



**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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

The Solar Unified Network of Western Pennsylvania (SUNWPA) 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.

SUNWPA is a coalition of solar businesses, solar owners, non-profit organizations and supporters who have worked together since 2010 to raise awareness of the benefits of solar energy in western Pennsylvania and that advocates for favorable solar laws and regulations across the state. SUNWPA currently has more than 20 organizational members including non-profit organizations as well as businesses that have installed thousands of solar systems in Pennsylvania. While most SUNWPA members and constituents do not work or are not located in the PPL service territory, we are concerned that permitting the type of DER management as proposed by PPL will set a precedence for other utilities to adopt similar practices without adequate establishment of need and without thorough stakeholder process as PPL is proposing. The practices proposed by PPL could have detrimental effects to the solar industry, to customers and to rate payers.

For the reasons set forth in NRDC’s answer, SUNWPA 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 SUNWPA 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,

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July 30, 2019