

September 27, 2024

**Via E-Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Petition of PPL Electric Utilities Corporation for Approval of its Second Distributed Energy Resources Management Plan, Docket No. P-2024-3049223; **Supplemental Responses to Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on the Joint Solar Parties – Set 1**

Dear Secretary Chiavetta:

Please find attached for filing the cover letter to PPL Electric and Counsel of Record and Certificate of Service pertaining to the Joint Solar Parties' Discovery Responses, supplemented today as per the September 24, 2024 Order of Administrative Law Judge John Coogan.

Highly Confidential documents were served this morning in a sealed envelope by hand delivery to Counsel of Record on the Certificate of Service, while the rest will be served electronically, in accordance with the attached Certificate of Service.

If you have any questions, please contact me at (202) 213-1672.

Respectfully submitted,



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*Counsel to Joint Solar Parties*

Attachments

cc: The Honorable John M. Coogan  
Service List

September 27, 2024

**Via E-Filing**

Devin Ryan  
Post & Schell  
17 North Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101

Re: Petition of PPL Electric Utilities Corporation for Approval of its Second Distributed Energy Resources Management Plan, Docket No. P-2024-3049223; **Supplemental Responses to Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on the Joint Solar Parties – Set 1**

Dear Attorney Ryan:

Please find attached the Joint Solar Parties' Responses to the the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on the Joint Solar Parties – Set 1, supplemented in accordance with the September 24, 2024 Order of Administrative Law Judge John Coogan, as well as to provide highly confidential, confidential and proprietary information in response to requests in addition to those specified in his Order, and anything outstanding.

Documents containing Trade Secret and Commercial Information left for hand-delivery to Counsel of Record in sealed envelopes at 11:10 A.M. this morning, which preceded the issuance of the Protective Order, a copy of which I received at 11:23 A.M. It is my understanding from the courier that no one was present at the Office of Small Business Advocate to receive the package, so it is being sent by mail.

All recipients should ensure that appropriate signature pages are executed per the Protective Order executed before providing copies of the received documents to anyone other than counsel. Please note that the packages delivered for attorneys' eyes only inadvertently excluded copies of I-1 Att. AHC-2, I-2 Att. SD-1 and I-20 Att. TS-1, and did not contain unredacted versions of several additional documents we are producing herewith in their redacted form. These will be provided to you shortly, along with a confidential version of the narrative responses that had redacted information. Please note as well that there was a typographical error in the docket number on the notice page but the package pertains to this matter.

Produced herewith are supplemental narrative responses to the following requests and accompanying exhibits:

I-1 – I-13, I-16 – 24, 28 – 30 and 32.

If you have any questions, please contact me at (202) 213-1672.

Very truly yours,



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*Counsel to Joint Solar Parties*

Attachments

cc: The Honorable John M. Coogan (w/out attachments)  
Service List

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of a Certificate of Service upon the parties listed below via electronic mail and/or hand-delivery, in accordance with the requirements of 52 Pa. Code § 154 (relating to service by a party):

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*PPL Electric Utilities*

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Dated this 27<sup>th</sup> day of September, 2024

/s/ Bernice I. Corman