

January 5, 2026

**Via E-Filing**

Matthew L. Homsher, 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; **Joint Solar Parties' Answer to PPL Motion to Strike**

Dear Secretary Homsher:

Please find attached for filing in the above-captioned matter the Joint Solar Parties' Answer to the Motion by PPL Electric Utilities Corporation to Strike the "Reply" of the Joint Solar Parties to PPL Electric's Answer to the Joint Solar Parties' Petition for Clarification and Stay/Supersedeas, filed by PPL Electric Utilities on January 2, 2026.

Please contact me at (202) 213-1672 if I can provide anything further.

Respectfully submitted,



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cc: Service List  
The Honorable John M. Coogan  
Office of Special Assistants

## 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 5th day of January, 2026

/s/ Bernice I. Corman

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**JOINT SOLAR PARTIES’ ANSWER TO THE “MOTION BY PPL ELECTRIC  
UTILITIES CORPORATION TO STRIKE THE  
‘REPLY’ OF THE JOINT SOLAR PARTIES TO PPL ELECTRIC’S ANSWER TO THE  
JOINT SOLAR PARTIES’ PETITION FOR CLARIFICATION AND  
STAY/SUPERSEDEAS”**

Pursuant to 52 Pa. Code §§ 5.61, 5.62 and 5.103(c), the American Home Contractors, Inc. (“AHC”), Enphase Electric, Inc. (“Enphase”), the Solar Energy Industries Association (“SEIA”), SolarEdge Technologies, Inc. (“SolarEdge”), Sun Directed, Tesla, Inc. (“Tesla”) and Trinity Solar, LLC (“Trinity Solar”) (referred to collectively as the Joint Solar Parties, or “JSPs”), by and through their Counsel, hereby respectfully submit their Answer to the Motion to Strike the “Reply”<sup>1</sup> to PPL Electric Utilities Corporation’s (“PPL’s”) Answer to the Petition of Joint Solar Parties for Clarification and Stay/Supersedeas. The Commission should deny PPL’s Motion to Strike and Consider the JSPs’ Reply, for the reasons explained herein.

On May 20, 2024, PPL Electric filed a Petition requesting the Commission’s Approval of tariff modifications and other authorizations that are needed to implement PPL Electric’s Second DER Management Plan, pursuant to Paragraph 62 or the Joint Petition for Settlement of All Issues approved by the Commission at Docket No. P-2019-3010128.<sup>2</sup>

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<sup>1</sup> The quotation remarks around “Reply” are included in PPL’s title for its Motion. They were not present in the JSPs’ filing.

<sup>2</sup> PPL Answer, ¶ 2.

On September 12, 2024, the Commission granted the August 12, 2024 Joint Petition filed by the parties at Docket No. P-2019-3010128, and extended the Pilot Program until 30 days after the Commission's Final Order is entered in the instant proceeding.

On June 20, 2025, the Commission issued Administrative Law Judge John M. Coogan's Recommended Decision ("R.D."), in which he recommended that the Commission deny the Company's Second DER Management Petition.<sup>3</sup>

On December 3, 2025, the Commission issued its Final Order which granted the Company's Second DER Management Petition subject to two minor modifications not material to this Answer ("December 3<sup>rd</sup> Order").<sup>4</sup>

On December 18, 2025, the Office of Consumer Advocate filed a Petition for Reconsideration and/or Clarification ("OCA Petition"), and the JSPs filed a Petition for Clarification and Stay/Supersedeas ("JSPs' Clarification/Stay Petition").<sup>5</sup>

On December 24, 2025, the Commission issued an Opinion and Order which granted the OCA and JSP petitions "pending further review of, and consideration on, the merits."

On December 29, 2025, PPL filed its Answer to the JSPs' and OCA's Petitions ("PPL Answer").

On December 30, 2025, the JSPs filed their Reply to the Company's Answer to the JSPs' Petition ("JSPs' Reply").

On January 2, 2026, PPL filed a Motion to Strike the JSPs' Reply.

As the JSPs' Reply addressed only Affirmative Relief or New Matter contained in PPL's Answer, chiefly, that given the present state of affairs in this post-Final Order world -- in which

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<sup>3</sup> *Id.*, ¶ 8.

<sup>4</sup> *Id.*, ¶ 10.

<sup>5</sup> *Id.*, ¶ 11.

PPL is asking either for affirmative relief (that it be permitted to launch its Second DER Management Program despite the Commission’s stay of its December 3<sup>rd</sup> Order authorizing the program, *see* PPL’s Answer, ¶ 24); or, that the Commission now, newly, interpret Settlement Paragraph 62 and find that the Pilot’s cap on device installations per year re-sets each year the Pilot continues (*see* PPL’s Answer, ¶ 23), PPL’s Answer necessarily seeks Affirmative Relief or raises New Matter, rendering the JSPs’ Reply to same appropriate. 52 Pa Code §§ 5.61, 5.62.<sup>6</sup>

The JSPs’ Reply also addresses new legal arguments and/or purports to support new legal arguments raised for the first time by PPL in its Answer – “that most of the JSPs’ alleged harms are financial” (PPL Answer, p. 21); and that deviation from notice and comment proceedings and application of “utility-by-utility approaches” are commonplace (PPL Answer, pp. 14 – 15). These factual allegations and argument were not raised by PPL in its Main Brief, Reply Brief, or exceptions briefs, and are, therefore, waived. *See Merritt v. Duquesne Light Co.*, 2011 Pa. PUC LEXIS 1197, at \*9-10 (Order entered Mar. 31, 2011). As such, the JSPs’ Reply to these was also appropriate, per 52 Pa. Code §§ 5.61 and 5.62.

Based on the foregoing, PPL’s Motion to Strike should be denied and any arguments made therein disregarded; and the Commission should consider the JSPs’ Reply.

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<sup>6</sup> In their Clarification/Stay Petition, the JSPs’ stated that in this period in which PPL’s authorization to proceed with implementing its Second DER Management Plan is stayed, “status quo,” or continued implementation of PPL’s Pilot/First DER Management Plan, means PPL has ceased testing inverters, has ceased installing its Devices in customers’ or third party-owned inverters, and has ceased testing for compatibility with PPL’s monitoring and management device. JSPs’ Clarification/Stay Petition, ¶ 24.b. In their Reply to PPL’s Answer to the JSPs’ Clarification/Stay Petition, the JSPs stated “[i]t is fair to interpret the parties’ agreed-upon extension of the Pilot as permitting PPL to extend the last year of its Pilot, which would include continuing to install its Devices until it hit its last authorized installation cap.” On further reflection, the JSPs state: Pursuant to Settlement ¶ 62, the mechanism under which the parties jointly moved simply to extend PPL’s Pilot beyond its scheduled sunset date of March 21, 2025, PPL expressly reserved the right only to “... request that Commission continue the existing remote active management program until litigation over a petition filed pursuant to Paragraph 62 concludes.” (emphasis added.) Thus, to be clear, Settlement ¶ 62, and the parties’ joint petition to extend the Pilot period thereunder, spoke only to PPL’s continuing to actively manage customers’ and third-party-owned inverters beyond March 31 2025. Neither Settlement ¶ 62, nor the parties’ agreed-upon extension, nor the Commission’s Order approving the parties’ joint petition to extend, said anything about PPL’s continuing to install additional Devices, or to the Pilot’s annual installation cap re-setting, or to anything other than PPL’s continuing active management under its existing program.

Respectfully submitted,



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Date: January 5, 2026