

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, Pennsylvania 17120**

**Petition of PPL Electric Utilities Corporation  
for Approval of a Default Service Program  
and Procurement Plan for the Period from  
June 1, 2025 through May 31, 2029**

**Public Meeting held November 7, 2024  
3047290-ALJ  
Docket No. P-2024-3047290**

**STATEMENT OF VICE CHAIR KIMBERLY BARROW**

For our disposition today is a unanimous settlement of issues in PPL Electric Utilities Corporation's (PPL's) Default Service Plan (DSP) to run through the end of the 2028-2029 Delivery Year.

The settling Parties come to a reasonable resolution on the DSP as a whole, but given the choice between PPL's proposed Time-of-Use (TOU) plan and retention of the current TOU plan, I prefer the TOU plan proposed by PPL in its Petition.

First, I agree with PPL that its current structure is quite complicated, which may affect customer adoption. On-peak times are 2-6 PM in the summer and 4-8 PM in the winter. The existing structure provides a ten percent discount versus the Price-to-Compare (PTC) during off-peak times, weekends, and holidays. Customers have to know whether they are in which period. This may not seem like a big ask, but customers have busy lives and when it comes to optional rate design, given the same rate discount for off-peak times, simpler is better.

If PPL were to retain a more complex structure, it might offer a super off-peak rate like other electric distribution companies (EDCs). By some rough calculation, e.g., PPL could offer an approximately 25-30% discount from 11PM-6AM year-round, charge an on-peak rate from 4-7 PM in July and August, and charge PTC in all other hours. Although this structure is more complex than PPL's proposal, the complexity is offset by much deeper discounts that customers might be interested in.

Second, I believe the 3-7 PM period properly reflects the likely on-peak times in the summer better than the present 2-6 PM period. Over the last five years, PJM's coincident peak (CP) times have shifted later in the day, from hour ending 17 (4-5 PM) in 2020 to hour ending 18 (5-6 PM) in 2024.

	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Hour ending	17	18	18	18	18
	17	17	17	17	18
	18	17	18	18	18
	15	17	16	17	18
	18	16	18	18	18
<b>Average hour</b>	<b>17</b>	<b>17</b>	<b>17.4</b>	<b>17.6</b>	<b>18</b>

This is due in part to the deployment of solar generation, which will very likely continue over the term of PPL's new DSP. Potentially, PPL's new summer on-peak TOU period may not align with the actual peak at all.

Third, I agree with PPL's proposed method to allocate costs between the summer and winter. Although PPL allocates capacity costs under the summer 5 CP methodology presently, the actual driver of capacity costs is not fully based on the summer. PPL should include summer-winter risk cost *drivers*—not just cost allocation—with the analysis that will be filed pursuant to the Settlement, as well as the other issues described above. Should it come to fruition that PPL's on-peak TOU times do not align with the real summer peak, I would encourage PPL not to wait until its next DSP to file changes.

November 7, 2024

A handwritten signature in black ink, appearing to read "Kim Barrow". The signature is written in a cursive, flowing style.

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**Kimberly Barrow, Vice Chair**