

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**REJOINDER TESTIMONY OF
SALIM SALET**

PPL Electric Statement No. 1-RJ

February 4, 2025

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Salim Salet, and my business address is 827 Hausman Rd., Allentown, PA
3 18104.

4
5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by PPL Services Corporation as Vice President – TD&S Engineering &
7 Construction.

8
9 **Q. DID YOU PREVIOUSLY SUBMIT TESTIMONY IN THIS PROCEEDING?**

10 A. Yes, I previously submitted direct testimony, rebuttal testimony, and surrebuttal testimony
11 on behalf of PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), which
12 were marked as PPL Electric Statement Nos. 1, 1-R, and 1-SR, respectively.

13
14 **Q. WOULD YOU PLEASE DESCRIBE THE SUBJECT MATTER OF YOUR
15 REJOINDER TESTIMONY?**

16 A. My testimony will respond to certain of the averments set forth in Office of Consumer
17 Advocate (“OCA”) witness Nelson’s surrebuttal testimony (OCA St. 1SR), Office of Small
18 Business Advocate (“OSBA”) witness Farr (OSBA St. No. 1-SR), and Joint Solar Parties
19 (“JSPs”) witnesses White, Zavala, Shadow, Graham, Monbouquette, Bobruk, Lydic, and
20 Brooks (JSP St. Nos. 1-SR, 2-SR, 3-SR, 4-SR, 6-SR, 8-SR, 9-SR, and 14-SR).

21
22 **Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

23 A. No.

1 **Q. DO YOU BELIEVE THAT YOUR STATEMENT THAT “ISSUES WITH DER**
2 **MANAGEMENT CANNOT BE ADDRESSED BY RELYING SOLELY ON**
3 **VOLUNTARY COMPLIANCE” CONFLICTS WITH PPL ELECTRIC WITNESS**
4 **JOHNSON’S TESTIMONY, AS ALLEGED BY MR. NELSON (OCA ST. 1SR, P.**
5 **13)?**

6 A. No. My rebuttal testimony and Ms. Johnson’s rebuttal testimony align. The Second DER
7 Management Plan is designed to maximize the benefits to customers. All the other options
8 discussed by Mr. Nelson, such as relying on traditional utility solutions or an opt-in
9 program with compensation, can be more expensive or fall short of maximizing the benefits.

10

11 **Q. MR. NELSON SUMMARIZES STATEMENTS MADE IN DISCOVERY AND THE**
12 **COMPANY’S REBUTTAL TESTIMONY AND ASSERTS THAT THE**
13 **COMPANY’S “CLAIMS THAT IT REQUIRES CONTROL OF EVERY**
14 **CONNECTED DER ARE BASELESS, UNTRUE, AND CONTRADICTED BY ITS**
15 **OWN TESTIMONY.” (OCA ST. 1SR, PP. 33-34.) WOULD YOU PLEASE**
16 **RESPOND?**

17 A. I would first note that Mr. Nelson incorrectly attributes a statement about the aggregate
18 impact of small DERs to me, when that statement was made by PPL Electric witness
19 Walling. (*See* OCA St. 1SR, p. 33; PPL Electric St. No. 4-R, p. 10.)

20 Next, PPL Electric has established that the best approach is for the Company to
21 monitor and manage all the DERs on its distribution system. This is not a “a scare tactic
22 to coerce agreement with the Company’s plan,” as alleged by Mr. Nelson. (OCA St. 1SR,
23 p. 33.) Rather, it reflects the optimal approach for distribution system planning and

1 operations in the fact of ever-increasing deployment of DERs on the Company's
2 distribution system. Even Mr. Nelson concedes in his surrebuttal testimony that PPL
3 Electric "will benefit from managing any number of DER, not only 100% of them." (OCA
4 St. 1SR, p. 34.) However, PPL Electric and its customers will lose out on a significant
5 number of benefits if the number of DERs is unduly limited, as doing so would inhibit the
6 Company's ability to: (1) address the issues presented by DERs on its distribution system;
7 (2) support electric service safety, reliability, and power adequacy; and (3) respond to the
8 resource adequacy challenges facing the Commonwealth.

9
10 **Q. MR. NELSON STATES THAT "WHILE IT IS GOOD THAT THE COMPANY**
11 **SHOWS INTEREST IN CLOUD-BASED ALTERNATIVES AND PROVIDED**
12 **USEFUL DETAILS FOR POTENTIAL REQUIREMENTS OF SUCH A**
13 **COMMUNICATIONS STRATEGY IN THE FUTURE," HE CLAIMS THAT THE**
14 **COMPANY DID NOT "PUT EFFORT" INTO EVALUATING THEM "AS A**
15 **SERIOUS ALTERNATIVE" AND DID NOT MAKE ANY "COMMITMENTS TO**
16 **PURSUING AND DEPLOYING LOWER COST ALTERNATIVE PROGRAM**
17 **DESIGNS IN THE FUTURE." (OCA ST. 1SR, P. 40.) PLEASE RESPOND.**

18 **A.** I disagree with Mr. Nelson. The Company did in fact put a lot of effort into evaluating
19 cloud-based communications as a serious alternative. During the process of standing up
20 the Company's IEEE 2030.5 servers, the DER Lab tested using a PPL Electric DER
21 Management Cellular Gateway, ethernet connection, and Wi-Fi connection. Through this
22 process, the DER Lab saw the issues of relying on Wi-Fi and ethernet connections if the
23 download and upload speeds were not sufficient. While the Company remains willing to

1 investigate cloud-based communications as an alternative to the DER Management devices,
2 PPL Electric wants to ensure that the cloud-based communications perform as well as the
3 DER Management devices.

4
5 **Q. WOULD YOU PLEASE RESPOND TO MR. NELSON’S ASSERTIONS ABOUT**
6 **THE COMPANY’S CONSIDERATION OF RELYING ON THIRD-PARTY**
7 **AGGREGATORS AS AN ALTERNATIVE TO THE COMPANY MONITORING**
8 **AND ACTIVELY MANAGING DERS (OCA ST. 1SR, PP. 40-44)?**

9 A. On page 42 of his surrebuttal testimony, Mr. Nelson claims that there are many examples
10 of programs where aggregators manage DERs similar to what is being proposed in PPL
11 Electric’s Second DER Management Plan. He later claims that his understanding is that in
12 such programs, the aggregator provides the communication path to DERs. However, the
13 Second DER Management Plan is much more than communications between PPL Electric
14 and DERs. The Second DER Management Plan is based on smart and automated ADMS
15 and DERMS technologies that monitor, in real time, assets on the grid, including DERs.
16 These technologies then take automated actions to manage each asset in the most effective
17 way. As far as I am aware, no aggregators are providing such a service in Pennsylvania,
18 nor could they without making significant investments beyond the communications
19 platforms they may have with their DERs.

20 As far as relying on aggregators to provide communication between PPL Electric
21 and DERs, the Company is open to considering cloud-based solutions that rely on third-
22 party aggregators or original equipment manufacturers (“OEMs”). Also, in response to Mr.
23 Nelson’s claim that aggregators can play the role of communication between utility and

1 DERs, PPL Electric would be willing to submit a Request for Proposal (“RFP”) to receive
2 bids from third-party aggregators and OEMs. In evaluating the bids, PPL Electric would
3 evaluate, among other things, the cost, the amount and location of the bidder’s DERs, and
4 the bidder’s ability to transmit the Company’s commands to the DERs.

5
6 **Q. DO YOU HAVE ANYTHING TO ADD REGARDING MR. NELSON’S**
7 **SURREBUTTAL TESTIMONY ABOUT HIS RECOMMENDATION FOR THE**
8 **COMPANY TO PREPARE AND FILE A DER ORCHESTRATION PLAN (OCA**
9 **ST. 1SR, PP. 44-49)?**

10 A. The shift in the Camus Energy Orchestration Platform priorities that Mr. Nelson describes
11 as “a priority of EV management” is consistent with the Company’s plan for DER
12 orchestration following a layered strategy, the first of which includes visibility of loads and
13 behind-the-meter (“BTM”) generation, to include electric vehicles.

14
15 **B. OSBA WITNESS FARR**

16 **Q. MR. FARR DISAGREES WITH YOUR STATEMENT IN REBUTTAL**
17 **TESTIMONY THAT HIS CONCERN ABOUT THE NEED FOR A MORE**
18 **RIGOROUS COST-BENEFIT ANALYSIS IS MOOT, AS HE HAS CERTAIN**
19 **ISSUES WITH MR. WISHART’S COST-BENEFIT ANALYSIS. (OSBA ST. NO. 1-**
20 **SR, P. 1.) WOULD YOU PLEASE RESPOND?**

21 A. I still believe that the cost-benefit analysis presented by Mr. Wishart should resolve any
22 issues about the costs and benefits of the Company’s proposal. Moreover, although certain
23 of the other parties’ witnesses raise some concerns with Mr. Wishart’s analysis in their

1 surrebuttal testimony, Mr. Wishart directly rebuts those concerns in his rejoinder testimony.
2 (*See* PPL Electric St. No. 10-RJ.)

3
4 **Q. WHAT IS YOUR RESPONSE TO THE RECOMMENDATIONS SET FORTH IN**
5 **MR. FARR’S SURREBUTTAL TESTIMONY (OSBA ST. NO. 1-SR, PP. 14-15)?**

6 A. I maintain that PPL Electric’s Second DER Management Plan should be approved as
7 proposed. Also, as I noted previously and as explained in Mr. Wishart’s rejoinder
8 testimony, the Company’s cost-benefit analysis is reliable and clearly demonstrates that
9 PPL Electric’s proposal will be cost-effective. Accordingly, there is no need to extend or
10 freeze the DER Management Pilot Program to develop a cost benefit framework, as
11 recommended by Mr. Farr. (OSBA St. No. 1-SR, pp. 14-15.)

12 I likewise disagree that the Commission should limit the Second DER Management
13 Plan’s term to three years. (OSBA St. No. 1-SR, P. 15.) PPL Electric has established that
14 its Second DER Management Plan is reasonable and in the public interest, and if
15 modifications to the Plan are required in the future, the Company can file a petition with
16 the Commission and propose those modifications. However, limiting the Second DER
17 Management Plan to three years would force PPL Electric to expend significant time and
18 resources in the next couple years to develop and litigate a Third DER Management Plan.
19 Also, the Company has already expressed its willingness to, as recommended by OCA
20 witness Nelson, develop and file a DER Orchestration Plan within 12 months of the
21 Commission’s final order in this proceeding. (*See* PPL Electric St. No. 1-R, p. 20.) Thus,
22 a three-year term for the Second DER Management Plan would likely result in the overlap

1 of a Third DER Management Plan proceeding and DER Orchestration Plan proceeding,
2 which would constrain the available time and resources of the Company and other parties.

3
4 **C. JSP WITNESS WHITE**

5 **Q. WOULD YOU PLEASE RESPOND TO MS. WHITE'S TESTIMONY**
6 **DISCOUNTING THE DELOITTE STUDY'S CONCLUSION ABOUT DER**
7 **CAPACITY IN PENNSYLVANIA BY 2035 AND ASSERTING THAT**
8 **"DEPLOYING THE SECOND PLAN NOW IS TOO FAR AHEAD OF" THAT**
9 **"TEN-YEAR HORIZON" (JSP ST. NO. 1-SR, PP. 3-5, 19)?**

10 **A.** The DERs being installed by customers today should still be in service by 2035.
11 Consequently, the benefits that result from the Company's monitoring and active
12 management of DERs will still be available and utilized in 2035. This is particularly
13 important for improvements in hosting capacity, which will enable the interconnection of
14 the additional and larger DERs expected to interconnect over that time horizon. As a result,
15 getting out ahead of increasing DER adoption is advantageous because it helps enable the
16 growth of DER while maintaining quality of service for customers.

17
18 **Q. MS. WHITE DISPUTES THE COMPANY'S CLAIM THAT THE SECOND DER**
19 **MANAGEMENT PLAN SHOULD BE APPROVED BECAUSE IT WILL RESULT**
20 **IN COST SAVINGS FOR CUSTOMERS, CONTENDING, AMONG OTHER**
21 **THINGS, THAT YOU "MISCONSTRUE[D] ONE OF [HER] MAIN ARGUMENTS."**
22 **(JSP ST. NO. 1-SR, PP. 16-17.) WOULD YOU PLEASE RESPOND?**

1 A. Ms. White describes her argument within her own surrebuttal testimony “that PPL should
2 be comprehensively planning its grid to identify necessary grid upgrades to accommodate
3 both DER and customer electrification.”¹ The Company’s active management of DERs
4 increases both the amount of load and generation that can be interconnected without
5 triggering system upgrades, resulting in the benefits identified by PPL Electric witness Mr.
6 Wishart. Thus, Ms. White’s subsequent argument that the Company’s DER management
7 efforts “do little to nothing to aid in the long-term integration of electrification and
8 renewables” is incorrect.

9
10 **Q. DO YOU HAVE ANYTHING FURTHER TO ADD REGARDING MS. WHITE’S**
11 **RECOMMENDATION FOR A STATEWIDE PROCEEDING ON FLEXIBLE**
12 **INTERCONNECTIONS (JSP ST. NO. 1-SR, PP. 18-19)?**

13 A. Ms. White, in her surrebuttal testimony, attempts to expand the scope of her previous
14 recommendation from “a statewide docket to promulgate state-wide rules for the
15 integration of DERs”² in her direct testimony to “evaluate a path forward for flexible
16 interconnection and/or grid modernization before authorizing such a significant
17 investment.”³ As I stated in my rebuttal testimony, I do not believe that the approval of the
18 Second DER Management Plan should be contingent upon the opening or completion of a
19 statewide docket. Ms. White’s incorporation of grid modernization in addition to or in
20 replacement of her initial flexible interconnection proposal only strengthens my

¹ JSP St. No. 1-SR, p. 17

² JSP St. No. 1, p. 30.

³ JSP St. No. 1-SR, p. 18.

1 recommendation, as such an expanded scope would likely further increase the time needed
2 to navigate such a proceeding.

3
4 **Q. DO YOU HAVE ANY RESPONSE TO MS. WHITE’S CLAIMS IN HER**
5 **SURREBUTTAL TESTIMONY REGARDING FERC ORDER 2222 (JSP ST. NO.**
6 **1-SR, PP. 20-21)?**

7 A. Ms. White recommends, in preparation for FERC Order 2222 implementation, that the
8 Company “should be building out its distribution network in a manner that can facilitate
9 the dynamic changes that are certain to make their way to Pennsylvania in the near future.”⁴
10 I would highlight that the Company, through its DER Management Pilot Program and its
11 proposed Second DER Management Plan, has pursued a reasonable alternative to reduce
12 the need to build out new infrastructure while improving the ability to identify and respond
13 to dynamic grid challenges. The Company is better prepared for FERC Order 2222 and
14 the “dynamic changes” referenced by Ms. White due to its DER Management Pilot
15 Program and the Second DER Management Plan.

16
17 **D. JSP WITNESS ZAVALA**

18 **Q. MR. ZAVALA STATES THAT HE CAN “NEITHER AGREE NOR DISAGREE”**
19 **AS TO WHETHER “AHC’S RECOMMENDED OPT-IN STRATEGY**
20 **INTERFERES WITH PPL’S OBLIGATION TO FURNISH SAFE, ADEQUATE**
21 **AND REASONABLE SERVICE,” BECAUSE THE COMPANY “HAS**

⁴ JSP St. No. 1-SR, p. 14.

1 advanced modeling, relying solely on autonomous functions, and relying on third-party
2 aggregators or OEMs. PPL Electric also is actively attempting to bring down the cost of
3 the DER Management devices and the associated servers. Therefore, Mr. Graham’s claim
4 that PPL Electric has not sufficiently explored alternatives to its proposal should be
5 rejected.

6
7 **Q. WOULD YOU PLEASE ADDRESS MR. GRAHAM’S TESTIMONY DISPUTING**
8 **THE COMPANY’S FORECASTS FOR THE AMOUNT OF DERS THAT ARE**
9 **PROJECTED TO INTERCONNECT WITH ITS DISTRIBUTION SYSTEM (JSP**
10 **ST. NO. 4-SR, PP. 27-28)?**

11 A. The actual data does not support Mr. Graham’s testimony. PPL Electric’s forecast of DERS
12 is supported by the number of DERS that have been interconnecting with the Company’s
13 distribution system and the trends that have been seen in several other jurisdictions, as
14 affirmed by PPL Electric witness Wishart. (*See* PPL Electric St. No. 10-R.) Moreover,
15 Mr. Graham does not respond to or reference the Deloitte study that Dr. Cook discussed in
16 her rebuttal testimony, which shows that by 2035, Pennsylvania would rank sixth amongst
17 all states in DER capacity, with 48.7 GW of DER capacity, ranking only behind California,
18 Texas, Florida, New York, and Illinois. (*See* PPL Electric. St. No. 6-SR, p. 19.) Also, on
19 January 30, 2025, Governor Shapiro announced his “Lightning Plan” to strengthen the
20 Commonwealth’s energy leadership, create jobs, and lower costs for consumers.⁷ Among
21 other parts of Governor Shapiro’s Lightning Plan, he proposes to: (1) establish a Reliable

⁷ <https://www.pa.gov/governor/newsroom/2025-press-releases/governor-shapiro-unveils--lightning-plan--to-strengthen-commonwe.html>.

1 Energy Siting and Electric Transition (“RESET”) Board, which is designed to “streamline
2 the process for building energy projects” by having a single state entity “handle siting
3 decisions for key energy projects”; (2) utilize the Pennsylvania Economic Development
4 for a Growing Economy (“PA EDGE”) Tax Credit Program to fund a “Reliable Energy
5 Investment Credit” of “[u]p to \$100 million per facility for three years, focused on adding
6 reliable energy sources to the grid”; and (3) implement the Pennsylvania Reliable Energy
7 Sustainability Standard (“PRESS”), which “would modernize Pennsylvania’s outdated
8 energy standards, incentivizing innovation in nuclear and renewable energy, including
9 battery storage, to remain competitive with other states.”⁸ Continued efforts like these will
10 only serve to spur more renewable energy development in the Commonwealth, which
11 further supports the Company’s DER forecast and underscores the importance of approving
12 PPL Electric’s Second DER Management Plan.

13
14 **G. JSP WITNESS MONBOUQUETTE**

15 **Q. MR. MONBOUQUETTE STATES THAT ALTHOUGH ENPHASE STILL**
16 **OPPOSES THE SECOND DER MANAGEMENT PLAN, IF THE COMMISSION**
17 **WERE TO AUTHORIZE THE PLAN TO MOVE FORWARD, “THE**
18 **COMMISSION SHOULD REQUIRE PPL TO ONBOARD ENPHASE MODEMS**
19 **INTO THE PROGRAM AND USE THEM FOR ENABLING SERVICES FROM**
20 **ENPHASE CUSTOMERS.” (JSP ST. NO. 6-SR, P. 11.) PLEASE RESPOND.**

21 **A.** PPL Electric is not opposed to exploring this solution for Enphase systems. PPL Electric
22 and Enphase have worked together to build a reliable IEEE 2030.5 server setup. If the use

⁸ *Id.*

1 of an Enphase modem could rely on that established IEEE 2030.5 server setup, PPL
2 Electric believes that it could seamlessly incorporate cloud-based communications through
3 the Enphase modems into its ADMS/DERMS. The issue becomes the modems'
4 availability and associated costs, inclusive of the device and any ongoing cellular charges,
5 and who would pay for those costs.

6
7 **Q. WOULD YOU PLEASE ADDRESS MR. MONBOUQUETTE'S TESTIMONY**
8 **ABOUT THE PURPORTED IMPACT THE SECOND DER MANAGEMENT**
9 **PLAN WILL HAVE ON THIRD-PARTY DER MANAGEMENT OR**
10 **AGGREGATIONS (JSP ST. NO. 6-SR, PP. 11-12)?**

11 A. Through its testimony, the Company has established that its Second DER Management
12 Plan will not adversely affect DERs' ability to participate in third-party aggregations. Mr.
13 Monbouquette states his "concerns" and acknowledges that any associated risks are
14 "difficult to quantify,"⁹ which falls well short of demonstrating that the Company's Second
15 DER Management Plan will materially reduce the capabilities of aggregators in
16 Pennsylvania.

17
18 **H. JSP WITNESS BOBRUK**

19 **Q. PLEASE RESPOND TO MR. BOBRUK'S TESTIMONY ABOUT THE ALLEGED**
20 **IMPACT THE SECOND DER MANAGEMENT PLAN WILL HAVE ON THIRD-**

⁹ JSP St. No. 6-SR, p. 12.

1 should always weigh how its policies benefits [sic] or harm ratepayers” has effectively
2 been addressed already. The Company does that continuously and did so in ultimately
3 deciding to pursue the DER Management Pilot Program and the Second DER Management
4 Plan. Also, as I covered earlier in this rejoinder testimony, PPL Electric has considered
5 and evaluated the various alternatives recommended by the other parties and explained
6 why the Company still believes that its proposed Second DER Management Plan is the
7 best path forward for its customers.

8
9 **J. JSP WITNESS BROOKS**

10 **Q. MR. BROOKS CONTENDS THAT YOU STATED THAT “NESC IS THE ONLY**
11 **CONSTRUCTION DOCUMENT PPL IS BOUND BY.” (JSP ST. NO. 14-SR, P. 12.)**
12 **IS THAT ACCURATE?**

13 A. Absolutely not. In discovery, I identified the National Electric Safety Code (“NESC”) as
14 an “**example**” of the “applicable regulations, codes, and standards” to which “the
15 Company’s installation of distribution facilities must conform.” (JSP Exhibit JSP-WB-
16 5SR, pp. 1-2) (emphasis added). I did not say that the NESC is the only one. Moreover, I
17 further explained that “the Company’s standards department verified that the installation
18 of the DER Management device met the requirements of the NEC.” (JSP Exhibit JSP-WB-
19 5SR, p. 2.) That position is reinforced by Mr. Floyd’s rebuttal and rejoinder testimony.
20 (See PPL Electric St. Nos. 12-R and 12-RJ.) Lastly, the Company has extensive
21 documentation on laying out how its DER Management devices should be installed in the
22 field, and its technicians, all of whom are licensed electricians or have had their work
23 supervised by licensed electricians, are trained and expected to install them in that manner.

1

2 **Q. DO YOU HAVE ANY FINAL COMMENTS ON MR. BROOKS’S TESTIMONY?**

3 A. It appears that the only reason why Mr. Brooks contends that PPL Electric’s DER
4 Management installations are subject to the NEC is because, according to Mr. Brooks, the
5 installations have not been “approved” as defined by the NEC, meaning “[a]cceptable to
6 the authority having jurisdiction.” (JSP St. No. 14-SR, pp. 11-2.) While PPL Electric
7 witness Floyd disputes Mr. Brooks’s position and argues that the Commission has
8 “approved” the DER Management device installations, the Company respectfully requests
9 that the Commission, which I am advised by counsel has jurisdiction over the Company’s
10 DER Management device installations, declare that PPL Electric’s DER Management
11 device installations are “acceptable” to the Commission as part of its Final Order in this
12 proceeding.

13

14 **Q. DOES THIS CONCLUDE YOUR REJOINDER TESTIMONY AT THIS TIME?**

15 A. Yes.