincident Peaks” or “5CP” construct)²⁷, as well as my analysis of the hours of the day
2 and the months when those 5CP hours occur.²⁸

3 Q. HOW DID MR. CASTANARO RESPOND TO YOUR RECOMMENDATION?

4 A. In his Rebuttal Testimony Mr. Castanaro objected to my recommendations for three
5 stated reasons. First, Mr. Castanaro stated that in response to discovery I was unable to
6 provide a revision to the TOU rate formula in the Company’s tariff which would
7 implement my recommendation. Second, Mr. Castanaro claimed that PPL allocates
8 capacity costs by 5CP days over the entire year. Third, he claimed that the Company
9 would need to change their methodology for calculating Installed Capacity (“ICAP”) tags
10 for customers, which are used to determine the allocation of capacity costs.

11 Q. DO YOU AGREE WITH ANY OF MR CASTANARO’S REASONS FOR
12 OBJECTING TO YOUR PROPOSED MODIFICATION OF TOU RATES?

13 A. No. First, as I explained in my interrogatory response PPL-I-2c, which is conveniently
14 provided by the Company in PPL Electric Exhibit AC3-R, the Time of Use rate formula
15 on PPL tariff Page Nos. 19Z.5B and 19Z.5C does not contain sufficient detail for me to
16 revise it in a way which would demonstrate how rates would be computed under my
17 proposal to assign all capacity costs to the summer season. Assigning all capacity costs
18 to the summer season would be accomplished by revising the way in which “GSM”
19 (Seasonal Multiplier based on historic data) is computed. The PPL Electric tariff pages
20 to which the interrogatory cited by Mr. Castanaro refers do not provide the formula
21 according to which the GSM Seasonal Multiplier is computed. Therefore, with the
22 information provided, it was, and still is, impossible for me to demonstrate how my
23 recommendation would be implemented as a tariff TOU rate formula. However, if the

²⁷ OCA Statement No. 1, p. 26, lines 13-23.

²⁸ OCA Statement No. 1, p. 27, lines 1-17.

1 Company were to provide the inputs to and the computation of the current on-peak
 2 multipliers, I could demonstrate how that computation would be modified to implement
 3 my recommendation.

4 Second, Mr. Castanaro’s claim that PPL allocates capacity costs by 5CP days over
 5 the entire year is simply incorrect. The figure below is an excerpt from a document on
 6 the Company’s website,²⁹ and it clearly states and demonstrates that PPL uses 5CP days
 7 exclusively over the summer period (June 1 through September 30), and not over the
 8 entire year, to assign capacity peak load contributions (or ICAP tags) and thus capacity
 9 costs.

**Peak Load Day/Hour Data for the Calculation
of the 2023 Peak Load Contributions (PLCs)**

PJM 2023 Coincident Peaks
Used in development of the 6/1/24 to 5/31/25 Capacity Peak Load Contributions

	Peak Date	Peak Time (Hour Beginning) (Hour Ending)		Peak Load Value ² (MW)
ICAP	7/5/2023	1700	1800	6598.1
ICAP	7/27/2023	1700	1800	6524.3
ICAP	7/28/2023	1700	1800	6696.6
ICAP	9/5/2023	1600	1700	6812.5
ICAP	9/6/2023	1600	1700	6862.4
ICAP Target¹	9/6/2023	1600	1700	6849.2

¹ Interrupted Load Added Back and Weather Normalized
² Metered Load with Interruptions Added Back
 Five Coincident PJM Peaks from 6/1/22 to 9/30/22 excluding Holidays and Weekends
 Based on the PJM Summer 2023 Weather Normalized Coincident Peaks

Updated 12/31/2023

10 Third, since PPL already allocates capacity peak load contributions based
 11 exclusively on 5CP days over the summer period, implementing my recommended

²⁹ <https://www.pplelectric.com/-/media/PPLElectric/At-Your-Service/Docs/General-Supplier-Reference-Information/2023/2023-PJM-and-PPL-Zone-Peak-Load-Dates-for-PLC-Calcs.ashx> (last visited on 7/10/2024)

1 change would not require the Company to change its methodology for calculating ICAP
2 tags for customers. I note that setting the TOU rate multiplier is an administrative task
3 and it is not equivalent to allocating energy and capacity costs.

4 Finally, if the Company is concerned that customers may game the system by
5 strategically switching between TOU rates and non-TOU default service rates,³⁰ it can
6 propose restrictions on switching into and out of TOU rates. For example, PECO Energy
7 Company's tariff includes the following language related to that issue:

8 Customers who select the TOU Pricing Option may leave at any time without incurring
9 related penalties or fees. However, Customers who select and subsequently leave the TOU
10 Pricing Option for any reason may not re-enroll on the TOU Pricing Option rate for twelve
11 billing months after switching off the TOU Pricing Option rate.³¹

12 Q. AFTER REVIEWING MR. CASTANARO'S REBUTTAL TESTIMONY, DO
13 YOU CONTINUE TO RECOMMEND THAT THE COMPANY RETAIN THE
14 SEASONALITY COMPONENT OF ITS TOU MULTIPLIER, WITH THE
15 SAME SEASONAL DEFINITIONS AND THE SAME SUMMER PEAK
16 HOURS (2 PM – 6 PM), AND ASSIGN ALL CAPACITY COSTS TO THE
17 SUMMER SEASON PEAK TOU PERIOD?

18 A. Yes.

19 Q. HOW DID MR. OLIKER RESPOND TO YOUR RECOMMENDATIONS
20 RELATED TO TOU RATES?

21 A. In his Rebuttal Testimony, Mr. Oliker makes a blanket statement and claims that both
22 Ms. Barbara Alexander's and my recommendations on the Company's TOU rate program
23 proposal should be rejected because, according to Mr. Oliker, the electric distribution
24 company ("EDC") should avoid expending ratepayer money on creating products that

³⁰ PPL Electric Utilities Corporation Statement No. 1-R, p. 16, lines 2-4.

³¹ PECO Energy Company Electric Service Tariff (Effective July 1, 2024), Supplement No. 47 to Tariff Electric Pa. P.U.C. No. 7, Tenth Revised Page No. 37A.

1 can more appropriately and effectively be delivered by the competitive market. He
2 cautions against any efforts here to enhance the PPL TOU rate offering and to instead
3 rely on EGSs in the competitive market to develop the innovative products that are
4 tailored to the needs of a variety of customers.³²

5 Q. PLEASE COMMENT ON MR. OLIKER'S RESPONSE TO YOUR
6 RECOMMENDATIONS.

7 A. As Mr. Oliker also acknowledges, the EDC has a statutory requirement to offer a TOU
8 rate. Mr. Oliker fails to explain how PPL can fulfill this requirement without expending
9 ratepayer money, or what kinds of products PPL can create which cannot be delivered by
10 the competitive market. PPL should strive to create the best TOU rate products it can so
11 that the ratepayer money which is already spent on the TOU program can be leveraged to
12 its fullest extent to meet the Commission's TOU rate program goals. This should entail
13 considering the recommendations in Ms. Alexander's and my respective direct
14 testimonies.

15 Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

16 A. Yes, it does.

³² RESA Statement No. 1-R, p. 12.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

SURREBUTTAL TESTIMONY

OF

BARBARA R. ALEXANDER

Barbara Alexander Consulting LLC

ON BEHALF OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

July 12, 2024

1 Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

2 A. My name is Barbara R. Alexander. I am the sole member of Barbara Alexander Consulting
3 LLC. My address is 44 Beech St., Hallowell, ME 04347. I appear in this case as a witness
4 on behalf of the Office of Consumer Advocate (OCA).

5 Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

6 A. Yes. I filed Direct Testimony on behalf of the OCA on June 3, 2024, and Rebuttal
7 Testimony on behalf of the OCA on July 1, 2024.

8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

9 A. I am submitting Surrebuttal Testimony in response to the Rebuttal Testimony of Ms.
10 Melinda Stumpf¹ and Mr. Andrew Castanaro² on behalf of PPL Electric Utilities (PPL)
11 and Rebuttal Testimony of Mr. Joseph Oliker on behalf of the Retail Energy Supply
12 Association (RESA).³

13 **RESPONSE TO REBUTTAL TESTIMONY OF PPL**

14 Q. TURNING FIRST TO THE REBUTTAL TESTIMONY OF MS. STUMPF ON BEHALF
15 OF PPL, WHAT WAS HER RESPONSE TO YOUR RECOMMENDATIONS FOR THE
16 STANDARD OFFER PROGRAM (SOP)?

17 A. Ms. Stumpf agrees to terminate the SOP if the Commission orders it. In addition, we both
18 agree that if the program is not terminated, that customers should be returned to default
19 service at the end of the SOP contract unless the customer has affirmatively consented to
20 new or renewed contract terms with the supplier.⁴

21

¹ PPL St. No. 3-R.

² PPL St. No. 1-R.

³ RESA St. No. 1-R.

⁴ PPL St. No. 3-R, page 28.

1 Q. PLEASE RESPOND TO MS. STUMPF'S REJECTION OF YOUR PROPOSED
2 CHANGE IN PPL'S BILL DISCLOSURES.

3 A. Ms. Stumpf rejects my recommendations with respect to improving PPL's bill disclosures
4 to enable customers to more correctly and easily compare supplier prices with the PTC.
5 First, I recommended that PPL calculate the total amount of what the customer would pay
6 under default service to compare with the total amount of the supplier charges billed by
7 PPL. Second, I recommended that PPL prohibit suppliers from presenting a cents per kWh
8 that does not include all supplier charges (such as the example in my Direct Testimony in
9 which the supplier charged both a fixed monthly fee with a cents per kWh charge). With
10 regard to my first recommendation, Ms. Stumpf misunderstands my proposal by stating
11 that PPL does not have sufficient information on the supplier charges to make such a
12 disclosure.⁵ However, this is not correct. PPL knows the total amount of the supplier
13 charges and can easily calculate the customer's charges under the PTC using the customer's
14 monthly usage and the applicable PTC. Second, with respect to suppliers that do not
15 provide billing information in sufficient detail to present an accurate cents per kWh rate
16 (e.g., those suppliers who do not include a cents per kWh rate on their billing detail or those
17 that include both a cents per kWh rate and a fixed charge) that reflects all their monthly
18 charges, PPL can require suppliers to provide this information as a condition of their
19 Purchase of Receivables billing arrangement. In total, PPL should present the customer's
20 monthly charges under the PTC to compare with a total amount of the supplier charges and
21 require suppliers to submit the billing detail that reflects an accurate cents per kWh rate on
22 the bill.

⁵ Ibid., pages 28-29.

1 Q. TURNING TO THE REBUTTAL FILED BY MR. CASTANARO ON BEHALF OF PPL,
2 PLEASE RESPOND TO HIS REJECTION OF YOUR SUGGESTION THAT PPL
3 EXPLORE A CREDIT OR REBATE RATE OPTION.

4 A. Mr. Castanaro’s rejection of my recommendation relies on his conclusion that demand
5 response programs are more properly considered under Act 129 and that there is no basis
6 for conducting a “pilot” for this type of program since the structure of demand response
7 programs are well documented.⁶ He states that the Commission has not authorized
8 dispatchable demand response programs under Act 129.⁷ However, Mr. Castanaro does not
9 properly understand my proposal. Act 129 and the Commission’s approval of energy
10 efficiency programs focus on PPL’s distribution service and recovery of costs of efficiency
11 programs through distribution rates. This is a default service proceeding and, as we both
12 agree, PPL is required to offer a time of use (TOU) rate option as part of its supply portfolio.
13 My recommendation is that PPL also offer an alternative to a traditional TOU rate option
14 to focus on a customer’s hourly usage by providing “carrots” instead of “sticks” in the form
15 of higher peak hour prices. Such a program would use the customer’s hourly usage
16 provided via the smart metering system to reward customers who reduce usage during peak
17 hours. Such a program could focus on the customer’s usage overall, such as the Maryland
18 Peak Rewards program, or this type of program could focus on Electric Vehicle usage and
19 reward those customers with a bill credit for charging their electric vehicle during off peak

⁶ PPL St. No. 1-R, pages 18-19.

⁷ Ibid, page 19, lines 3-9: “However, PPL Electric does not have a dispatchable demand response (“DDR”) program because in its Phase IV Implementation Order, the Commission specifically excluded DDR from counting toward the peak demand reduction targets established for Phase IV of Act 129 EE&C. See Energy Efficiency and Conservation Program, Docket No. M-2020-3015228, pp. 68, 84 (Order entered on June 18, 2020). Therefore, EDCs can only achieve their demand reduction targets with the peak demand reductions associated with energy efficiency measures.”

1 hours. In either case, I do not see the precedent of Act 129 program orders as prohibiting
2 such a program to compare customer enrollment and impact to the more traditional TOU
3 rate option, particularly since PPL's TOU rate option is poorly subscribed and without any
4 sufficient impact on peak demand to justify the costs of offering this program.

5 Q. MR. CASTANARO ALSO EXCUSES THE LACK OF PARTICIPATION AND
6 RESULTS FOR ITS TOU RATE OPTION. PLEASE RESPOND.

7 A. According to Mr. Castanaro, "However, the TOU rate program is a default service product
8 and like other Default Service rates, its goal is not to aggressively attract a significant
9 number of customers. Rather the competitive market should drive adoption of TOU
10 products."⁸ I disagree with this statement because it appears to conclude that it doesn't
11 matter how poorly the current TOU rate option performs or whether the costs of
12 implementing this program are worth the lack of benefits. Even more importantly, to my
13 knowledge, no EGS offers a TOU rate option to PPL's customers so that the reliance on
14 the competitive market to offer more popular or effective TOU rate options is without
15 evidence.⁹ Furthermore, there is no prohibition in any statute that would prevent PPL from
16 evaluating and potentially designing an incentive type program in addition to the statutory
17 obligation to offer a TOU rate option. It is unfortunate that the statute only mentions an
18 obligation to offer a TOU rate option. It is reasonable for the Commission to consider this
19 obligation as having been met but also to conclude that alternative approaches should be
20 evaluated and potentially implemented to achieve a higher degree of customer interest and
21 results. It is time for the distribution companies and the Commission to consider the value

⁸ Ibid., page 18, lines 10-12.

⁹ I explored the EGS offers to PPL's residential customers in zip code 17104 on 7/7/2024 and no TOU rate offers were available. It is my understanding that no EGS currently offers TOU rates to PPL's residential customers.

1 to ratepayers based on the design of the current TOU programs and explore alternative or
2 complimentary options such as I have proposed.

3 Q. HOW SHOULD THE COSTS OF ANY REBATE PROGRAM BE RECOVERED?

4 A. Reasonable costs for an additional pilot program to evaluate customer interest and results
5 should be paid for in the same manner as the current TOU rate option.

6

7 **RESPONSE TO REBUTTAL TESTIMONY OF RESA**

8 Q. DOES MR. OLIKER'S REBUTTAL ON BEHALF OF RESA PROVIDE ANY
9 EVIDENCE TO SUPPORT HIS REJECTION OF YOUR FINDINGS AND
10 RECOMMENDATIONS CONCERNING THE SOP AND PPL'S BILLING
11 DISCLOSURES?

12 A. No. Mr. Oliker's Rebuttal Testimony, like his Direct, continues to rely on unsubstantiated
13 claims of benefits associated with the retail energy market and to recommend proposals
14 that conflict with the statutory and regulatory policies governing default service in
15 Pennsylvania. I will not repeat my Rebuttal Testimony regarding the legislative and
16 regulatory policies that govern default service procurement policy, bill presentation, and
17 pricing comparisons based on the PTC, but my Rebuttal Testimony addresses the
18 arguments made in Mr. Oliker's Rebuttal Testimony.

19 Q. SHOULD MR. OLIKER'S RELIANCE ON OVERALL TRENDS IN CUSTOMER'S
20 SELECTION OF SUPPLIERS IMPACT YOUR SOP PROPOSALS?

21 A. No. According to Mr. Oliker, the trend of lower customer interest in choosing EGSs should
22 support the continuation of the SOP.¹⁰ However, Mr. Oliker does not apparently view

¹⁰ RESA St. No. 1-R, page 5, lines 3-6.

1 consumers as educated sufficiently to choose not to shop and to rely on default service after
2 15+ years of experience in the retail energy market. Shopping statistics reflect customer
3 decisions that should be viewed as valid and not relied upon to promote the choice of an
4 ESG as an end in itself. I continue to raise significant concerns about the use of PPL's role
5 as the distribution service provider to subsidize the marketing and enrollment function that
6 should rightly be allocated to EGSs.

7 Q. DID MR. OLIKER PROVIDE ANY BILLING DATA IN HIS REBUTTAL
8 TESTIMONY?

9 A. No. He continues to denigrate the comparison between a supplier's price and that of default
10 service by claiming that the supplier's price or its charges do not reflect values or benefits
11 that cannot be captured in a cents per kWh comparison to the PTC.¹¹ This argument
12 reflects the long standing attempt by EGSs to justify higher prices. However, Mr. Oliker
13 does not acknowledge the obvious solutions to this "problem." EGSs could offer TOU rate
14 options to PPL's customers, but they do not.¹² EGSs could communicate to their customers
15 to justify their higher prices, but they do not. EGSs could issue their own bills to their
16 customers to fully explain the "value" of their higher prices or the attributes of their service,
17 but they do not. Instead, EGSs rely on the subsidy provided by PPL and other distribution
18 companies under the Purchase of Receivables program to bill and collect their charges.

¹¹ See, e.g., RESA St. No. 1-R, page 7: "For instance, this model does not permit suppliers to factor into the supply price per kWh the value of long-term price certainty, Time of Use ("TOU") rates, gift cards and other value-added products and services. However, the answer is not to transition to a dollars and cents calculation being shown on the bill, which would suffer from similar deficiencies."

¹²

1 Q. ON WHAT BASIS DOES MR. OLIKER REJECT YOUR PROPOSAL TO SHOW A
2 COMPARISON BETWEEN THE SUPPLIER CHARGES AND WHAT THE
3 CUSTOMER WOULD PAY UNDER DEFAULT SERVICE?

4 A. According to Mr. Oliker I have not presented any evidence that justifies this proposal.¹³
5 That is incorrect. I presented evidence of a supplier bill that included a misleading cents
6 per kWh rate that did not include the impact of the additional dollar charges.¹⁴ The
7 customer who looked at the cents per kWh rate disclosed in the supplier charges and
8 compared with the applicable PTC would be misled into thinking their rate was below the
9 PTC. The supplier's use of the Rate Ready billing feature offered by PPL should be
10 reformed to require the supplier to provide the actual cents per kWh charged to the
11 customer and PPL should adopt my recommendation to show the total charges under the
12 PTC to compare with the total supplier charges presented on the PPL bill. Both
13 recommendations will enhance the ability of the customer to shop and compare offers. To
14 the extent that suppliers seek to provide a service in addition to the generation supply
15 service, such services could be billed separately by the supplier or be the subject of separate
16 communications from the supplier to the customer to justify their price differential from
17 the PTC. The current Purchase of Receivables billing arrangement may not suit the needs
18 of suppliers with more complex pricing mechanisms or for attributes other than generation
19 supply service.

¹³ Ibid., page 7, pointing to my lack of "supporting evidence."

¹⁴ OCA St. No. 2, page 14 and Exhibit BA-3.

1 Q. HAS MR. OLIKER PROVIDED ANY EVIDENCE OF SUPPLIERS THAT OFFER
2 PRODUCTS AND SERVICES OTHER THAN GENERATION SUPPLY SERVICE?

3 A. No. His claim that such additional products and services are actually offered by suppliers
4 to PPL’s residential customers is made without evidence.

5 Q. MR. OLIKER OPPOSES YOUR RECOMMENDATION TO EXPLORE AN
6 ALTERNATIVE TO THE CURRENT TOU RATE OPTION. DO YOU AGREE WITH
7 HIS REASONING?

8 A. No. The basis for Mr. Oliker’s objection to any enhancement or alternative approach to
9 the current TOU rate option is that the competitive market should be relied upon to provide
10 “innovative” products, stating “EGSs have long advocated for the importance of relying on
11 TOU offers that are available in the retail competitive market.”¹⁵ However, there is no evidence
12 that EGSs offer TOU or any other innovative rate offering to PPL’s customers. I reviewed the
13 current EGS offers to PPL’s residential customers using either 750 kWh and 1,500 kWh per
14 month for zip code 17104 in Harrisburg, PA.¹⁶ None of those offers reflect a TOU rate or any
15 rate option either than fixed or variable cents per kWh prices. However, 20 of these offers
16 included a monthly charge such as the example I provided in my Direct.

17 Q. DID RESA PROVIDE ANY EVIDENCE THAT TOU PLANS ARE OFFERED TO
18 PPL’S RESIDENTIAL CUSTOMERS?

19 A. No. In response to OCA-I-1, RESA was asked to document any TOU rates offered to
20 PPL’s residential customers. The response, which I attach as Exhibit BA-1SR, confirms
21 that no such offers are made. I explored the link for NRG provided in this response for Zip
22 Code 17104 in PPL’s service territory and no TOU rate was offered. I explored the

¹⁵ RESA St. No. 1-R, page 12, lines 8-9.

¹⁶ Ms. Alexander reviewed these rate offers on the PaPowerSwitch.com web portal on 7/7/2024.

1 Direct Energy link but that link is to a generic terms of service document that does not
2 reflect any TOU offer to any PPL residential customer. Finally, the third citation in this
3 response is applicable to Texas and not Pennsylvania. As a result the concern RESA raises
4 about expanding or relying on PPL's TOU rate options and any others I have
5 recommended should be ignored.

6 Q. SHOULD MR. OLIKER'S TESTIMONY BE RELIED UPON TO SUPPORT ANY OF
7 HIS RECOMMENDATIONS?

8 A. No. He offers no evidence to support any of his claims of innovative services or value
9 added services to PPL's residential customers. On the contrary, my testimony and that of
10 PPL's witnesses offer fact-based evidence of the higher prices charged to PPL's residential
11 customers and the adverse impacts of the SOP, both during the program and with post-SOP
12 contract prices. I continue to urge the Commission to adopt my recommendations
13 concerning the SOP and the TOU programs as set forth in my Direct.

14 Q. DOES THIS COMPLETE YOUR TESTIMONY AT THIS TIME?

15 A. Yes.

**EXHIBIT BA-1SR
(RESA RESPONSE TO OCA SET 1-1)**

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of Office of Consumer Advocate (“OCA”), Set I in
Docket No. P-2024-3047290**

Request: OCA-I-1 Please provide any evidence that indicates that RESA members or any EGS offers TOU rates to PPL’s residential customers. In your response, state whether Mr. Oliker is aware of any such offers and provide examples of such offers.

Response:

See RESA Exh. JO-2 at pdf page 5. According to the Commission’s Activity Report 2022, there were 7,583 TOU customer accounts reported by the EGSs.

In addition, a search of publicly available information resulted in the below examples:

NRG

<https://www.picknrg.com/en/pennsylvania>

NRG offers both electricity and gas plans for Pennsylvania customers. By choosing NRG as your energy supplier and selecting one of our excellent plans, you’ll enjoy rewards like cash back, travel points or charity contributions.

- Renewable electricity plans provide an offset to your electricity use in the form of renewable energy credits (RECs) that help fund the production of green energy.
- Time of use plans allow you to get a lower electricity rate at certain times of the day or week.

Direct Energy (Gateway Energy Services)

Residential and Small Commercial Terms and Conditions

<https://directenergydocuments.gesc.com/TCPPage.aspx?Doc=DERPADTDTCE>

Constellation

Texas Offer:

<https://www.constellation.com/energy-101/energy-education/peak-vs-off-peak.html>

EV TOU Rate Plans : Flex Charge and Free Charge

There are two Time of Use Rate plans for EV owners to choose from:

<p>FlexCharge 10pm-6am (TX); 11pm- 7am (MD): LOWER off-peak rate All other hours: On Peak Rate</p>	<p>FreeCharge 12:00am-3:59am: FREE off-peak rate 4:00am-11:59pm: On Peak Rate</p>
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Our TOU Rate Structure drives the desired outcome by incentivizing customers to charge during off-peak periods.

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: July 12, 2024

**Response of the Retail Energy Supply Association (“RESA”)
to the Interrogatories of Office of Consumer Advocate (“OCA”), Set I in
Docket No. P-2024-3047290**

Request: OCA-I-2 Does Mr. Oliker agree that PPL would present a TOU rate on behalf of an EGS on its customer bills if any EGS submits such a rate option for billing?

Response:

Mr. Oliker agrees that the prices charged by the EGS would be displayed in the manner dictated by PPL’s billing system but not that the display of these EGS prices would be in a manner to understand that the end user charge is a factor of various calculations related to the time of usage. The ability of EGSs to present their customers useful information about the prices they are charged is limited to what is permitted by PPL to be included on the EDC consolidated bill. *See* PP&L Competitive Billing Specifications Rider:

- Section 3: “The EGS will calculate its customers’ charges and will send its’ customers’ basic charges. . . in accordance with the data transfer processes established by [EDEWG].”
- Section 4: “PPL will provide the EGS up to two lines, each 80 characters in length on its standard bill for messages directly related to the calculations or understanding of the EGS portion of the bill.”

Response provided by: Joseph Oliker on behalf of RESA

Date response provided: July 12, 2024

