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March 25, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
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;
SEF MAIN BRIEF

Dear Secretary Chiavetta:

Attached for filing with the Commission is The Sustainable Energy Fund's Main Brief in the above-referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Judith D. Cassel

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Micah R. Bucy
*Counsel for The Sustainable Energy Fund of Central
Eastern Pennsylvania*

JDC/das
Enclosure

cc: Administrative Law Judge John Coogan (via email, jcoogan@pa.gov)
Per Certificate of Service

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I. INTRODUCTION AND PROCEDURAL HISTORY

On May 20, 2024, PPL Electric Utilities Corporation (“PPL” filed,”), pursuant to Paragraph 61 of the Joint Petition for Settlement of All Issues approved by the Commission at Docket No. P-2019-3010128, a Petition requesting that the Pennsylvania Public Utility Commission (“Commission”) approve tariff modifications and other authorizations in order to implement PPL’s Second Distributed Energy Resources (“DER”) Management Plan (“DERM” or “PPL’s DER Plan).

This case was assigned to Administrative Law Judge (“ALJ”) Coogan for development and certification to the Commission of a record in this proceeding.

On June 7, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention and Public Statement in this proceeding. On July 1, 2024, the Office of Consumer Advocate (“OCA”) filed an Answer to PPL’s Petition. On July 8, 2024, American Home Contractors, Inc.; Enphase Energy, Inc.; the Solar Energy Industries Association; SolarEdge Technologies, Inc.; Sun Directed; Sunnova, Inc.; Tesla, Inc.; and Trinity Solar, LLC (collectively, the “Joint Solar Parties” or “JSP”) filed an Answer, Petition to Intervene, and Protest in this proceeding.¹ On July 10, 2024, the PP&L Industrial Customer Alliance (“PPLICA”) filed a Petition to Intervene. On July 12, 2024, pursuant to 52 Pa. Code §5.72, the Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”) filed a Petition to Intervene.

On July 24, 2024, a hearing notice was issued, establishing a telephonic prehearing conference for this proceeding for Tuesday, August 6, 2024, at 10:00 a.m. A Prehearing Conference Order was issued on July 25, 2024 setting forth rules that would govern the prehearing conference.

¹ On September 13, 2024, the JSPs filed a letter stating that Sunnova, Inc. is no longer a member of the JSPs.

The prehearing conference convened on August 6, 2024, as scheduled. During the Prehearing Conference, the Petitions to Intervene filed by the JSPs, PPLICA, and SEF were granted; litigation schedules were set; and modifications to the Commission’s discovery rules were established. A Scheduling Order was issued on August 7, 2024.

On September 27, 2024, a Protective Order was issued.

On January 8, 2025, a corrected hearing notice was issued, establishing a telephonic evidentiary hearing for this proceeding for Tuesday, February 11, 2025, Wednesday, February 12, 2025, and Thursday, February 13, 2025.

On September 24, 2024, along with other parties, SEF filed its direct testimony - the Direct Testimony of John M. Costlow and Exhibit No. 1. On December 5, 2024, along with other parties, SEF filed its rebuttal testimony – Statement No. 1-R, Rebuttal Testimony of John Costlow.

The evidentiary hearings were held as scheduled on February 11 and 12, 2025. During the hearings, pre-served testimony and exhibits were admitted into the record; witnesses for PPL and the JSPs were cross-examined. The Hearings concluded on February 12, 2025, after parties completed cross-examination.²

II. STATEMENT OF THE CASE

1. Background and Introduction

PPL is a utility providing electric distribution service throughout areas of Pennsylvania. As part of its services, it connects DERs to its distribution system. Before, or in lieu of, the Commission holding state-wide hearings on the most efficient, effective, cost-savings, and

² The Commission issued a hearing cancellation notice on February 13, 2025, canceling the hearing scheduled for February 13, 2025.

consistent manner in which to develop DER systems across Pennsylvania, PPL, filed with the Commission its request to implement its own singular and unique process for installing and integrating DERs into its distribution system. On January 1, 2021, pursuant to a settlement agreement, PPL filed its Pilot laying out PPL's plan to implement, conduct, test, and evaluate specific methods and approaches for its Pilot. Importantly under the Pilot, PPL was to design, test, and evaluate the cost benefits of systems that simply monitored DER activity³ (autonomous grid support function only) versus those DERs that PPL actively managed and controlled.⁴

Barely three years into the Pilot, on May 20, 2024, PPL filed its Petition seeking to move from its Pilot into Phase II of its DER Management Plan ("Phase II"). In Phase II, PPL requests approval to: (1) monitor and control customers' DERs including output and usage; (2) allow only PPL-approved inverters to be installed by DER customers in the PPL territory; (3) require PPL-approved inverters to be installed on solar photovoltaic systems interconnected prior to the commencement of the Pilot; and (4) make the Second DER Plan permanent.

SEF is a Pennsylvania corporation established upon the conclusion of PPL's Restructuring Proceeding and pursuant to the terms of the Joint Settlement of that proceeding approved by the Commission's August 27, 1998 Order at Docket No. R-00973954. SEF's mission is to promote and invest in energy efficiency, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers. Inclusive in SEF's mission is to lower barriers to enter the renewable energy. SEF intervened in this proceeding because it is uniquely positioned to advocate

³ SEF acknowledges that "monitoring" would include PPL or the Commission requiring that each DER inverter be set to certain autonomous functions and curves in order to enhance distribution systems, but such requirements should be done at the utility's cost with no rate impact on either DER or ratepayers. SEF Statement No. 1 at 8:12-15.

⁴ PPL DER Management Pilot Implementation Plan, January 19, 2021, p. 2.

for DERs, customers, installers, and Pennsylvanians as these entities may be benefited or burdened by the approval of PPL's Phase II.

2. Legal Standards

The Commission has jurisdiction over the parties and subject matter of this proceeding.⁵

Burden of Proof is with the party seeking a rule or order from the Commission. It is well-established that “[a] litigant’s burden of proof before administrative tribunals as well as before most civil proceedings is satisfied by establishing a preponderance of evidence which is substantial and legally credible.”⁶ The burden of proof is comprised of two distinct burdens: the burden of production and the burden of persuasion. The burden of production tells the adjudicator which party must come forward with evidence to support a particular proposition.⁷ The burden of persuasion determines which party must produce sufficient evidence to convince a judge that a fact has been established, and it never leaves the party on whom it is originally cast.⁸

⁵ 66 Pa.C.S. § 2801 *et seq*; 52 Pa. Code §§ 54.181-54.189.

⁶ *Samuel J. Lansberry, Inc. v. Pa. Pub. Util. Comm'n*, 578 A.2d 600, 602 (Pa.Cmwlth. 1990). Section 332(a) of the Public Utility Code, 66 Pa.C.S. § 332(a).

⁷ *See In re Loudenslager's Estate*, 430 Pa. 33, 240 A.2d 477, 482 (1968).

⁸ *Reidel v. County of Allegheny*, 633 A.2d 1325, 1329 n. 11 (Pa.Cmwlth. Ct. 1993).

Where competing proposals are introduced, the sponsoring party must show that the alternative proposal will better service customers.⁹

In the instant case, the burden is on PPL to demonstrate that its singular approach to actively controlling DERs is a better proposal than a hands-off approach of autonomous control over DERs or, in the alternative, the proposal where the Commission institutes a state-wide proceeding to develop one set of rules and guidelines to govern all DERs in all utilities across Pennsylvania. PPL's petition to commence its Phase II, is premature, not in the best interest of customers, not in the public's interest, and therefore not just and reasonable.

III. SUMMARY OF ARGUMENT

PPL's request for the Commission to approve its Phase II DER is premature and poses both internal risks to those customers within its service area as well as external risks across the entirety of Pennsylvania. Internal risks arise mainly from PPL's conflict with the interests of the DERs it serves. Because PPL is a monopoly, profit-driven entity, its motives conflict with DERs' desires to obtain affordable, abundant, and reliable energy while reducing energy costs and negative environmental impacts. PPL's motivation to increase distribution sales may lead it to curb output from DERs. The more DERs exist and create in-place energy, the fewer distribution charges PPL will collect. DERs currently represent a fraction of PPL's total customer base, but DERs are still in their infancy and are likely to grow dramatically in the future if their growth is not stifled.

Because PPL is proposing to "actively manage" or control all DERs in its territory, the internal risks to DERs and PPL customers of approving Phase II range from increased cyber

⁹ *Joint Petition of Metropolitan Edison Company and Pennsylvania Electric Company for Approval of Their Default Service Programs*, Docket No. P-2009-2093053 and P-2009-2093054 at 19 (Opinion and Order entered November 6, 2009).

security risks (hacks) to personal health risks from DERs being shut off in households that have critical healthcare equipment in place. PPL fails to adequately explain why it requires “control” over DERs when every benefit PPL describes in its Petition can be achieved solely with basic autonomous control (setting parameters and monitoring outputs). Equally alarming, are PPL's claims that “control” of DERs will save substantial costs to its customers¹⁰; yet not only will PPL not commit to reducing customer rates, but PPL will not commit to not raising customers' rates based on its Phase II costs.¹¹

PPL's Phase II also presents external risks. By demanding that the Commission approve “its” plan, it robs Pennsylvania of a consistent plan across the Commonwealth that installers, DERs, and customers can rely on – now and in the future. PPL's Phase II is also counter to the deregulation of energy - Pennsylvania's long-standing goal. Based on these risks and lack of fulsome and complete data from PPL's Pilot DER program, the Commission should not approve PPL's DERM Plan, or at a minimum require PPL to continue its Pilot Program to obtain the necessary information for the Commission to make an informed decision.

IV. ARGUMENT

SEF has concerns over both the internal and external problems created by PPL's DERM as well as its timing and lack of essential information. Internally, SEF is concerned with PPL's plan to control the output of DERS within the PPL territory and the conflict this represents between PPL's profit goals and the goals of energy independence, healthcare security, cyber safety, and environmental impacts that individual DERs and customers have within the PPL territory.

¹⁰ PPL Electric Petition B. 53 p. 15.

¹¹ PPL's Response to SEF-I-25, PPL would not guarantee that, based on the cost reductions claimed in its DER Petition, ratepayers will never bear the burden of PPL's cost to implement its DER Plan.

Externally, SEF is concerned that allowing each utility to develop its own unique DERM creates confusion, inconsistency, and increased unnecessary costs for all Pennsylvania DER stakeholders including customers. Finally, PPL's DER Plan lacks the essential information needed for the Commission to approve it, and therefore PPL's proposal to move to Phase II is premature.

A. Internal Problems with Approving PPL's DERM

a. Undermining of Deregulation

As the Pennsylvania Department of Environmental Protection (DEP) found in its *PA Solar Future Plan* ("PA's Solar Plan"), control over DERs is not needed in order to achieve reliability. As Mr. John Costlow stated in his testimony, "EDCs are distribution companies. PPL as a distribution company should not be controlling generation or output."¹² Such utility control over DER generation undermines the longstanding goals of the Commonwealth of deregulating the electric generation market. The Commission should not "under the mantra of system reliability, re-regulate the industry by favoring the distribution company, thereby thwarting the goals of the Competition Act."¹³ Additionally, under the Commission's regulations, an electric distribution company may not "change a customer's electricity supplier without direct oral confirmation from the customer of record or written evidence of the customer's consent to a change of supplier."¹⁴ PPL's control over, and ability to shut off, a DER facility changes the customer's electricity supplier without consent – oral or written.

¹² SEF Statement No. 1-R at 4:5-6.

¹³ *PP & L Indus. Customer All. v. Pennsylvania Pub. Util. Comm'n*, 780 A.2d 773, 782 (Pa.Cmwlth. 2001), as amended (July 10, 2001).

¹⁴ 66 Pa.C.S.A. § 2807(d)(1).

b. PPL's Control of DERs Increases Human Risks

More than injuring the Commonwealth's goals for deregulation and customer energy independence, PPL's DER Plan presents real health risks to individuals who rely on their DER systems to power critical healthcare equipment. PPL admits that it does not know or even track which DER customers may be relying on their systems to power critical medical devices.¹⁵ With PPL's DER Plan, PPL would be able to cut off electric supply to those customers relying on critical medical equipment effectively turning off their medical devices. PPL's control over DER systems would also permit it to cut power to both batteries and electric vehicles, leaving customers stranded without backup energy supplies or means of traveling in an emergency.¹⁶ PPL's insistence on actively controlling DER systems instead of only autonomous control also increases the risk of cyber security incidents – "hacking".¹⁷

DER customers self-source their energy for many reasons, including but not limited to, the desire for low-cost electricity, reduction in their carbon footprint, and independence from traditional energy sources. This democratization of energy is important to DER customers.¹⁸ Because everything that PPL argues for in its Petition can be secured by autonomous control as opposed to actively controlling them, PPL's DER Plan, unnecessarily increases the costs to DER owners and ratepayers, decreases reliability, and does not contribute materially to environmental impact reductions.¹⁹ Since the Commission has a duty to ensure that all services are not "unreasonable, unsafe, inadequate, insufficient, or unreasonably discriminatory" PPL's DER Plan,

¹⁵ PPL's Response to SEF I-38 (Mr. Salet states that "PPL Electric does not ask or track why customers are installing a DER or if they have medical devices").

¹⁶ SEF Statement No. 1-R at 4:16-19.

¹⁷ SEF Statement No. 1-R at 3:22.

¹⁸ SEF Statement No. 1 at 6:3-9.

¹⁹ *Id.*

should not be approved.²⁰ Because the Commission may only allow an electric distribution company to control generation when “there is no reasonable alternative”, and here the reasonable alternative is autonomous control of DERs, which would still give PPL all of the benefits it asserts it needs, the Commission should deny PPL’s Petition to commence Phase II of its DER Plan.

B. External Problems with Approving PPL’s DER Program

The Commission should consider the significant drawbacks of allowing each utility to create its own individual DER plan. Such a piecemeal approach to DER rules and procedures creates inconsistencies and confusion in the Pennsylvania DER market. PPL’s proposed singular-utility approach excludes key stakeholders such as state-wide DERs, installers, and both commercial and residential customers outside of the PPL territory.

Instead of allowing PPL to commence Phase II of its DER plan unattached to any other Pennsylvania utilities or state-wide issues, the Commission should institute a state-wide proceeding that would ensure that all relevant parties are included, thereby providing a more comprehensive and representative set of data points for the commission to consider when developing comprehensive state-wide DER policies and regulations. Such inclusivity is crucial for developing balanced and effective regulations that reflect the interests and needs of all stakeholders in Pennsylvania and uphold the core principles this Commonwealth has cherished – renewable energy and environmental conservation.²¹

Moreover, a state-wide proceeding would be less costly for smaller stakeholders. The current piecemeal approach imposes higher costs on these stakeholders, who may lack the resources to participate in multiple, individual proceedings. By consolidating the regulatory

²⁰ 66 Pa.C.S.A. § 1505.

²¹ AEPS, 73 P.S. § 1648.1 *et al.*

process, the commission can reduce these costs and facilitate broader participation, thereby promoting fairness and equity in the regulatory process.

Additionally, limiting standards for inverters, installers, and customers to only those approved by PPL serves to confuse the market, slow adoption, and increase costs.²² This restrictive, one-off process creates unnecessary barriers to DER adoption and innovation, which is counterproductive to Pennsylvania's goals of promoting renewable energy and net metering.²³

C. Essential Information is Missing from PPL's DER Plan

In addition to understanding the costs associated with having multiple utilities initiate different DER proceedings, knowing the costs of PPL's Pilot Program is instrumental to determining the success of that program and whether the Commission should approve PPL's Phase II DER Program. However, PPL's Pilot Program is missing this essential information. PPL failed to gather the costs to installers, contractors, DER system owners, and ratepayers to implement PPL's Pilot Program. PPL's DER Pilot Program failed to assess the cost savings to customers of implementing an autonomous control-only plan versus PPL's active control plan.²⁴ Likewise, PPL failed to account for increased costs to solar contractors and installers of complying with PPL's DER Plan.²⁵ Incredibly, after touting the savings that the PPL DER Plan would provide, PPL was unwilling to commit to not having ratepayers bear the burden of costs to implement its DER

²² SEF Statement No. 1 at 7:4-5.

²³ *Dauphin Cnty. Indus. Dev. Auth. v. Pa. PUC*, 123 A.3d 1124, 1131 (Pa.Cmwlth. 2015). (The purpose of the Alternative Energy Act is to encourage growth and investment in renewable sources of energy. The Alternative Energy Act achieves this goal by requiring that excess generation from net-metered customer-generators shall receive full retail value for all energy produced on an annual basis 73 P.S. § 1648.5).

²⁴ SEF Statement No. 1 at 12:5-7.

²⁵ PPL's response to SEF I-22 (Mr. Salet states that "PPL Electric does not currently have that information.").

Program.²⁶ Because PPL has not adequately gathered or provided essential information during its Pilot Program necessary for the Commission to determine whether PPL should commence with Phase II, PPL's Petition is woefully premature and should be denied.

V. CONCLUSION AND REQUEST FOR RELIEF

Because of the increased costs of PPL establishing its own unique set of DER standards and the benefits of implementing a state-wide DER proceeding, the Commission should adopt a state-wide proceeding for DER regulations to ensure inclusivity, reduce costs for smaller stakeholders, and alignment with the state's goals of deregulation, democratization, net metering, and renewable energy. Because of the missing essential information and likely cost increases of PPL's DER Plan to DER owners, installers, contractors, and ratepayers, the Commission should not approve PPL's Petition to Implement Phase II of its DER Plan.

²⁶ PPL's response to SEF I-22 and 25 (Mr. Salet responded "To be clear, reasonable and prudent capital costs and expenses incurred by the Company are recoverable from customers in rates." Mr. Salet responded, "The ratemaking treatment of the capital costs and expenses incurred by PPL Electric that are associated with DERs would be addressed in a future base rate proceeding.").

Wherefore, for all the foregoing reasons, The Sustainable Energy Fund requests Your Honor and the Commission not approve PPL's Phase II DER Management Plan as submitted and in the alternative, either limit PPL's DER plan to only autonomous control of those DERs that grant permission for such monitoring or institute a Commission based hearing to create and implement a consistent regulatory structure for all DERs across the Commonwealth.

Respectfully submitted,

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Dated: March 25, 2025

APPENDICES

APPENDIX A	PROPOSED FINDINGS OF FACT
APPENDIX B	PROPOSED CONCLUSIONS OF LAW
APPENDIX C	PROPOSED ORDERING PARAGRAPHS

APPENDIX A: PROPOSED FINDINGS OF FACT

1. PPL is proposing to actively control all DER customers' inverters in its Phase II DER Plan. SEF Statement 1, Exhibit A, PPL's response to SEF-I-43 Discovery Request.
2. PPL's Phase II DER Plan requires DERs to meet PPL-specific standards for inverters. SEF Statement 1, Exhibit A, PPL's response to SEF-I-26 Discovery Request.
3. DERs are responsible for the cost of installing PPL-specified inverters. SEF Statement 1, Exhibit A, PPL's response to SEF-I-27 Discovery Request.
4. PPL could not commit to not charging ratepayers in the future for installation costs of installing PPL-specified converters. SEF Statement 1, Exhibit A, PPL's response to SEF-I-28 Discovery Request.
5. Despite stating that its Phase II DER Plan would "produce additional, substantial, costs effective benefits for customers", (SEF Exhibit A, PPL's response to SEF-I-29 Discovery Requests), PPL could not guarantee that ratepayers will not bear the burden of the costs to implement PPL's DER Plan. SEF Statement 1, Exhibit A, PPL's response to SEF-I-25 Discovery Request.
6. PPL has not conducted any analysis on the rate impact of its Phase II DER Plan. SEF Statement 1, Exhibit A, PPL's response to SEF-I-33 Discovery Request.
7. PPL has not conducted any analysis on the price sensitivity of low-income customers of its Phase II DER Plan. SEF Statement 1, Exhibit A, PPL's response to SEF-I-34 Discovery Request.
8. PPL has not projected how many customers will install DER systems to work in parallel to the grid should PPL's distribution system fail to provide power in the future. SEF Statement 1, Exhibit A, PPL's response to SEF-I-37 Discovery Request.

9. PPL's Petition to approve its Phase II DER Plan does not include the costs and benefits of autonomous control.
10. PPL does not know whether or how many ratepayers may be installing DER systems in order to allow them to operate medical devices in the event PPL's system fails to deliver power. SEF Statement 1, Exhibit A, PPL's response to SEF-I-38 Discovery Request.
11. DER customers pay for the electricity to power PPL's devices. SEF Statement 1, Exhibit A, PPL's response to SEF-I-42 Discovery Request.
12. PPL did not complete a cost/benefits analysis comparing the various DER monitoring systems: autonomous control, remote control, and no control. SEF Statement No. 1-R, 1:19-20.
13. PPL's Phase II DER Plan is unclear as to whether it will save ratepayers money or justify a rate increase. SEF Statement No. 1-R, 2:16-21.
14. PPL's proposed active control allows PPL to shut down a customer's system, limiting the amount of energy a customer can receive from its own system. SEF Statement No. 1-R, 3:6-7.
15. PPL's control over DERs may increase safety issues. SEF Statement No. 1-R, 3:11.
16. PPL's active control over DERs make DERs more susceptible to nefarious intervention – hacking. SEF Statement No. 1-R, 3:16.
17. Autonomous Control is likely less expensive than PPL's Active Control over DER systems. SEF Statement No. 4:5.
18. PPL's Active Control of DER systems would allow PPL to cut power to both batteries and electric vehicles. SEF Statement No. 1-R, 4:13-14.

19. For most participating parties, a single statewide DER proceeding would be less costly than intervening in individual utility DER proceedings and would provide the Commission with a more rounded set of information. SEF Statement 1, 10:7-16.

APPENDIX B: PROPOSED CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the parties and subject matter of this proceeding.
66 Pa.C.S. § 2801 et seq; 52 Pa. Code §§ 54.181-54.189.
2. The party seeking a rule or order from the Commission has the burden of proof in that proceeding. It is well-established that “[a] litigant’s burden of proof before administrative tribunals as well as before most civil proceedings is satisfied by establishing a preponderance of evidence which is substantial and legally credible.” *Samuel J. Lansberry, Inc. v. Pa. Pub. Util. Comm’n*, 578 A.2d 600, 602 (Pa.Cmwlth. 1990). Section 332(a) of the Public Utility Code, 66 Pa.C.S. § 332(a).
3. PPL has the burden of proving that its Phase II DER Plan is just and reasonable.
4. The burden of proof is comprised of two distinct burdens: the burden of production and the burden of persuasion. The burden of production tells the adjudicator which party must come forward with evidence to support a particular proposition. See *In re Loudenslager’s Estate*, 430 Pa. 33, 240 A.2d 477, 482 (1968). The burden of persuasion determines which party must produce sufficient evidence to convince a judge that a fact has been established, and it never leaves the party on whom it is originally cast. *Reidel v. County of Allegheny*, 633 A.2d 1325, 1329 n. 11 (Pa.Cmwlth. Ct. 1993).
5. Where competing proposals are introduced, the sponsoring party must show that the alternative proposal will better service customers. *Joint Petition of Metropolitan Edison Company and Pennsylvania Electric Company for Approval of Their Default Service Programs*, Docket No. P-2009-2093053 and P-2009-2093054 at 19 (Opinion and Order entered November 6, 2009).

6. PPL's Phase II DER Plan is not just and reasonable, is not the most cost-effective means of achieving the claimed desired results, and is premature.
7. Pennsylvania's General Assembly has continuously placed the deregulation of electricity and the development of renewable energy as primary goals of the state. AEPS, 73 P.S. § 1648.1 *et al.* and 66 Pa.C.S.A. § 2802.
8. Under the guise of reliability, the Commission should not allow deregulation by a EDC. *PP & L Indus. Customer All. v. Pennsylvania Pub. Util. Comm'n*, 780 A.2d 773, 782 (Pa.Cmwlth. 2001), as amended (July 10, 2001).
9. An electric distribution company may not "change a customer's electricity supplier without direct oral confirmation from the customer of record or written evidence of the customer's consent to a change of supplier." 66 Pa.C.S.A. § 2807(d)(1).
10. The Commission has a duty to ensure that all services are not "unreasonable, unsafe, inadequate, insufficient, or unreasonably discriminatory". 66 Pa.C.S.A. § 1505.
11. In order to ensure that PPL's services are just and reasonable, narrowly tailored to effectively administer its DER Program, and to protect both ratepayers and DER customers, the Commission should not approve PPL's Phase II DER Plan.

APPENDIX C: PROPOSED ORDERING PARAGRAPHS

1. To ensure that DER services in Pennsylvania are just and reasonable, narrowly tailored to effectively administer DER Programs, and to protect both ratepayers and DER customers from privacy incursions, health risks, cyber security hacks, and unnecessary costs, the Honorable Administrative Law Judge John M. Coogan and the Commission should not approve PPL's Phase II DER Plan filed on May 20, 2024, at Docket No. P-2024-3049223.
2. The Commission should institute a state-wide DER proceeding that would establish consistent, efficient, and effective DER standards for all utilities in Pennsylvania.
3. In the alternative, the Honorable Administrative Law Judge John M. Coogan and the Commission should approve PPL to implement only autonomous control over DER systems which would minimize conflicts between PPL's profit-making goals and DER customers' desire to have safe, reliable, environmentally friendly, and self-sufficient energy in the Commonwealth.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served, via email, a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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