

February 8, 2025

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

Dear Secretary Chiavetta:

Attached for filing is the public version of the Joint Solar Parties' [Protective] Motion for Leave to File Surrejoinder Testimony (JSP St. No. 1-SRJ) ("Motion").

The **HIGHLY CONFIDENTIAL** version of the [Protective] Motion will be filed with the Commission using its Confidential ShareFile site and will only be served upon Administrative Law Judge John M. Coogan and counsel who have executed and returned appropriate Non-Disclosure Certificates pursuant to an appropriate Stipulated Protective Agreement or the Protective Order entered in this proceeding.

Copies will be provided as indicated on the 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

Attachment

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 8th day of February, 2025

/s/ Bernice I. Corman

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**[PROTECTIVE] MOTION FOR LEAVE TO SUBMIT
SURREJOINDER TESTIMONY
(JSP St. No. 1-SRJ)**

TO ADMINISTRATIVE LAW JUDGE JOHN M. COOGAN:

Pursuant to 52 Pa. Code § 5.103, the Joint Solar Parties (“JSPs”) respectfully request, as a protective matter, leave to submit the attached Surrejoinder Testimony of SolarEdge employee Brett Hallgren, Joint Solar Parties Statement No. 1-SRJ. They request as well that Your Honor accelerate the time for PPL’s response (§ 5.103(c) allows for 20 days, “unless the period of time is otherwise fixed by the Commission or the presiding officer”), and rule before, or during the forthcoming hearing.

On Tuesday, February 4, 2025, PPL Electric Company (“PPL”) served Surrebuttal Testimony. Therein, PPL claimed for the first time that an August, 2023 review of PPL’s installation manual by a SolarEdge Account Manager named Brett Hallgren shows SolarEdge knew or should have known about SolarEdge’s method of powering its device a year earlier than another SolarEdge employee testified. PPL discussed Mr. Hallgren’s “knowledge” in Rejoinder Testimony of Aliesha Dombrowski-Diamond (PPL Electric Statement (No. 2-RJ), and two associated exhibits (HIGHLY CONFIDENTIAL PPL Electric Exhibit AD-1RJ, August 31, 2023 Email Chain with

SolarEdge; and HIGHLY CONFIDENTIAL PPL Electric Exhibit AD-7RJ – August 23, 2024 Email Chain with SolarEdge).

The Joint Solar Parties seek leave to present the non-hearsay statement of Mr. Hallgren that upon learning that his review of the manual was limited to ascertaining whether it was SolarEdge’s customer, Trinity Solar, that had installed PPL’s Device in the inverter and triggered a warranty claim, or whether the communications installation was done by PPL.

On February 7th, the Joint Solar Parties served an updated discovery response on all parties indicating their intent to call Mr. Hallgren as a fact witness to testify in the hearing.

PPL will suffer no prejudice by the Joint Solar Parties’ introducing evidence to rebut PPL’s evidence, first presented on February 4th.

The JSPs sought the parties’ concurrence on this Motion this morning. PPL opposes the JSPs’ Motion. The other parties provided no response as of this filing.

Dated: February 8, 2025

Respectfully submitted,

America Home Contractors, Inc.
Enphase Energy, Inc.
The Solar Energy Industries Association
SolarEdge Technologies, Inc.
Sun Directed
Tesla, Inc. and
Trinity Solar, LLC



By their Attorney:

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**SURREJOINDER TESTIMONY OF
BRETT HALLGREN**

JSP Statement No. 1-SRJ

February 6, 2025

1 **I. INTRODUCTION AND PURPOSE OF SURREJOINDER TESTIMONY**

2 **Q. Please state your name and business address.**

3 A. My name is Brett Hallgren. My business address is 700 E. Tasman Dr., Milpitas, CA ///

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by SolarEdge as a Senior Technical Account Manager. I provide post-
6 sales technical assistance to SolarEdge high-volume customers, such as Trinity Solar,
7 which is an installer in Pennsylvania.

8 **Q. Did you previously submit testimony in this proceeding?**

9 A. No.

10 **Q. On whose behalf are you testifying in this proceeding?**

11 A. The Joint Solar Parties are an ad hoc group of entities who are either in the business of
12 installing solar energy and battery storage equipment and/or manufacturing said
13 equipment, and/or providing grid services via aggregation of said equipment, or
14 constitute a trade association representing same, all of whom have been impacted by
15 PPL's Pilot Program and will be impacted if PPL's 2nd Distributed Energy Resources
16 Management Plan becomes effective as proposed.

17 **Q. Are you sponsoring any exhibits with your surrebuttal testimony?**

18 A. Yes, I am sponsoring:

19 Exhibit JSP-BH-1SRJ -- my resume

20 Exhibit JSP-BH-2SRJ -- Trinity Solar Communication

21 Exhibit JSP-BJ-3SRJ -- screenshots of case notes

22 **Q. Please briefly summarize your work experience.**

1 A. My background is in mechanical engineering. For four years after college, I was a
2 mechanical design engineer for a government subcontractor. I then worked for two
3 years for a solar installation company as a design engineer. I then went to SolarEdge in
4 2016 as a Technical Support Engineer (in SolarEdge’s call center in California), and then
5 moved into account management for six years (first as staff, then with a senior title for
6 the last two years).

7 **Q. Would you please describe the purpose of your testimony?**

8 A. I am addressing the statement in Ms. Dombrowski-Diamond’s Rejoinder Testimony that
9 that “SolarEdge had the Company’s installation manual in its possession on August 31,
10 2023, and knew or should have known the method by which PPL Electric was installing
11 its DER Management devices on SolarEdge’s inverters well before [August of 2024],”
12 and exhibits attached to her Rejoinder Testimony.

13 **Q. Please explain how you came into possession of the Company’s installation manual
14 on August 31, 2023.**

15 A. As stated in my August 29, 2023 e-mail to PPL’s Matt Wallace (AD-1RJ), on which Ms.
16 Dombrowski-Diamond was cc’d:

17 The inverter has a warranty claim against it for failing to communicate. I’m
18 conducting an investigation into the failure, as this is the first inverter warranty
19 claim we have received with a DER Management device installed. The purpose
20 of the investigation is to (1) evaluate the install of both inverter and device as not
21 violating the warranty, and (2) provide training information/materials on the DER
22 management device to our support center staff.

23 I am hoping that PPL is willing to provide:

- 24 1. An install manual for the device.
 - 25 2. An install date of the device on this specific site.
- 26

27 **Q. Why did you request the installation manual?**

1 A. On August 28, 2023, I was notified by Trinity Solar that SolarEdge’s call center denied a
2 Trinity Solar warranty claim. Trinity Solar had alerted the call center after an inverter
3 stopped communicating at an installation in which PPL had installed its monitoring and
4 control device. See Exhibit JSP-BH-2SRJ (Trinity Solar Communication). When the
5 Trinity Solar field service tech was on site, he was informed by SolarEdge that “[Trinity
6 Solar] had too many optimizers on the inverter.” Trinity Solar asked me to review the
7 site and determine if Trinity Solar could “get the comms board RMA’d,” meaning
8 replaced under the warranty.

9 **Q. What did you do?**

10 A. I reviewed the case file (Exhibit JSP-BJ-3SRJ) and determined that the the cause of the
11 inverter failure was not “too many optimizers,” that it could have been the PPL
12 communications installation, and that therefore, since the failure was not attributable to
13 Trinity Solar, that I could override the warranty denial and replace the inverter under the
14 warranty.

15 **Q. At what point did you receive the Manual?**

16 A. I received the manual on August 31, 2023, after my review of the case notes and decision
17 to override the warranty denial.

18 **Q. Did you review it?**

19 A. Yes, I performed a “quick” review, as I state in my e-mail, a copy of which is contained
20 in Exhibit AD-1RJ.

21 **Q. What was the outcome of your review of the manual?**

22 A. None, as I had already issued the replacement, and my “quick” review confirmed that the
23 installation at the comms board was not done by Trinity Solar.

1 **Q. Did you review the manual to determine the fitness of PPL's Device installation**
2 **method?**

3 A. No. My responsibility was confined to finding a solution for Trinity Solar's warranty
4 claim, which I did, by finding that the device installation at the comms board had not
5 been done by Trinity Solar.

6 **Q. What sort of training information/materials on the DER management device did**
7 **you provide to SolarEdge's support center staff.**

8 A. None.

9 **Q. Why?**

10 A. I don't know.

11 **Q. Ms. Dombrowski-Diamond's Exhibit AD-7RJ shows that roughly a year later, you**
12 **asked PPL for "an install manual for the DER management device" because**
13 **"SolarEdge has a number of sites where this device has apparently been installed**
14 **incorrectly and caused equipment failure," and you wished to "confirm the install**
15 **procedure." Did PPL provide you with the install manual at that juncture?**

16 A. No.

17 **Q. What had happened to the install manual Ms. Dombrowski-Diamond sent you a**
18 **year before?**

19 A. I don't know.

20 **Q. Why did you request the manual at that time?**

21 A. I participated in a weekly general technical meeting run by the Technical Marketing
22 Group, at which it was mentioned that SolarEdge had started receiving calls from
23 customers saying they were seeing a higher rate of inverter failure in PPL territory, and

1 suspected that the PPL device was the cause. I volunteered that I could try to locate a
2 copy of PPL’s device installation manual.

3 **Q. Who mentioned PPL?**

4 A. I don’t remember.

5 **Q. What happened with the “sites where this device has apparently been installed and
6 caused equipment failure?”**

7 A. I do not know for sure, but I believe the reports were forwarded to Jason Bobruk for
8 further consideration.

9 **Q. In August of 2024, did you “confirm the install procedure[,]” as you stated you
10 would do in your e-mail?**

11 A. No, Ms. Dombrowski-Diamond never responded to my e-mail, and I did nothing further.

12 **Q. On p. 42 of her Rejoinder Testimony, Ms. Dombrowski states that at your request,
13 she sent a copy of the installation manual for the DER Management device on
14 SolarEdge’s inverters to Mr. Dinh. Why did you ask her to do so?**

15 A. I do not recall doing that, and I do not see that I posed that request. I see that Mr. Dinh
16 connected me to PPL in 2023 and remained cc’d on the e-mails contained in the e-mail
17 chain in Ms. Dombrowski-Diamond’s Exhibit AD-1RJ.

18 **Q. Do you know if she sent Mr. Dinh a copy of the installation manual?**

19 A. I do not.

20 **Q. Does that conclude your testimony?**

21 A. Yes.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

VERIFICATION

I, BRETT HALLGREN, hereby state that the facts set forth in my Pre-Filed Direct Surrejoinder Testimony are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter.

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: February , 2025

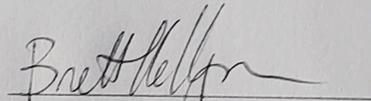

Brett Hallgren

EXHIBIT JSP-BH-1SRJ

Brett D. Hallgren
brett.hallgren@gmail.com
202-510-8334 Cell

Self-motivated post-sales engineer & account manager in the energy efficiency and customer success market. Experienced in fast-paced small business environments as well as large business structures.

EMPLOYMENT EXPERIENCE

SolarEdge Technologies

Senior Technical Account Manager, 2023-Current

Remote, East Coast

In addition to TAM tasks this role emphasizes work with our Strategic Accounts, key business as defined by the Sales organization. Tasks are focused around business development, install and support strategy, rather than day-to-day task completion.

- Manage 2 national installation companies, each 80MW+ per year of PV and ESS
- Manage 2 national Third Party Ownership (TPO) companies, one of which installed 150MW in 2024
- Participate in project management, using Agile to advance technical solutions in North America
- Work with Support (Embedded Technicians, Service Advisors, Field Engineers), Product Management, Sales, and Operations to meet customer needs and drive product development

Technical Account Manager, 2017-2023

Remote, East Coast

This post-sales engineering role works closely with the Sales team to achieve account goals. The TAM group collectively helps manage 50% of the North American business. This role emphasizes installation volume, installation quality, and handling escalations. This is achieved by internal coordination with sales, operations, field engineering, R&D, and other support functions. Effective communication within and without the organization is a must.

- Streamline the post-sale and technical integration relationship between key accounts and SolarEdge
- Coordinate with SolarEdge North America and Global HQ to support customer feature requests.
- Work continuously to reduce cost of ownership and increase ease of maintenance for key accounts
- Create and track projects both internally and with key accounts, regularly present and track the progress of each project
- Work with product management to drive the development of new tools and new product innovations to meet changing market requirements
- Coordinate with product marketing and field teams for effective training for all levels of customers
- Coordinate with R&D for pilot testing of new products and services
- Keep current on industry standards and trends
- Maintain high technical knowledge of product line, installation practices and related codes, and software capabilities

Technical Support Engineer, 2016-2017

Grass Valley, CA

The call center-based role is to work with installers to troubleshoot equipment issues in English and Spanish.

- Coordinate with Field Engineers and Sales to direct efforts towards high-opportunity customers
- Document nonconformances for review by R & D to improve our products

Costa Rica Solar Solutions
Design Engineer, 2014—2016

Santa Ana, Costa Rica

CRSS is a small installer completing 1 to 2 solar installations per week. The primary customer is looking for a premium product and installation. My primary functions included servicing existing customers, assisting Sales with quotes, preparing plansets, and completing permitting applications. As a small business employee I helped at all roles within the company including Sales, Operations, and Installs.

- Coordinated with employees in the field, customers, and government employees, in bilingual environments
- Helped manufacturers implement and install new products for customer and industry benefit.
- e.g. I worked closely with SolarEdge and Continental Control Systems to pioneer feed-in limitation (Zero Export) in North America

QinetiQ North America
Mechanical Engineer, Associate, 2010—2014

Waltham, MA

QinetiQ is a military sub-contracted engineering firm that designed and manufactured many of the control systems for launching (EMALS) and landing (AAG) systems on aircraft carriers. An associate engineer's tasks included product testing (real and virtual), make/edit engineering drawings, product acceptance testing, and perform field service at US Military testing sites.

- Work with Operations and Purchasing staff to streamline designs for minimal lead times
- Create, check, and evaluate drawings using GD&T methods according to ASME 14.5-1994

CERTIFICATIONS

NABCEP Certified PV Installation Professional
Certification # PV-021423-013822

EDUCATION

University of Massachusetts Amherst
Bachelor of Science in Mechanical Engineering, May 2010

HIGHLY CONFIDENTIAL
EXHIBIT JSP-BH-2SRJ

HIGHLY CONFIDENTIAL
EXHIBIT JSP-BH-3SRJ