

PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, Pennsylvania 17120

**Petition of PPL Electric Utilities Corporation
for Approval of its Second Distributed Energy
Resources Management Plan**

**Public Meeting held November 20, 2025
3049223-OSA
Docket No. P-2024-3049223**

STATEMENT OF VICE CHAIR KIMBERLY BARROW

Before the Commission is PPL Electric Utilities Corporation's (PPL) Petition for Approval of its Distributed Energy Resource (DER) Management Plan. I thank PPL for its innovation in this area, but I believe the record before us does not support approval of the plan. Nor do I believe I can join in the approval of a substantially modified plan as suggested in PPL's Fourth Exception.

With respect to the record evidence for and against the plan, I found especially persuasive the Joint Solar Parties' witness Mr. Graham, Exhibit 4-SR. Therein the witness provides numerous examples of other methods that could be used to accomplish PPL's goals without mandating installation of PPL owned devices on every DER in its service territory. Namely, the use of autonomous functions of which many inverters are already capable could provide many services. It does not seem to me that PPL sufficiently demonstrated that active management was needed *in every case* over and above the autonomous functions. PPL did demonstrate that it may be needed *in some cases*, but that was not the case presented to us. The OSBA's witness Mr. Farr succinctly stated this point in OSBA 1-SR: "It seems to me that PPL has been so narrowly focused on proving the merits of active management that they've missed an opportunity to examine the costs and benefits of autonomous smart inverters and other solutions that do not require the installation of DER management devices." PPL is not required and should not be required to explore every possibility, but they seemed to ignore many of the most apparent alternatives that may have saved ratepayer funds.

In PPL's Fourth Exception the company suggests approval with modification, instead of denying the proposal outright. While I believe modification of utility filings by the Commission is acceptable, I also believe that the record must support the Commission's replacement of the utility filing. Given the complexity of the issue and the degree of deviation from the original proposal, I cannot support granting PPL's Fourth Exception. I would have happily invited PPL to return with a further filing; but, I cannot vote to approve the filing precisely because of the extent of the modification.

November 20, 2025


Kimberly Barrow, Vice Chair