



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
Corporation for Approval of Tariff :  
Modifications and Waiver of : Docket No. P-2019-3010128  
Regulations Necessary to Implement :  
its Distributed Energy Resources :  
Management Plan :

**COMMENTS IN SUPPORT OF ANSWER FILED BY  
NATURAL RESOURCES DEFENSE COUNCIL**

GridLab submits these comments in support of the July 30, 2019 answer filed by Natural Resources Defense Council (“NRDC”) to the Petition of PPL Electric Utilities Corporation (“PPL”) for Approval of Tariff Modifications and Waivers of Regulations Necessary to Implement its Distributed Energy Resources Management Plan. GridLab is a national 501c3 that provides technical expertise to policymakers and regulators on complex grid issues.

For the reasons set forth in NRDC’s answer, GridLab agrees that the Pennsylvania Public Utility Commission (“PUC”) should deny the Petition or, in the alternative, suspend the proposed tariff revisions and establish necessary proceedings to allow interested parties an opportunity to thoroughly examine the major policy and technical issues raised by the Petition.

Although GridLab is not seeking to intervene in this proceeding at this juncture, it respectfully requests that the PUC notify it of any hearings or other actions taken by the PUC with respect to the Petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ric O'Connell".

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Ric O’Connell  
GridLab  
20120 University Ave, Berkeley CA 94704

Date: July 30, 2019