

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation  
for Approval of its Second Distribution Energy Resources Management Plan : P-2024-3049223  
: :

**ORDER**  
**GRANTING MOTION TO COMPEL**

On May 20, 2024, PPL Electric Utilities Corporation (PPL) filed a Petition requesting that the Pennsylvania Public Utility Commission (Commission) approve of tariff modifications and other authorizations that are needs to implement PPL’s Second Distributed Energy Resources (DER) Management Plan, pursuant to Paragraph 62 of the Joint Petition for Settlement of All Issues approved by the Commission at Docket No. P-2019-3010128.

On June 7, 2024, the Office of Small Business Advocate (OSBA) filed a Notice of Intervention and Public Statement in this proceeding.

On July 1, 2024, the Office of Consumer Advocate (OCA) filed an Answer to PPL’s Petition.

On July 8, 2024, American Home Contractors, Inc., Enphase Energy, Inc., the Solar Energy Industries Association, SolarEdge Technologies, Inc., Sun Directed, Sunnova, Inc., Tesla, Inc., and Trinity Solar, LLC (collectively, the Joint Solar Parties or JSPs) filed an Answer, Petition to Intervene, and Protest in this proceeding.<sup>1</sup>

On July 10, 2024, the PP&L Industrial Customer Alliance (PPLICIA) filed a Petition to Intervene.

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<sup>1</sup> On September 13, 2024, the JSPs filed a letter stating that Sunnova, Inc. is no longer a member of the JSPs.

On July 12, 2024, the Sustainable Energy Fund of Central Eastern Pennsylvania (SEF) filed a Petition to Intervene.

On July 24, 2024, a hearing notice was issued, establishing a telephonic prehearing conference for this proceeding for Tuesday, August 6, 2024, at 10:00 a.m. and assigning me as the Presiding Officer. A Prehearing Conference Order was issued on July 25, 2024, setting forth rules that would govern the prehearing conference.

On August 2, 2024, prehearing memoranda were filed by PPL, OSBA, OCA, the JSPs, and PPLICA. On August 5, 2024, SEF filed a prehearing memorandum.

The prehearing conference convened on August 6, 2024, as scheduled. PPL, OSBA, OCA, the JSPs, PPLICA, and SEF were present and represented by counsel. During the Prehearing Conference various procedural matters were discussed, including: the Petitions to Intervene filed by the JSPs, PPLICA, and SEF were granted; litigation schedules were set; and modifications to the Commission's discovery rules were established. A Scheduling Order was issued on August 7, 2024.

On September 13, 2024, PPL filed its Motion to Dismiss Objections and Compel Responses to Interrogatories and Requests for Production of Documents Propounded on the Joint Solar Parties – Set I (Motion to Compel). In accordance with the Scheduling Order issued on August 7, 2024, Motions to Compel are due within three days of service of written objections. The JSPs served their formal objections to PPL on September 10, 2024. Therefore, PPL's Motion to Compel was timely filed on September 13, 2024.

On September 16, 2024, the JSPs filed their Answer to PPL's Motion to Compel. In accordance with the Scheduling Order issued on August 7, 2024, Answers to Motions to Compel are due within three days of service of a Motion to Compel. The JSPs served their Answer to PPL's Motion to Compel on September 16, 2024. Therefore, the JSP's Answer to PPL's Motion to Compel was timely filed.

For the reasons stated below, PPL's Motion to Compel is granted.

### DISCUSSION

Section 5.321(c) of the Commission's Rules of Administrative Practice and Procedure, 52 Pa.Code § 5.321(c), specifically provides that "a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action." Discovery is permitted regardless of whether the information sought "relates to the claim or defense of the party seeking discovery or to the claim or defense of another party or participant." *Id.* Information may be discoverable, even if it would be inadmissible at a hearing. "It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence." *Id.* Consistently, the Commission has allowed participants wide latitude in discovery matters. *Pa. P.U.C. v. The Peoples Natural Gas Company*, 62 Pa. PUC 56 (August 26, 1986); and *Pa. P.U.C. v. Equitable Gas Company*, 61 Pa. PUC 468 (May 16, 1986).

The Commission's regulations place limitations on the scope of discovery. Discovery that would cause unreasonable burden or expense or require an unreasonable investigation by a party is not permitted. 52 Pa.Code § 5.361(a)(2), (4). "The law is [ ] clear that the Commission has the right to limit discovery that would place an unreasonable burden upon a participant in litigation." *Application of Newtown Artesian Water Company and Indian Rock Water Company*, Docket No. A-212070, 1990 Pa. PUC LEXIS 83 (June 20, 1990) *citing City of Pittsburgh v. Pa. PUC*, 526 A.2d 1243, 1249-50 (Pa. Cmwlth. 1987).

#### **I. The Joint Solar Parties' Objections to PPL to JSP-I-1(a)(3), I-2(a)(7), and I-23**

PPL to JSP-I-1(a)(3) provides:

Re: Petition to Intervene, pp. 3-5. For each solar installer Joint Solar Party (i.e., AHC, Sun Directed, Sunnova, Tesla, and Trinity Solar), please provide a detailed inventory of each inverter used by each solar installer in Pennsylvania.

(a) For each inverter, please:

- (3) State the purchase price of the inverter

PPL to JSP-I-23 provides:

Re: Petition to Intervene, p. 9; Protest ¶ 23. Trinity Solar alleges that “PPL's limits on eligible smart inverters inflates the prices of inverters, causes delays in supply deliveries, delays on installations due to equipment availability, and increased costs associated with connecting the particular inverters, all of which costs are passed on to customers.”

(a) Please explain in detail how the Approved Inverter List “inflates the prices of inverters.”

(b) Please explain in detail how the Approved Inverter List “causes delays in supply deliveries.”

(c) Please explain in detail how the Approved Inverter List “increased costs associated with connecting the particular inverters.”

(d) Please provide all Documents upon which Trinity Solar relied in making these statements and in responding to this interrogatory.

PPL to JSP-I-2(a)(7) provides:

Re: Petition to Intervene, pp. 6-9. For each solar installer Joint Solar Party (i.e., AHC, Sun Directed, Sunnova, Tesla, and Trinity Solar), please identify each potential sale the installer alleges did not go forward because of the Pilot Program.

(a) For each potential sale, please provide:

(7) Each reason the sale did not move forward.

The Joint Solar Parties’ objections to these interrogatories state:

The Joint Solar Parties (“JSPs”) object to the provision of very confidential/highly sensitive and trade secret pricing information as requested in PPL to JSP-I-1(a)(3) and I-23, on grounds of its commercial sensitivity. Following our September 5th tele-conference and investigation into the possibility of producing this information, the JSPs are now add that they object to the interrogatories on grounds that they impose a significant burden on the JSPs of determining

the price paid for each inverter used in Pennsylvania, involving, at a minimum, their conferring with each of the parties to non-disclosure agreements associated with such purchases. The JSPs assert the same objections with regard to Interrogatories which do not expressly call for pricing information, but where provision of same might be required to fully respond to interrogatory requests (for example, PPL to JSP-I-2(a)(7)). Notwithstanding the foregoing, the JSPs are in the process of diligently attempting to secure responsive information so as to produce it in accordance with an appropriate protective order, seek entry of the stipulated agreement as an order, and seek inclusion of protection for Trade Secret information.

In its Motion to Compel, PPL avers that the JSPs fail to comply with the Commission's discovery regulations by generally objecting to unidentified interrogatories. PPL also avers that Section 5.321(c) of the Commission's regulations establishes the broad scope of discovery in Commission proceedings, and interrogatories that may require production of trade secrets or commercially sensitive information does not shield that information from production. PPL argues that the JSPs' fail to support their objection that the interrogatories impose a significant burden, and that PPL is requesting information about inverter pricing to respond to claims put forth by the JSPs.

In its Answer to PPL's Motion to Compel, the JSPs generally aver that a ruling on the Motion to Compel is premature as parties are negotiating a protective order and otherwise informally attempting to resolve their disputes. Regarding its objections based on confidentiality, the JSPs state that a protective order could aid in resolving their differences. Regarding its objections based on burden, the JSPs state that PPL's request steps into the sensitive issue of pricing, and that the JSPs have answered the interrogatories in part.

I will grant PPL's Motion to Compel the JSPs' answers to JSP-I-1(a)(3), I-2(a)(7), and I-23. Claims that interrogatories seek commercially sensitive information do not preclude that information from discovery. As PPL notes, the JSPs have options to protect its claimed commercially sensitive information, including by seeking a protective order. 52 Pa. Code § 5.362. Although the JSPs state that discussions regarding a protective order are ongoing, such discussions do not excuse a party's responsibility in timely responding to discovery requests.

Regarding the JSPs' claim that the interrogatories impose a significant burden to respond, although Commission regulations do prohibit discovery that would cause an unreasonable burden or expense, the JSPs have not explained with sufficient specificity why producing the information requested would cause an unreasonable burden or expense. I agree with PPL that the JSPs are sophisticated businesses and by intervening in this proceeding they should have anticipated that material like that sought by PPL would be requested in discovery. Although the JSPs assert that some response has been provided to these interrogatories, each interrogatory must be answered fully and completely. 52 Pa. Code § 5.342(a)(4).

## **II. The Joint Solar Parties' Objections to PPL to JSP-I-2(a)(4)**

PPL to JSP-I-2(a)(4) provides:

Re: Petition to Intervene, pp. 6-9. For each solar installer Joint Solar Party (i.e., AHC, Sun Directed, Sunnova, Tesla, and Trinity Solar), please identify each potential sale the installer alleges did not go forward because of the Pilot Program.

(a) For each potential sale, please provide:

(4) The address of the planned installation

The Joint Solar Parties' objections to this interrogatory states:

The JSPs object to PPL to JSP-I-2(a)(4), which asks for the addresses of each planned installation that did not go forward because of the Pilot Program, as requesting irrelevant information. In our September 5, 2024 telephone conference, PPL indicated it sought address information in order to determine if there may have been a technical reason preventing the sale that PPL could have addressed. We stated in the conference that the address information was not relevant where the reason for a sale not going forward was, for example, the inability to use a particular product in PPL's service territory, as would be a response to PPL to JSP-I-2(a)(7). On September 10, 2024, PPL asserted that relevance is not a ground for objections in Pennsylvania Public Utility Commission ("PaPUC") proceedings, and maintained its requests for addresses in the Interrogatories but agreed that as to sales that did not go forward, that the scope would be

limited to provision of the municipality. The JSPs in a September 10, 2024 stated their disagreement that relevance is a basis for objection, cited 52 Pa. Code 5.321, and stated that they maintain their concern with regard to additional interrogatories in which addresses of customers or potential customers are sought, for example, PPL to JSP-I-11. The JSPs also note that 66 Pa. C.S. 333(d) also limits discovery to information that is relevant. Notwithstanding the foregoing, the JSPs are diligently attempting to determine if they may provide this information in conjunction with an appropriate protective order, and/or can provide information by municipality.

In its Motion to Compel, PPL states that the JSPs again attempt to make general objections to unidentified interrogatories. PPL also avers that the JSPs' relevance objection lacks merit. PPL explains that its interrogatory is relevant because it seeks to confirm whether the potential sale was located within PPL's service territory and otherwise explore the claim that a potential sale did not go forward because of PPL's existing program

In its Answer to PPL's Motion to Compel, the JSPs state that PPL's challenge is premature as parties are informally attempting to resolve the dispute.

I will grant PPL's Motion to Compel the JSPs' answer to JSP-I-2(a)(4). The JSPs claim that PPL's existing program has adversely affected them through lost sales, and PPL persuasively explains that the information sought is necessary to confirm whether the potential sales were located within PPL's territory, and otherwise explore why a potential sale did not go forward. PPL seeks to rebut the JSPs claim through this interrogatory and therefore I find this interrogatory seeks information relevant to the subject matter of this proceeding or is otherwise reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

The JSPs aver that PPL's challenge is premature and time should be provided for ongoing discussions. I continue to encourage the parties to informally resolve their disputes, if possible. However, the formal process for resolving discovery disputes is controlled by deadlines as found in the Commission's regulations as modified by the Scheduling Order in this proceeding. These regulations include a deadline for my issuing an order in response to a motion

to compel in addition to the directive that a ruling be issued as soon as practicable. 52 Pa. Code § 5.342(g)(2).<sup>2</sup>

### **III. The Joint Solar Parties' Objections to PPL to JSP-I-1(a)(4)**

PPL to JSP-I-1(a)(4) provides:

Re: Petition to Intervene, pp. 3-5. For each solar installer Joint Solar Party (i.e., AHC, Sun Directed, Sunnova, Tesla, and Trinity Solar), please provide a detailed inventory of each inverter used by each solar installer in Pennsylvania.

(a) For each inverter, please:

(4) Provide the quantity in the solar installer's current inventory;

The Joint Solar Parties' objections to this interrogatory states:

The JSPs maintain their burdensomeness and relevance objections to PPL to JSP-I-1(a)(4), which inquires into the quantity of inverters in each solar installer's current inventory of each inverter used by each solar installer in PA. As to burdensomeness, for some installers, the inquiry will require numerous communications with numerous employees in numerous locations. Additionally, as stated in our September 6, 2024 e-mail, we questioned the relevance of inventory where the problem faced by the installer is simply that the product cannot be used in PPL territory, and the relevance of "current inventory" to purchases made previously. Notwithstanding the foregoing, the JSPs are diligently attempting to secure the requested information.

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<sup>2</sup> In the conclusion to its Answer, the JSPs request that the parties either provide me a status report by September 30, 2024, or, in the alternative, provide the parties an opportunity before issuing a ruling on the Motion to Compel. As already explained, I am obligated to provide a ruling on this Motion to Compel pursuant to the directions set by 52 Pa. Code § 5.342(g)(2), and I am not persuaded that there is either sufficient time to schedule an oral argument or that it is necessary to have an oral argument to resolve the Motion to Compel based on the pleadings related to this motion.

In its Motion to Compel, PPL argues that the JSPs' fail to explain with specificity why the interrogatory is burdensome. PPL provides the following explanation as support for why its interrogatory seeks relevant information:

[I]t is critical to know what inverters the solar installer Joint Solar Parties have in their inventories for projects in Pennsylvania, which will provide necessary insight as to: (a) how many of those inverters meet the Commission's required standards and, therefore, could actually be used for projects in electric utilities' service territories; (b) how many of those inverters do not meet the Commission's required standards and, therefore, could not be used for projects in electric utilities' service territories; (c) how many of those inverters are on the Company's Approved Inverter List and, therefore, could actually be used for projects in PPL Electric's service territory; (b) how many of those inverters are not on the Company's Approved Inverter List and, therefore, could not be used for projects in the Company's service territory.

In its Answer to PPL's Motion to Compel, the JSPs state that PPL's challenge is premature as parties are informally attempting to resolve the dispute. Regarding its objections based on burden, the JSPs state that PPL's request steps into the sensitive issue of pricing, and that the JSPs have answered the interrogatories in part.

I will grant PPL's Motion to Compel the JSPs' answer to JSP-I-2(a)(4). Regarding the JSPs' claim that the interrogatory imposes a burden to respond, as explained above, although Commission regulations prohibit discovery that would cause an unreasonable burden or expense, the JSPs have not explained with sufficient specificity why producing the information requested would cause an unreasonable burden or expense. Regarding the JSPs' objection that the interrogatory seeks irrelevant information, for the reasons detailed in PPL's Motion to Compel, reproduced in part above, I agree that PPL's interrogatory seeks information

relevant to the subject matter of this proceeding or is otherwise reasonably calculated to lead to the discovery of admissible evidence.

Although the JSP's Answer again states that a ruling on the Motion to Compel regarding this interrogatory is premature, as explained above, the formal process for resolving discovery disputes includes deadlines. Additionally, although the JSPs assert that some response has been provided to this interrogatory, as explained above, each interrogatory must be answered fully and completely. 52 Pa. Code § 5.342(a)(4).

**IV. The Joint Solar Parties' Vagueness Objections to PPL to JSP-I-4(a)(4) and (a)(5), I-14, I-16, I-17, and I-19**

PPL to JSP-I-4(a)(4) and (a)(5) provide:

Re: Petition to Intervene, pp. 6-7. For each inverter manufacturer Joint Solar Party (i.e., Enphase and Solar Edge), please identify every instance in which the manufacturer alleges PPL Electric's DER Management devices have interfered with communications to their inverters and/or devices, including to the cloud, apps, and/or customer dashboards.

- (a) For each instance identified, please provide:
  - (4) The grid code that was set on the inverter at the time of installation;
  - (5) The grid code that was set on the inverter at the time of the communications issues;

PPL to JSP-I-14 provides:

Re: Petition to Intervene, p. 8. Sunnova alleges that "the Pilot Program has demonstrated that PPL monitoring and control devices consistently interfere with necessary device communication." Please identify every instance that Sunnova maintains PPL Electric's DER Management devices "interfere[d] with necessary device communication."

- (a) For each instance, please provide:

- (1) The date the incident was discovered;
  - (2) The date the incident was resolved;
  - (3) The inverter model and manufacturer;
  - (4) The grid code that was set on the inverter at the time of installation;
  - (5) The grid code that was set on the inverter at the time of the communications issues;
  - (6) The communications modules installed;
  - (7) Whether communication modules were installed by the manufacturer or by Tesla;
  - (8) The precise reason the communication was interrupted;
  - (9) The total time spent by Tesla resolving the incident;
  - (10) The total costs related with resolving the incident;
  - (11) The dates of any site visits performed;
  - (12) The date the incident was reported to PPL Electric;
  - (13) The identity of the individual who reported the incident to PPL Electric  
;
  - (14) The identity of the individual at PPL Electric to whom it was reported; and
  - (15) The resolution of the incident, if any.
- (b) Please produce all Documents relied upon in making that statement and in responding to this interrogatory.

PPL to JSP-I-16 provides:

Re: Petition to Intervene, p. 8. Please identify every instance that “multi-inverter Tesla solar systems installed in PPL territory, customers’ communications have been fully or partially knocked offline due to the presence of PPL’s DER Management Device.”

- (a) For each instance, please provide:
- (1) The date the incident was discovered;
  - (2) The date the incident was resolved;
  - (3) The inverter model and manufacturer;
  - (4) The grid code that was set on the inverter at the time of installation;
  - (5) The grid code that was set on the inverter at the time of the communications issues;
  - (6) The communications modules installed;
  - (7) Whether communication modules were installed by the manufacturer or by Tesla;
  - (8) The precise reason the communication was interrupted;
  - (9) The total time spent by Tesla resolving the incident;
  - (10) The total costs related with resolving the incident;
  - (11) The dates of any site visits performed;
  - (12) The date the incident was reported to PPL Electric;
  - (13) The identity of the individual who reported the incident to PPL Electric;
  - (14) The identity of the individual at PPL Electric to whom it was reported; and
  - (15) The resolution of the incident, if any.
- (b) Please produce all Documents relied upon in making that statement and in responding to this interrogatory.

PPL to JSP-I-17 provides:

Re: Petition to Intervene, p. 8. Please identify every instance in which Tesla alleges that “[c]ommunications problems caused by PPL’s Management Device with certain inverter

and system combinations resulted in Tesla and its customers receiving numerous ‘false alarms’ that indicated the customer’s solar system had stopped producing power, which in turn required numerous site visits and additional labor from Tesla.”

- (a) For each instance, please provide:
  - (1) The date the incident was discovered;
  - (2) The date the incident was resolved;
  - (3) The inverter model and manufacturer;
  - (4) The grid code that was set on the inverter at the time of installation;
  - (5) The grid code that was set on the inverter at the time of the communications issues;
  - (6) The communications modules installed;
  - (7) Whether communication modules were installed by the manufacturer or by Tesla;
  - (8) The precise reason the communication was interrupted;
  - (9) The total time spent by Tesla resolving the incident;
  - (10) The total costs related with resolving the incident;
  - (11) The dates of any site visits performed;
  - (12) The date the incident was reported to PPL Electric;
  - (13) The identity of the individual who reported the incident to PPL Electric;
  - (14) The identity of the individual at PPL Electric to whom it was reported; and
  - (15) The resolution of the incident, if any.
- (b) Please provide all Documents relied upon in making that statement and in responding to this interrogatory.

PPL to JSP-I-19 provides:

Re: Petition to Intervene, p. 8; Protest ¶ 22. Please identify every instance that Tesla alleges that “as a result of failed communications hindering Tesla’s ability to calculate solar system exports on some system inverters, and after an additional expenditure of staff time, Tesla has forfeited collecting SREC credits, the rights to which it purchased from customers, amounting to thousands if not hundreds of thousands of dollars potentially lost if the hindrances persist over the life of the systems.”

- (a) For each instance, please identify:
  - (1) The date the communications issue was discovered;
  - (2) The date the communications issue was resolved;
  - (3) The inverter model and manufacturer;
  - (4) The grid code that was set on the inverter at the time of installation;
  - (5) The grid code that was set on the inverter at the time of the communications issues;
  - (6) The communications modules installed;
  - (7) Whether any communication modules were installed by the manufacturer or by Tesla;
  - (8) The precise reason the communication was interrupted;
  - (9) The number and value of SREC credits “forfeited”;
  - (10) The reason the SREC credits were “forfeited”;
  - (11) The total time spent by Tesla resolving the incident;
  - (12) The total costs related with resolving the incident;
  - (13) The dates of any site visits performed;
  - (14) The date the incident was reported to PPL Electric;

(15) The identity of the individual who reported the incident to PPL Electric;

(16) The identity of the individual at PPL Electric to whom it was reported; and

(17) The resolution of the incident, if any.

(b) Please provide all Documents relied upon in making that statement and in responding to this interrogatory.

The Joint Solar Parties' objections to these interrogatories state:

The JSPs continue to object to the use of the term "grid code" in Interrogatories PPL to JSP-I-4(a)(4) and (5), I-14, I-16, I-17, I-19 on vagueness grounds, and are as of the time of serving these Objections, seeking to determine whether the definition offered in PPL's September 10, 2024 e-mail resolves the JSPs' objection.

PPL's Motion to Compel notes that only subparts I-14(a)(4) and (a)(5), I-16(a)(4) and (a)(5), I-17(a)(4) and (a)(5), and I-19(a)(4) and (a)(5) contain the term "grid code", and therefore no grounds have been provided to object to the remaining subparts of I-14, I-16, I-17, and I-19. PPL avers that, in addition to making good faith efforts to informally resolve this discovery dispute by providing to the JSPs a definition of the term "grid code", the term "grid code" is widely understood in the industry.

In its Answer to PPL's Motion to Compel, the JSPs state that they provided the requested grid code information in their responses, and/or will do so upon the parties' finalizing a protective order.

I will grant PPL's Motion to Compel the JSPs' answer to JSP-I-4(a)(4) and (a)(5), I-14, I-16, I-17, and I-19. As an initial matter, I agree with PPL that the JSPs' objections to use of the term "grid code" only applies to certain portions of the objected to interrogatories, and therefore any remaining interrogatories or subparts of interrogatories to which no objection is stated must be answered. 52 Pa. Code § 5.342(c)(6). As for the JSPs' claim that the term "grid code" is vague, whether or not this term is widely understood in the industry, through informal



**P-2024-3049223 - PETITION OF PPL ELECTRIC UTILITIES CORP FOR APPROVAL OF ITS SECOND DISTRIBUTED ENERGY RESOURCES MANAGEMENT PLAN**

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