

October 3, 2024

**Via E-Mail**

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

Dear Secretary Chiavetta:

Please find attached for filing the Certificate of Service documenting service via e-mail to Counsel of Record of the publicly available documents, and the Highly Confidential documents via separate e-mail to persons who executed the Non-Disclosure Certificates comprising Appendix A to Judge Coogan's September 27, 2024 Protective Order, listed on the attached chart with the dates of October 2 and 3, 2024.

Attached as well is a letter documenting provision to Judge Coogan of copies of the materials identified on the attached chart.

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 (w/out attachments)

October 3, 2024

**Via E-Mail**

John M. Coogan  
Administrative Law Judge  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
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

Your Honor:

Please find the following, which will be sent to you under separate cover:

- Copies of publicly available documents served via e-mail on Counsel of Record on September 13, 2024, as indicated on the letter to Secretary Chiavetta dated September 13, 2024;
- Copies of Highly Confidential documents responsive to discovery requests as directed in your October 24, 2024 Order Granting Motion to Compel, which documents were hand-delivered to Counsel of Record, and copies of additional materials served on the Service List, on September 27, 2024, as indicated on the letter to Secretary Chiavetta bearing that date; and
- Copies of three Highly Confidential documents responsive to discovery requests that were inadvertently omitted from the September 27<sup>th</sup> production, and five documents in their unredacted form, served on September 30, 2024 to persons who executed the Non-Disclosure Certificates comprising Appendix A to your September 27, 2024 Protective Order, and corrected versions of redacted documents from the September 27<sup>th</sup> production served separately on Counsel of Record, as indicated on the letter to Secretary Chiavetta dated October 1, 2024; and
- A Certificate of Service dated today documenting updates to the narrative portions of discovery responses and/or testimony to reflect the foregoing, and service on the Non-



Disclosure Certificate signatories of unredacted and/or Highly Confidential exhibits to testimony, served yesterday; and documenting provision of an discovery response today, corrected to clarify that an amendment was made on September 27 to the response and exhibit number referred to therein.

All of the foregoing being provided to you today are listed on a chart. To the extent that documents produced to you have previously been updated (e.g., to reflect designations of materials first produced pursuant to your September 24, 2024 Order and thereafter under your September 27, 2024 Protective Order, and/or reflect corrections and/or redactions and removals of redactions), the chart shows only the dates the documents were last updated and produced, which are the versions being sent to you.

Included in the package being sent to you under separate cover are copies of prior letters to Secretary Chiavetta, for your convenience.

Thank you.

Respectfully submitted,

Bernice I. Corman, PA BAR #332915  
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*Counsel to Joint Solar Parties*

Attachments

cc: Secretary Chiavetta (Cover Letter Only)  
Service List (w/out attachments)

## Master List of Documents Provided to Administrative Law Judge Coogan

Answer	Date Served
I-1	9 27 24
I-2	10 3 24
I-3	9 27 24
I-4	9 27 24
I-5	9 27 24
I-6	9 27 24
I-7	9 27 24
I-8	9 27 24
I-9	9 27 24
I-10	9 27 24
I-11	9 27 24
I-12	9 27 24
I-13	9 27 24
<del>I-14 VOID</del>	
<del>I-15 VOID</del>	
I-16	9 27 24
I-17	9 27 24
I-18	9 27 24
I-19	9 27 24
I-20	9 27 24
I-21	9 27 24
I-22	9 27 24
I-23	9 27 24
I-24	9 27 24
I-25	9 13 24
I-26	9 13 24
I-27	9 13 24
I-28	9 27 24
I-29	9 27 24
I-30	9 27 24
I-31	9 13 24
I-32	9 27 24
I-33	9 13 24
I-34	9 13 24
I-35	9 13 24
I-36	9 13 24
I-37	9 13 24
I-38	9 13 24
I-39	9 13 24

Exhibit	Date Served
I-1 AHC-1	Courier 9 13 24
I-1 AHC-2	10 2 24
I-1 AHC-3	9 27 24
I-1 AHC-4	10 2 24
I-1 AHC-5	9 27 24
I-1 AHC-6	Courier 9 13 24
I-1 SD-1	Courier 9 13 24
I-1 SD-2	10 2 24
I-1 SD-3	9 27 24
I-1 SD-4	Courier 9 13 24
I-1 TS-1	Courier 9 13 24
I-1 TS-2	Courier 9 13 24
I-1 TS-3	Courier 9 13 24
I-1 TS-4	Courier 9 13 24
I-1 JG-1	Courier 9 13 24
<del>I-2 AHC-1</del> ERROR	
I-2 AHC-2	9 27 24
I-2 AHC-3	10 2 24
I-2 AHC-4	10 2 24
I-2 SD-1	10 2 24
I-2 SD-2	Courier 9 13 24
I-2 JG-1	Courier 9 13 24
I-3 MM-1	Courier 9 13 24
I-3 JB-1	Courier 9 13 24
I-4 MM-2	10 2 24
I-4 MM-2 RE	9 27 24
I-4 JB-1	9 27 24
I-4 JB-2	10 2 24
I-4 JB-3	9 27 24
I-4 JB-4	Courier 9 13 24
I-6 AHC-1	Courier 9 13 24
I-7 JW-1	Courier 9 13 24
I-10 JB-1	9 27 24
I-10 JB-2	9 27 24
I-11 JB-1	10 2 24
I-16 JG-1	9 27 24
I-18 JG-1	10 2 24
I-20 TS-1	10 2 24
I-20 TS-2	10 2 24
I-20 TS-2 RE	9 27 24
I-20 TS-3	10 2 24
I-20 TS-3	10 2 24
I-20 TS-3 RE	9 30 24

I-23 TS-1	10 2 24
I-23 TS-1 RE	9 30 24
I-25 JG-1	10 2 24
I-26 JG-1	9 27 24

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing 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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Dated this 3<sup>rd</sup> day of October, 2024

/s/ Bernice I. Corman