

**PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, Pennsylvania 17120**

Roxanne Harpster
v.
PPL Electric Utilities Corporation

Public Meeting held December 4, 2025
3052644-ALJ
Docket No. C-2024-3052644

MOTION OF VICE CHAIR KIMBERLY BARROW

Before us for disposition is the Complaint of Roxanne Harpster (Complainant), filed December 20, 2024, against PPL Electric Utilities Corporation (PPL). In her Complaint Ms. Harpster alleges that PPL unreasonably delayed the installation of a solar distributed energy resource at her service address.

An evidentiary hearing was convened on June 30, 2025, before Administrative Law Judge Emily Farren. Following the hearing, the ALJ issued an Initial Decision granting the Complaint, but declining to issue a penalty.

Complainant is a residential customer of PPL who owns a behind-the-meter solar system at her service address. On September 14, 2024, Complainant submitted a complete application for interconnection of her solar system to PPL for the purpose of injecting energy into the distribution grid. The Alternative Energy Portfolio Standards Act of 2004 provides incentives for distributed resources to interconnect, compensating those resources through net metering programs and Alternative Energy Credits.¹

Between September 14 and November 18, PPL accepted the interconnection application as complete, and Complainant navigated municipal requirements to interconnect her solar system. Over the same period, on November 1, PPL informed Complainant that it would need to install a Distributed Energy Resource (DER) Management Device to receive final approval to interconnect. On November 29, 2024, Complainant followed up with PPL to determine when the DER Management Device would be installed. On December 3, PPL reached the maximum amount of DER Management Device installations allowed under the DER Management Pilot in place at the time.² The same day, PPL informed Complainant it would have to install the DER Management Device in person. Two days later, Complainant asked PPL when it would conduct its site visit. On December 12, PPL ultimately informed Complainant that it would not install a DER Management Device and that it would no longer require an in-person visit. PPL asked for photographs of Complainant's system and inverters. Complainant provided that information the same morning. Complainant was ultimately given formal permission to operate her system on December 23, 2024.

The Initial Decision grants the Complaint, reasoning that PPL did not provide Ms. Harpster reasonable service by failing to: (1) timely explain that PPL did not intend to install a DER Management Device; and (2) timely grant Complainant Permission to Operate her solar

¹ 73 P.S. 1648.1 *et seq.*

² Docket No. P-2019-3010128.

array. However, the Initial Decision declines to issue a penalty. In part, this is due to the Initial Decision's determination under our *Rosi*³ factors that the violation was technical, and that a civil penalty is not warranted to deter future violations. I disagree with these determinations. Rather, I believe the delay in interconnection was not just a technical error, and I also believe a civil penalty is necessary to deter any future delays with the interconnection of distributed energy resources.

First, although the violation did not endanger life or property, I consider the delay involved to be a violation not just of PPL's duty to provide reasonable service, but specifically of its settlement agreement in the DER Management Pilot. Under the settlement agreement for its DER Management Pilot, PPL may not delay the permission to connect and operate a distributed energy resource, like Complainant's solar system, due to unavailability of DER management devices. PPL took over a week to inform the Complainant that it would no longer require a DER Management Device installation. When PPL asked for photographs to verify inverter information, Complainant responded almost instantly. It took a further nine days to provide formal permission to operate. Additionally, the Commission takes the smooth installation of distributed energy resources seriously. Presently the grid needs all the power it can get, and while distributed energy resources are small, they have a role to play. Further, although the facts in the record relate to a specific instance, distributed energy resource interconnections of the type here are not rare. From 2022-2024, there have been 179,137 Tier I interconnections across all service territories.⁴ In 2024 alone, PPL managed over 25,000 interconnections, and this number is growing year-over-year. Based on PPL's violations here, I believe a civil penalty of \$250 is warranted to deter delays in interconnection processes and to emphasize the seriousness with which we take utility responsibilities in this area.

THEREFORE, I MOVE THAT:

1. The Initial Decision of Administrative Law Judge Emily Farren is affirmed as modified by this Opinion and Order.
2. Within thirty (30) days of the entry date of this Opinion and Order, PPL Electric Utilities Corporation shall pay a civil penalty of \$250 dollars.
3. Upon payment of the civil penalty, the Secretary shall mark this matter at Docket No. C-2024-3052644 as closed.
4. The Office of Special Assistants prepare an Opinion and Order consistent with this motion.



Kimberly Barrow, Vice Chair

December 4, 2025

³ Codified at 52 Pa. Code § 69.1201(c).

⁴ Net Metering & Interconnection Report 2022 – 2024, <https://www.puc.pa.gov/media/3263/net-metering-interconnection-report-2022-2024-final.pdf>.