

PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, Pennsylvania 17120

Petition of PPL Electric Utilities Corporation Public Meeting held March 27, 2025
for Approval of a Minor Change to its Act 129 3020824-OSA
Phase IV Energy Efficiency and Conservation Docket No. M-2020-3020824
Plan

STATEMENT OF VICE CHAIR KIMBERLY BARROW

Before the Commission is the Petition for Reconsideration from staff action regarding a new Electric Vehicle (EV) Charging Pilot. The proposed Pilot has a budget of \$875,000 and aims to serve approximately 1,000 customers with EnergyStar EV chargers that draw less energy in “standby mode”, when they are not charging. Based on PPL Electric Utilities Corporation’s (PPL) estimates, the Pilot will save 60,500 kWh and 7.13 kW of peak demand savings. However, the Pilot’s cost-effectiveness is a significant concern, as evidenced by its total resource cost (TRC) ratio of 0.04, far below the threshold typically used to justify such investments. Given the low TRC ratio, from a cost-effectiveness perspective, I do not believe the Pilot, in its current form, aligns with the Commission’s broader goals of promoting cost-effective energy efficiency and responsible use of ratepayer dollars. Instead of using the money for this Pilot, PPL could achieve much greater levels of energy efficiency through other means.¹

Nevertheless, some technological pilots are useful despite not being cost effective because they gather data which will facilitate other programs in the future. In order to be a useful pilot for information gathering, I do not believe the information PPL provided in its application was sufficient. Broadly, PPL describes that the Pilot will gather data on potential load shapes.

Responses to the questions below might assist me in justifying the extremely low cost-effectiveness of the program.

- a. Explain why the load shape data gathered from the Pilot is expected to be representative of broader EV charging load shapes. If it is not expected to be representative, explain how it will be nonetheless useful for system management of EV charging expansion.

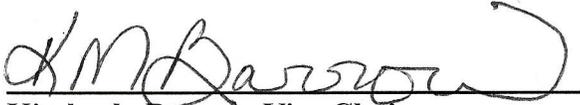
- b. PPL states that it will gather load shape data “for customers that provide data authorization.” Explain why customers that do not provide data authorization will be allowed to participate in the Pilot.

¹ For example, our Technical Reference Manual estimates that an 8 kW solar system in Bradford County saves 2.05 kW and 9000 kWh. See *Technical Reference Manual Volume 2: Residential Measures*, at 229 (September 2024), <https://www.puc.pa.gov/pcdocs/1848563.pdf>. Therefore, greater savings than the Pilot could be achieved with only seven of such systems (14.35 kW and 63,000 kWh total savings). Using a conservative estimate of \$3.00/W for a rooftop solar PV system, <https://www.energysage.com/local-data/solar-panel-cost/pa/>, deploying solar while saving more energy than the Pilot would cost \$168,000 instead of the cost of the Pilot.

c. Reference data request response A-1b. PPL states that the Pilot will provide the “number of hours” in each mode. Explain whether PPL will merely gather data on the number of hours in each mode, or which hours are in each mode.

d. Reference data request response A-1b; supplemental data response A-1b. Explain “each mode” that PPL will be studying. PPL describes its assumptions regarding (Plugged in charging hours, plugged in standby mode, and unplugged standby mode). Will PPL be studying which hours the charger is in each of these modes? How will PPL detect whether the charger is plugged in or not? Are there other modes not listed PPL will be studying?

March 27, 2025


Kimberly Barrow, Vice Chair