

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
(800) 684-6560

 @pa\_oca  
 /pennoca  
FAX (717) 783-7152  
consumer@paoca.org  
www.oca.pa.gov

January 22, 2025

**Via Electronic Mail Only**

Administrative Law Judge John M. Coogan  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
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 Judge Coogan,

Enclosed please find a copy of the Surrebuttal Testimony being submitted on behalf of the Office of Consumer Advocate in the above-referenced proceeding, as follows:

OCA Statement ISR: Surrebuttal Testimony of Ron Nelson

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully,

/s/ Harrison Brietman

Harrison Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
hbreitman@paoca.org

Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service Only*)  
Certificate of Service

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities :  
Corporation for Approval of its Second : Docket No. P-2024-3049223  
Distributed Energy Resources Management :  
Plan :

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Direct Testimony as follows:

OCA Statement 1SR: Surrebuttal Testimony of Ron Nelson

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.

Dated this 22nd day of January 2025.

SERVICE BY E-MAIL ONLY

Steven C. Gray, Esquire  
Rebecca Lyttle, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
sgray@pa.gov  
relyttle@pa.gov  
*Counsel for OSBA*

Devin T. Ryan, Esquire  
Kim Klock, Esquire  
Dave MacGregor, Esquire  
Megan Rulli, Esquire  
Post & Schell P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
dryan@postschell.com  
kklock@pplweb.com  
dmacgregor@postschell.com  
mrulli@postschell.com  
*Counsel for PPL*

Allison Kaster, Esquire  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
akaster@pa.gov  
*Counsel for I&E*

Beren Argetsinger, Esquire  
Keyes & Fox LLP  
PO Box 166  
Burdett, NY 14818  
bargetsinger@keyesfox.com  
*Counsel for Sunrun, Inc.*

Bernice I. Corman, Esquire  
BICKY CORMAN LAW PLLC  
1250 Connecticut Avenue, NW, Suite 700  
Washington, DC 20036  
bcorman@bickycormanlaw.com  
*Counsel for Tesla, Inc., Sun Directed,  
American Home Contractors, Sunrun, Inc.,  
and Solar Energy Industries Association*

SERVICE BY E-MAIL ONLY

Adam E. Gersh, Esquire  
Flaster Greenberg P.C.  
1717 Arch Street, Suite 3300  
Philadelphia, PA 19103  
adam.gersh@flastergreenberg.com  
*Counsel for Sunrun, Inc.*

Adeolu A. Bakare, Esquire  
Rebecca Kimmel, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
abakare@mcneeslaw.com  
rkimmel@mcneeslaw.com  
*Counsel for PPLICA*

Judith D. Cassel, Esquire  
Micah R. Bucy, Esquire  
Hawke, McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
jdcassel@hmslegal.com  
mrbucy@hmslegal.com  
*Counsel for Sustainable Energy Fund*

*/s/ Harrison Breitman*  
Harrison Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)

Christy Appleby  
Senior Assistant Consumer Advocate  
[CAAppleby@paoca.org](mailto:CAAppleby@paoca.org)

*Counsel for:*  
Patrick M. Cicero  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
717-783-5048

Dated: January 22, 2025