

**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**

Interstate Renewable Energy Council, Inc. (“IREC”) 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. IREC is a non-partisan, non-profit organization working nationally for 37 years to increase consumer access to sustainable energy and energy efficiency through independent fact-based policy leadership, quality workforce development, and consumer empowerment. In service of its mission, IREC works to increase the adoption of policies and regulatory reforms that expand access to and streamline grid integration of distributed energy resources (“DER”) to optimize their widespread benefits. The scope of IREC’s work includes updating interconnection processes to facilitate deployment of DER, including facilitating the adoption of IEEE 1547-2018 and related rules and technical standards. Our work helps facilitate the streamlined rollout of smart inverters and IEEE Standard 1547-2018 nationally, with the goal of maintaining reliability and safety of the grid while increasing deployment of DER and ensuring customers are treated fairly. IREC has recently been or is currently involved in interconnection proceedings across the United States, including most recently in California, Nevada, North Carolina, Maryland, Minnesota, and Montana, among others. We also participated in the proceeding at Federal Energy Regulatory Commission (“FERC”) to revise the Small Generator Interconnection Procedures (“SGIP”), and we are active in numerous IEEE 1547-2018 working group and education efforts.

For the reasons set forth in NRDC's answer, IREC 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 IREC 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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Date: July 30, 2019