

**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 :

PETITION OF NATURAL RESOURCES DEFENSE COUNCIL TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.71, et seq., Natural Resources Defense Council (“NRDC”) hereby files this Notice of Intervention in the above captioned proceeding, and in support of its intervention states as follows:

1. NRDC is an environmental organization and not-for-profit corporation with more than 1.4 million members, including more than 16,000 in the state of Pennsylvania and more than 500 members in Pennsylvania counties served by PPL Electric Utilities Corporation (“PPL” or “the Company”). Since 1970, NRDC’s attorneys, scientists, and other environmental specialists have worked to protect the world’s natural resources, public health, and the environment. NRDC’s top institutional priority is building an equitable clean energy future, among other things through the increased use of energy efficiency, renewable energy, and renewables-based transportation electrification, with the ultimate goal of reducing air pollution from the combustion of fossil fuels.

2. Pending the entry of appearance by other counsel, NRDC will be represented in this matter by:

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3. Pursuant to 52 Pa. Code § 1.54(b)(3), NRDC consents to the electronic service of all documents upon counsel at the e-mail address stated above.

4. On May 24, 2019, PPL filed a Petition seeking approval of tariff modifications and waivers of regulations necessary to implement its Distributed Energy Resources (DERs) Management Plan. Among other things, the requested relief would require DERs to comply with various new standards under consideration by the Institute of Electrical and Electronics Engineers (IEEE) relating to the integration, monitoring and management of DERS. Under PPL’s proposal, customers applying to interconnect new DERs with the Company’s distribution system would be required to: (1) use Company-approved smart inverters that are compliant with IEEE 1547-2018 and forthcoming UL Standard 17414; and (2) install devices that enable PPL to monitor and proactively manage DERs. (Petition, p. 2) Depending upon actions that PPL proposes to take under its DER Management Plan to “proactively manage DERs” – actions that are not apparent from the Petition or the proposed tariff revisions – the prospects for continued development of DERs in Pennsylvania may be adversely affected.

5. PPL’s Petition raises issues that affect the interests of NRDC’s members and NRDC’s institutional goals of expanding the use of renewable energy, and DERs in

particular, in Pennsylvania. NRDC has expended organizational resources in Pennsylvania to expand the use of renewable energy, and to ensure that the market for DERs continues to develop in the state.

6. NRDC's interests in this proceeding are unique from and not adequately represented by other parties.

7. NRDC intends to participate in this matter concerning such matters as affect the interest of its members and its institutional interests, including but not limited to the impact of PPL's proposed DER Management Plan on the prospects for the continued development of DERs in Pennsylvania. NRDC reserves the right to raise and address issues raised by PPL's Petition that are not specifically identified in this Petition to Intervene, as well as additional issues raised by other parties.

WHEREFORE, NRDC respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,

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